



April 28, 2026

2905 Corporate Circle

Flower Mound, TX 75028

Phone: 972-353-4174

Fax: 972-221-9316

Partners

Shawn P. Black ¹

Ryan Black ²

Daniel S. Engle ³

Steven Kubik

Senior Lawyers

Margaret A. Noles

Sydney Davis

Associates

Jodi Sealy

Of Counsel

David M. Tritter

Gregory S. Graham ⁴

Retired Partner(s)

Calvin C. Mann, Jr.*

Thomas E. Black, Jr.*

Gregory S. Graham ⁴

To: Clients and Friends

From: Daniel S. Engle

Subject: Federal Housing Administration and Federal Housing Financing Agency Announce Expansion of Credit Score Models

On April 22, 2026 the Federal Housing Administration (“FHA”) and the Federal Housing Financing Agency (“FHFA”) made a joint announcement ([click here for FHFA release](#) and [click here for FHA release](#)) that Vantage Score 4.0 and FICO 10T will be permitted as eligible credit scoring models for mortgage loans.

Fannie Mae and Freddie Mac issued guidance on April 22, 2026, indicating how lenders may take advantage of this new development. Both Fannie Mae and Freddie Mac noted that VantageScore 4.0 is eligible for immediate use for approved lenders. They both stated that implementation of the FICO 10T score would follow at a future time. Interested lenders should contact Fannie Mae or Freddie Mac for details on how to become approved for use for VantageScore 4.0. Lenders who are not approved must continue to use Classic FICO. Fannie Mae’s Announcement SEL-2026-04 bulletin may be found [here](#) and Freddie Mac’s Bulletin 2026-D may be found [here](#).

This Memorandum is provided as general information in regard to the subject matter covered, but no representations or warranty of the accuracy or reliability of the content of this information are made or implied. Opinions expressed in this memorandum are those of the author alone. In publishing this information, neither the author nor the law firm of Black, Mann & Graham L.L.P. is engaged in rendering legal services. While this information concerns legal and regulatory matters, it is not legal advice and its use creates no attorney-client relationship or any other basis for reliance on the information. Readers should not place reliance on this information alone but should seek independent legal advice regarding the law applicable to matters of interest or concern to them. The law firm of Black, Mann & Graham L.L.P. expressly disclaims any obligation to keep the content of this information current or free of errors.

¹ Also Licensed in Kentucky and New York

² Also Licensed in District of Columbia

³ Also Licensed in New York

⁴ Also Licensed in Georgia

*Retired from the practice of law

Proposed Amendments to