



September 29, 2026

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

Director Pulte:

The Community Home Lenders of America (CHLA)¹ is writing to commend you for your recent decision to have Fannie Mae and Freddie Mac *add their own credit score numbers publicly to their mortgages and Mortgage-Backed Securities (MBS)*.

CHLA believes your efforts to have more data available to assess prepayment speeds and credit performance of the underlying mortgages will improve market efficiency and ultimately the safety and soundness of the overall US mortgage market. In addition, more marketplace data and more comparative metrics will, down the road, be instrumental in stemming the recent annual skyrocketing of mortgage credit score prices.

CHLA has been at the forefront calling on Washington to find ways to restrain what has become an annual Fall exercise—the announcement of expected mortgage credit score pricing for the following calendar year. Last year, we predicted publicly that Fair Isaac would raise prices for 2026, and unfortunately, we were correct. In 2024 we predicted price hikes for 2025, and again we were correct. The price hikes have been occurring since the Fall of 2022 and we predict will occur again this Fall for 2027.

CHLA has previously endorsed your efforts regarding VantageScore implementation and adoption, but also, since May 2025, has been calling for not just two suppliers of mortgage credit score algorithms, but up to four, with the Fannie Mae and Freddie Mac algorithms being additional potential market entrants. We do view your announcement as an important initial step in this direction.

With time, your reforms will be wholly integrated into US mortgage markets and we believe they will provide a badly-needed market check on dramatic price hikes.

Thank you for your work, and your consideration of these comments.

Sincerely

COMMUNITY HOME LENDERS OF AMERICA

¹ CHLA is the only national trade association that exclusively represents non-bank mortgage lender/servicers (also known as independent mortgage banks or IMBs).