



Pension Benefit
Guaranty Corporation

Review of the PBGC Smaller Asset Manager Pilot Program

May 2018

REVIEW OF THE PBGC

SMALLER ASSET MANAGER PILOT PROGRAM

The Pension Benefit Guaranty Corporation (PBGC) established the Smaller Asset Managers Pilot Program (SAMPP) to provide opportunities for smaller investment management firms to manage some of the agency's fixed income assets. Performance measurement for investments under the pilot program began August 1, 2016. This report summarizes PBGC's experience thus far under the pilot program. The report provides investment return performance (net of fees) of the pilot program relative to a benchmark and to non-pilot program fixed income asset managers. It also describes the program structure, observations and lessons learned thus far.

PBGC is submitting this report to the Committee on Appropriations of the Senate and the Committee on Appropriations of the House as required by Division H of the Explanatory Statement of the Consolidated Appropriations Act, 2018 (Pub. L. 115-141), incorporating House Report 115-244¹ and Senate Report 115-150.²

BACKGROUND

PBGC uses institutional investment management firms to invest its assets, subject to PBGC's oversight and consistent with the investment policy statement approved by PBGC's Board of Directors (Board). PBGC does not determine the specific investments to be made, but instead relies on PBGC's investment managers' discretion in executing investments appropriate for their contractually assigned investment mandates. PBGC does ensure that each investment manager adheres to PBGC's prescribed investment guidelines associated with each investment mandate and measures each investment manager's performance in comparison with agreed-upon investment benchmarks.

In August 2014, the Board asked PBGC's Advisory Committee to provide recommendations to address the lack of inclusion of smaller asset managers and to expand diversity in its portfolio by increasing the number of investment ideas, approaches and management teams. The Board then

¹ "The Committee directs PBGC to submit a report to the Committees on Appropriations of the House of Representatives and the Senate within 180 days of enactment of this Act that includes an evidence-based review and assessment of the Smaller Asset Manager Pilot Program. The report should include performance comparisons of pilot participants and non-pilot PBGC asset managers, after fees, relative to their portfolio benchmarks, and should identify best practices and lessons learned that could be applied at PBGC and other Federal pension and retirement benefit systems."

² "The Committee recognizes PBGC's "Smaller Asset Managers Pilot Program" to ensure that smaller and more diverse investment management entities more effectively compete for investment allocations. The project, announced in 2015 and now underway, provided access to smaller allocations ranging from \$50,000,000 to \$250,000,000, creating new opportunities for smaller asset managers to participate. Similarly, several States have established programs to encourage greater participation by smaller and diverse asset management entities, and studies have found that women and minority-owned firms have achieved at least comparable performance, both in terms of absolute returns and risk-adjusted returns, as the rest of the market. The Committee directs the PBGC to provide by December 31, 2017, an interim update on the performance of the pilot program, as well as a written account of additional steps that can be explored to expand opportunities for smaller and diverse asset management entities."

directed PBGC to develop a pilot program to address these goals. PBGC staff, with the assistance of the Advisory Committee, assessed industry best practices in this area and developed recommendations on how such a smaller asset manager program might be established.

PBGC announced the Smaller Asset Managers Pilot Program (SAMPP) in May 2015. The program seeks to reduce competition barriers faced by asset managers that do not have multiple billions of dollars under management, while maintaining rigorous investment risk and control standards. PBGC selected US Core Fixed Income as the initial asset class for the pilot because research showed that there was a higher probability of finding smaller managers that could add value relative to the benchmark return compared to other asset classes. Additionally, the majority of PBGC's assets are invested in fixed income.

In developing parameters for the program, eligible firms were required to have a minimum of \$250 million in assets under management, a five-year performance history, and undergo the same competitive evaluation as other PBGC money managers. The procurement was open to all managers that met the minimum assets under management (AUM) requirement. Additionally, PBGC limited allocations to no more than twenty percent of a firm's AUM, which is in keeping with industry standards. Ultimately, in June 2016 PBGC selected five firms for the pilot program that would be expected to outperform the portfolio benchmark (BBG Barclays Aggregate Bond Index) over a full market cycle of highs and lows at an acceptable level of risk. Each of the selected firms was allocated \$175 million, with performance management beginning on August 1, 2016.

PBGC adopted a plan to analyze the implementation and operation of the pilot program after one year; and to analyze the performance of the firms after five years, which is the industry standard. Five years is considered to be an appropriate period of time to determine whether a manager is successful because historically, on average, market cycles last approximately five to seven years. To fully evaluate a manager's performance track record, it must demonstrate its capabilities in the variety of market environments that encompass a market cycle. Investment managers have unique areas of expertise with strategies that often result in managers performing differently in varying market conditions. For this reason, a full market cycle is necessary to allow each manager the opportunity to demonstrate their skill in varied market environments.

ANALYSIS AFTER FIRST YEAR

The following analysis of the SAMPP after the first year includes structure, due diligence, performance, and resource factors.

PROGRAM STRUCTURE:

PBGC designed the program for hiring of smaller asset managers in an asset class where active management has historically added value. This is reflected in the relative performance of its Core US Bond Composite returns. The successful hiring of small asset managers was a result of the asset class, the program parameters, and the procurement process.

- Asset Class: Core US fixed income was chosen because inefficiencies exist in the asset class that allow for the success of active management. In contrast, the U.S. public equity sector of

the market is highly efficient, making value added performance from active management more difficult, by either large or small firms. This is reflected in the current position of the PBGC domestic equity portfolio, which is entirely passively managed via use of index funds. Additionally, the risk (volatility) of equities is greater than the risk of Core US fixed income. An active international fixed income allocation applied to a smaller manager framework is not feasible, because those asset classes require a large infrastructure to cover the breadth and complexity of those markets. There are other segments of the market, such as private equity and private real estate, for which the PBGC investment policy statement does not allow an active allocation. PBGC's private market assets consist entirely of assets inherited from terminated pension plans.

- **Program Parameters:** In designing the SAMPP to accommodate smaller managers, the PBGC lowered both insurance requirements and the minimum assets under management required to bid on this PBGC investment contract.
- **Procurement Process:** The cooperation of multiple PBGC departments was needed to make the search process efficient. The Corporate Investments Department (CID), the Procurement Department (PD), and the Office of General Counsel (OGC) worked together to meet timelines and successfully implement the pilot program. The effective collaboration was evident in a successful pre-bidder's conference at which PBGC staff described federal procurement rules for prospective managers.

DUE DILIGENCE:

- **Deliverables:** The same due diligence framework that is applied to PBGC's larger fixed income managers is utilized for the SAMPP managers. Managers have monthly, quarterly and annual deliverables. However, because of resource constraints at these firms, CID staff has had to work with some of the firms to bring their reporting practices up to the same standards as the larger firms. Examples where enhancements were necessary included tracking error and attribution reporting, which provide CID staff information on both the extent to and the reasons why a manager's performance deviates from its benchmark. Currently, the managers are all providing the required information.
- **Meetings:** In addition to the periodic deliverables, CID conducts two due diligence meetings each year at six-month intervals, one on-site at the manager's office and the second at PBGC's office. Each of the SAMPP managers participates in the semiannual due diligence meetings and all are able to provide all required information.
- **During the first year of the program,** one of the five SAMPP managers had a guideline violation. The violation was the result of an error related to the new-account set-up process in which guideline restrictions are programmed into the investment manager's trading system. As a result, the manager has separated the roles of Chief Compliance Officer and Operations Manager. CID staff reported this guideline violation to the PBGC Advisory Committee and Board of Directors through its normal process. PBGC's experience is that new-account set-up issues are not uncommon. The manager compensated PBGC for a small loss resulting from the trade error.
- **Regarding manager reporting,** one area that needed clarification was the communication of organizational changes that occur between reporting dates. CID needs to be informed about

significant organizational changes as soon as possible. Examples of such changes include staff departures/additions and client losses. At this point, all SAMPP managers understand CID's expectations and inform CID of such changes as they occur.

PERFORMANCE:

As of July 31, 2017 (one year after initial allocations), each of the five smaller managers generated net-of-fee returns in excess of the established benchmark. In the aggregate, the program generated a one-year return of -0.12% as compared to a -0.51% return for the benchmark. The negative returns for this period are a function of rising market interest rates generally, not the asset managers' performance. CID believes that not enough time has passed to make meaningful comparisons of the SAMPP to its larger US Core managers, which may have strategies that perform differently at this stage of the economic cycle.

The table below reflects the one-year net-of-fee performance for the SAMPP Composite, the benchmark, and the PBGC Core US Bond Composite:

Investment Performance (One Year)		
	One Year*	Difference from Benchmark
SAMPP Composite	-0.12%	0.39
<i>BBG BARC Aggregate Bond Index</i>	-0.51%	
PBGC Core US Bond Composite	0.40%	0.91

* Net of fees as of 7/31/2017

Inception-to-date performance versus the benchmark through February 2018 shown below is not materially different from results shown in the table for the one-year period ending 7/31/17.

Investment Performance (Since Inception)		
	Since Inception*	Difference from Benchmark
SAMPP Composite	-0.73%	0.42
<i>BBG BARC Aggregate Bond Index</i>	-1.15%	
PBGC Core US Bond Composite	-0.38%	0.77

* From SAMPP inception date 8/1/2016 through 2/28/2018, net of fees.

RESOURCES:

The SAMPP required additional staffing resources. Specifically, CID currently allocates two of its 18 FTE staff approximately half time to the project, along with management supervision.

OBSERVATIONS/LESSONS LEARNED

Observations and lessons learned from the program to date include:

- Identifying the right asset class was important to a successful and efficient search process, and maybe to the performance of the managers. As described in the analysis, core US fixed income was chosen because inefficiencies exist in the asset class that allow for the success of active management.
- The pre-bidder's conference was well received and proved helpful in describing the federal procurement rules for managers who were unfamiliar with the process.
- Tailoring the Request For Proposal (RFP) to more accurately address the potential strategies of smaller, niche asset managers made the evaluation process more efficient.
- The smaller managers have had issues with meeting PBGC reporting requirements, because smaller managers typically have fewer resources. PBGC staff have been able to collaborate with smaller manager staff to bring their reporting in line with requirements.
- Smaller managers generally have a higher asset concentration per client, which increases the firm's operational risk to investors. CID strives to develop an understanding of current clients of the firm (when disclosure is not prohibited), which allows PBGC to better assess areas of potential risk. One smaller manager had a few sizeable accounts leave the firm, which CID discussed with the manager. CID continues to closely monitor the asset levels of the manager since it has been identified as an area of risk.

FUTURE CONSIDERATIONS

While not enough time has passed to fully assess the performance and skill of the managers, early results are encouraging. The managers in the program have done well relative to the benchmark to date. We will continue to monitor the program and assess it over the full five-year market cycle as planned.

At the end of the five-year period, the success of the program will be evaluated and future options considered.