

Validation of Credit Rating and Scoring Models: Panel Discussion

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Consumer Risk Modeling and Analytics

Consumer Risk Management

Chase Bank

February 2-3, 2006

Validation is integral part of model development process

- At Chase Bank, Model risk is governed through Consumer Risk (Model) Policy
 - Model Specialist - Internal oversight and independent evaluation
 - Ownership for validation separated from model developers
 - Documentation requirements integral part of model approval process
 - Accountability
- Validation as integral part of model development (Dennis Glenn and Mitchell Stengal)
 - Kick-off meeting : Model purpose, Implementation and Validation process
 - Data review : Development, Validation and Benchmark samples
 - Model robustness evaluated across development and validation (out-of-time) samples
 - K-S, ROC (C- Stat), % bad captured
 - Validation of proposed segmentation schemes
- Evaluating Forecast Performance (Erik Larson)
 - Increased focus on both discriminatory power and forecasting effectiveness
 - Goodness of fit statistic: HL or Modified HL Test
 - Also useful to evaluate value of alternative segmentation schemes
 - AVM models : how do we validate their accuracy and precision?

Proactively Manage Model Risk...

---Process verification - Mike Carhill

---Benchmarking (Nazmul Hasan)

- We have deployed a Model Monitoring System for model tracking and validation
 - Modelers work closely with testing and implementation team to insure integrity of data and model algorithms
 - Credit score models scaled based on *benchmark sample* that best reflects future
 - Dynamic reporting with drill down capabilities
 - Early Warning
 - Population Stability and Characteristics Analysis Performance reports
 - KS statistic may not be a good indicator to measure the strength of a single score over time
 - We also focus on PDO and Odds (or bad rate) at reference score
 - Has become an effective management tool beyond just scorecard validation
 - Model inventory
 - Model management
 - Understand score impact due to unexpected events

Challenges

- Investment
- Modeling Efficiency
 - Reduce model development cycle time without compromising quality and meeting all documentation/validation requirements.
- IT Resource Prioritization
- Structural Changes
 - Market expansion
 - Shifts in product/marketing strategy
- Fraud Model Tracking (low bad rate with high volume)