

Discussion of “Do pension plans manipulate pension liabilities ?”

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Background

- Lots of discussion in many countries about manipulation of *valuation of pension liabilities*
- Value of liability: minimum wealth to do what was promised
- Straightforward in text books ...
 - Risk free nominal discounting if pension income risk free nominal guarantee
 - Risk free real discounting if pension income risk free real guarantee
 - Corporate term structure if credit risk to be incorporated
 - Discount against expected portfolio return if pension income is risky and shocks not smoothed
 - Use risk neutral valuation argument in more general cases
 - E.g. non-linear link between investment returns and pension income (Netherlands).

Why room for discussion ?

- Contract is opaque;
 - Who pays / receives what, especially in bad scenarios
- Valuation used for different purposes
 - Value to participant (someone takes residual risk)
 - Can pension provider meet its liabilities ?
 - Value of firm (with credit risk)
- Should future accruals be incorporated
 - How to incorporate labor market risk individual ?
 - How to incorporate discontinuity of sponsor / collective ?
- Heterogeneity in participants
 - E.g. group specific survival probabilities (UK/NL)
- Input parameters unknown (expected returns on asset classes, expected inflation; wage growth)
- Model risk; DGP unknown (full risk neutral valuation)

Beyond manipulation of the valuation ...

- Paper: *“Giving more freedom to choose actuarial assumptions involves a difficult trade-off. When a temporary funding relief for underfunded pension plans may help to restore the long term viability of plan sponsors it may go against the interests of employees and retirees”*
 - Better motivation than intransparency required ?
- Why would sponsors of funds be given degrees of freedom in the valuation ? Better information on
 - Investment strategy (i.e. expected portfolio returns) ?
 - Survival probabilities for this population ?
 - Wage profiles for workers ?
 - Continuity of firm ?
 - ... ?
 - *At least clear transparency on choice and adequate supervisory framework needed ...*

Beyond manipulation of the valuation ...

- Key problem: those who set “details” of valuation formula might have strong incentives
 - NL: retirees want to avoid benefit cuts and stimulate inflation compensation; young participants want to protect their rights
 - The results in the paper might show that sponsor sets valuation: in case of underfunded plans in the US sponsor typically mandated to make additional contributions
 - Also in US MAP legislation 2012 more mandatory contributions if more underfunded...
- Innovation (Bovenberg/Nijman): Personal Pensions with Risk sharing (PPR). Life long income with straightforward valuation. Combine strengths DB and DC. This afternoon, 13.45 - 14.30....

This paper

- One of few empirical studies of the phenomenon
- Corporate DB plans in US had choice option in their valuation
- Underfunded plans use higher discount rates to report less underfunding
- Less impact of choice in longevity assumptions
- Also in US issues still quite relevant: In 2012 pension contributions dropped by more than 30% for funds that adopted MAP-12 in 2012; increased by more than 30% for the others
- MAP corridor for discount rates based on 25 years of history?? Even worse than Dutch 10 year average *in setting pension contributions only*

Questions

- Nature of contract
 - Presented to participants as (nominal) guarantee ?
 - I.e. no options to cut benefits after poor investment returns ?
- Goal of valuation ? What are incentives for whom to underestimate or overestimate ?
 - Value of liabilities of firm ?
 - Or solvency goal: how much wealth needed to meet promises ?
 - Or value transfer: how much money transferred in case of change of employer ?
 - Or impact on contribution level or compensation for inflation ?
- *We test whether credit risk of the sponsor helps to explain the findings..*

Questions

- Underfunded plans use higher discount rates to report less underfunding
 - More risky investing ? Allowed by regulators ?
- Longevity assumptions less impact
 - Can underfunded funds have different participants with other life expectancies ?
 - Regulatory mechanism to motivate choices made ?

More technical points

- Why not focus on explaining differences in assumed discount rates and mortality assumptions from funding status ?
 - Rather than on explaining differences in accrued and current liability values from funding status, difference in discount rates and in mortality assumptions ?
 - Accrued liability impact really different if sponsor in trouble ?
- Interest and mortality assumptions explain only 26% of changes in valuation ? What else ?
- Use precise impact of other actuarial assumption on $B(i,t)$, rather than approximation through common duration and change in life expectancy

Conclusion

- Very interesting and relevant paper
- Could be linked to broader issues
 - Goal of valuation
 - Full freedom in choices or supervisory rules / publicity ?
- Explain also differences in discount rates and mortality assumptions directly



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