



**THE FAIR CREDIT REPORTING ACT:
ACCESS, EFFICIENCY & OPPORTUNITY**
**THE ECONOMIC IMPORTANCE OF
FAIR CREDIT REAUTHORIZATION**

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June 2003

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The Information Policy Institute, a 501 c (6) not for profit corporation, is the premier center for research, education and outreach on issues pertaining to the regulation of the Information Economy, both in the United States and internationally. Harnessing the collective wisdom of a diverse group of academic specialists, veteran business executives and seasoned policy experts, the Information Policy Institute seeks to engage the full range of contemporary policy debates shaping the contours of the Information economy.

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I. EXECUTIVE SUMMARY

I. Executive Summary

A. BACKGROUND

By most accounts, the consumer credit marketplace in the United States is the envy of the world. In 30 short years, fragmented local credit markets—characterized by undifferentiated prices on credit, highly subjective application processes, and limited access—have evolved into a national consumer credit marketplace distinguished by dynamic competition among lenders and broad participation by most American consumers. This marketplace has played a significant role in fostering consumer spending that stimulates economic growth.

Consumer credit underpins much of the consumer spending that accounts for more than two-thirds of the U.S. gross domestic product. The following are some of the features of this marketplace:

- Between 1970 and 2001, the overall share of families with general-purpose credit cards increased from 16 to 73 percent (Federal Reserve).
- Previously underserved groups have greater access to credit. The percentage of households in the lowest income quintile with a credit card has increased from 2 percent in 1970 to 28 percent in 2001. During the same period, the percentage of African American households with credit cards has more than doubled, from 23.6 percent to 55.8 percent (Federal Reserve).
- Competition, credit scoring, and technology have reduced the consumer's price for credit card credit. Assuming constant prices for credit card credit since 1997, we estimate the consumer savings from the increased competition in the credit card industry to be about \$30 billion per year from 1998 to 2002 (see endnote 51).

Trends in the mortgage market are much the same. Housing is a significant economic sector, and the percent of American families who own homes has grown to 68 percent in recent years. Credit is essential to homeownership, which is often the largest purchase a consumer ever makes.

The development of the secondary market—coupled with intense competition and the use of increasingly sophisticated technologies and risk management tools—has transformed a

fragmented, inefficient system dominated by local savings and loan associations to a highly sophisticated national market with ready access to capital throughout the world. For the U.S. economy, this spending has helped bolster economic growth. For consumers, the net result has been expanded access and lower costs. For example:

- Between 1983 and 2001, the share of families with home-secured debt rose from 36 to 45 percent. Over the same period of time, the percentage of families who own their homes increased from 60 to 68 percent (see Table 3).
- The largest gains were achieved by families who have traditionally been underserved. For example, between 1983 and 2001, the minority homeownership rate increased from 34 to 47 percent (see Table 4).
- The relative costs of a mortgage have dropped significantly. For example, if spreads today were at their early 1980s levels, the interest rate on a 30 year fixed rate mortgage would be at least one percent higher than it is today. This translates into \$54 billion in annual savings to consumers (see endnote 54).

The development of a competitive national market for consumer credit has required lenders to assess the risk associated with a particular loan based on the applicant's credit history. Lenders are able to do this today because of a national credit reporting system centered around three national credit bureaus. This system makes it possible for lenders to determine the risk associated with specific borrowers, regardless of where they live; and is, in part, responsible for enabling lenders to compete for consumers nationally. Moreover, in the United States, credit reporting is "full-file"—positive experiences with consumers are reported to bureaus as well as negative ones.

Since 1970, the Fair Credit Reporting Act (FCRA) has provided a national standard for ensuring the accuracy and security of the information contained in credit reports. Amendments to the FCRA made in 1996 strengthened this national standard by preempting state and local governments from enacting measures in several areas considered crucial to the national credit reporting system. The 1996 preemptions are due to sunset January 1, 2004.

B. RESEARCH PROGRAM

Our research suggests that the market for consumer credit has matured in interesting and important ways, largely to the benefit of consumers. However, the principal aim of our

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research is to examine whether or not a loss of the existing framework of preemption would threaten the benefits currently enjoyed by consumers. We also consider the impact on consumers of possible modifications made at the federal level to that framework, where these modifications are consistent with the state legislative proposals examined in this report.

Our quantitative analysis considers the following areas of inquiry:

- (1) Has automated underwriting contributed to the availability of home mortgage loans and increased homeownership? If so, who has been affected, and how? How would changes to the framework of preemptions enacted in 1996 affect automated underwriting practices?
- (2) Has the ability to prescreen made consumer credit markets more competitive? If so, how would restrictions on this method of customer acquisition affect the cost and availability of consumer credit? Do prescreened credit card offers contribute to identity theft? If prescreening is not essential to risk-based pricing or credit decision-making, are there other benefits that justify its preempted status?
- (3) Have uniform national standards for credit reporting contributed to the ability of credit grantors to model risk? If so, would certain types of federal or state legislative activity in areas currently preempted by the FCRA diminish the quality and quantity of data available in credit reports? And how would this affect the availability and price of credit, particularly for traditionally underserved populations?

C. KEY FINDINGS

1. HOME MORTGAGES: LOWER PRICES, INCREASED ACCESS, AND GREATER CHOICE

In the past, manual underwriters were forced to weigh the various strengths and weaknesses of an individual's loan application in making their lending decisions—an inherently subjective process that made the system vulnerable to bias, however unintended. In contrast, automated underwriting provides an objective, performance-based tool for assessing these kinds of trade-offs in a way that treats every applicant the same. If the framework of preemption created in 1996 is permitted to sunset, it is likely that the benefits arising from automated underwriting would be placed at risk. Likewise, if this framework of preemption is modified in a manner consistent with state legislative proposals, the consumer benefits stemming from AUS could be threatened. As discussed in our analysis of full-file credit reporting, deterioration in the quality and quantity of the data contained in credit reports would significantly affect the predictive power of automated underwriting models.

Based on an extensive literature review, we found that the introduction of credit scoring and automated underwriting into the mortgage market has generated sizeable benefits to both consumers and, more broadly, to others affected by this economic sector:

- (1) Automated underwriting consistently does a better job of identifying loans that ultimately “perform” – loans that do not experience a serious delinquency or default. The greater precision of automated underwriting results in higher approval rates, particularly for underserved populations. For example, a recent study found that using one of these tools resulted in approval rates improving by 29 percent for minority borrowers (Gates, Perry, and Zorn).
- (2) Automated underwriting systems permit consumers to react quickly to changes in the market, and allow underwriters to accommodate high volumes of activity during these periods. In 2002, the Federal Reserve estimates that homeowners were able to extract some \$700 billion of accumulated equity from their homes, prompted by the lowest interest rates in 35 years, according to the Federal Reserve Board.
- (3) Before the advent of automated underwriting, approving a loan application took close to three weeks; in 2002, over 75 percent of all loan applications received approval in two to three minutes (Mortech).
- (4) The introduction of automated underwriting into the mortgage market has also significantly reduced the cost of closing a loan, making homeownership more accessible to families with income and wealth constraints. Based on the number of sales of homes in 2002, automated underwriting saved consumers at least \$18.75 billion (Gates, Perry, and Zorn).

2. THE RELATIONSHIP BETWEEN FULL-FILE CREDIT REPORTING AND UNIFORM NATIONAL DATA STANDARDS

Building on an earlier generation of research on credit reporting, we constructed a case study based on six commercial scoring models that are in widespread use today. We created four different scenarios, based on either allowing the FCRA's strengthened preemption provisions to expire or modifying them in ways suggested by current state legislative proposals examined in this report. Using these four scenarios, we predicted the potential effect on the quality and quantity of information contained in consumer credit reports under each scenario.

We then examined what would happen to the performance of the six commercial scoring models under each of the different scenarios and measured the impact this would have on the availability and the cost of credit. Separately, we considered the consequences for consumers, both in the aggregate and according to various demographic attributes for one of the commercial scoring models.



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Our model yielded a number of interesting findings:

- (1) *Either acceptance rates would decline or delinquencies would increase under all four scenarios.* For example, in the “most severe” scenario, at standard acceptance rates, delinquencies would increase by about 70 percent, costing consumers about \$22 billion a year. Or, if access to credit were restricted to maintain the current delinquency rate, 30 percent of those now granted general purpose credit would be denied it under this scenario. This could prevent as many as 41 million people from receiving new credit card accounts.
- (2) *In general, the kinds of changes envisioned in our four scenarios would alter the credit scores of a high proportion of consumers.* For example, under each of the four scenarios, roughly 88 percent of all consumers would experience a change in their calculated credit score as measured by one of the commercial scoring models used.
- (3) *The predictive power of scoring models would likely decline.* The greatest impact appears to occur when there are restrictions on the kinds of negative data that can be contained in the consumer’s credit report. In the most “severe scenario” considered, the reduction in predictive power of the various scoring models would range from about 10 to 15 percent. By almost any yardstick, such changes would result in a dramatic decline in the industry’s ability to measure credit risk.

3. THE RELATIONSHIP BETWEEN PRESCREENING AND COMPETITIVE CREDIT MARKETS

Robust data on consumer credit history has enabled the development of progressively more sophisticated risk models. These models have radically improved the ability of credit issuers to identify good credit risks. Prescreening, in turn, enables issuers to compete for these desirable borrowers more effectively by permitting them to identify these good credit risks en masse and solicit their business.

In tandem, these innovations have moved the industry away from a regime of cross-subsidization toward one of risk-tiering. In the risk-tiering regime, responsibility is rewarded, access is broadened, and borrowers are extended credit in accordance with their credit capacity and credit worthiness.

This regime change has led to a dramatic increase in access to consumer credit, particularly for traditionally underserved groups. Our analysis suggests that restricting prescreening would increase the cost of credit and reduce access to credit. As recently as 12 years ago, access to credit cards was primarily for the affluent, and most borrowers paid dearly for credit. The high interest rate was the result of a system in which low-risk borrowers were forced to cross-subsidize higher-risk borrowers, and access was limited.

We surveyed major credit card providers to collect information from them on the customer acquisition channels they currently use, the costs of acquiring new customers with current channels, and the methods they would use to acquire customers in the absence of prescreening. Based on the response of five of these credit providers, which collectively issue almost half of all MasterCard and VISA accounts, we constructed a “model” issuer of credit cards.

Survey responses strongly suggest that prescreening has played a critical role in the competitiveness observed in consumer credit markets:

- (1) *Prescreening has helped to dramatically lower the interest rate on credit card balances.* Increased competition, driven in part by prescreening, has caused interest rates today to be more widely dispersed (and lower overall) than they were in 1990. In 1990, only six percent of card balances were below 6.5 percent, and 93 percent were above 16.5 percent APR. Indeed, by 2002 almost three-quarters (74 percent) of all outstanding balances were at interest rates below 18 percent, while an incredible 15 percent of balances were at interest rates under 5.5 percent. On the other end, only 24 percent of outstanding balances had interest rates above 18 percent.
- (2) *Prescreening is the most important method of acquiring new customers.* Our survey finds that prescreened offers of credit account for more than two-thirds of all new customers acquired. In contrast, the next most popular method, direct mail not prescreened, accounted for only 17 percent of the new customers acquired.
- (3) *The cost of acquiring new customers would increase, and access would decrease if prescreening is restricted.* Our model credit card issuer currently spends an average of \$57.86 to acquire a new customer. In contrast, in the absence of prescreening, this cost would increase to between \$60.78 and \$72.62 depending on the model credit card issuer’s response to the problem of customer acquisition. We estimate that in the absence of prescreening, total costs to consumers would increase between \$269 million to \$1.36 billion per year.
- (4) *Prescreened offers of credit are not driving the rise in identity theft.* In fact, prescreened offers of credit have a lower incidence of identity theft and application fraud than other forms of customer acquisition. Prescreened solicitations are subject to the same procedures for fraud detection as other forms of customer acquisition, and other fraud prevention procedures specific to prescreening.

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D. CONCLUSION

In all areas of inquiry, we find that federal preemption has contributed significantly to the benefits currently enjoyed by consumers. On the other side of the ledger, we see few quantifiable direct or indirect costs. Loss of the existing framework of preemption, or changes to that framework consistent with state legislative proposals examined in this report, would threaten the benefits currently enjoyed by consumers. Congressional action is therefore urgently recommended to reauthorize the framework of preemption that has been in place since 1996.

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