STAFF PAPER

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REG IASB Meeting

Project	**Dynamic Risk Management**		
Paper topic	Summary of discussions to date		

CONTACT(S)	Ross Turner	rturner@ifrs.org	+44 (0) 20 7246 6920
	Fernando Chiqueto	fchiqueto@ifrs.org	+44 (0) 20 7246 6496
	Kumar Dasgupta	kdasgupta@ifrs.org	+44 (0) 20 7246 6902

Introduction

1. The objective of this paper is to summarise the Board's discussions to date related to the Dynamic Risk Management (DRM) project. This paper is structured as follows:

   (a) Business context (paragraphs 2–4);

   (b) Objective of the project (paragraph 5);

   (c) The approach to meet the objective (paragraph 6);

   (d) The plan to meet the objective (paragraphs 7 – 9); and

   (e) Tentative decisions to date (paragraphs 10 – 55).

Business context

2. The core economic activity of some financial institutions can be described as raising funds to provide longer-term loans to customers. An adverse change in market factors, such as interest rates, can negatively impact interest income and interest expense and thus the performance of the financial institution. DRM is the process that involves understanding and managing how and when a change in market factors can impact interest income and interest expense. In the context of financial institutions, matching re-pricing dates of cash inflows and outflows is a

common approach used to mitigate the impact that changes in market factors can have on interest income and interest expense.

3. Some sources of funding, specifically demand deposits, can be insensitive to changes in market factors, such as market interest rates. Consequently, because interest expense will remain stable regardless of changes in market rates for an extended period of time, these deposits effectively represent perpetual fixed rate funding. As fixed rate perpetual life loans do not exist in sufficient quantity to match the quantum of deposits, aligning the re-pricing of loans and deposits is difficult and perfect alignment may not be possible. In this situation, while the financial institution cannot eliminate the impact of market factors on interest income and interest expense, it can influence the speed at which those changes impact interest income and interest expense. The ability to accelerate or delay re-pricing, but not eliminate, forces management to decide whether they will be proactive and take action altering re-pricing or if they will accept re-pricing based upon the terms of the originated loans. If the financial institution decides, or is required, to proactively manage interest income and interest expense, it must decide how changes in market factors should influence interest income and interest expense. This decision reflects management's target profile. In practice, as management cannot force customers to originate loans that are convenient from a re-pricing perspective, derivatives are used to influence the speed of re-pricing. The derivatives transform loans such that the financial institution's cash inflows will react to changes in market factors based on management's target profile rather than the profile based on the loans originated by the financial institution.

4. The decision on how interest income and interest expense will re-price with interest rates over time future represents an entity's target profile. For the purpose of the DRM accounting model the target profile must be consistent with an entity's interest rate risk management objectives. As such, if the entity's risk management objective focused on discounted cash flows, the target profile should reflect that objective.

Objective of the project

5. The objective of developing a new model is to improve information provided regarding risk management and how risk management activities affect the financial institution's current and future economic resources. A perfect and complete reflection of all risk management in financial reporting is an aspirational objective as 'financial reports do not and cannot provide all of the information that existing and potential investors, lenders and other creditors need.'[1] The aim of the model is to faithfully represent, in the financial statements, the impact of risk management activities of a financial institution in the area of DRM rather than perfectly capture every aspect of the risk management activity. The staff believe that to achieve the above, the model should consider the four pillars outlined below:

   (a) Transparency: Details of the company's risk management objective and the implications for current and future economic resources is largely absent from financial reporting today. Increasing transparency would better enable users to evaluate management's approach and rationale for their decisions;

   (b) Eligible Items: The interaction between the risk management activities and the existing eligibility criteria for hedge accounting within IFRS Standards can create tension when the derivatives required to accomplish the risk management objective exceed existing eligible hedged items. This has been deemed the '*Capacity Issue*';

   (c) Dynamic Nature: On a daily basis, events alter the composition of the assets of financial institutions. These changes often mandate additional DRM actions. As IFRS 9 usually requires one-to-one designations between eligible hedged items and hedging instruments, the additional mitigating actions lead to an overly complex process of frequent de-designations and re-designations of hedge accounting relationships. Such operational challenges result from the application of IFRS 9 hedge accounting requirements to dynamic portfolios;

[1] Paragraph OB6 of the Conceptual Framework.

(d) Performance Measurement: Current financial reporting provides some information regarding the effectiveness of hedging programs. However, the current measures reflect the performance of one-to-one relationships. Providing a simple and understandable metric demonstrating if management was successful in achieving their risk management objective as desired would be relevant information for economic decision-making.

The approach to meet the objective

6. At the November 2017 Board meeting[2], the staff presented the outline of the proposed DRM accounting model considering the feedback received on the 2014 DP and the educations sessions completed throughout 2017. The Board tentatively decided that the DRM accounting model should be developed based on the cash flow hedge mechanics. In particular, it was tentatively decided that, if derivative instruments are successful in aligning the asset profile with the target profile, changes in fair value of such derivative instruments would be deferred in Other Comprehensive Income and recycled to profit or loss as the asset profile affects the statement of profit or loss. In a situation of perfect alignment, interest income would reflect the entity's target profile.

The plan to meet the objective

7. At the December 2017 Board meeting[3], the Board tentatively decided the staff should develop the accounting model for DRM in two phases. The Board asked the staff to develop the 'core areas' that are central to the model and then seek external feedback on that core model. The staff would then develop areas that are extensions of concepts developed during the first phase. These core areas will shape the fundamentals of the proposed DRM accounting model. The first phase

[2] For further information, refer to the November 2017 Agenda Paper 4 *Outline of proposed DRM accounting model and next steps*.

[3] For further information, refer to the December 2017 Agenda Paper 4 *Proposed project plan*.

should capture a significant portion of DRM activities to provide an adequate basis for an early and thorough assessment.

8. At the same meeting, the Board tentatively decided the following areas require further discussion to develop the core of the DRM accounting model:

(a) Asset profile;

(b) Target profile;

(c) Derivative instruments used for DRM purposes; and

(d) Performance assessment and recycling.

9. The non-core areas will be addressed prior to finalising the project as they influence risk management actions and therefore should be considered in a complete accounting model. However, these areas represent more an extension of the core model rather than a fundamental change. These non-core areas include but are not necessarily limited to:

(a) Financial assets at fair value through Other Comprehensive Income. While interest from such instruments will impact interest income, they represent a smaller proportion of the portfolios managed by the DRM function;

(b) DRM derivative instruments other than interest rate swaps, such as options. The use of such instruments, although not absent, is not widespread due to market constraints and increased complexity when compared with interest rate swaps; and

(c) Equity as a source of funding for the target profile. Again, whilst this is prevalent in certain jurisdictions it is not the key driver for funding the target profile.

Asset Profile

10. At the February 2018 Board meeting, the Board discussed the role of the asset profile within the DRM model. In particular, the Board discussed the application of qualifying criteria to the asset profile, as well as designation of items within the asset profile and documentation requirements.

Asset Profile Qualifying criteria

11. Based on the staff analysis the Board identified the following qualifying criteria for financial assets to be eligible for inclusion in the asset profile:

    (a) Financial assets must be measured at amortised cost under IFRS 9;

    (b) The effect of credit risk does not dominate the changes in expected future cash flows;

    (c) Future transactions, which are highly probable forecast transactions and firm commitments, must be highly probable;

    (d) Future transactions must result in financial assets that are classified as subsequently measured at amortised cost under IFRS 9;

    (e) Items already designated in a hedge accounting relationship are not eligible under the DRM accounting model; and

    (f) Items within the asset profile must be managed on a portfolio basis for interest rate risk management purpose.

12. The Board specifically instructed the staff to seek external feedback on the above qualifying criteria during outreach.

Designation of the asset profile on a portfolio basis

13. Based on the staff analysis the Board tentatively agreed that financial assets and future transactions dynamically managed for interest rate risk and meeting the qualifying criteria should be designated as part of the asset profile as a portfolio. The Board also tentatively agreed that portfolios should be defined consistently with the entity's risk management policies and procedures and that portfolios should share similar risk characteristics and at a minimum, an entity should consider different currencies and the existence of prepayment features when defining the portfolios. The Board also tentatively agreed that the application of the DRM model should take effect from the date an entity has completed the necessary documentation to designate a specific portfolio.

Designation and the Dynamic Nature of Portfolios

14. The Board tentatively agreed that an entity should have a choice to designate future transactions to be part of the asset profile but only at initial designation,

provided such designation is consistent with the entity's risk management strategy. In addition, the Board also tentatively agreed that changes to designated portfolios resulting in updates to the asset profile should not represent a designation or a de-designation event but instead a continuation of the existing relationship.

Designation of a percentage of a portfolio

15. The Board tentatively agreed that the DRM accounting model should allow for designation of a percentage of a portfolio, provided that:

    (a) The designated percentage is consistently applied to all expected cash flows within the portfolio;

    (b) The same percentage of a portfolio of financial assets is applied to a related portfolio of future transactions; and

    (c) Designation of a percentage of a portfolio is consistent with an entity's risk management strategy.

16. Regarding growth, the Board tentatively agreed an entity may choose to designate growth as a future transaction. It also tentatively agreed that the requirement for designating a consistent percentage between portfolios of future transactions and other related portfolios should not apply if the future transaction is growth.

De-Designation

17. The staff presented preliminary views not to allow voluntary de-designation of portfolios within the asset profile when the risk management objective remains the same and the financial assets in the portfolio continue to meet the qualifying criterion. In addition, the Board also tentatively agreed that financial assets and future transactions should be de-designated when they no longer meet the qualifying criteria or when they are derecognised from the statement of financial position consistent with the requirements of IFRS 9.

Documentation

18. The Board discussed and tentatively agreed that an entity should formally document:

(a) The portfolio(s) of financial assets designated as part of the asset profile under the DRM accounting model.

(b) The methodology used by the entity to determine the amount of future transactions to be designated as part of the asset profile and how such designation is consistent with risk management policies and procedures.

(c) Evidence supporting the high probability of future transactions occurring.

19. The Board also tentatively agreed that the documentation provided should be supported by an entity's risk management procedures and objectives.

Target Profile

20. At the March 2018 Board meeting, the Board discussed the role of the target profile within the DRM model. In particular, the Board discussed what is a target profile, how it is determined, consistency of the asset profile and target profile, and the time horizon of the target profile. The paper also briefly discussed laddering strategies along with other matters that will be relevant regarding the target profile in future Board discussions.

21. The Board tentatively decided the staff should continue developing the model based on the following:

(a) the target profile represents management's objective for a given asset profile;

(b) the entity's risk management strategy should define the target profile considering:

(i) the contractual terms of financial liabilities; and

(ii) the entity's approach to core deposits where present.

(c) the notionals of the asset profile and the target profile are required to be the same but not the tenors; and

(d) the time horizon of the target profile is the period of time over which the entity is managing interest rate risk.

Target Profile: Qualifying Criteria

22. At the April 2018 Board meeting, the Board discussed the application of qualifying criteria to financial liabilities used to determine the target profile, as well as designation of items within the asset profile and documentation requirements.

Qualifying criteria

23. Based on the staff analysis the Board identified the following qualifying criteria for financial liabilities to be eligible as part of the target profile:

    (a) Financial liabilities must be measured at amortised cost under IFRS 9;

    (b) Future transactions such as refinancing of maturing financial liabilities or growth must be highly probable;

    (c) Future transactions must result in financial liabilities that are classified as subsequently measured at amortised cost under IFRS 9;

    (d) Financial liabilities and future transactions are not already designated in another hedge accounting relationship for interest rate risk; and

    (e) Financial liabilities and future transactions must be managed on a portfolio basis for interest rate risk.

24. Additionally, it was tentatively decided that financial liability designated at fair value through profit or loss are not eligible when an entity determines its target profile. The staff plan to consider potential implications for transition during outreach.

Core Demand Deposits

25. Regarding core demand deposits, the Board tentatively decided the DRM model will allow for inclusion of core demand deposits based on an entity's risk management strategy in target profile, provided:

    (a) they have a demand feature; and

    (b) they will not reprice with a change in market interest rates.

26. In addition, Board members directed the staff to add a criterion stating that the notional of demand deposits treated as core and the associated tenor must be based

on reasonable and supportable information. Board members also directed staff to clarify that, for a financial liability to be a demand deposit, the interest rate paid can change only at the discretion of the deposit taker and they are not contractually obligated to change the interest rate paid when market interest rates change. The staff will incorporate the feedback received prior to finalising the core model.

Designation on a portfolio basis

27. Consistent with the tentative decisions on the asset profile, the Board tentatively decided that financial liabilities and future transactions dynamically managed for interest rate risk and meeting the qualifying criteria should be designated on a portfolio basis. The Board also tentatively agreed that portfolios should be defined consistently with the entity's risk management policies and procedures and that portfolios should share similar risk characteristics and at a minimum, an entity should separate different currencies and core demand deposits when defining portfolios. In addition, the Board also tentatively agreed that changes to designated portfolios resulting in updates to the target profile should not represent a designation or a de-designation event but instead a continuation of the existing relationship.

Designation of a percentage of a portfolio

28. The Board tentatively agreed that the DRM accounting model should allow for designation of a percentage of a portfolio, provided that:

    (a) The designated percentage is consistently applied to all expected cash flows within the portfolio;

    (b) The same percentage of a portfolio of financial liabilities is applied to a related portfolio of future refinancing; and

    (c) Designation of a percentage of a portfolio is consistent with an entity's risk management strategy.

29. Regarding growth, the Board tentatively agreed an entity may choose to designate a proportion of growth in the target profile provided the designated percentage is consistent with the risk management strategy, and the designated amount is the same as the amount of growth designated as part of the asset profile.

De-Designation

30. The Board tentatively decided financial liabilities and future transactions should be de-designated when one of the following events take place:

    (a) Financial liabilities are derecognised in accordance with IFRS 9; or

    (b) Any of the tentatively agreed qualifying criteria are no longer met.

31. In addition, the Board tentatively decided voluntary de-designation of portfolios within the target profile is not permitted when the risk management objective for a particular portfolio of financial liabilities remains the same and all other qualifying criteria are still met.

Documentation

32. The Board discussed and tentatively agreed that an entity should formally document:

    (a) The portfolio(s) of financial liabilities designated as part of the target profile under the DRM accounting model;

    (b) A description of the methodology and key assumptions used by the entity to estimate the core and non-core portions of its demand deposit portfolio;

    (c) The methodology used by the entity to determine the amount of future transactions to be designated as part of the target profile and how such designation is consistent with risk management policies and procedures; and

    (d) Evidence supporting the high probability of future transactions occurring.

33. The Board also tentatively agreed that the documentation provided should be supported by an entity's risk management procedures and objectives.

Designated Derivatives

34. At the June 2018 Board meeting, the Board discussed the derivative financial instruments that will be addressed in the first phase of the DRM project,

designation and de-designation of derivatives and use of internal derivatives in the DRM accounting model.

35. The Board tentatively decided that interest rate swaps, including basis swaps and forward start swaps, and forward rate agreements (FRAs) should be addressed in the first phase of the DRM project as these will capture a significant portion of DRM hedging instruments. The Board also tentatively decided that, given the use of interest rate options, although not absent, is not widespread due to market constraints, costs and their complex nature, the staff should seek external feedback on whether interest rate options should be specifically addressed in the second phase as an extension of the DRM accounting model.

36. Regarding designation and de-designation of derivatives, the Board tentatively decided that formal designation is required and should occur when the entity completes the necessary documentation requirements. While designation can occur on an individual or group basis, an entity must demonstrate sufficient specificity to enable performance assessment and reclassification. In addition, the Board tentatively decided that the DRM model should not allow voluntary de-designation of a derivative when the risk management objective for that particular derivative remains the same. Finally, the Board tentatively decided that the DRM accounting model should allow the designation of a proportion of the notional amount of a derivative, such as a percentage of its notional amount, however, an entity would not be allowed to designate a portion of the time period during which the derivative is outstanding.

37. With respect to internal derivatives, the Board tentatively decided that only contracts with a party external to the reporting entity (ie external to the group or individual entity that is being reported on) can be designated within the DRM accounting model.

Financial Performance

38. At the June 2018 Board meeting, the Board started the discussion of financial performance in the context of the DRM accounting model. More specifically, the Board discussed what performance means in the context of DRM and the information that should be provided in the statement of profit or loss regarding

DRM activities. The Board also considered if the DRM accounting model should require a prospective test as a pre-condition for applying the DRM model and discussed the implications due to a termination event.

Information provided in the statement of profit or loss regarding DRM activities

39. Regarding the information to be provided in the statement of profit or loss, the Board tentatively decided that:

    (a) perfect alignment is achieved when the asset profile, in conjunction with the designated derivatives, equal the target profile.

    (b) the results reported in the statement of profit or loss should reflect the entity's target profile in the case of perfect alignment. Deferral and reclassification are the mechanisms by which the DRM accounting model ensures that the statement of profit or loss reflects the entity's target profile.

    (c) reclassification should occur over the time horizon of the target profile such that, in conjunction with the asset profile, the results reported in the statement of profit or loss reflect the entity's target profile.

40. Regarding the principle that reclassification should occur over the time horizon of the target profile, the IASB queried whether amounts could be deferred past the contractual maturity of a derivative. The proposed mechanics—the pull to par effect on the derivative combined with the reclassification of interest accruals to the statement of profit or loss—would ensure that no balance was deferred beyond the contractual maturity of the derivative.

Testing requirements

41. Regarding whether the DRM accounting model should require a prospective test as a pre-condition for applying the model, the Board tentatively decided that, to apply the DRM accounting model, entities must demonstrate the existence of a continuing economic relationship, but the model will not propose a bright-line test. In addition, the IASB instructed the staff to further amplify the term 'economic relationship' to specify that the DRM accounting model requires more than 'better alignment'

Termination

42. With respect to termination, the Board tentatively decided that if an entity chooses to discontinue the DRM accounting model, and the cash flows from the designated assets and liabilities still exist and future transactions are still expected to occur, the amount recognised in Other Comprehensive Income should be reclassified over the life of the target profile such that, in conjunction with the asset profile, the results reported in the statement of profit or loss reflect the entity's target profile.

Imperfect Alignment

43. At the September 2018 Board meeting, the Board discussed the information that should be provided in situations of imperfect alignment. More specifically, the Board discussed assessment, measurement and recognition requirements for imperfect alignment under the DRM accounting model.

Measurement of imperfect alignment

44. Measurement and assessment of imperfect alignment are two different concepts. Assessment is a qualifying criterion for applying the DRM model where the expected behaviour of the asset profile and designated derivatives are considered to demonstrate an economic relationship with the target profile. Measurement, in its turn, is the quantification of the actual difference, if any, between the benchmark and designated derivatives, so that an entity can determine the extent of imperfect alignment.

45. Based on the staff analysis, the Board tentatively agreed that entities should be required to measure the extent to which they have not achieved alignment. Measuring imperfect alignment would provide information about the extent to which an entity has not achieved its risk management strategy and therefore quantifies the potential impact on the entity's future economic resources. In particular, when cash flows in excess to those required to achieve alignment are designated within the DRM accounting model (ie when an entity 'over-hedges'), the effects of imperfect alignment are contractual and therefore the cash flows in question will flow to or from the entity. However, when insufficient cash flows

are designated (ie when an entity 'under-hedges') measuring imperfect alignment provides information about the effect on the entity's future economic resources had the benchmark derivatives been executed. In other words, this would quantify the opportunity cost of an action not taken.

46. Entities could do so by comparing the designated derivatives with the benchmark derivatives. In addition, the Board tentatively agreed that entities should measure alignment on an on-going basis (ie prior to each change in inputs). If there are no changes in inputs during the period, entities should measure imperfect alignment at each reporting date, at a minimum.

Communication of imperfect alignment

47. Regarding how imperfect alignment, and the information content thereof, should be communicated to users of financial reporting, the Board discussed imperfect alignment when an entity over and under-hedges.

48. The Board tentatively decided that, when an entity over-hedges, it should present the difference between changes in fair value of the designated and benchmark derivatives in the statement of profit or loss as imperfect alignment. This treatment is consistent with existing IFRS Standards and also provides relevant information to users of financial statements regarding the impact an entity's risk management activities have on the entity's current and future economic resources.

49. Furthermore, in the case of under-hedging, the Board tentatively decided that the 'lower of' test should be retained within the DRM accounting model as it maintains consistency with IFRS 9 but more importantly, because recognising gains or losses within the statement of profit or loss related to an asset or liability that does not exist (ie the benchmark derivative) is inconsistent with the Conceptual Framework.

50. The Board also tentatively agreed that, in the absence of recognition as a means of communication, disclosures should be provided to inform users about the impact of imperfect alignment in the case of under-hedging.

Target profile defined as a range

Regarding whether the target profile could be defined as a range, the Board noted that the concept of risk limits (ie a defined tolerance) was considered by 2014 DP and the feedback received at the time supported the Board's preliminary view not to consider risk limits. As such, the Board tentatively decided that the target profile within the DRM accounting should be defined as a single outcome.

Assessment of imperfect alignment

51. Assessing imperfect alignment aims to ascertain whether financial assets, financial liabilities and derivatives designated within the DRM model can be expected to meet the risk management strategy for which they have been designated. Therefore, the objective of this assessment is to set a minimum level of alignment to apply the DRM accounting model.

52. At its September 2018 meeting, the Board tentatively agreed that a 'bright line test' should not be introduced to the DRM model. The Board tentatively decided that the DRM model should require a minimum level of alignment in the form of qualitative thresholds supported by quantitative analysis.

53. At the December 2018 Board meeting, the Board discussed how the minimum performance requirements considered at the September 2018 Board meeting would be applied in the context of the DRM model. In particular, the Board tentatively decided that:

    (a) an entity can apply the DRM model if designation of the asset profile, target profile and designated derivatives does not reflect an imbalance that would create misalignment that could result in an accounting outcome inconsistent with the purpose of the DRM model; and

    (b) subject to further articulation, there must be an economic relationship between the target profile and the combination of the asset profile and designated derivatives. The Board emphasised its previous tentative decision not to define a quantitative threshold. The Board also instructed the staff to seek feedback on the articulation of the strength of the economic relationship during outreach on the Core Model.

Change in Risk Management Strategy

54. At the September 2018 Board meeting, the Board discussed how an entity applying the DRM accounting model should treat a change in its risk management strategy. More specifically, the Board discussed how a change in risk management strategy will impact the statement of profit or loss and the amount recorded in Other Comprehensive Income. The discussion was focused on changes in risk management strategy that require a change in the entity's target profile.

55. The Board tentatively decided that, when a change in risk management strategy requires a change in the entity's target profile, the accumulated amount in Other Comprehensive Income should be reclassified to profit or loss over the life of the target profile as defined prior to the change in risk management strategy. This approach would preclude entities from changing its risk management strategy to achieve a specific accounting outcome that is inconsistent with the purpose of the DRM accounting model and is consistent with the performance principles and termination guidance tentatively agreed during the June 2018 Board meeting.