

CONNECTION POINTS

# **A Critical Response to the Equifax-Funded Whitepaper: *Advocating for Unbiased Re- search in Mortgage Credit Reporting***



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## **Executive Summary**

The October 2025 whitepaper *Fixing What Isn't Broken: Why Moving to a Single-Bureau Credit Report in Mortgage Underwriting Is Misguided and Expensive*, authored by Amy Crews Cutts—a former Equifax executive—and explicitly funded by Equifax, defends the tri-merge credit reporting system (requiring data from all three nationwide credit reporting agencies, or NCRAs: Equifax, Experian, and TransUnion) as essential for accuracy, risk management, and affordable mortgages [0]. However, this document is riddled with biases, outdated data, selective omissions, and emotion-laden language designed to preserve a profitable status quo for the NCRAs. Drawing on independent studies from regulators like the Federal Housing Finance Agency (FHFA) and Consumer Financial Protection Bureau (CFPB), industry groups such as the Mortgage Bankers Association (MBA), and think tanks like the Urban Institute, this response systematically dismantles the whitepaper's claims. It highlights how escalating costs, data inaccuracies, and a government-mandated monopoly undermine consumer interests. Ultimately, we call for an unbiased, comprehensive study—conducted across multiple lenders, geographic areas, and scenarios—free from CRA influence, as papers from insiders like Cutts cannot be trusted to prioritize objectivity over self-preservation.

## **Understanding the Topic and the Whitepaper's Inherent Bias**

Mortgage underwriting relies on credit reports in part to assess borrowers' overall capacity, creditworthiness, and collateral—the "three C's" as outlined in the whitepaper. The tri-merge system combines reports from the three NCRAs to generate credit scores, which influence loan approvals, pricing via loan-level price adjustments (LLPAs), and investor confidence. The whitepaper argues that shifting to single- or bi-merge reports would increase risks, costs, and market instability, citing variances in NCRA data (e.g., a 29-point average FICO differential).

Yet, the whitepaper's credibility is compromised by its funding and authorship. Cutts, with over a decade at Equifax and Freddie Mac, positions herself as a neutral economist but thanks Equifax for financial support while disclaiming their influence—a classic conflict [1] [2]. NCRAs like Equifax profit immensely from tri-merge mandates, with Equifax's net income rising from \$520 million in 2020 to \$659 million (trailing twelve months as of September 2025), totaling approximately \$3.8 billion over the period despite broader economic challenges for lenders who have struggled in an extremely challenging business environment since 2022 [3]. Collective NCRA net incomes exceed \$11 billion from 2020–2025 [4] [5] [6]. This bias manifests in loaded phrases like "miraculous machinery" for the

U.S. system and "misguided and expensive" for alternatives, evoking emotion over evidence. Independent analyses from FHFA and CFPB reveal tri-merge as an anticompetitive "triopoly" inflating costs without proportional value [7] [48]. To truly evaluate reforms, we need unbiased research, not industry apologetics.

### **Outdated and Understated Costs – Ignoring Escalating Fees and Broader Origination Trends**

The whitepaper cites credit report costs at \$40–\$240 per loan (1% of closing costs), framing them as negligible. These figures are outdated, failing to reflect post-2025 hikes and projected 2026 increases of 40–100% [8] [9]. FICO royalties alone jumped 41% in 2025 to \$4.95 per score, with bureaus adding markups. Once again bureaus increased their pricing anywhere from 40%-100% higher in 2026, further exacerbating already financially strained lenders and borrowers [10] [11] [12] [13]. The paper went so far as to mock fallout amplification, where lenders absorb \$500 million+ annually in “voluntarily” unrecovered fees [14] [15].

Broader origination costs have surged 35% since 2020, averaging \$11,600 per loan in 2024, per Freddie Mac's 2024 Cost to Originate Study—driven by personnel, compliance, and third-party fees like credit reports [16] [17] [18] [19]. The whitepaper flippantly suggests passing costs to consumers, ignoring the fiercely competitive market that lenders operate in, amid high rates and low volumes. Few industries match NCRAs' hikes: While utilities rose 20–30% and groceries 25% cumulatively since 2020, credit reports have increased by 300%+—unique due to their monopoly [20] [21] [22] [23].

The NCRA have cited appraisal fees in defense of their own price hikes, comparing costs for the two products. However, appraisal costs have stabilized or declined through efficiencies: FHFA expanded waiver eligibility to 97% LTV in 2024, reducing needs for full appraisals (costs ~\$500–\$600, up only 10–15% since 2020 vs. credit's 100%) [24] [25] [26]. The appraisal industry would state that expanded waivers also increase risk, yet the GSE have not been deterred in providing this cost saving alternative to a traditional appraisal [27] [28] [29]. Lenders seek alternatives precisely because NCRAs impose drastic annual increases (e.g., FICO's 16x rise over five years), squeezing affordability [10]. CFPB's 2025 focus on "junk fees" targets credit reports, with Director Chopra noting spikes of 25–400% [30] [31].

### **Admissions of Data Flaws and the Questionable Value of Tri-Merge**

By insisting all three bureaus are needed due to a 29-point FICO differential, the whitepaper implicitly admits NCRA data is flawed and incomplete—stemming from voluntary reporting without incentives for accuracy. Independent studies question if this

differential meaningfully impacts performance: FHFA validations show bi-merge captures 85–90% of variances with minimal risk, and for scores 700+, differences average 15–20 points without affecting default rates [30] [31] [32]. Urban Institute analyses confirm marginal risk differences, potentially expanding access for 200,000 borrowers annually [33] [34] [35].

Consumers aren't helpless: They can request tri-merge reports if dissatisfied with a single pull, per FCRA rights [36] [37]. The whitepaper's claim that U.S. homebuyers enjoy the "lowest cost and most easily obtained" mortgages worldwide is unsubstantiated—Statista data shows U.S. rates (5.77% projected 2026) higher than Europe's (<2% in many countries), with real borrowing costs often negative abroad due to inflation adjustments [38] [39] [40]. This hyperbolic language again exemplifies the paper's bias, using terms like "miraculous" to romanticize a system plagued by inefficiencies.

### **Misrepresentation of the MBA Proposal – A Pilot, Not a Overhaul**

The whitepaper frames the shift as an immediate, risky overhaul but omits that the MBA proposes a pilot program for single-bureau reports on lower-risk borrowers (FICO  $\geq$ 700), not an immediate blanket change [41] [42] [43]. This targeted approach, urged in MBA's December 2025 letter to FHFA, could save \$200 million annually while maintaining 95% accuracy [41] [44]. NCRAs oppose independent validation—perhaps fearing exposure of redundancies—as evidenced by their resistance to FHFA's bi-merge proposal [45] [46] [47]. An unbiased study across lenders and regions is essential to test merits, not speculative hypotheticals.

### **The NCRA Monopoly – No Incentives for Accuracy or Competition**

Tri-merge isn't "used by" the industry—it's forced via mandates, creating a government-imposed oligopoly without competitive pressures [48] [49] [50]. The whitepaper claims limited providers don't mean "unlimited pricing power," but the price hikes imposed since 2020 would beg to differ [8] [9]. The MBA pilot would force NCRAs to compete as the "default" provider, incentivizing accuracy and affordability—something NCRAs, with double-digit margins, seem unfamiliar with compared to lenders' thin profits [51] [52] [53].

### **Self-Serving Solutions – More CRA Products, Not Real Fixes**

The white paper suggests other solutions like soft pulls or undisclosed debt monitoring (UDM), which are just additional CRA revenue streams, adding costs without addressing root issues [54] [55]. UDM on all loans could exceed repurchase expenses: Repurchase rates are low (0.49% from 2023–2024), costing ~\$10,000–\$20,000 per incident, while UDM can add more than \$20 per borrower, across millions of loans [56] [57]. As an industry, we have blindly paid an increasing amount for these ancillary products to reduce our risk, but

perhaps it is time to take a step back and ask if these extra costs, blanketed across our entire book of business, are really the economically better option for us. Perhaps instead, we should be taking a far more targeted and nuanced approach to risk management.

### **Flawed Hypotheticals and Fabricated Problems**

The whitepaper's cited S&P study uses a tiny sample (23,000 loans)—insufficient for broad claims; larger FHFA datasets show bi-merge sufficiency [58]. Hypotheticals assume low scores (<700), exempt from the MBA pilot, and unchanged LLPAs—ignoring potential adjustments [41]. These examples highlight NCRA failures (inconsistent data) more than refute reforms. The paper invents "technological mazes" for single-bureau; auto, home equity, and consumer lenders use one score successfully without such issues [59] [60] [61] [62]. Lenders wouldn't pull three and cherry-pick—that defeats cost savings.

### **Regulatory Scrutiny and Predatory Practices**

The paper cites possible Fair Lending concerns. Lenders are required to undergo routine Fair Lending analysis and testing that would quickly identify possible issues. This would all be tested out in a pilot, and should be one of the indicators that are examined before making a permanent policy change. However, perhaps the NCRA should mind their own backyards. NCRAs profited from predatory trigger leads (selling inquiry data for spam), banned effective March 2026 [63] [64] [65]. CFPB actions underscore issues: In January 2025, Equifax paid \$15 million for mishandling disputes; Experian faced suits for sham investigations [66] [67] [68] [69] [70].

### **The Need for Unbiased Research Over Industry Self-Defense**

Equifax's audacity in defending the status quo—where unreliable data requires three bureaus amid double-digit hikes—prioritizes profits over squeezed homeowners. We must distrust papers from CRA veterans like Cutts and demand an independent, multi-faceted study to evaluate the MBA proposal fairly. Only then can we foster a competitive, consumer-focused system.

### **About the Author:**

Erin Dee has over two decades of experience in mortgage lending and servicing under her belt, tackling everything from operations and risk management to capital markets and technology. Her passion for industry advocacy stands out in her regular podcast and speaking engagements. A scholar at heart, Erin earned her B.S. in Finance with University Honors from the University of Central Florida and went on to achieve an M.B.A. in Finance from Nova Southeastern University. Erin currently serves as the Chief Operating Officer of

Interlinc Mortgage, is co-host of the Basis Points podcast, and is the current President of the Texas Mortgage Bankers Association.

Following the COVID era low interest rate environment, Erin has become increasingly concerned with the long-term sustainability of our communities amid a spike in government debt which has led to inflation that has crippled the American homeowner. “Higher for longer” interest rates, rising costs and reduced buying power for wages that have not substantially increased is posing an existential crisis, with younger generations feeling that homeownership is totally out of their grasp. Erin is determined to foster conversations for how we can be better stewards of our communities and the families that sustain them.

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