



April 13, 2026

The Honorable William Pulte
Director, U.S. Federal Housing
400 7th Street, SW
Washington DC 20219

Dear Director Pulte:

The Community Home Lenders of America (CHLA)¹ is writing to commend and encourage your continued fast-tracking of adding the VantageScore product into conventional mortgage underwriting, enabling lenders to choose between a FICO Classic score and this new option.

On this subject, we want to bring to your attention our **Update** two weeks ago to our January 2024 **White Paper on Mortgage Credit Score Markets and Pricing**. This Update documents the fact that FICO has raised the price of their credit score by 1,567% in just the last 3 and ½ years - a real world validation that FICO has monopoly pricing capability.

The most significant recommendation from our Update is that **“CHLA urges no delay in making VantageScore fully available to American homebuyers.”**

Finally, on a different but related subject, we also support your maintaining the current tri-merge regime. Our recent January release identifies **Concerns Regarding Single Bureau Credit Pulls**, which are that such a proposal would introduce additional risk and uncertainty to Fannie Mae and Freddie Mac mortgage loans – and ultimately could increase consumer costs.

Regarding VantageScore, you have taken an excellent first step towards reining in a monopoly marketplace, where the Fair Isaac (FICO) CEO and management team are able to set the credit score price based on whatever number appeals to them. *No other sector of the mortgage market has this kind of monopoly on an essential component of a mortgage loan origination.*

Regrettably, last July we wrote to you and predicted that FICO would again raise prices in late 2025. Unfortunately for American families--we were correct. FICO charged 60 cents per credit pull in 2022; four years later, with price hikes every Fall season, they now charge \$10 per pull (and perhaps higher based on a new \$33 per pull “success fee” on closed mortgages).

Our recent Update, developed through a survey of our Member lenders, finds that total credit report costs per closed loan now routinely exceed \$550 (factoring in multiple pulls for a single borrower and borrowers where a loan was not closed). This figure is up from a comparable CHLA survey calculation of \$50 in 2022. This is mortgage inflation run amok.

¹ CHLA is the only national trade association focused exclusively on small and mid-sized independent mortgage banks (IMBs).

Our recent update explains that the great majority of these cost increases comes from FICO price hikes, and states CHLA's belief that **"if FICO did not raise prices each Fall, neither would the other companies in this credit score industry."**

Further, our association is primarily made up of community-based mortgage lenders, focused on originating mortgages to first-time homebuyers. More credit pulls are generally required for these loans – compared to mortgage shops that primarily originate mortgage refis – and this can have an impact on this calculation.

And today—just as we did last year--CHLA is predicting *another major round of FICO price hikes* this Fall for 2027, perhaps by as much as 50% from today's prices, which, as noted, are themselves a 1,567% increase since 2022.

FICO continues to report to its investors that its mortgage credit score business channel is their number one source of revenue growth and profitability, far surpassing any revenue and earnings growth from its other business channels. In fact, none of their other business channels have anywhere near the growth of their monopoly mortgage credit score channel.

We again recommend that current guidelines of both Fannie Mae and Freddie Mac be changed to remove the citing of "*Fair Isaac*" by name as a requirement, stating instead that credit scores (generically) be required for mortgage delivery to the Enterprises. Naming one company explicitly sends the wrong signal to the marketplace and inhibits creative thinking on how to innovate here to keep costs lower.

More important, we recommend that VantageScore be approved as soon as possible, without waiting for FICO 10T to be fully tested and vetted. Although U.S. Housing (Federal Housing Finance Agency or FHFA) has only recently been able to access the 10 years of indexing data from FICO, and market testing of this data will take time, we believe that speeding this credit score to market makes sense for American homebuyers.

Finally, because four credit score companies are better than two, CHLA continues to recommend the Fannie and Freddie be directed to use their massive data and analytics to each establish their own business subsidiaries to evaluate the creditworthiness of borrowers.

Such companies, once established and proven to be reliable, could then be sold off by each GSE into the open market to ensure these de novo companies serve as independent umpires that also provide more competition generally. In this manner, under your leadership, the Enterprises can make markets work better for consumers and also get an additional return on Enterprise assets.

In conclusion, we commend your recent work here and look forward to discussing with you and your team proposals to ensure that the mortgage origination process is as competitive as possible, to keep credit score and credit report prices down, and ultimately to make it easier to help more American families achieve the dream of homeownership.

Thank you for consideration of these comments and recommendations.

Sincerely

COMMUNITY HOME LENDERS OF AMERICA