Session I Building and Validating Credit Rating and Scoring Models Dennis Glennon

> Deputy Director – Credit Risk Modeling Risk Analysis Division Washington, DC 20219 Dennis.Glennon@occ.treas.gov



- Introduction
- Developmental Evidence: Building statistical-based rating/scoring models
- Performance Evaluation: Verifying the model works

Introduction

Is there a supervisory concern?

- Sound modeling practices
- How do we approach the supervision of model risk?
 - Focus on two fundamental properties of a valid modeling process:
 - Iogically consistent model/sample design
 - valid statistical methods

Introduction

Sound modeling practices

- There are generally accepted, or industry-accepted, methods of building and validating models.
- These methods incorporate procedures developed in the statistics, econometrics, information-theory, and operations research literature.
- Although these methods are valid, they may not be appropriate in all applications.
 - A model selected for its ability to discriminate between high and low risk may perform poorly at predicting the likelihood of default.

- Model development is a process.
- Simply stated:
 - define the purpose discrimination vs prediction;
 - <u>select a sample</u> that reflects/represents the targeted population – a reference data set;
 - <u>select a modeling technique</u> consistent with the purpose;
 - <u>identify risk factors</u> that reflect the lender's knowledge and historical experience;
 - <u>fit the model</u> and check for model mis-specification or overfitting of the data;
 - <u>develop methods of verifying</u> that the model works outcome-based methods.

Sample-design issues

- Missing data
 - not available
 - censored data (i.e., reject inference)
 - truncated data (i.e., prepayment/attrition)
- Omitted variables (implicitly held constant)
 - product terms (e.g., price, payment options)
 - economic conditions (e.g., interest rates, employment, business/industry conditions)
- Pooling time-sensitive data

Modeling techniques

- Expert systems
- Regression
 - logit, probit, least squares, neural network
- Decision-tree methods
 - CHAID, CART
- Linear programming

- Step 1: Univariate analysis used to reduce the set of potential risk factors to a subset of feasible risk factors
 - correlation
 - weight of evidence
- Step 2: Multivariate analysis used to capture the combined effect of multiple factors on expected performance
 - regression approach

Selecting the "best" model

- Business sense
- Diagnostic test
- Out-of-sample analysis
 - In-time sample (i.e., hold-out)
 - Out-of-time sample
- Cross-validation/benchmark analysis

- Common performance measures
 - Kolmogorov-Smirnov (K-S)
 - Gains charts/cumulative accuracy profiles (CAP)
 - Divergence
 - Log-odds

- Model Performance Measures K-S
 - Upper Bound: If the scores partition the population into two separate groups in which one group contains all the defaulted accounts and the other all the non-defaulted accounts, then the K-S is 100.



Model Performance Measures - K-S

 Lower Bound: If the model can not differentiate between nondefaulted and defaulted accounts, then it is as if the model selects individuals randomly from the population. There would be no difference in the location of the distributions. The K-S would be 0.



- Model Performance Measures K-S
 - These results suggests that the K-S value will fall between 0 and 100, and that the higher the value the better the model is at separating the non-defaulted from defaulted accounts.
 Model 1
 Model 2



Slide 12

Model performance: Kolmogorov-Smirnov (K-S)

Obs	Score	Range	Distri	butions	Cumulative	Distributions	K-S	
(i)	lower	upper	Default	Non-Def	Default	Non-Def		
			(#)	(#)	(%)	(%)		
								(82+428)/24092
1	0	15	82	458	0.34	0.05	0.29	(02+120)/21092
2	15	20	428	3205	2.12	0.37	1.75	
3	20	25	1235	13886	7.24	1.75	5.49	
4	25	30	2778	41657	18.77	5.92	12.85	
5	30	35	4074	91645	35.69	15.09	20.60	_
6	35	40	5092	152741	56.82	30.36	26.46	
7	40	45	4365	196381	74.94	50.00	24.94	
8	45	50	3274	196381	88.53	69.64	18.89	
9	50	55	1698	152741	95.58	84.91	10.67	
10	55	60	764	91645	98.75	94.08	4.67	
11	60	65	232	41657	99.71	98.24	1.47	
12	65	70	58	13886	99.95	99.63	0.32	
13	70	75	9	3205	99.99	99.95	0.04	
14	75	80	1	458	100	100	0.00	
15	80	100	1	31	100	100	0	

Cumulative non-default and default distributions



Score

Separation as a modeling objective

- Comment: The K-S statistic is not a measure derived from the difference between the actual and predicted values of the dependent variable; as such, it is not an R²-type measure of model accuracy.
- Comment: For that reason, in practice, the K-S test is used to evaluate the model as a segmentation or classification tool. As a result, this test does not necessarily identify the model that is best at predicting the probability of default.

Performance Evaluation: K-S Test

- Hypothesis Test: the difference between two distributions
 - Test statistic (K_{α})

$$K_{\alpha} = 100 \left\{ D\left[\frac{(\#non-defaults + \#defaults)}{(\#non-defaults)(\#defaults)}\right]^{1/2} \right\}$$

where α = significance level (e.g., .95) D = critical value (table value)

Performance Evaluation: Hypothesis Test

- Difference between two distributions
 - Example 1 (from above): Default Rate = 2.35%
 - # Defaults = 24,091
 - # Non-defaults = 999,977
 - $K_{\alpha = 95} = 0.80\% < KS = 26.5\%$
- Example 2: Default Rate = 4.41% Example 3: Default Rate = 50.0%
 - # Defaults = 441
 - # Non-defaults = 9,559
 - $K_{\alpha=.95} = 5.94\%$

- - # Defaults = 1,500
 - # Non-defaults = 1,500
 - $K_{\alpha = 95} = 4.45\%$

Performance Evaluation: Gains Chart

Model Performance Measure



Performance Evaluation: Gini Coefficient



Performance Evaluation: Gini Coefficient

- There is no magic number
 - Higher is better, but there is no ratio that says a scoring or rating system is "good" or "bad"
- All errors are *not* created equal
 - Gini coefficient treats "false negatives" and "false positives" as equally bad
- Be careful about making comparisons
 - Dispersion of credits across score ranges or grades
 - Number of defaulters in sample
 - Portfolio composition

Performance Evaluation: Diagnostics

- Goodness-of-fit measures
 - R²-type measure of goodness-of-fit are generally not used.
- Robustness test: out-of-sample analysis
 - In-time sample: Observations randomly selected from the development or reference data.
 - Out-of-time sample: Observations randomly selected from a population with observation and performance periods different from those of the reference sample.

In-time and out-of-time analyses

- The models are evaluated in terms of their ability to maintain:
 - stable parameter estimates across the different validation samples, and
 - a given level of separation between the good and bad distributions (i.e., stable K-S statistics).

- Are these tools really useful?
- *Illustrative Example:* Developing a Credit Scoring Model for Risk Segmentation Purposes
 - Sample: A simulated random sample of 10,000 observations.
 - Performance: Derived from the following data generating process.

Illustrative Example: Data

Data Generating Process

•
$$y = 0$$
 if $Y < 0$

y = 1 otherwise

• Y = -52.5 + 1.0
$$r_1$$
 + 1.0 r_2 + 1.0 r_3
+ 2.0 r_4 + 2.0 r_5 + 2.0 r_6 - e

- where
 - e ~ logistic(0, $\pi^2/3$)
 - r₁ r₆ are uncorrelated continuous random variables
- pr(default) = pr(y=1)
- mean of y = 0.0866

Illustrative Example: Univariate

Variables	Estimated Parameters β	P-Values Pr > ChiSq	Divergence Index
r1	0.1442	0.0001	0.3746
r2	0.1415	0.0001	0.4875
r3	0.1339	0.0001	0.4488
r1	0.3729	0.0001	3.746
r2	0.2917	0.0001	1.383
 r3	0.2911	0.0001	1.345
w1	0.0356	0.3172	0.0048
w2	-0.0795	0.0256	0.0192
w3	-0.0197	0.5792	0.0039
w4	0.0523	0.1019	0.7826
w5	0.2237	0.0001	0.2839
w6	0.0412	0.2465	0.0033

The estimated parameters β are derived from the univariate (logit) regression models:

 $y = b_0 + b_1 x$ where $x = \{r1, r2, r3, ..., w6\}$; and y = 1 if default, 0 otherwise.

The Divergence Index is: $D = \Sigma^{10}_{g=1} (p_g - q_g) \ln(p_g/q_g)$, where $p_g (q_g)$ is the percentage of non-default (default) accounts in the gth decile.

Illustrative Example: Logit Model

		Exact	Over-specified		Mis-specified	
Variables	Development Parameters	Estimated Parameters	Estimated Parameters	Estimated Parameters	Estimated Parameters	
Intercept	-52.5	-53.1642	-53.2803	-53.2157	-11.7397	<.0001
r1	1.0	1.0127	1.0141	1.0128	0.3476	<.0001
r2	1.0	0.9777	0.9781	0.9779	0.3255	<.0001
r3	1.0	0.9745	0.9775	0.9746	0.3201	<.0001
r4	2.0	2.0327	2.0312	2.0330	0.6712	<.0001
r5	2.0	1.9921	1.9715	1.9673	1.3224	<.0001
r6	2.0	2.0185	2.0304	2.0254		
w1	0		-0.0575			
w2	0		-0.0769			
w3	0		0.0166			
w4	0		0.4387	0.4401	-9.7901	<.0001
w5	0		0.0312			
w6	0		0.0307			

Illustrative Example

Parameter Stability

Variables	Exact Specification		Over-Identified		Mis-Specified	
	Development	Validation	Development	Validation	Development	Validation
Intercept	-53.1642	-52.8708	-53.2157	-52.8258		-10.3896
rl	1.0127	1.0195	1.0128	1.0197	0.3476	0.3161
r2	0.9777	1.0070	0.9779	1.0072	0.3255	0.3108
r3	0.9745	1.0214	0.9746	1.0217	0.3201	0.3188
r4	2.0327	1.9487	2.0330	1.9494	0.6712	0.6006
r5	1.9921	2.0400	1.9673	2.0669	1.3224	1.0034
r6	2.0185	2.0384	2.0254	2.0315		
w4			0.4401	-0.1527	-9.7901	-1.8131

black – statistically significant at the 1% level blue – statistically significant at the 10% level red – statistically insignificant at the 10% level

Illustrative Example

K-S Test

 The K-S stat is a measure of the degree of separation between the non-default and default distributions.

Model	Sample						
	Development	Validation	Total				
Exact	94.9	93.6	94.1				
Over-Identified	94.7	93.2	94.0				
Mis-Specified	82.0	57.6	66.2				

Illustrative Example: Gains Charts



Slide 29

Performance Evaluation: Other Issues

- Developing benchmarks for performance monitoring and early-read/early-warning analysis.
 - Benchmark values and distributions constructed at time of model development are used to differentiate between
 - temporary shifts due to "random" shocks
 - permanent drift due to structural changes

Conclusion

- Model development is a process.
- Models should be developed using sound modeling practices.
- Model verification is an integral part of the model development process.