# ORSA Updates, Issues, Opinions, Debates – A Socratic Dialogue

CAS CLRS Seminar ERM-3
Max J. Rudolph, FSA CFA CERA
Rudolph Financial Consulting, LLC
September 7, 2012 @ 8 am



- OWN RISK solvency assessment
- Common Issues
- Leveraging Efforts
- Splitting the CRO Job



- OWN RISK solvency assessment
- Common Issues
- Leveraging Efforts
- Splitting the CRO Job



# **OWN RISK solvency assessment**

- Drivers of Enterprise Risk Management
  - Internal, not regulators
- Concentration Risk
- Leveraging ORSA to add value



## **ORSA Background**

- Can't rely on regulators to manage risk
  - Dodd Frank: designed for banks by banks
  - Risk Focused Examinations (RFE): checklist
  - Sarbanes Oxley: who to fire
- Corporate culture: hindsight is easier
- Long time horizon
- Stable periods allow risks to grow



- Own risk solvency assessment
- Common Issues
- Leveraging Efforts
- Splitting the CRO Job



#### **Common Issues**

- Culture Enron
- Accountability hedge funds
- Incentives banks
- Exposures/correlations in the tail RMBS
- Leverage LTCM
- Systemic risk/liquidity 2008



#### **Concentration Risk**

- Decision making
- Exposures
  - Geographic
  - Asset class
  - Product
- Won't show up in stochastic modeling



- Own risk solvency assessment
- Common Issues
- Leveraging Efforts
- Splitting the CRO Job



## **Leveraging Efforts**

- Build off of DFA/business plans
- Test strategies/tactics
  - Acquisition/divestiture
  - Organic growth
  - Scenario/Stress tests
  - Stochastic/deterministic
  - Quantitative/qualitative
  - Emerging risks



#### **Model Issues**

- Procyclical results
- Correlations are not stable over time
- Historical data may not represent future
- Reliance on statistical representations
- Liquidity/Reputation
- Net exposure versus gross



#### **Model Issues**

- Black box
- Single number product
- Herd mentality mitigation/modeling
- Risk appetite is not stable over time
- Cookie cutter risk mitigation strategies



#### **Solutions**

- Realistic stress testing
- Exposure database crossing products/assets
- Contrarian thought
- Healthy dialogue with alternative views



- Own risk solvency assessment
- Common Issues
- Leveraging Efforts
- Splitting the CRO Job



## Splitting the CRO Job

- ERM process owner
  - Rotate with product line responsibilities
  - Own the process, not the risks
  - Incentives should not tie to financial results
- Chief Risk and Return Officer
  - Strategic planning
  - Upside as well as downside
  - Interact with CEO/board/modelers



#### Skill set of CRRO

- Emerging risks
- Interactions between risks
- Unintended consequences
- Willing to share ideas/concerns
- Big picture/holistic



#### Max J. Rudolph, FSA CFA CERA Rudolph Financial Consulting, LLC Twitter – maxrudolph (402) 895-0829

max.rudolph@rudolph-financial.com

