Jump in Credit Scores Means Dip in Underwriting Predictability

September 26, 2017

ARITON

Underwriters that rely on popular credit-scoring models like FICO and VantageScore to assess risk may have noticed that some consumer credit scores jumped recently. The nationwide credit reporting agencies, Equifax Inc., Experian PLC, and TransUnion began excluding incomplete records of bankruptcies, tax liens, and civil judgments beginning on July 1, 2017. The changes to public record reporting requirements should eventually improve modeling predictability after the market adjusts. Public records information that poses a risk of attributing the information to the wrong consumer is now left off credit reports. Incomplete records are those that don't include the consumer's name, address, and either a Social Security number or date of birth. The decision covers new and existing bankruptcies, tax liens, and civil judgments. Bankruptcies generally meet the enhanced data standards already. So, this data point is unlikely to waver much. But unlike credit applications, court judgments don't collect and furnish information in the same formats. Many courts require redactions of the ubiquitous identifier, the Social Security number. Most civil judgment records will not initially meet the enhanced standards. About half of tax liens will fail the completeness tests. It's a positive change for consumers. All bankruptcy, tax lien, and judgment information is negative. For report and score users, it's a dip in efficacy. While the move omits unreliable data which increases predictability it over-excludes accurate but incomplete data. Fair Isaac Corporation (FICO) says it's caused a "modest" impact on score predictability. Until public records furnishers become more reliable, predict moderate surprise at finding you have clients with undisclosed tax liens and civil judgments.

Related Practices

Consumer Finance Banking, Commercial, and Consumer Finance

Related Industries

Banking, Commercial, and Consumer Finance

©2024 Carlton Fields, P.A. Carlton Fields practices law in California through Carlton Fields, LLP. Carlton Fields publications should not be construed as legal advice on any specific facts or circumstances. The contents are intended for general information and educational purposes only, and should not be relied on as if it were advice about a particular fact situation. The distribution of this publication is not intended to create, and receipt of it does not constitute, an attorney-client relationship with Carlton Fields. This publication may not be quoted or referred to in any other publication or proceeding without the prior written consent of the firm, to be given or withheld at our discretion. To request reprint permission for any of our publications, please use our Contact Us form via the link below. The views set forth herein are the personal views of the author and do not necessarily reflect those of the firm. This site may contain hypertext links to information created and maintained by other entities. Carlton Fields does not control or guarantee the accuracy or completeness of this outside information, nor is the inclusion of a link to be intended as an endorsement of those outside sites.