July 29, 2026

The Honorable William J. Pulte
Federal Housing Finance Agency
400 7th Street, SW
Washington, D.C. 20219

Re: Next Steps in the Credit Score Transition – Enhancing Multi-Score Acceptance and Investor Disclosure Frameworks

Dear Director Pulte:

The Structured Finance Association ("SFA") appreciates the opportunity to provide follow-up commentary regarding the ongoing implementation of the credit score transition at the Government Sponsored Enterprises ("GSEs"), Fannie Mae and Freddie Mac. As the leading trade association representing the securitization market—including investors, issuers, and operational intermediaries—SFA's membership has a vital stake in ensuring that any modifications to the core pricing, underwriting, and disclosure frameworks of the RMBS market maintain the highest standards of transparency, predictability, and liquidity.

SFA commends the Federal Housing Finance Agency and the GSEs for the substantial operational and collaborative work completed to date. As this transition progresses from initial delivery mechanics into a mature, comprehensive multi-score paradigm, SFA emphasizes that our historical core principles remain paramount. These principles include:

• **Maximizing Transparency:** Institutional investors require robust, consistent data models to accurately price credit, model prepayment speeds, and assess risk profiles across economic cycles.

• **Operational Feasibility:** Systemic overhauls should minimize unnecessary implementation costs and technical burdens on originators, aggregators, and technology vendors.

• **Market Liquidity:** Policy adjustments must guard against the fragmentation of the To-Be-Announced ("TBA") market, which remains the cornerstone of affordable housing finance in the United States.

Expanding GSE Capabilities for Multi-Score Loan Acceptance

While the baseline acceptance of individual scores represents vital progress, SFA strongly recommends that the FHFA direct the GSEs to take operational steps to enable accepting loans characterized by multiple distinct credit scores within the same application or loan file.

Agency MBS investors continue to express a desire for additional loan-level data. This preference may be manifested in premiums for bonds backed by loans with the most robust data available, i.e., loans with multiple scores. This preference can drive pricing competition in a feedback loop that will ultimately result in lower mortgage rates for consumers.

However, if the GSEs lack the operational capacity to process loans with multiple scores, or to disclose loan-level data on loans that were delivered with multiple scores, that feedback loop will be ineffective, as investors will lack the data necessary to express pricing-based preferences. Enabling the GSEs to accept multi-score loan files and to subsequently disclose multi-score loans will better align secondary market mechanics with modern underwriting realities and foster true competition between credit score providers.

Standardizing Multi-Score Pool-Level Disclosures for Investors

The secondary mortgage market's long-term stability hinges on transparency at the security level combined with clarity at the collateral level. As loans utilizing different credit score models are mixed into standard GSE pools, SFA urges the FHFA to establish explicit guidelines for pool-level disclosures delivered to MBS investors.

To prevent market fragmentation and avoid liquidity discounts on pools containing newer credit models, investors must receive granular, standardized disclosures that explicitly delineate the distribution of credit scores within each pool. SFA recommends that disclosures provide detailed flags indicating which score model (or combination of models) was utilized for each underlying loan. Without clear, comprehensive disclosure at the pool level, the analytical complexity of valuing mixed-score pools could impair pricing execution, widen spreads, and ultimately increase borrowing costs for consumers.

Conclusion

SFA stands ready to assist the FHFA, Fannie Mae, and Freddie Mac in executing these next operational phases. We look forward to convening industry workgroups to refine specific data fields for disclosure templates and to help establish technical standards for multi-score delivery. By prioritizing robust investor disclosure and expanding delivery mechanics to encompass multi-score loan structures, the FHFA will successfully complete a modernized, resilient, and highly competitive credit scoring framework.

Sincerely,

Dallin Merrill
Head of Policy
Structured Finance Association