

SECTOR COMMENT

8 May 2018

Rate this Research



Analyst Contacts

Warren Kornfeld +1.212.553.1932 Senior Vice President warren.kornfeld@moodys.com

Lan Wang, CFA +1.212.553.7761

Associate Analyst
lan.wang@moodys.com

Brian L. Harris +1.212.553.4705 Senior Vice President/ Manager

Ana Arsov +1.212.553.3763
Managing Director Financial Institutions

CLIENT SERVICES

brian.harris@moodys.com

ana.arsov@moodys.com

Americas 1-212-553-1653
Asia Pacific 852-3551-3077
Japan 81-3-5408-4100
EMEA 44-20-7772-5454

Banks and Finance Companies - United States

Underwriting standards for credit cards and auto loans tighten modestly, a positive

Summary

The latest Senior Loan Officer Opinion Survey (SLOOS), released today, 8 May, reveals a modest tightening of bank underwriting standards for approving credit card and auto loan applications during the first quarter of 2018, a mild credit positive. Standards for residential mortgages were largely unchanged.¹

Consumers are in better shape than they have been in quite some time, but there is a risk that they will take on too much credit in the present accommodative environment. Auto loan underwriting remains weak, and we expect credit card underwriting to deteriorate, despite the modest tightening indicated by the SLOOS survey. Our concern stems from lenders' tendency to grow complacent and increase the risk in their consumer loan portfolios, thinking they have plenty of time to tighten before the next downturn. Time and time again, lenders have proved unable to tighten in time.

Exhibit 1 summarizes underwriting standards and trends for credit cards, auto loans, and residential mortgages, including the current quarter SLOOS results and our projections.

Exhibit 1

Auto underwriting remains weak; cards and residential mortgages expected to loosen

Current underwriting standards compared to historical standards

	Current underwriting standards vs. historical standards*	Trend over last two years	Current quarter's Senior Loan Officer Opinion Survey results	Moody's projected trends
Credit cards	Looser end of historically average standards	Very modest tightening	Modest tightening	Loosening to moderately weak standards
Auto loans	Weak	Modest tightening	Very modest tightening	Remains weak
Residential mortgages	Tighter end of historically average standards	Modest loosening	Largely neutral	Loosening to average standards
Legend:				
Credit negative	Modest credit negative	Neutral	Modest credit positive	Credit positive

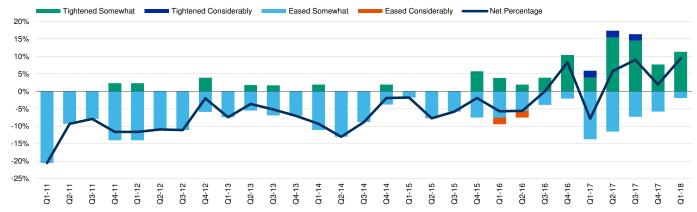
^{*}Historical standards from the last twenty-five years or so. Source: Federal Reserve, Moody's Investors Service

Credit Cards: continued modest tightening of average underwriting standards

As shown in Exhibit 2, first quarter results indicate continued modest tightening of credit card underwriting standards. Of particular significance is that only one bank out of 53 surveyed reported modest loosening. The banks indicated that they had tightened standards with respect to minimum credit scores. Despite these results, we forecast a net deterioration in standards over the next 12-18 months.

We have been flagging a deterioration in credit card underwriting over the last several years, which resulted in the change of our credit card outlook to stable from positive in July 2017. We believe credit card underwriting is still at the looser end of average historical standards over the last twenty-five years or so. Given the solid employment market, high consumer confidence, and the strong profitability reported by bank's credit card segments, we expect underwriting standards to again begin deteriorating despite the modest tightening reported in the first quarter.

Exhibit 2
Credit cards: Average underwriting standards tighten moderately
Underwriting standards for application approvals for credit cards



Source: Federal Reserve

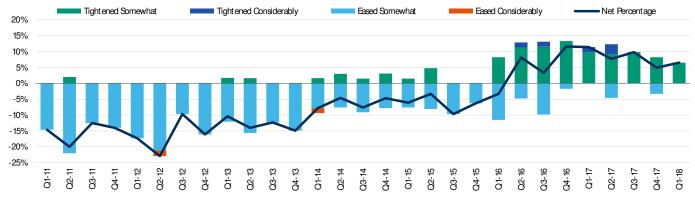
Auto Loans: continued modest tightening of weak underwriting standards

As shown in Exhibit 3, first quarter results indicate auto loan underwriting continued to tighten, but only very modestly. We continue to believe that auto loan underwriting is weak. Loan losses have been only slightly above historical averages from the last twenty-five years or so, but they should be much lower given the strong economy. This points to underlying risk in the loan portfolios that is well above historical standards. Over the last two years, auto loan underwriting has tightened somewhat and loan growth has also slowed, a credit positive. But underwriting is unlikely to tighten sufficiently to reflect underlying risk because of the solid employment market and high consumer confidence.

This publication does not announce a credit rating action. For any credit ratings referenced in this publication, please see the ratings tab on the issuer/entity page on www.moodys.com for the most updated credit rating action information and rating history.

Exhibit 3

Auto: Underwriting standards are weak despite modest tightening
Underwriting standards for application approvals for auto loans



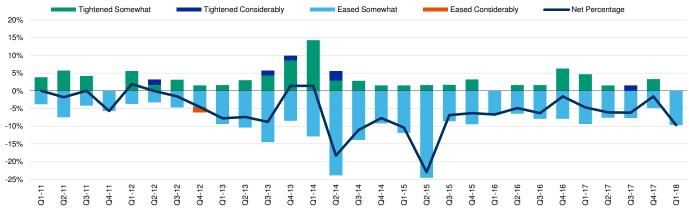
Source: Federal Reserve

Residential Mortgages: largely unchanged solid underwriting standards

Banks reported little change in underwriting standards for most residential mortgages. However, as shown in Exhibit 4, first quarter results indicate that underwriting standards modestly loosened for qualified mortgage (QM) jumbo mortgages, continuing the trend of the last several years. Of interest is that no surveyed bank reported a tightening of standards for QM jumbo mortgages.

Outstanding residential mortgage loan balances have recently increased a bit as purchase origination volume has increased and as underwriting standards have been loosening. Nonetheless, residential mortgage underwriting is on the tighter end of historically average standards from the last twenty-five years or so. Given the generally tight underwriting standards, we expect residential mortgage underwriting to continue loosening over the next 12-18 months, normalizing toward historical average underwriting standards.

Exhibit 4
Residential mortgage: Solid underwriting standards continue despite modest loosening
Underwriting standards for application approvals for prime/QM jumbo residential mortgages



Source: Federal Reserve

Endnotes

1 Two caveats to the implications of the survey responses, however, are that they reflect only the banks' own view of their underwriting and that non-banks, which are not surveyed, have meaningful market shares in auto loans and residential mortgages.

© 2018 Moody's Corporation, Moody's Investors Service, Inc., Moody's Analytics, Inc. and/or their licensors and affiliates (collectively, "MOODY'S"). All rights reserved.

CREDIT RATINGS ISSUED BY MOODY'S INVESTORS SERVICE, INC. AND ITS RATINGS AFFILIATES ("MIS") ARE MOODY'S CURRENT OPINIONS OF THE RELATIVE FUTURE CREDIT RISK OF ENTITIES, CREDIT COMMITMENTS, OR DEBT-LIKE SECURITIES, AND MOODY'S PUBLICATIONS MAY INCLUDE MOODY'S CURRENT OPINIONS OF THE RELATIVE FUTURE CREDIT RISK OF ENTITIES, CREDIT COMMITMENTS, OR DEBT OR DEBT-LIKE SECURITIES. MOODY'S DEFINES CREDIT RISK AS THE RISK THAT AN ENTITY MAY NOT MEET ITS CONTRACTUAL, FINANCIAL OBLIGATIONS AS THEY COME DUE AND ANY ESTIMATED FINANCIAL LOSS IN THE EVENT OF DEFAULT. CREDIT RATINGS DO NOT ADDRESS ANY OTHER RISK, INCLUDING BUT NOT LIMITED TO: LIQUIDITY RISK, MARKET VALUE RISK, OR PRICE VOLATILITY. CREDIT RATINGS AND MOODY'S OPINIONS INCLUDED IN MOODY'S PUBLICATIONS ARE NOT STATEMENTS OF CURRENT OR HISTORICAL FACT. MOODY'S PUBLICATIONS MAY ALSO INCLUDE QUANTITATIVE MODEL-BASED ESTIMATES OF CREDIT RISK AND RELATED OPINIONS OR COMMENTARY PUBLISHED BY MOODY'S ANALYTICS, INC. CREDIT RATINGS AND MOODY'S PUBLICATIONS AND MOODY'S PUBLICATIONS ARE NOT AND DO NOT PROVIDE RECOMMENDATIONS TO PURCHASE, SELL, OR HOLD PARTICULAR SECURITIES. NEITHER CREDIT RATINGS NOR MOODY'S PUBLICATIONS COMMENT ON THE SUITABILITY OF AN INVESTMENT FOR ANY PARTICULAR INVESTOR. MOODY'S ISSUES ITS CREDIT RATINGS AND PUBLISHES MOODY'S PUBLICATIONS WITH THE EXPECTATION AND UNDERSTANDING THAT EACH INVESTOR WILL, WITH DUE CARE, MAKE ITS OWN STUDY AND EVALUATION OF EACH SECURITY THAT IS UNDER CONSIDERATION FOR PURCHASE, HOLDING, OR SALE.

MOODY'S CREDIT RATINGS AND MOODY'S PUBLICATIONS ARE NOT INTENDED FOR USE BY RETAIL INVESTORS AND IT WOULD BE RECKLESS AND INAPPROPRIATE FOR RETAIL INVESTORS TO USE MOODY'S CREDIT RATINGS OR MOODY'S PUBLICATIONS WHEN MAKING AN INVESTMENT DECISION. IF IN DOUBT YOU SHOULD CONTACT YOUR FINANCIAL OR OTHER PROFESSIONAL ADVISER. ALL INFORMATION CONTAINED HEREIN IS PROTECTED BY LAW, INCLUDING BUT NOT LIMITED TO, COPYRIGHT LAW, AND NONE OF SUCH INFORMATION MAY BE COPIED OR OTHERWISE REPRODUCED, REPACKAGED, FURTHER TRANSMITTED, TRANSFERRED, DISSEMINATED, REDISTRIBUTED OR RESOLD, OR STORED FOR SUBSEQUENT USE FOR ANY SUCH PURPOSE, IN WHOLE OR IN PART, IN ANY FORM OR MANNER OR BY ANY MEANS WHATSOEVER, BY ANY PERSON WITHOUT MOODY'S PRIOR WRITTEN CONSENT.

CREDIT RATINGS AND MOODY'S PUBLICATIONS ARE NOT INTENDED FOR USE BY ANY PERSON AS A BENCHMARK AS THAT TERM IS DEFINED FOR REGULATORY PURPOSES AND MUST NOT BE USED IN ANY WAY THAT COULD RESULT IN THEM BEING CONSIDERED A BENCHMARK.

All information contained herein is obtained by MOODY'S from sources believed by it to be accurate and reliable. Because of the possibility of human or mechanical error as well as other factors, however, all information contained herein is provided "AS IS" without warranty of any kind. MOODY'S adopts all necessary measures so that the information it uses in assigning a credit rating is of sufficient quality and from sources MOODY'S considers to be reliable including, when appropriate, independent third-party sources. However, MOODY'S is not an auditor and cannot in every instance independently verify or validate information received in the rating process or in preparing the Moody's publications.

To the extent permitted by law, MOODY'S and its directors, officers, employees, agents, representatives, licensors and suppliers disclaim liability to any person or entity for any indirect, special, consequential, or incidental losses or damages whatsoever arising from or in connection with the information contained herein or the use of or inability to use any such information, even if MOODY'S or any of its directors, officers, employees, agents, representatives, licensors or suppliers is advised in advance of the possibility of such losses or damages, including but not limited to: (a) any loss of present or prospective profits or (b) any loss or damage arising where the relevant financial instrument is not the subject of a particular credit rating assigned by MOODY'S.

To the extent permitted by law, MOODY'S and its directors, officers, employees, agents, representatives, licensors and suppliers disclaim liability for any direct or compensatory losses or damages caused to any person or entity, including but not limited to by any negligence (but excluding fraud, willful misconduct or any other type of liability that, for the avoidance of doubt, by law cannot be excluded) on the part of, or any contingency within or beyond the control of, MOODY'S or any of its directors, officers, employees, agents, representatives, licensors or suppliers, arising from or in connection with the information contained herein or the use of or inability to use any such information.

NO WARRANTY, EXPRESS OR IMPLIED, AS TO THE ACCURACY, TIMELINESS, COMPLETENESS, MERCHANTABILITY OR FITNESS FOR ANY PARTICULAR PURPOSE OF ANY SUCH RATING OR OTHER OPINION OR INFORMATION IS GIVEN OR MADE BY MOODY'S IN ANY FORM OR MANNER WHATSOEVER.

Moody's Investors Service, Inc., a wholly-owned credit rating agency subsidiary of Moody's Corporation ("MCO"), hereby discloses that most issuers of debt securities (including corporate and municipal bonds, debentures, notes and commercial paper) and preferred stock rated by Moody's Investors Service, Inc. have, prior to assignment of any rating, agreed to pay to Moody's Investors Service, Inc. for appraisal and rating services rendered by it fees ranging from \$1,500 to approximately \$2,500,000. MCO and MIS also maintain policies and procedures to address the independence of MIS's ratings and rating processes. Information regarding certain affiliations that may exist between directors of MCO and rated entities, and between entities who hold ratings from MIS and have also publicly reported to the SEC an ownership interest in MCO of more than 5%, is posted annually at www.moodys.com under the heading "Investor Relations — Corporate Governance — Director and Shareholder Affiliation Policy."

Additional terms for Australia only: Any publication into Australia of this document is pursuant to the Australian Financial Services License of MOODY'S affiliate, Moody's Investors Service Pty Limited ABN 61 003 399 657AFSL 336969 and/or Moody's Analytics Australia Pty Ltd ABN 94 105 136 972 AFSL 383569 (as applicable). This document is intended to be provided only to "wholesale clients" within the meaning of section 761G of the Corporations Act 2001. By continuing to access this document from within Australia, you represent to MOODY'S that you are, or are accessing the document as a representative of, a "wholesale client" and that neither you nor the entity you represent will directly or indirectly disseminate this document or its contents to "retail clients" within the meaning of section 761G of the Corporations Act 2001. MOODY'S credit rating is an opinion as to the creditworthiness of a debt obligation of the issuer, not on the equity securities of the issuer or any form of security that is available to retail investors. It would be reckless and inappropriate for retail investors to use MOODY'S credit ratings or publications when making an investment decision. If in doubt you should contact your financial or other professional adviser.

Additional terms for Japan only: Moody's Japan K.K. ("MJKK") is a wholly-owned credit rating agency subsidiary of Moody's Group Japan G.K., which is wholly-owned by Moody's Overseas Holdings Inc., a wholly-owned subsidiary of MCO. Moody's SF Japan K.K. ("MSFJ") is a wholly-owned credit rating agency subsidiary of MJKK. MSFJ is not a Nationally Recognized Statistical Rating Organization ("NRSRO"). Therefore, credit ratings assigned by MSFJ are Non-NRSRO Credit Ratings. Non-NRSRO Credit Ratings are assigned by an entity that is not a NRSRO and, consequently, the rated obligation will not qualify for certain types of treatment under U.S. laws. MJKK and MSFJ are credit rating agencies registered with the Japan Financial Services Agency and their registration numbers are FSA Commissioner (Ratings) No. 2 and 3 respectively.

MJKK or MSFJ (as applicable) hereby disclose that most issuers of debt securities (including corporate and municipal bonds, debentures, notes and commercial paper) and preferred stock rated by MJKK or MSFJ (as applicable) have, prior to assignment of any rating, agreed to pay to MJKK or MSFJ (as applicable) for appraisal and rating services rendered by it fees ranging from JPY200,000 to approximately JPY350,000,000.

MJKK and MSFJ also maintain policies and procedures to address Japanese regulatory requirements.

REPORT NUMBER 1123791

CLIENT SERVICES

 Americas
 1-212-553-1653

 Asia Pacific
 852-3551-3077

 Japan
 81-3-5408-4100

 EMEA
 44-20-7772-5454

