



2024 Q4 Credit Risk Review

Trends and Early Risk Indicators in Consumer Credit

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February 2025

Executive Summary – Overall Consumer Credit

Credit Card



Personal Loans



Auto Loans



Student Loans



Mortgage & HELOC



- Delinquency rates continue to rise, especially in near-prime and prime
- 2023 and early 2024 vintages' risk levels stable relative to 2022
- Origination volumes trending down
- \$8 late fee regulation unlikely to go into effect

- Delinquencies remain below pre-pandemic levels due to early tightening
- Recent prime/ super prime PL origination vintages seeing worsening risk
- High credit card interest rates creating debt consolidation opportunity

- Auto loan delinquency rates continued to rise in Q4
- Origination volumes remained low in the 4th quarter compared to prior years
- Recent origination vintage risk levels look mostly stable, with some deterioration for super prime customers

- The student loan repayment grace period ended in September
- 30% of borrowers have missed at least one payment as of January 2024
- Full extent of delinquency impact will appear in Jan 2025 bureau data

- Mortgage originations are still yet to rebound, driven by still-elevated interest rates and high home prices
- Recent vintages are still performing in line with pre-pandemic (2018/2019) originations
- Homeowner equity reached an all-time high in Q4, boosting HELOC limits and utilization

Recent Quotes from Industry Leaders

“**Debt Settlement volumes continue to creep up** despite overall delinquencies flattening. **We're starting to see more activity outside of Cards and PLs**, in areas like Auto (deficiency balances) and Student Loans.”

“Who knows what inflation is going to do...it's **tough forecasting for such a wide range** of potential outcomes from the new policies”

“**I'm wondering when I'll get pressure to loosen credit** but not in this environment”

“It's been encouraging to see stability (in credit card delinquencies), but **I can't help but think there's another shoe to drop**. Increased unemployment? Tariff-driven inflation? **Student loan delinquencies spilling over to other asset classes?**”

“Things look good now, but I have no way to know what the new administration is going to do with tariffs and other policies...**my worry is that it's quiet before the storm**”

“I had trouble explaining to the EC **why credit risk was so benign in December**”

“**Feels like the dam is about to break on AI**, we're starting to design use cases that would have been impossible a year ago.”

Executive Summary – Credit Cards

Performance

- Delinquency (DQ) rates were up for all risk bands over the last few months, most acutely in near prime
- 2023 and 2024 vintages showed improved performance relative to 2022 as originations shifted towards less risky customers, but still performed worse than earlier years
- Roll rates remained high, and the 30-to-60 DPD rate was well above pre-pandemic levels

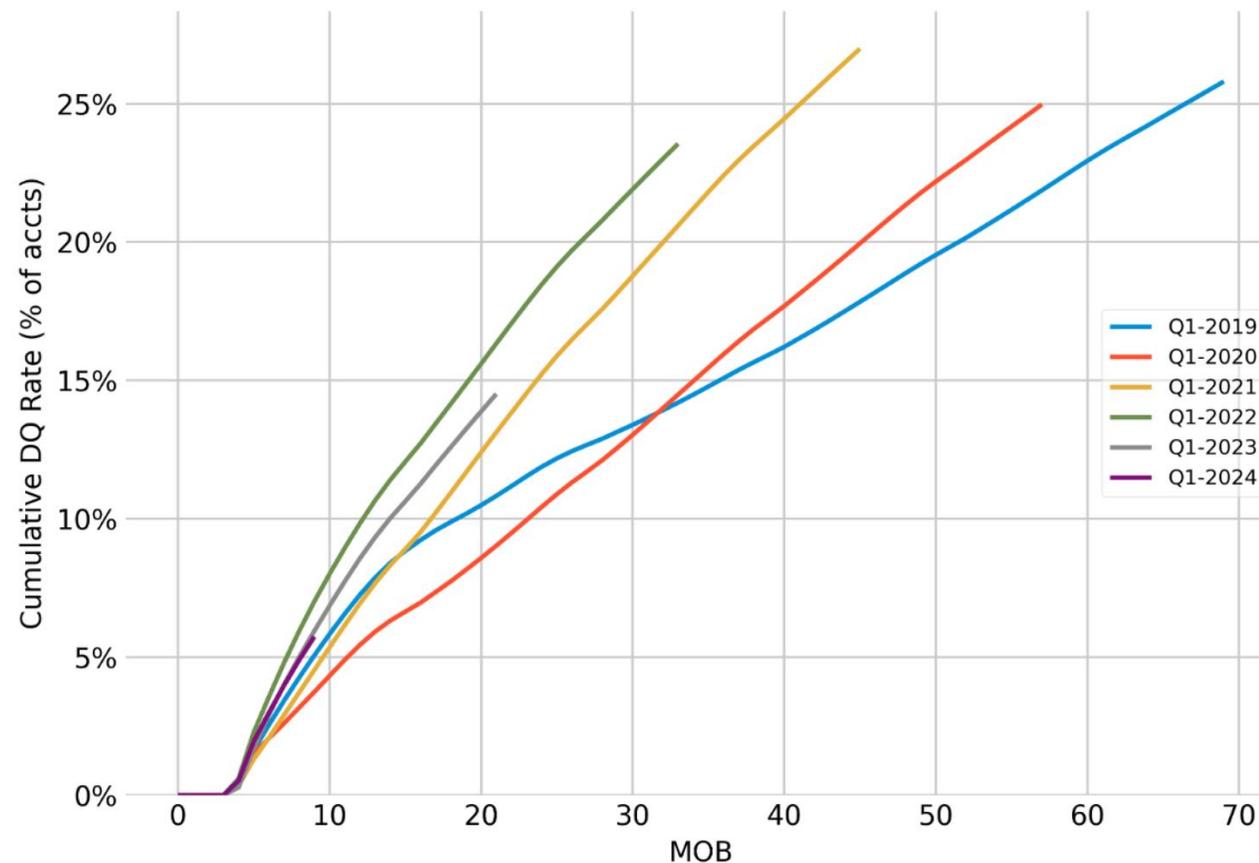
Balance

- Credit card debt continued growing across all risk bands and hovers around \$1.2T
- Subprime balances saw the largest increase from Q3

Originations

- Originations have fallen since 2023 and are stabilizing close to pre-pandemic levels
- The risk distribution among originated accounts reflected some continued tightening with a reduction in subprime originations and an increase in super prime originations
- Credit limits were stable this quarter, near pre-pandemic levels

Credit Card Cumulative 60+DPD Rate by Annual Vintage



Executive Summary – Personal Loans

Performance

- 60+ DPD rate continues to be stable since 2022 at levels lower than pre-pandemic
- Newer vintages (2022 and on) perform worse than older vintages despite a lower proportion of subprime originations

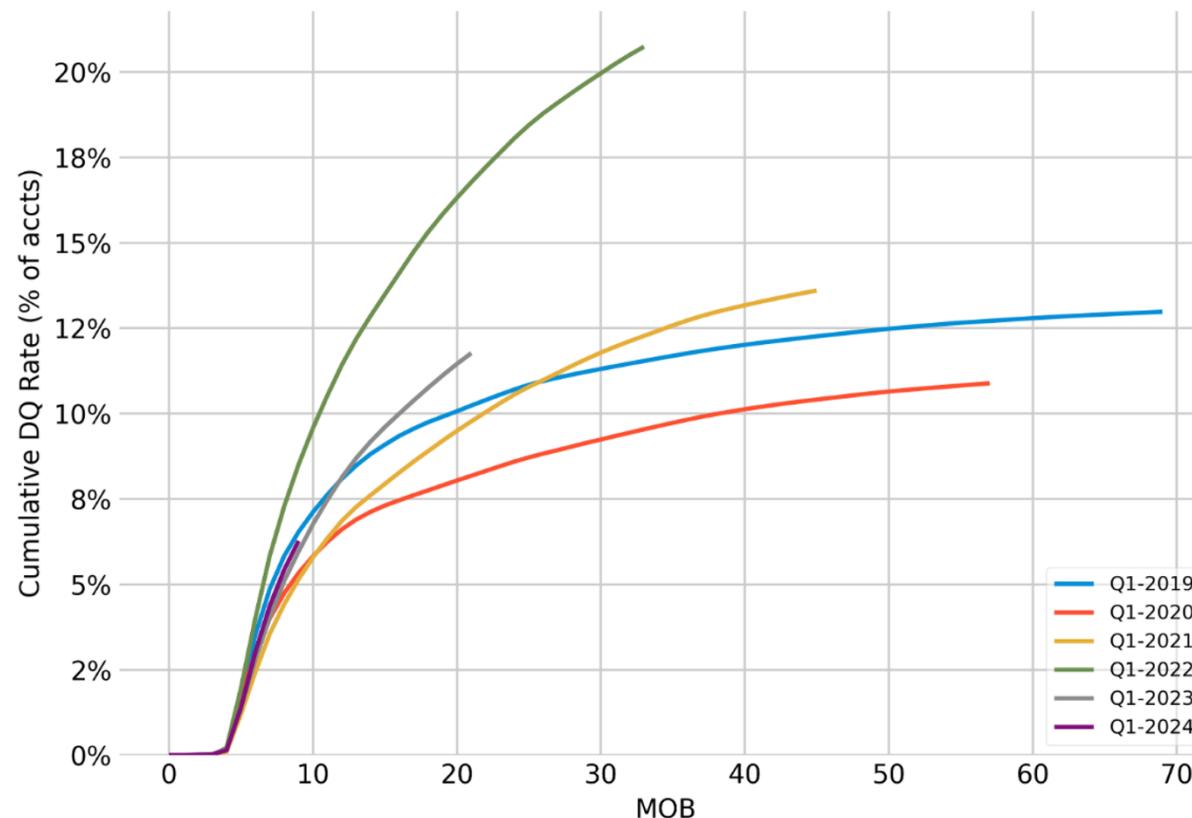
Balance

- Total industry PL has remained relatively steady since 2023 after an increasing trend over the past decade
- Super prime and subprime balance increases this quarter were offset by other bands' balances

Originations

- Origination volumes began decreasing in 2022 but appear to be leveling off as of late
- Subprime borrowers still took out more loans than other risk bands in recent originations, but fewer than they did pre-pandemic
- Average loan size remained well above pre-pandemic levels, primarily driven by a shift towards less risky consumers

Personal Loan Cumulative 60+DPD by Annual Vintage



Executive Summary – Auto Loans

Performance

- Vehicle prices increased in Q4 after a gradual reduction through the first half of 2024, but are still below 2022 and early 2023 levels
- Delinquency rates continued to rise to unprecedented levels (+18.6 bps compared to Q4 '23), with higher risk borrowers acting as the main driver of the increase
- Early 2024 vintages are slightly outperforming 2022 and 2023 but remain worse than 2019-2021 vintages

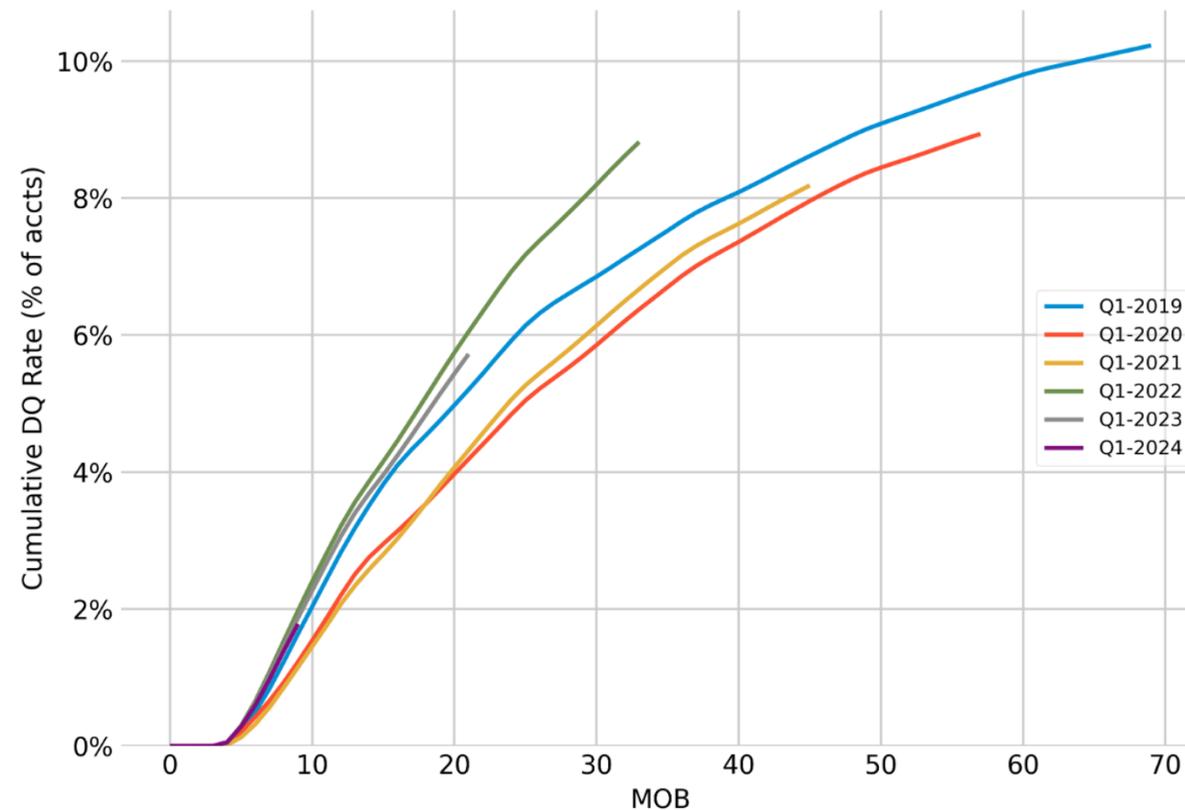
Balance

- Total auto debt was relatively stable this quarter, hovering around \$1.62 T
- Total balance owed by subprime and super prime borrowers grew, while balances dropped across all other risk bands

Originations

- Originations increased slightly over the last few months, but remained relatively stable throughout 2024
- The distribution of originated accounts shifted towards super prime borrowers, emphasizing the persistence of tightened underwriting and elevated costs

Auto Loan Cumulative 60+DPD by Annual Vintage



Executive Summary – Student Loan and Mortgage

Student Loan

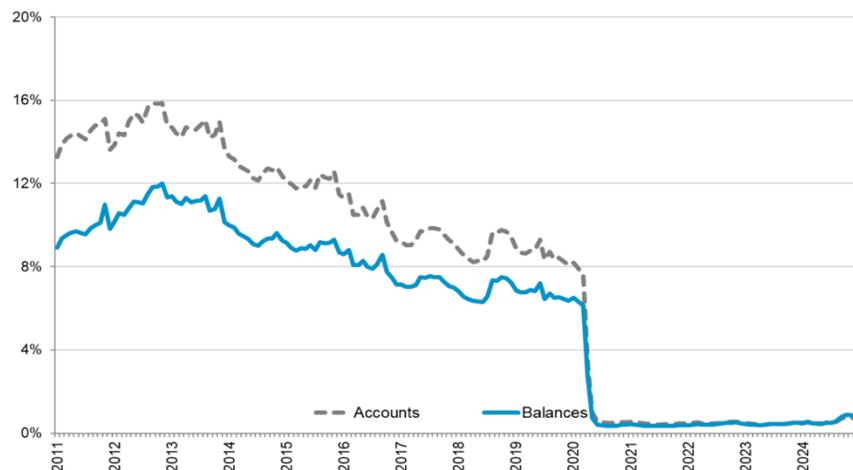
- While delinquencies are expected to be reported to the bureaus in January, we observed an early increase in severe delinquency rate in Q4 2024
- The severe delinquency rate could increase significantly as delinquencies flow through early stages
- Early data after the on-ramp period show student loan balances beginning to increase
- Average student loan borrowers age increased in Q4

Mortgage

- HELOC utilization and limits continued growing, likely due to the all-time high home equity and increasing house values in the US
- Mortgage rate increased in Q4 2024, reaching the high levels seen in early 2024
- 2024's mortgage originations continue underperforming pre-pandemic originations, but with some improvement relative to 2023
- Mortgage originations remained lower than pre-pandemic, in line with last year's trends

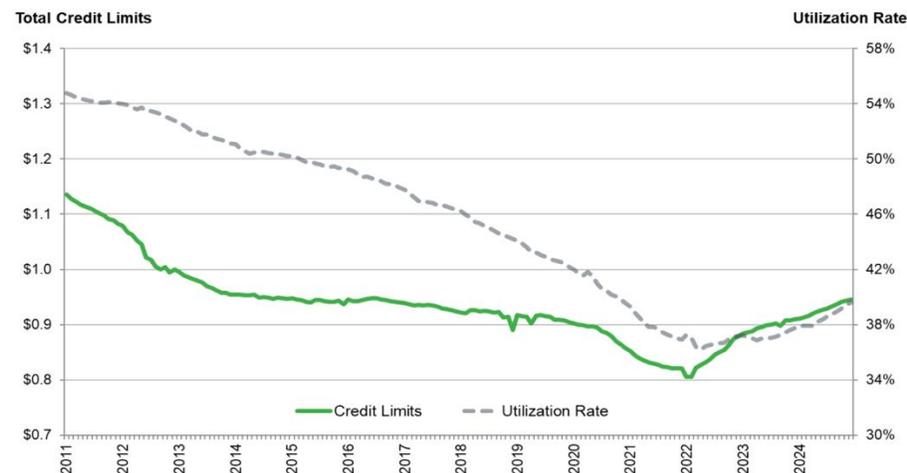
Severe Delinquency Rate

90+ Days Past Due or in Bankruptcy
Percent of Non-deferred Accounts and Balances; NSA; Excludes Severe Derogatory



Utilization and Credit Limit

Utilization Rate in %; NSA
Credit Limit in \$Trillions; NSA



Special Topic: Continued monitoring on potential post-inauguration impacts to consumer lending

Following President Donald Trump's re-election and inauguration, reporters and regulatory experts have been analyzing potential impacts on the consumer lending ecosystem.

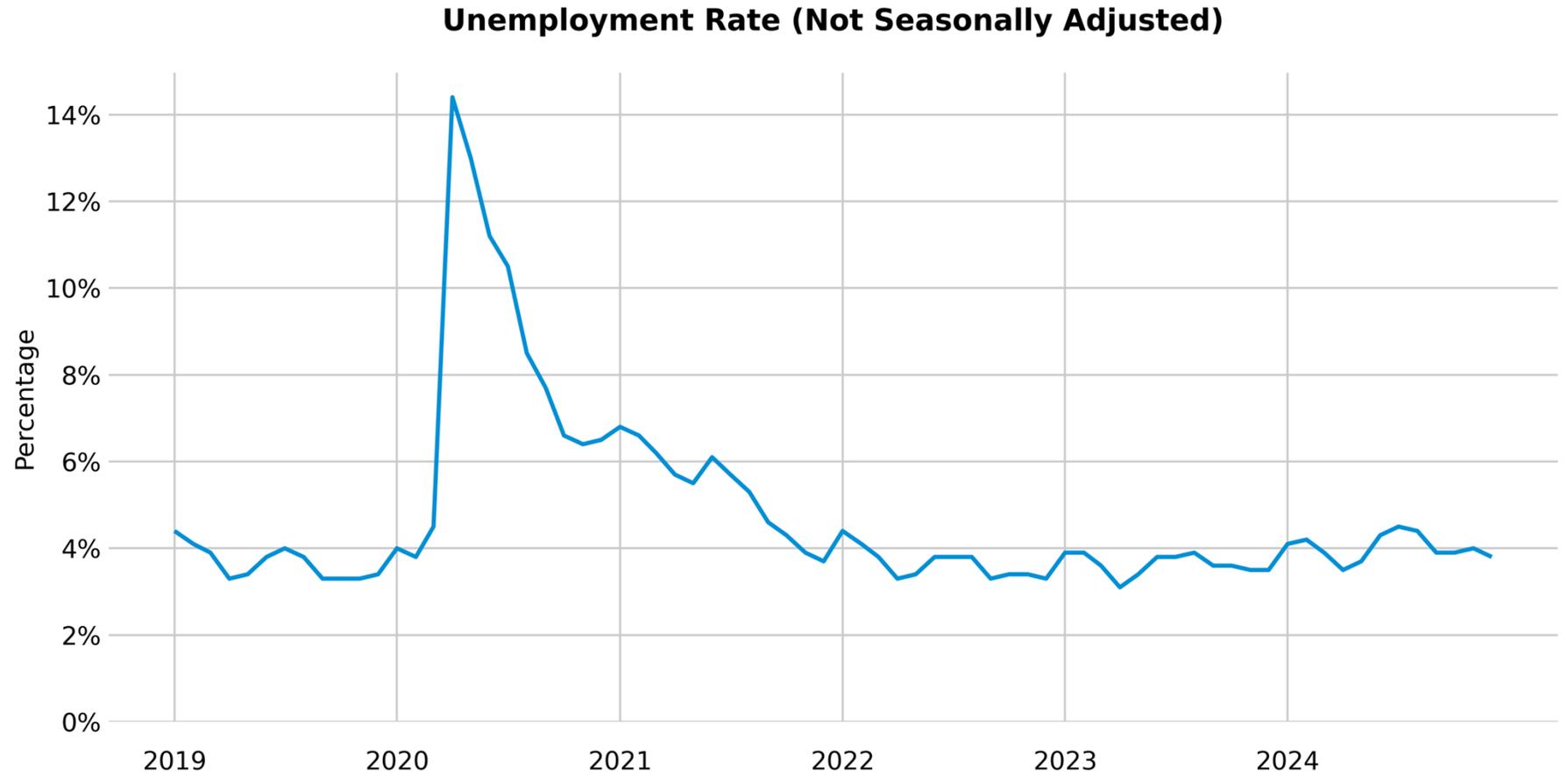
- **CFPB Administration Changes and Operational Hold:** CFPB Director Rohit Copra was removed from his post on February 1, 2025, with Treasury Secretary Bessent replacing him as acting director. Bessent immediately instituted a hold on most of the CFPB's operations. ([Bloomberg](#))
- **Late Fees:** The CFPB's attempt to dissolve an injunction restricting the new late fee rule was recently rejected. With the expected pull-back of the CFPB, issuers are starting to assume late fees will not be capped at \$8. ([ABA](#))
- **NSF Fees:** CFPB withdrew its proposal on barring banks from charging fees when transactions are declined in real time. The CFPB suggests it will reconsider its proposal for more comprehensive rules. ([Federal Register](#))
- **Credit Card Interest Rate Cap Proposal:** A bill proposed by Senators Hawley and Sanders would cap credit card interest rates at 10% for five years. The proposal already faces high levels of scrutiny from financial institutions and credit card issuers. ([American Banker](#), [Payments Dive](#))
- **Basel III Endgame:** The Bank of England announced that it would postpone implementing its version of global bank capital reforms by a year to January 2027 due to uncertainty over whether Trump might delay or repeal the regulations in the U.S. ([Reuters](#))
- **Open Banking:** With political support and industry momentum for the CFPB's Final 1033 Rule released in October, the rule continues to have a good chance to go into effect pending the outcome of an ongoing judicial challenge. ([Bloomberg Law](#))
- **SEC Cryptocurrency Bulletin Reversal:** The SEC recently reversed a 2022 bulletin that required banks to record and account for their customers' crypto assets at the assets' fair value. The reversal of the bulletin, along with President Trump's executive order on cryptocurrency, point towards the easing of regulation surrounding digital assets. ([ABA](#))
- **Executive Orders:** President Trump's flurry of executive actions at the start of his second term, including tariffs, government shrinkage, restructuring of AI guidance, and trade deals could have macroeconomic effects on consumer prices and spending. ([NPR](#))

*Note: This presentation is for informational purposes only and does not constitute financial, legal, or regulatory advice. The insights provided are based on current industry trends and should not be interpreted as definitive predictions about regulatory or macroeconomic developments.

- State of the Consumer
- Credit Card
- Personal Loan
- Auto Loan
- Student Loan
- Mortgage

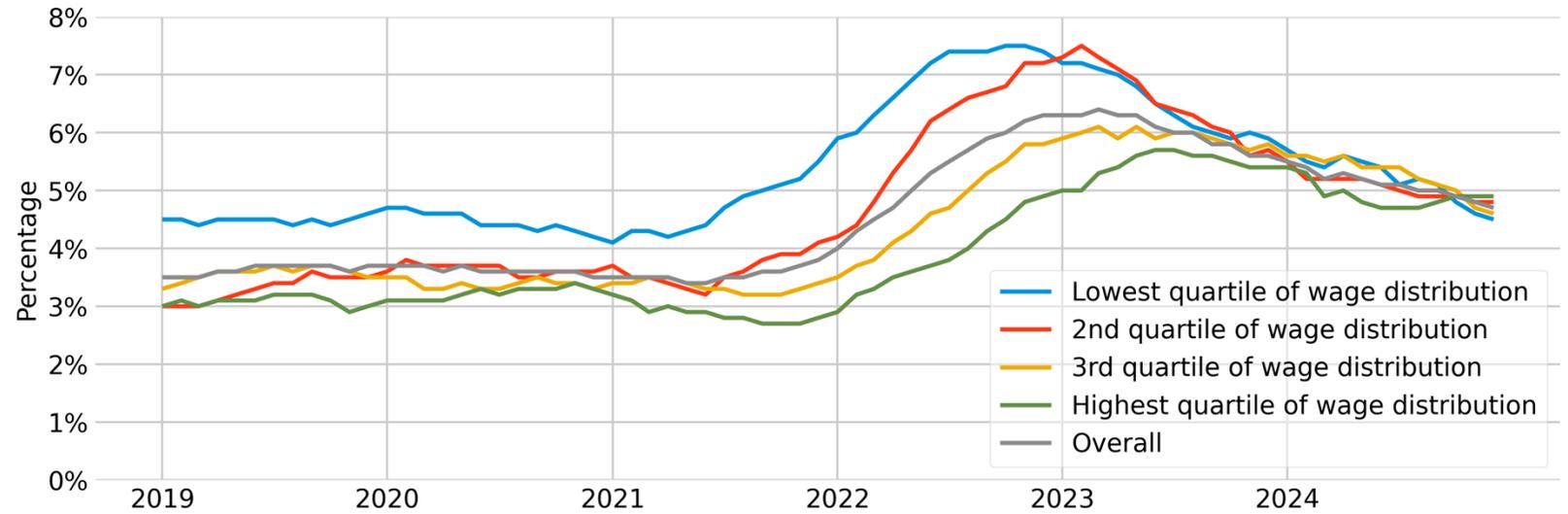


**Unemployment
remained low in
Q4**

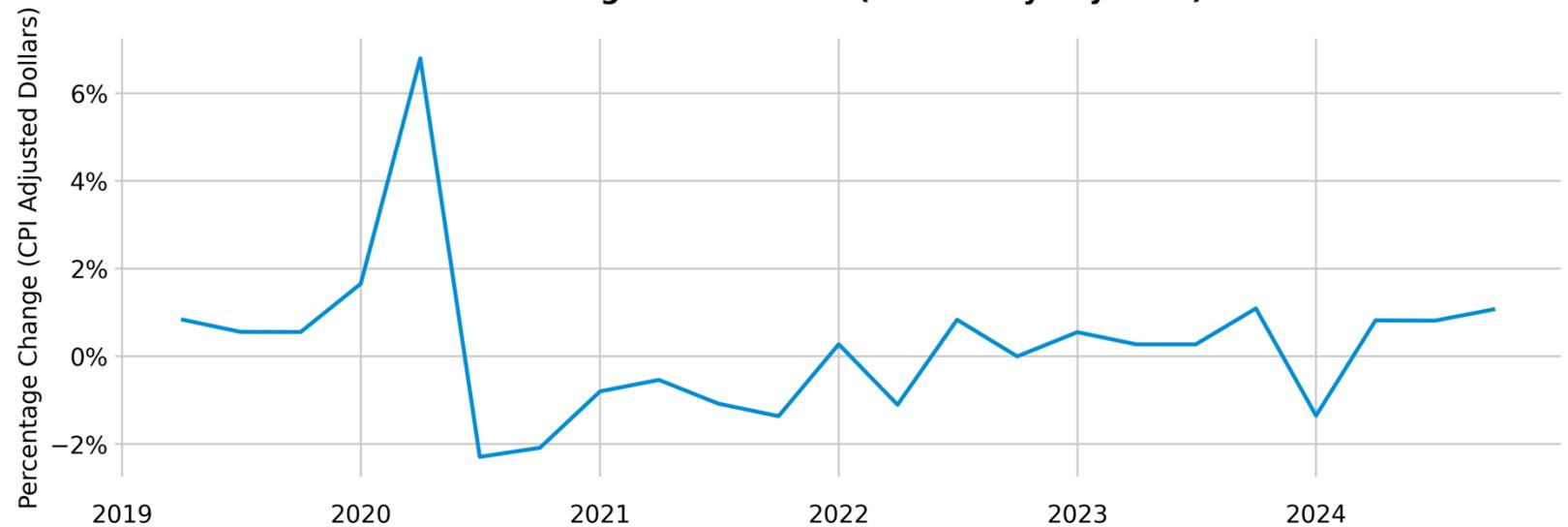


Overall wage growth continued decelerating and rank ordering shifted after recent convergence

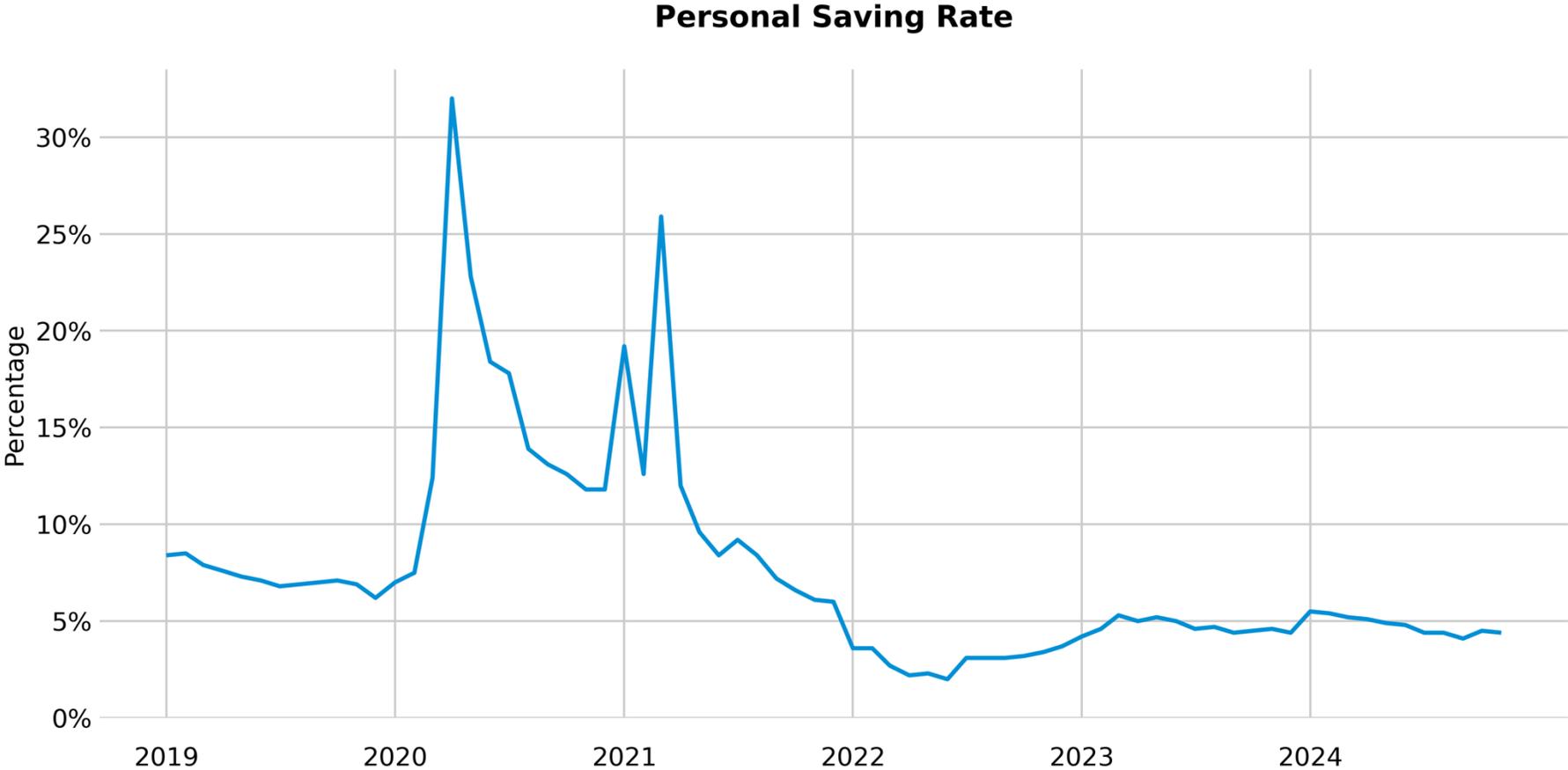
Wage Growth Rate By Wage Distribution



Real Wage Growth Rate (Seasonally Adjusted)



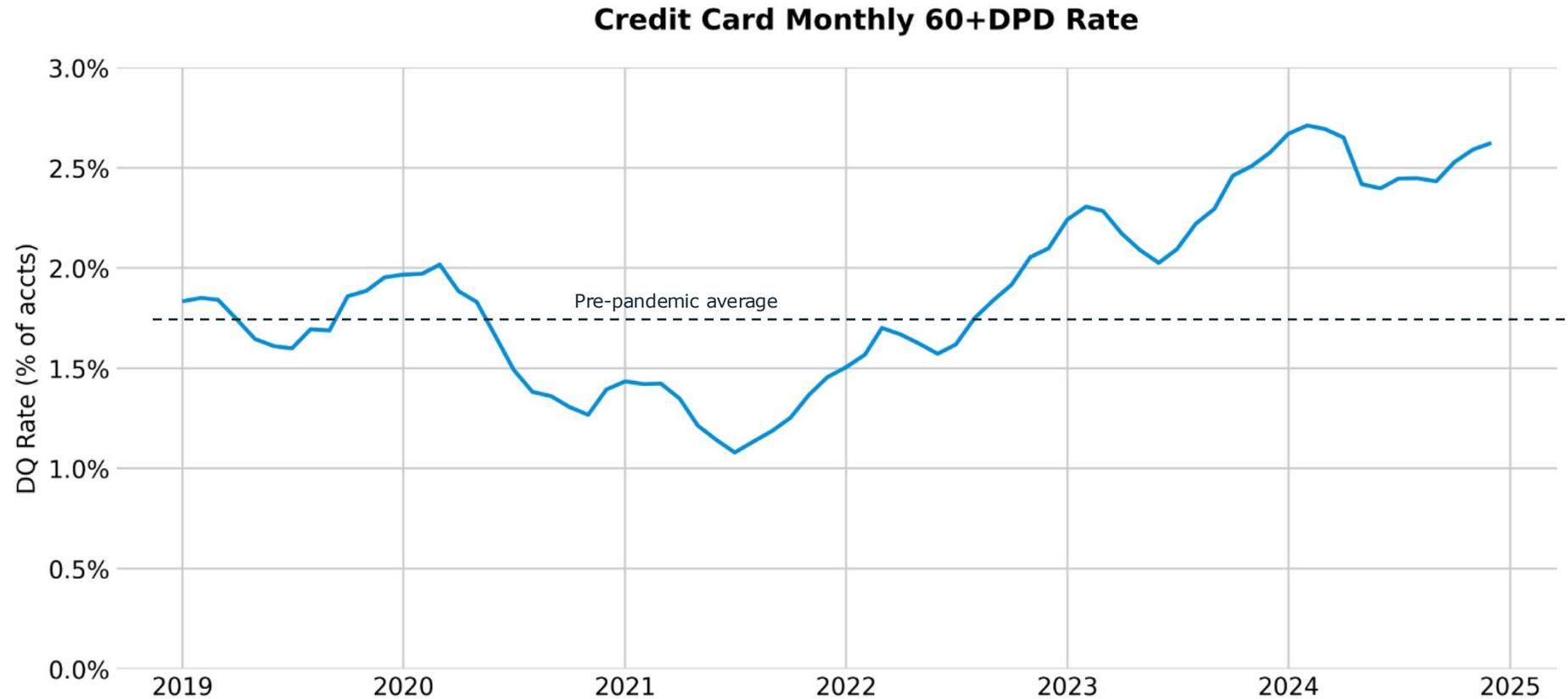
The personal saving rate decreased modestly this quarter but remained consistent with 2023 patterns at levels lower than pre-pandemic



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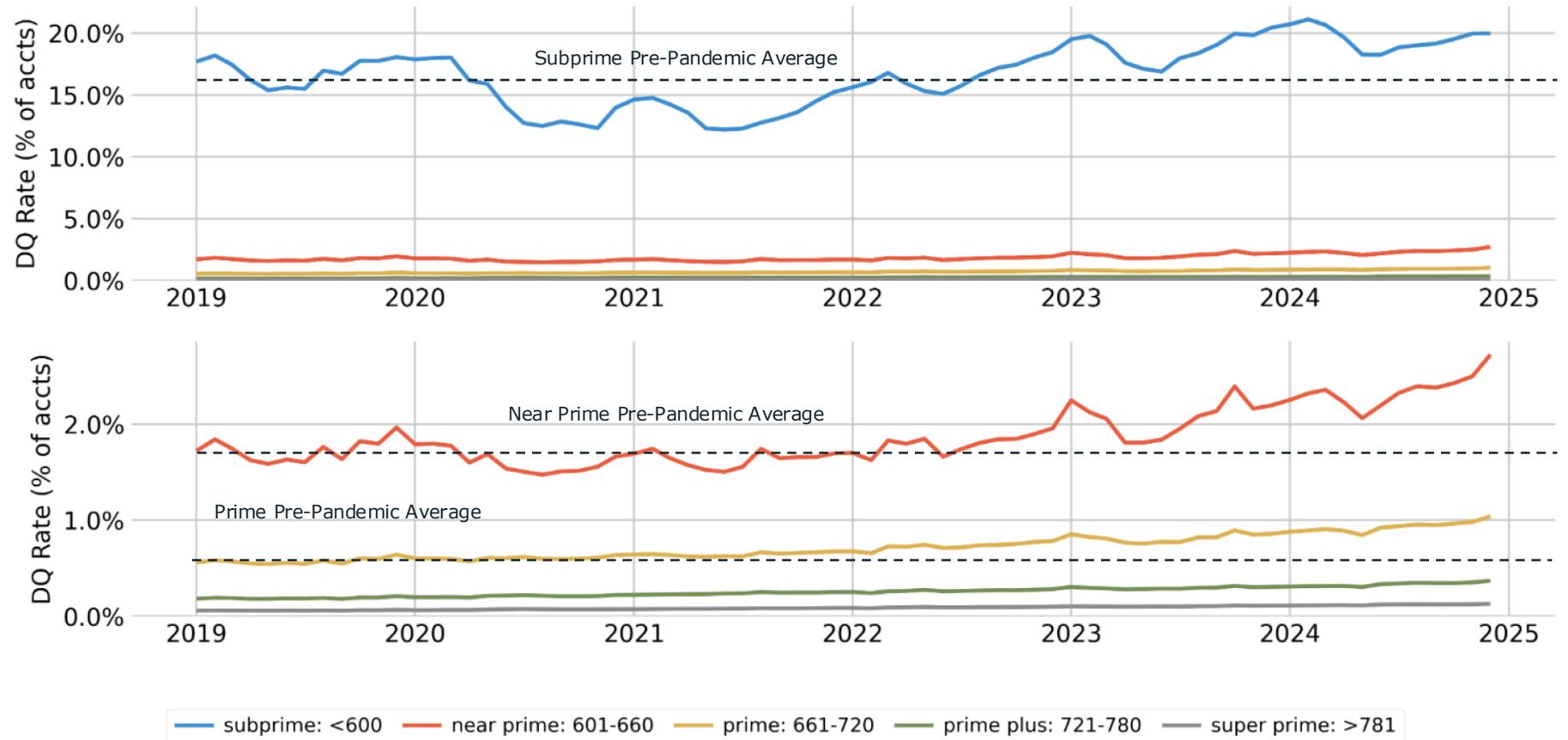
Credit card 60+ delinquencies continued rising in recent months, remaining well above pre-pandemic levels



Source: 2OS, Equifax Ignite. Data as of Dec. 31st, 2024

Near prime and prime delinquencies rose to post-pandemic highs, with acute impacts in near prime

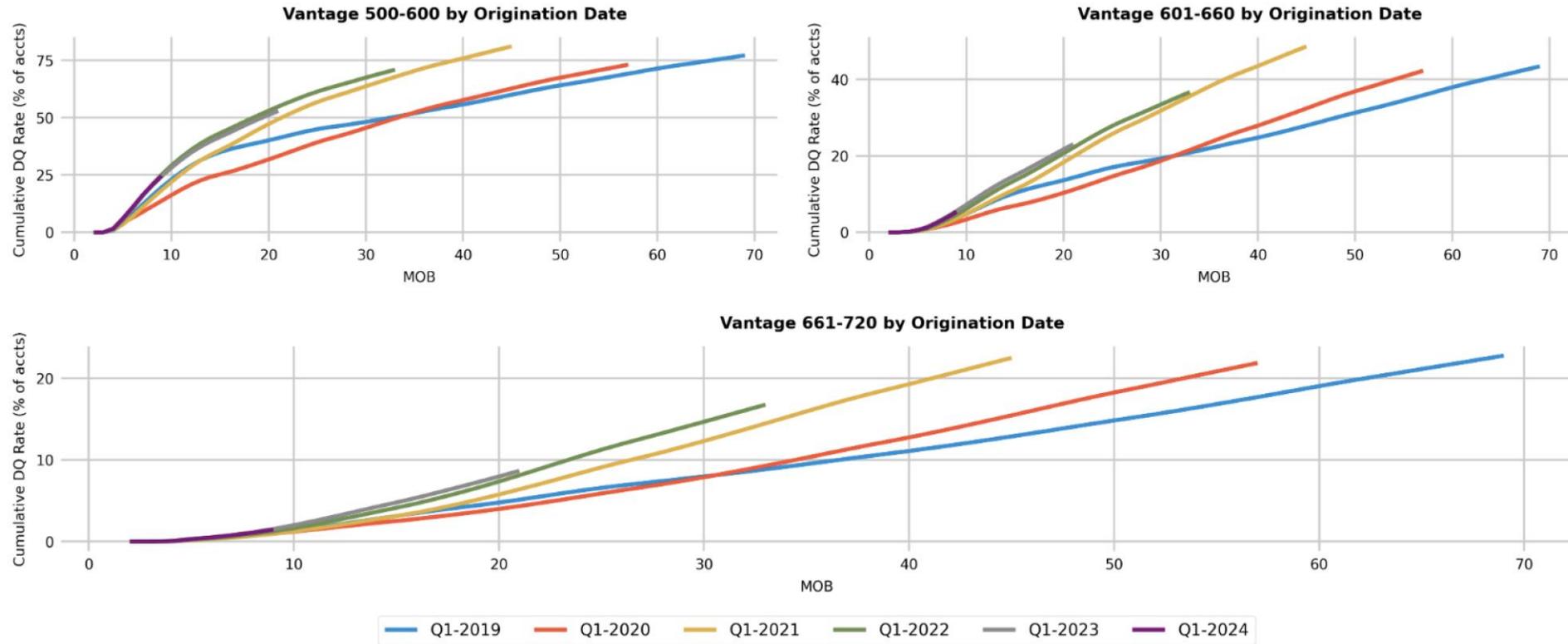
Credit Card Monthly 60+DPD Rate by Vantage



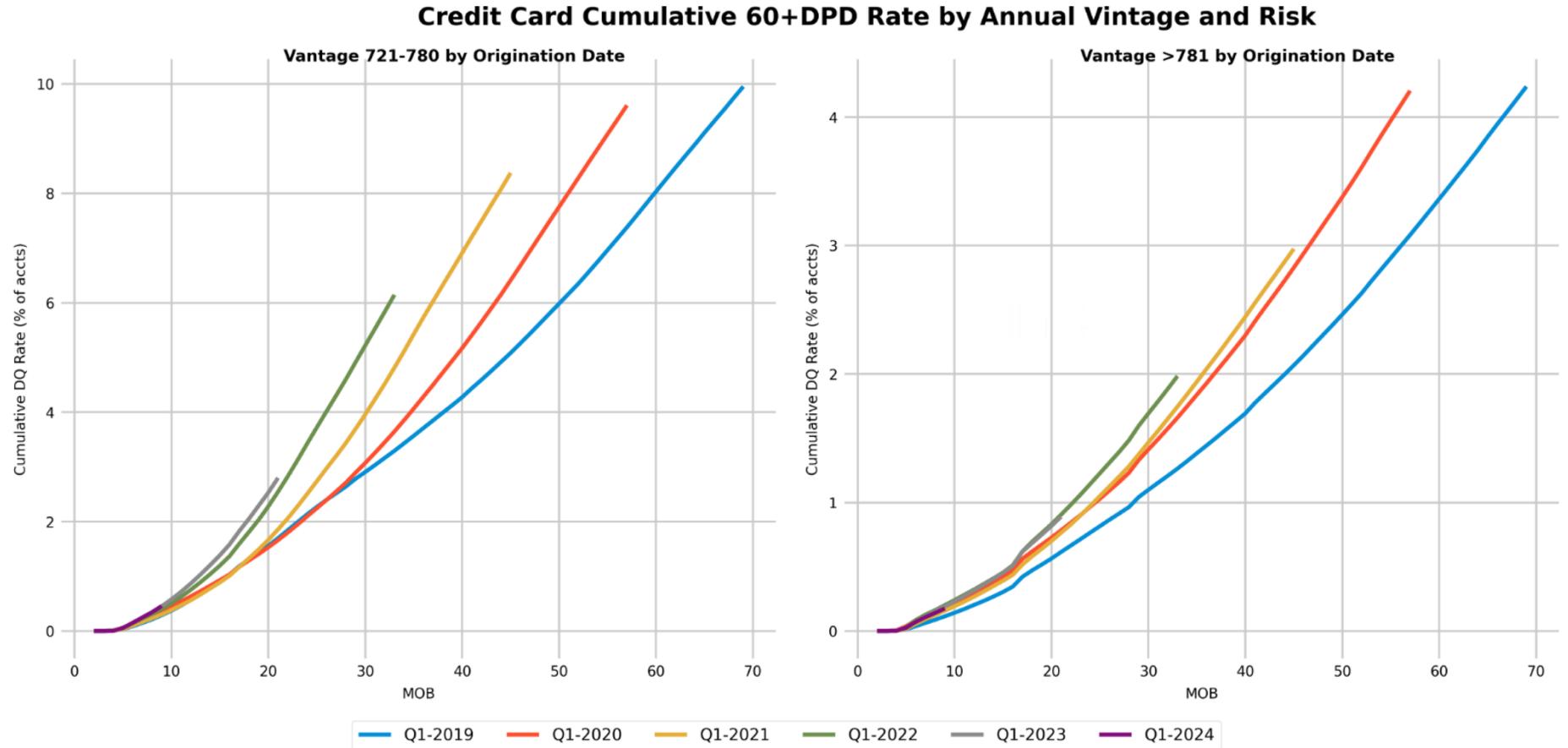
Source: 2OS, Equifax Ignite. Data as of Dec. 31st, 2024

Across risk bands, early 2024 vintages performed in-line with recent vintages and worse than older vintages (Slide 1 of 2)

Credit Card Cumulative 60+DPD Rate by Annual Vintage and Risk

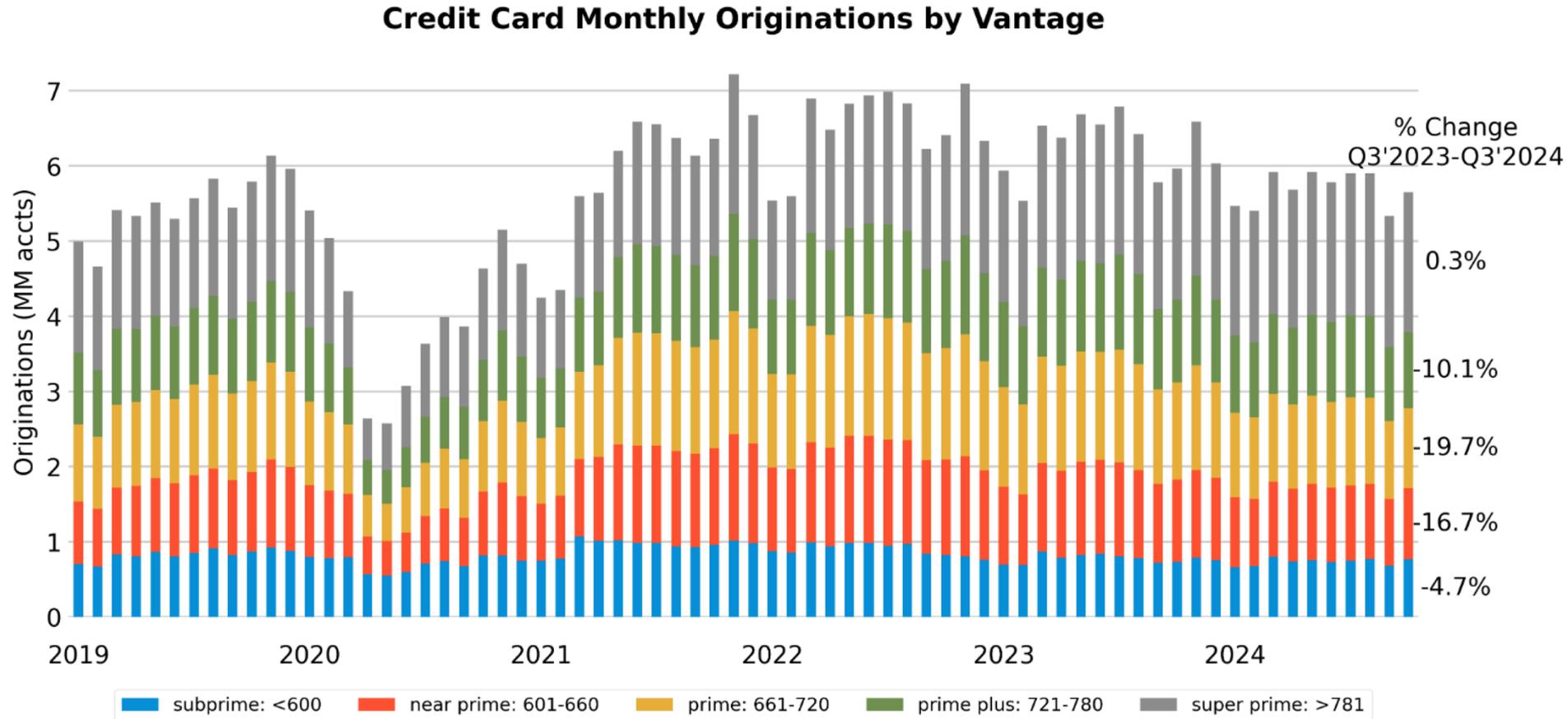


Across risk bands, early 2024 vintages performed in-line with recent vintages and worse than older vintages (Slide 2 of 2)



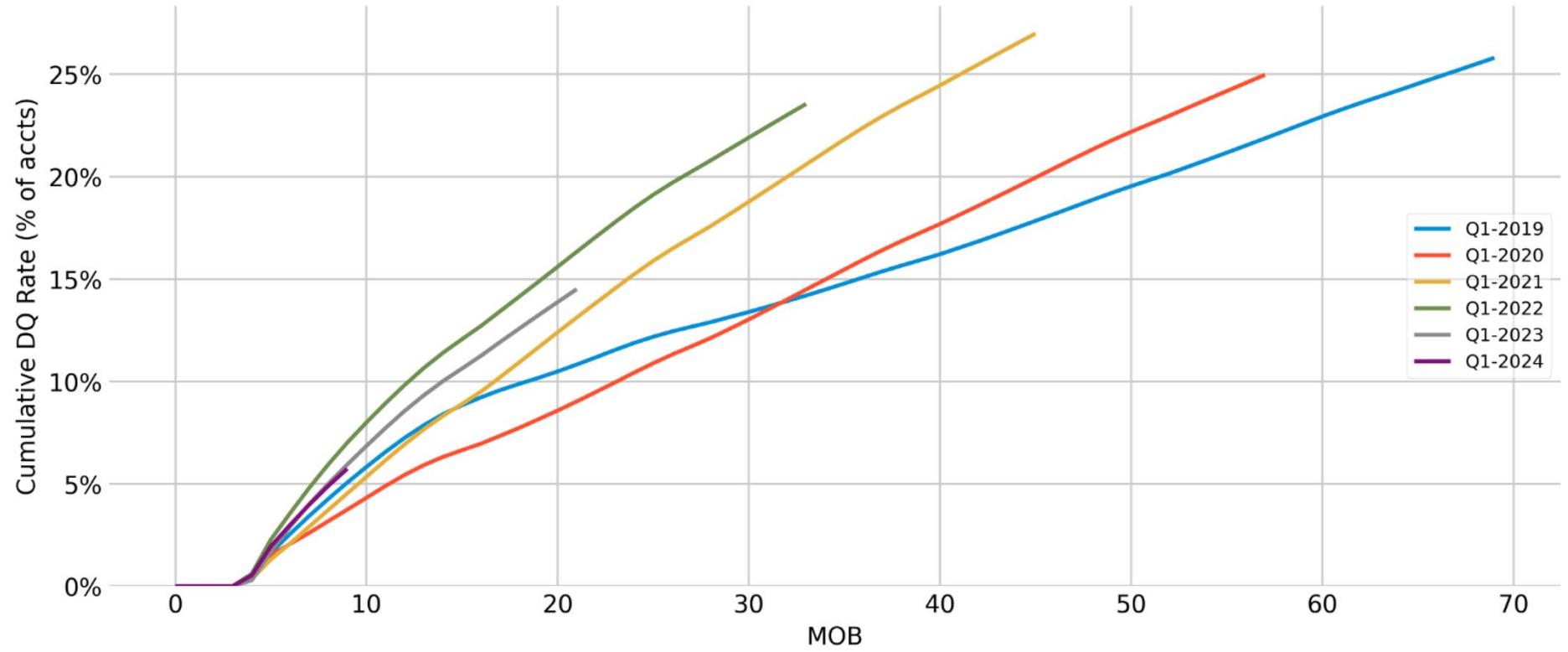
Source: 2OS, Equifax Ignite. Data as of Dec. 31st, 2024

2024 originations continued shifting towards less risky customers



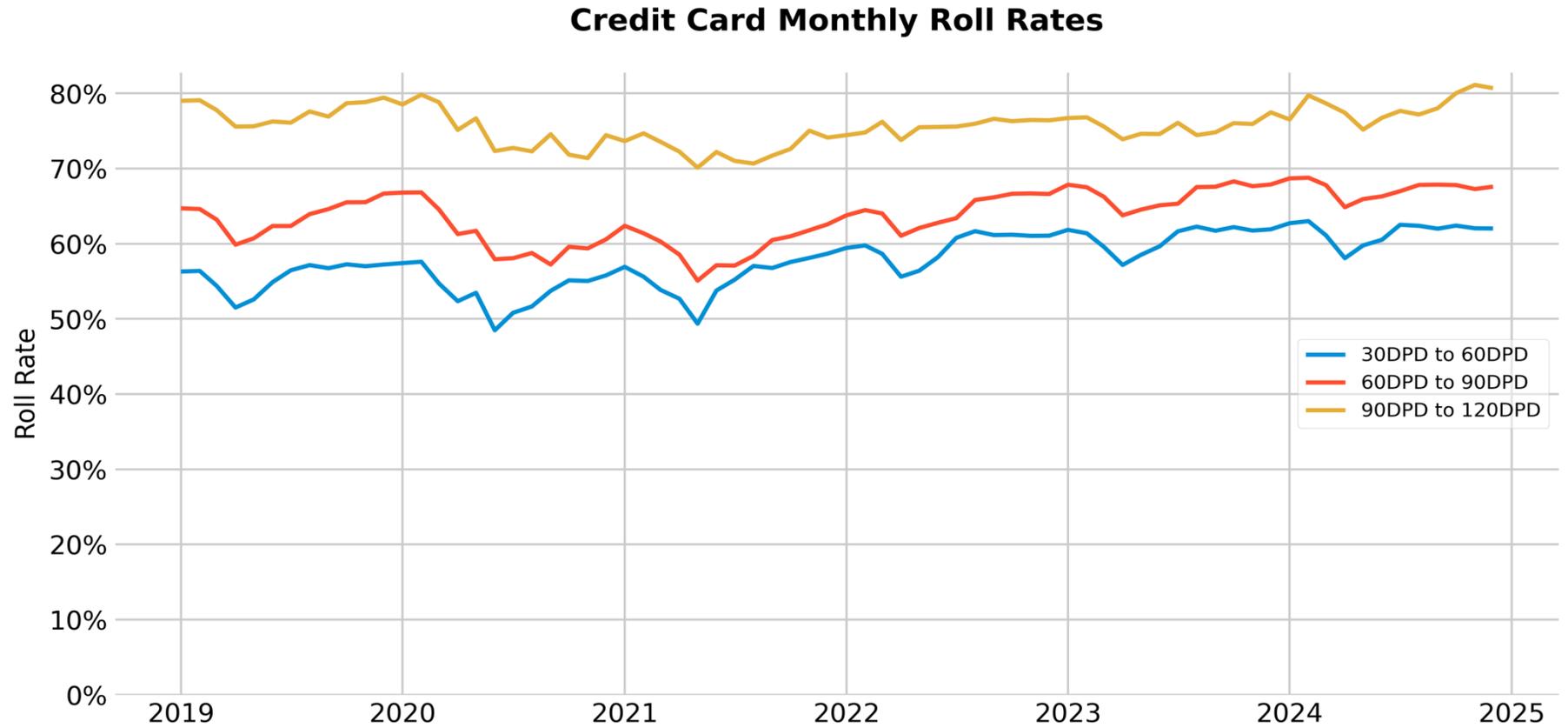
This shift towards less risky customers drove improved overall performance for 2023 and 2024 vintages relative to 2022, despite similar performance at risk band level

Credit Card Cumulative 60+DPD Rate by Annual Vintage



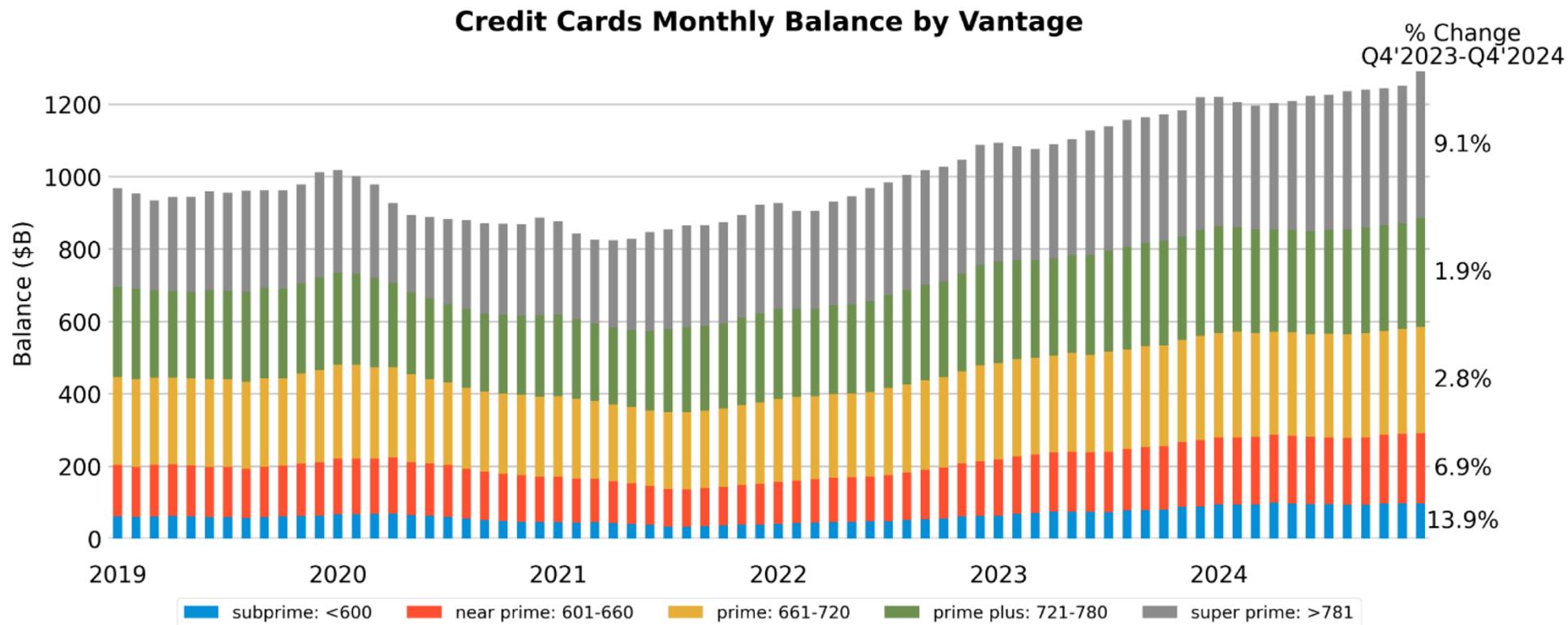
Source: 2OS, Equifax Ignite. Data as of Dec. 31st, 2024

Early-stage roll rates remained well above pre-pandemic levels



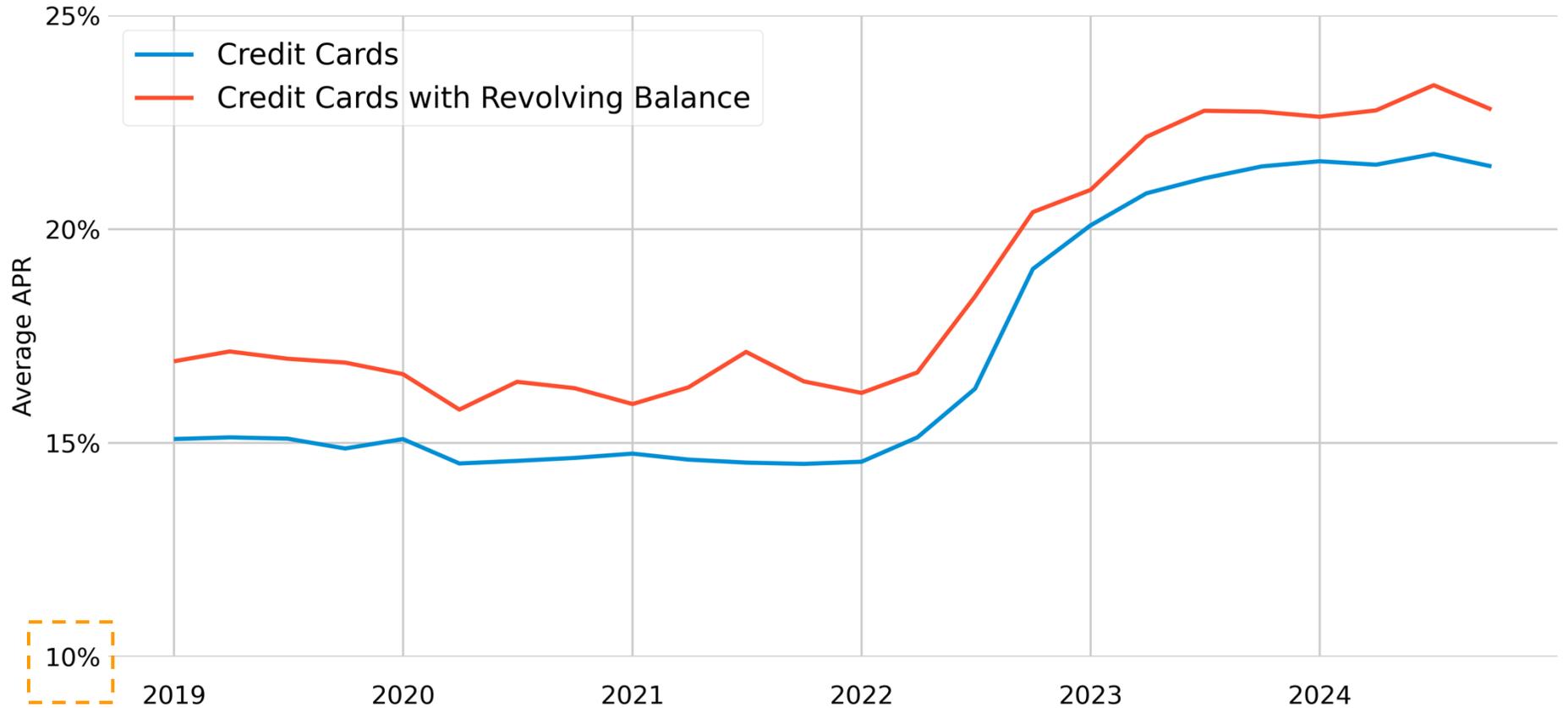
Source: 2OS, Equifax Ignite. Data as of Dec. 31st, 2024

Overall credit card debt grew across all risk bands, with subprime customers' balance growing the most year over year



Credit card APRs decreased slightly over the past few months, in alignment with broader rate decreases

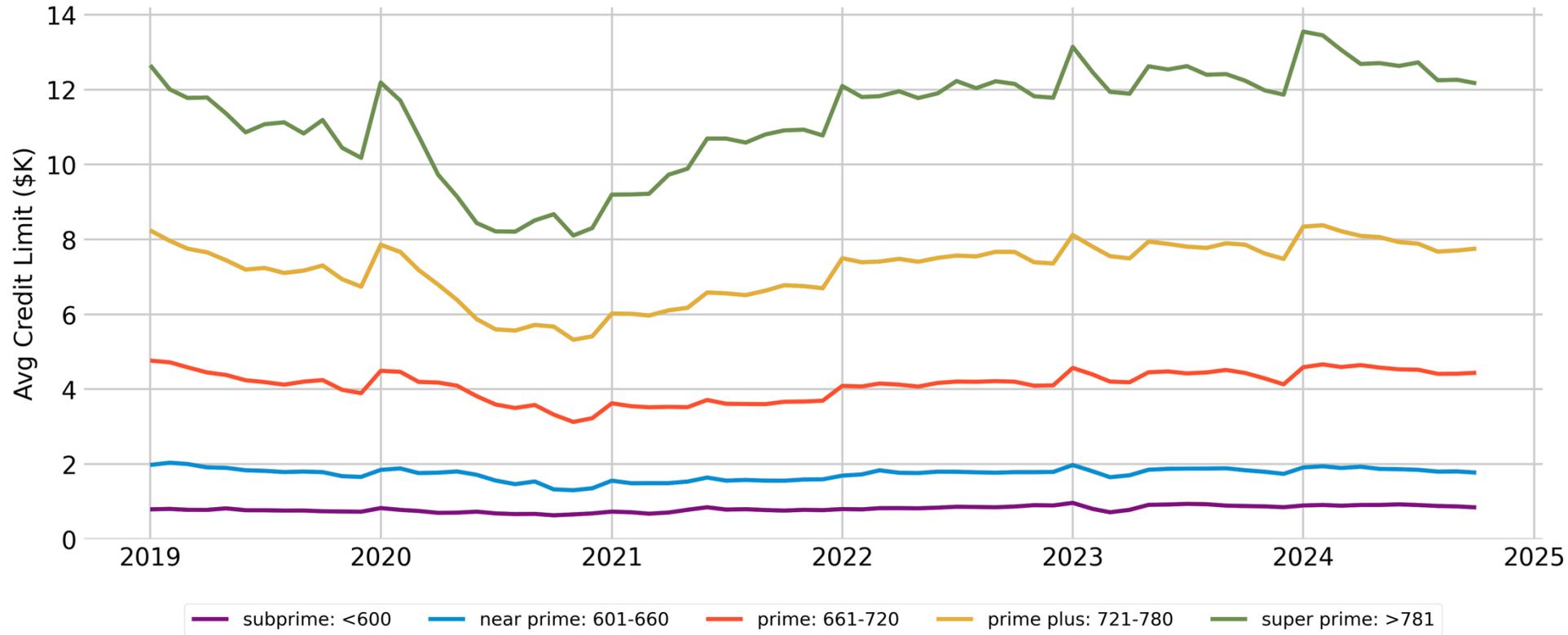
Average APR for Credit Cards



Source: 2OS, Federal Reserve G19 [report](#). Data as of Dec. 31st, 2024

Average credit limit at origination remained stable across risk bands

Credit Card Monthly Originations Average Credit Limit by Vantage



- State of the Consumer
- Credit Card
- Personal Loan
- Auto Loan
- Student Loan
- Mortgage



60+ DPD rate has remained relatively stable since 2022, reflecting the mix shift towards lower risk originations

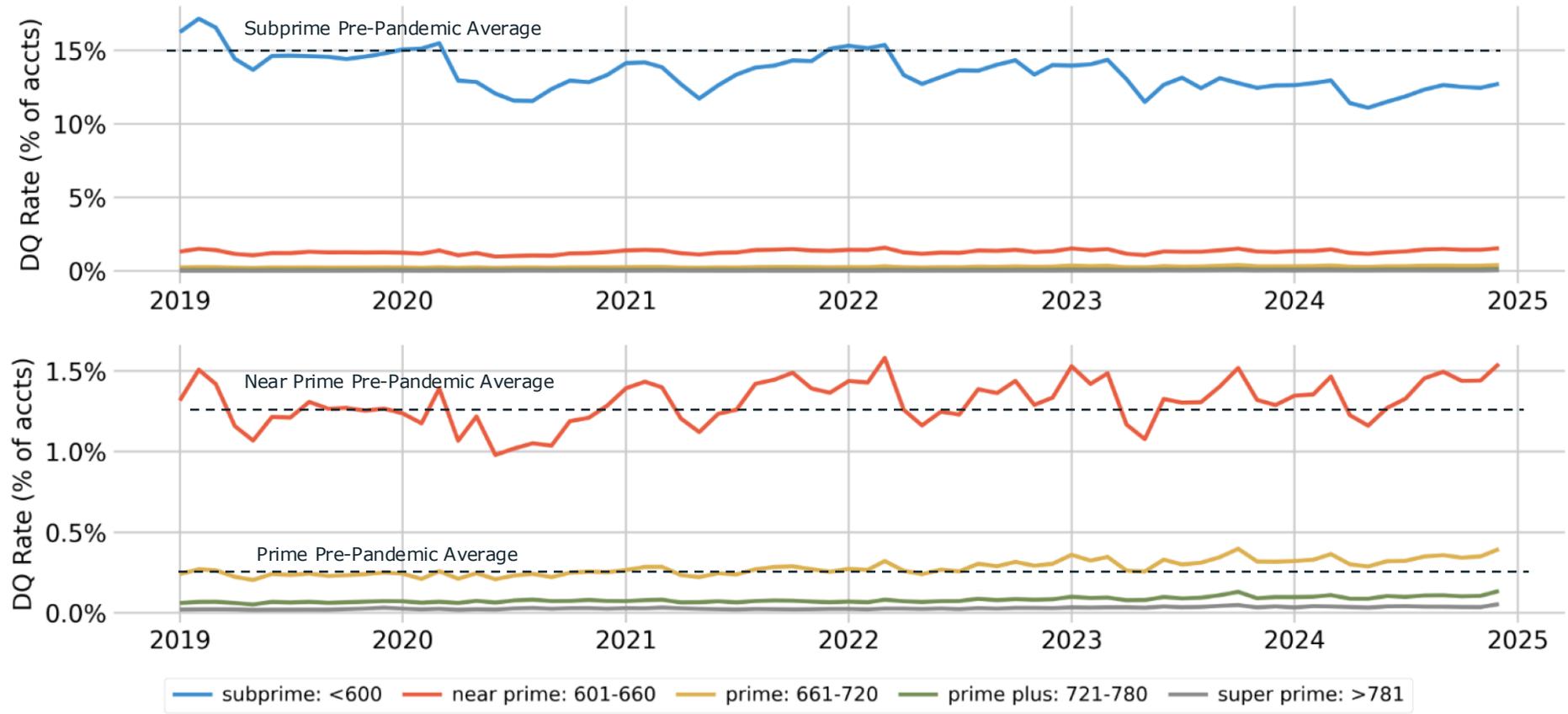
Personal Loan Monthly 60+DPD Rate



Source: 2OS, Equifax Ignite. Data as of Dec. 31st, 2024

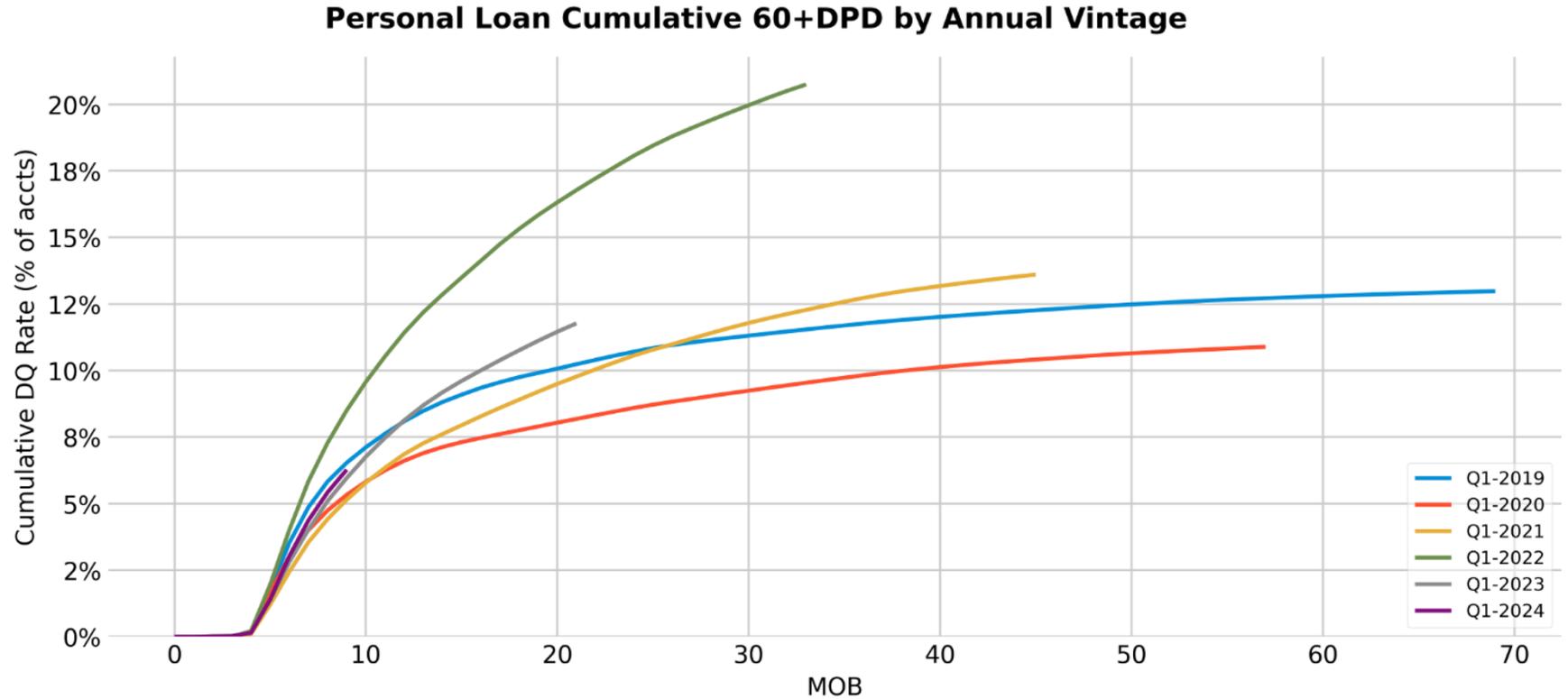
**Subprime 60+
DPD rates
remained lower
than pre-
pandemic
averages while
the opposite
held for prime
and near prime**

Personal Loan Monthly 60+DPD Rate by Vantage



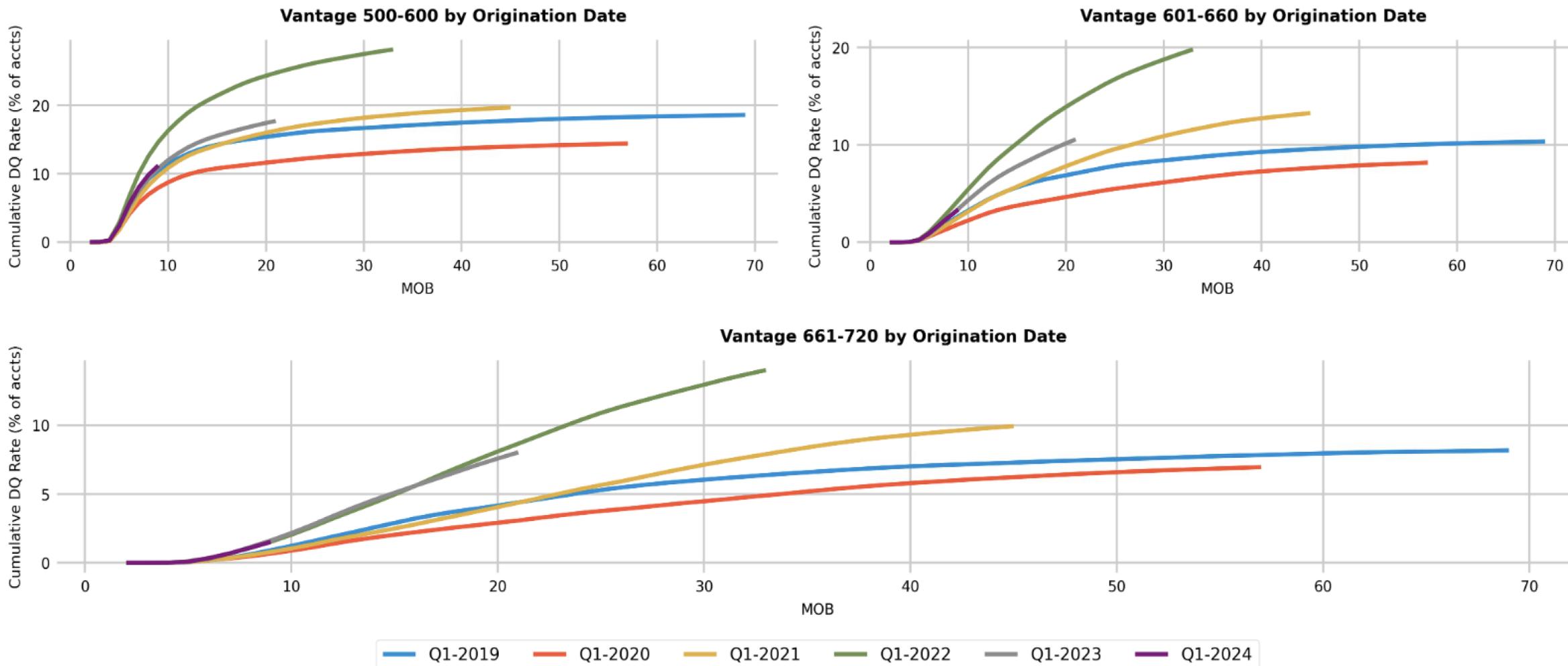
Source: 2OS, Equifax Ignite. Data as of Dec. 31st, 2024

**2023 and 2024
vintages
performed
worse than
2021 vintages,
but showed
improvement
over 2022**



The trends seen in overall PL delinquency rates persist for higher risk bands

Personal Loans Cumulative 60+DPD Rate by Annual Vintage and Risk

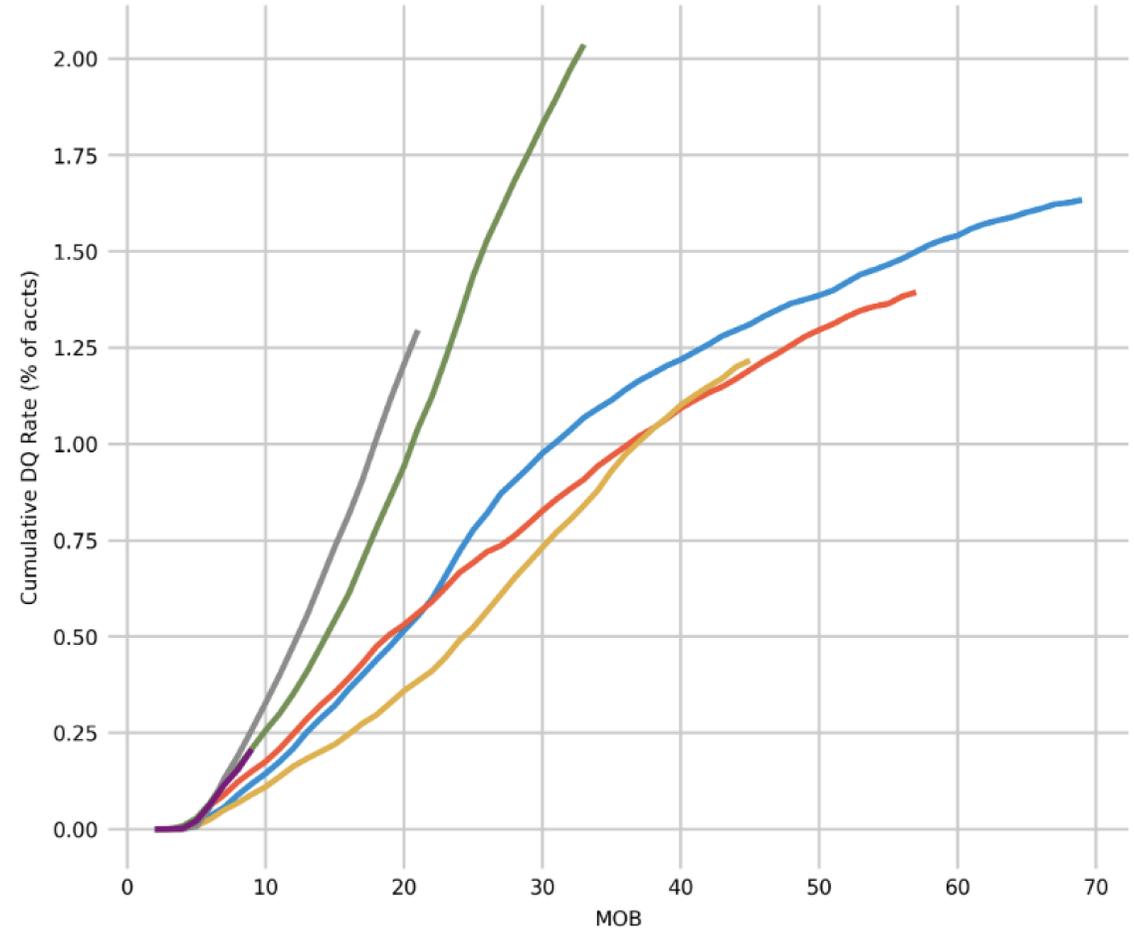
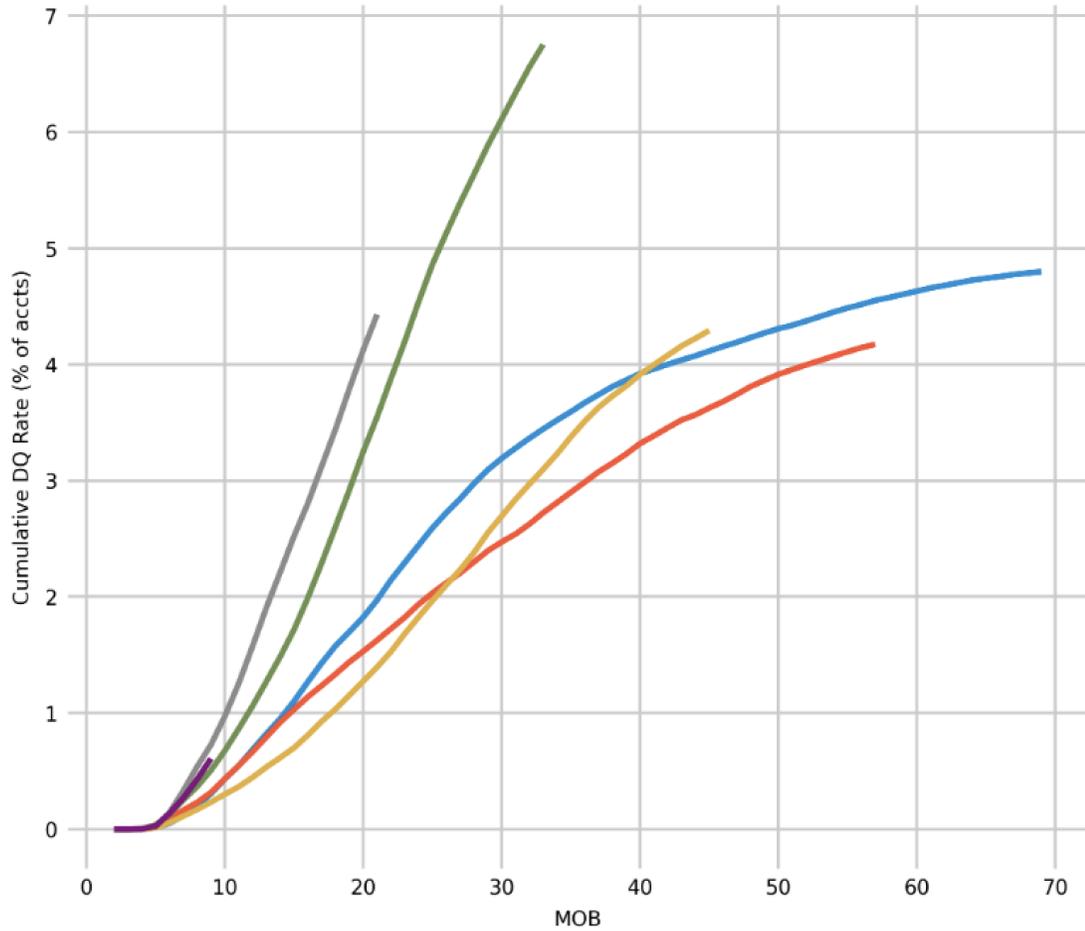


For lower risk bands, newer vintages still exhibit worse performance than pre-2022 vintages, but 2023 and 2024 are in-line with or performing worse than 2022

Personal Loans Cumulative 60+DPD Rate by Annual Vintage and Risk

Vantage 721-780 by Origination Date

Vantage >781 by Origination Date



Q1-2019 Q1-2020 Q1-2021 Q1-2022 Q1-2023 Q1-2024

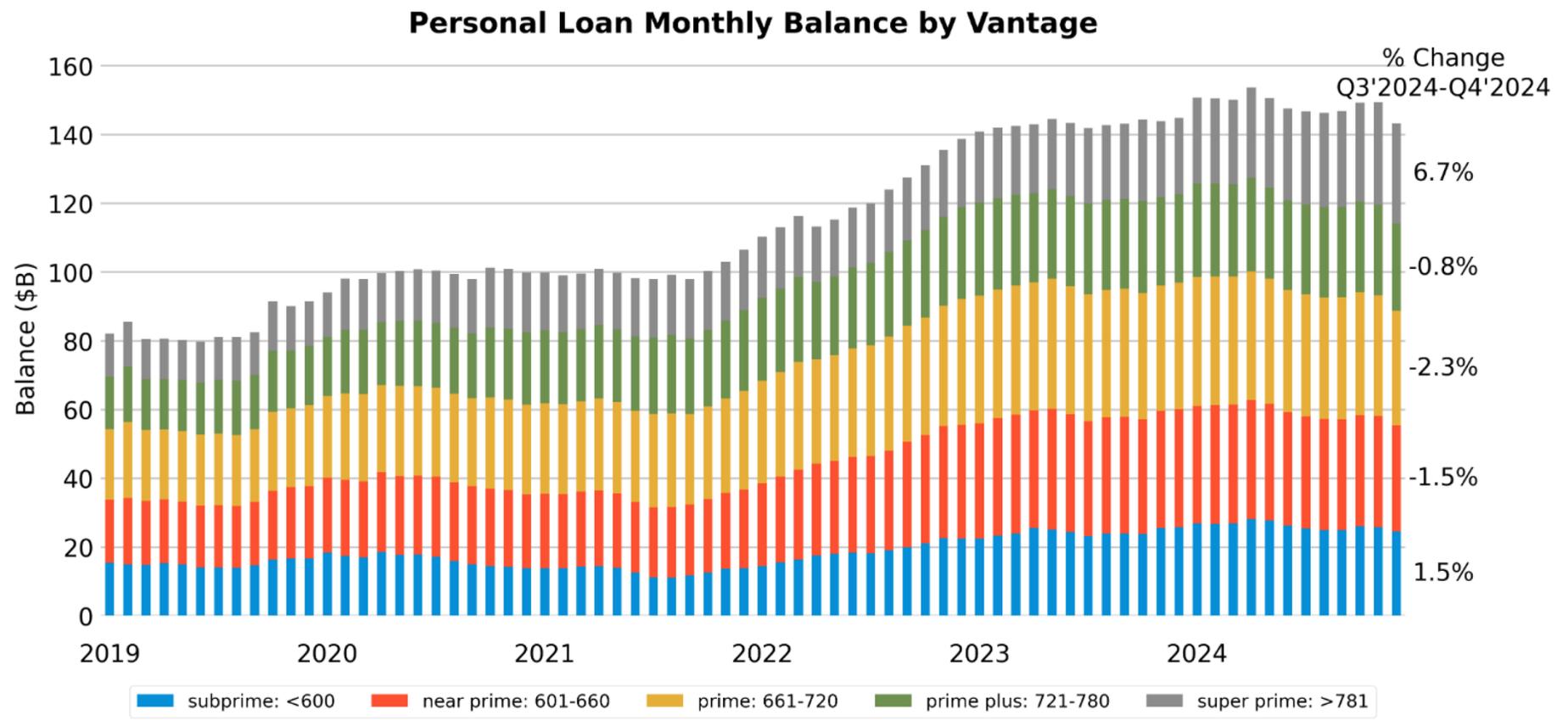
Personal Loan Monthly Balance



Total personal loan balances have remained relatively stable since 2023

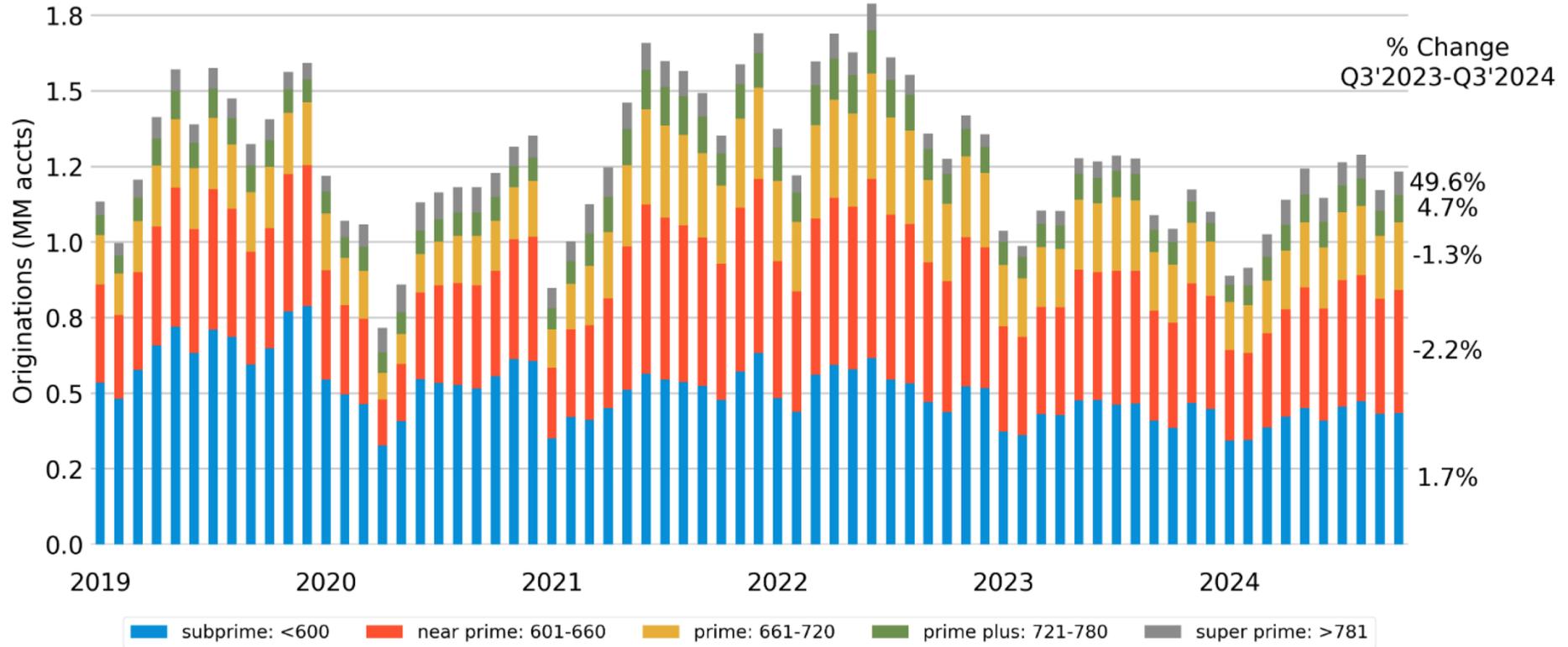
Source: 2OS, Equifax Ignite. Data as of Dec. 31st, 2024

Super prime and subprime borrowers held an increasing balance of personal loan debt while other risk band balances shrunk this quarter

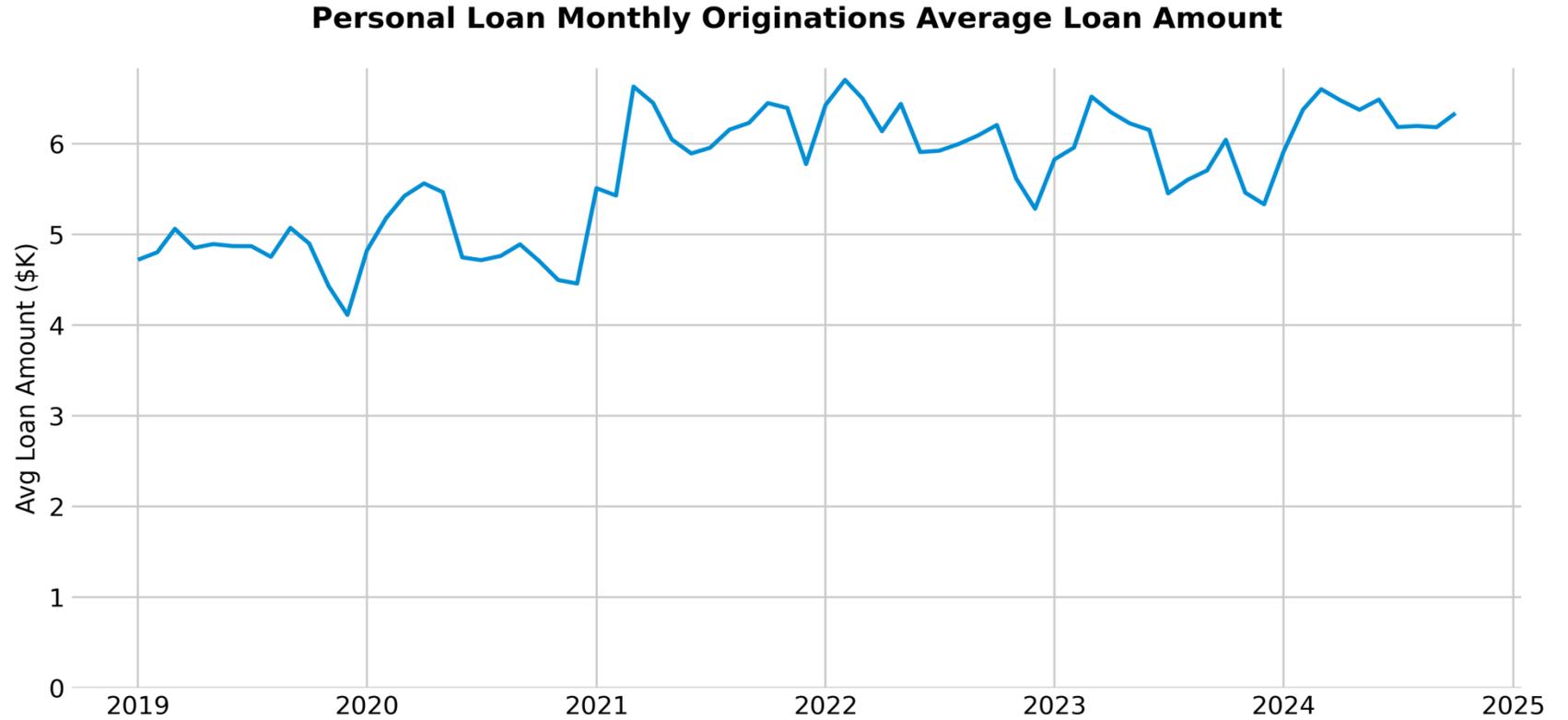


The increasing balance among super prime borrowers aligns with a significant increase in recent super prime originations

Personal Loan Monthly Originations by Vantage



Average loan amount remained significantly above pre-pandemic levels, driven by the origination shift towards super prime



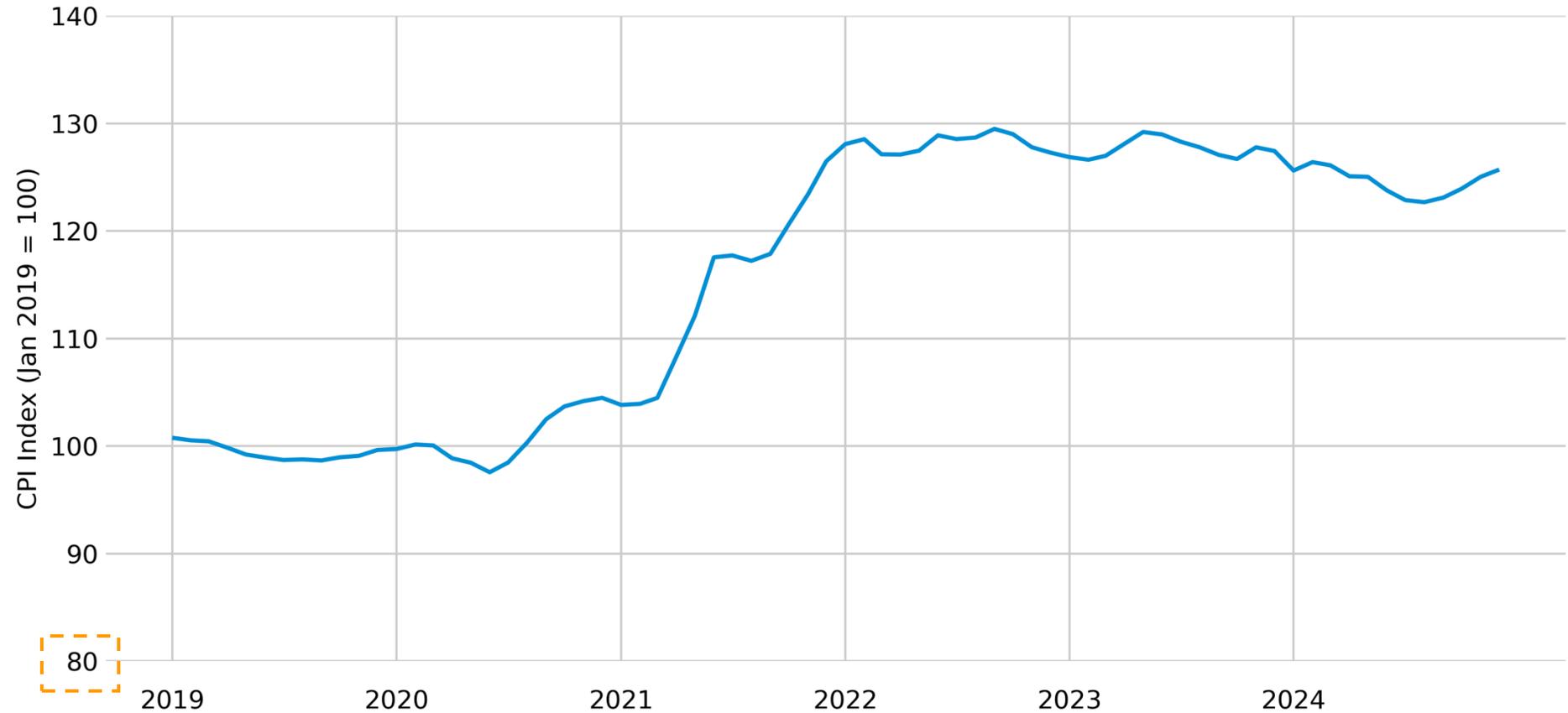
Source: 2OS, Equifax Ignite. Data as of Dec. 31st, 2024

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New and used vehicle prices slightly increased in Q4 after a declining through the first half of the year

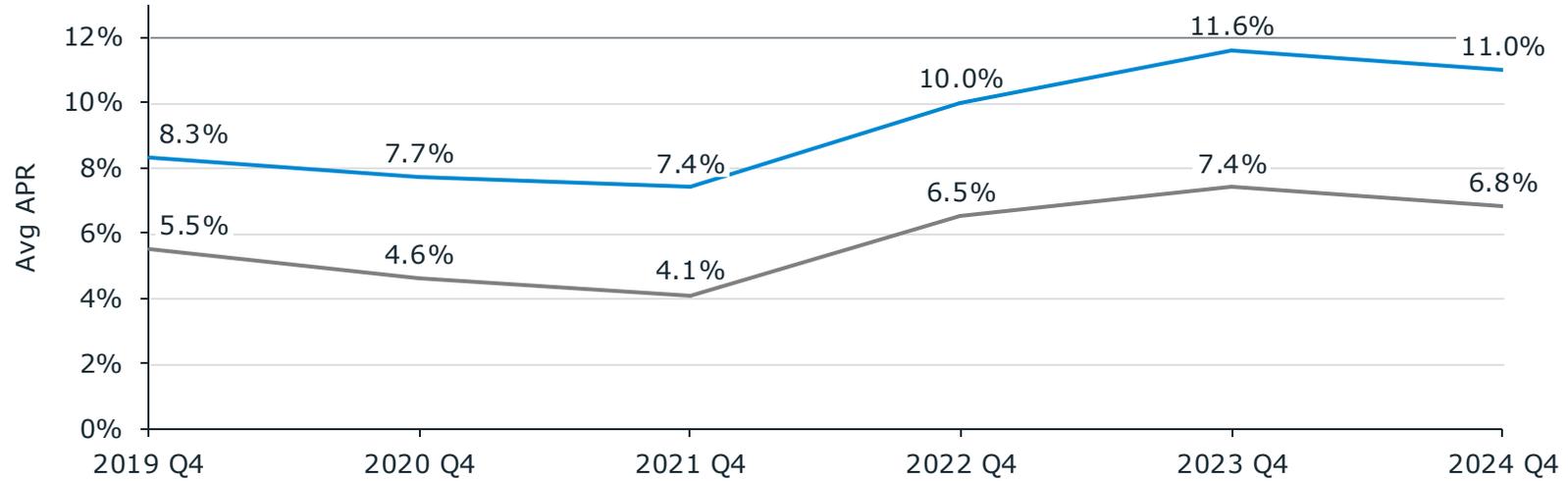
Average Consumer Price Index for New and Used Motor Vehicles



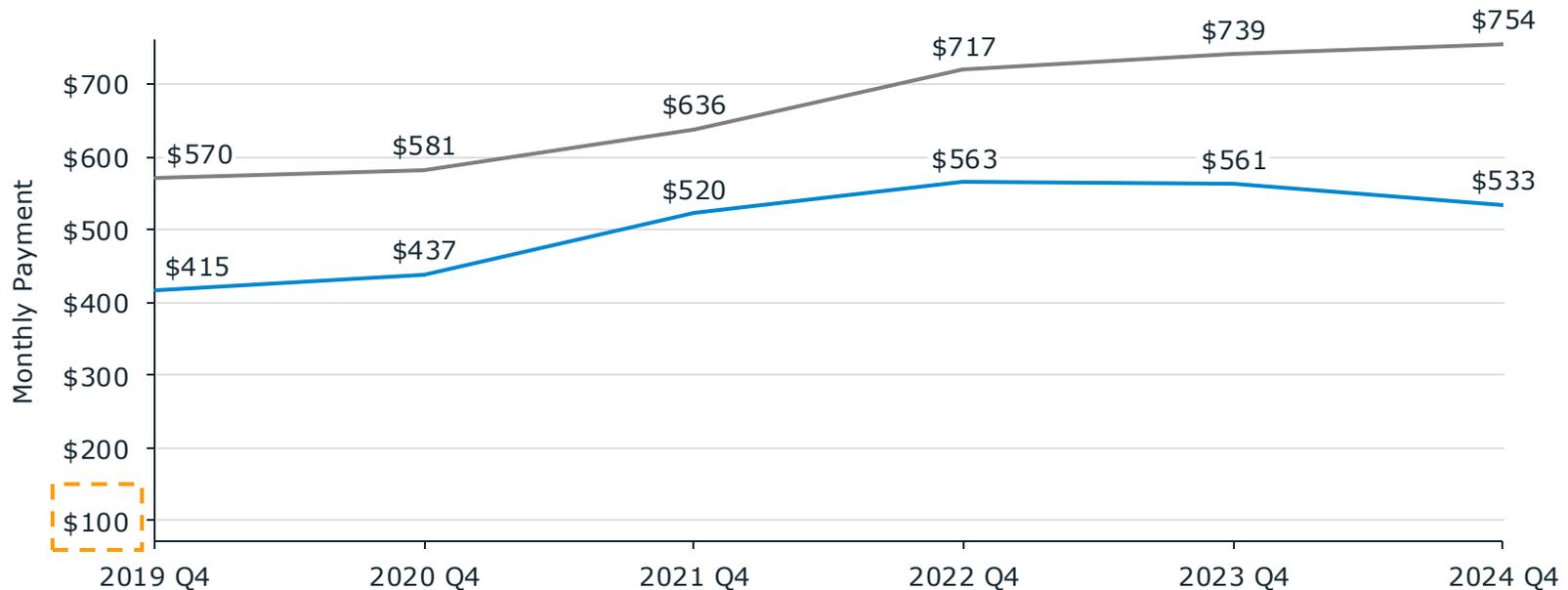
Source: 2OS, [FRED](#). Data as of Dec. 31st, 2024

Auto Loan APRs slightly decreased in Q4, while average monthly payments for new cars hit an all-time high

Average APR on New & Used Cars



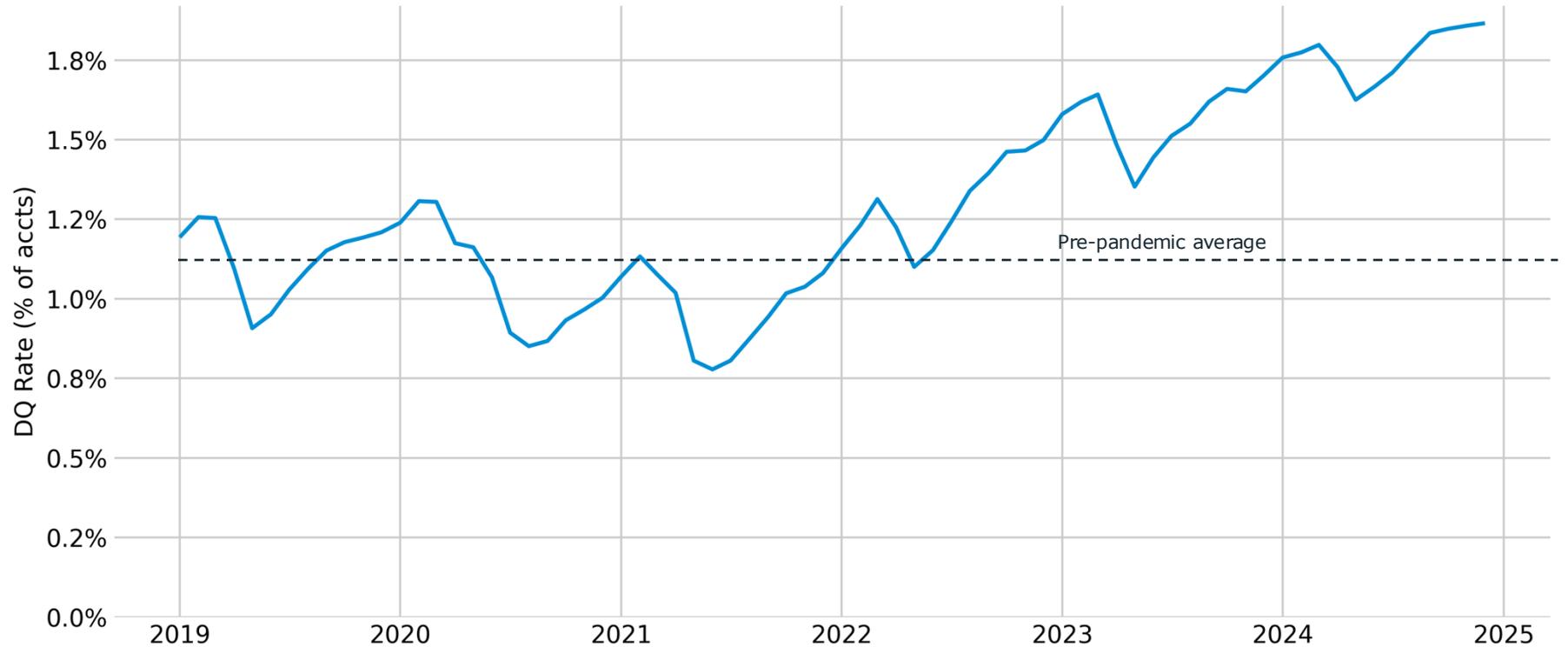
Average Monthly Payment on New & Used Cars



Source: [Edmunds](#) reports 2019-2024. Data as of Dec. 31st, 2024

The auto loan delinquency rate continued climbing through Q4, consistent with the trend starting in mid-2021

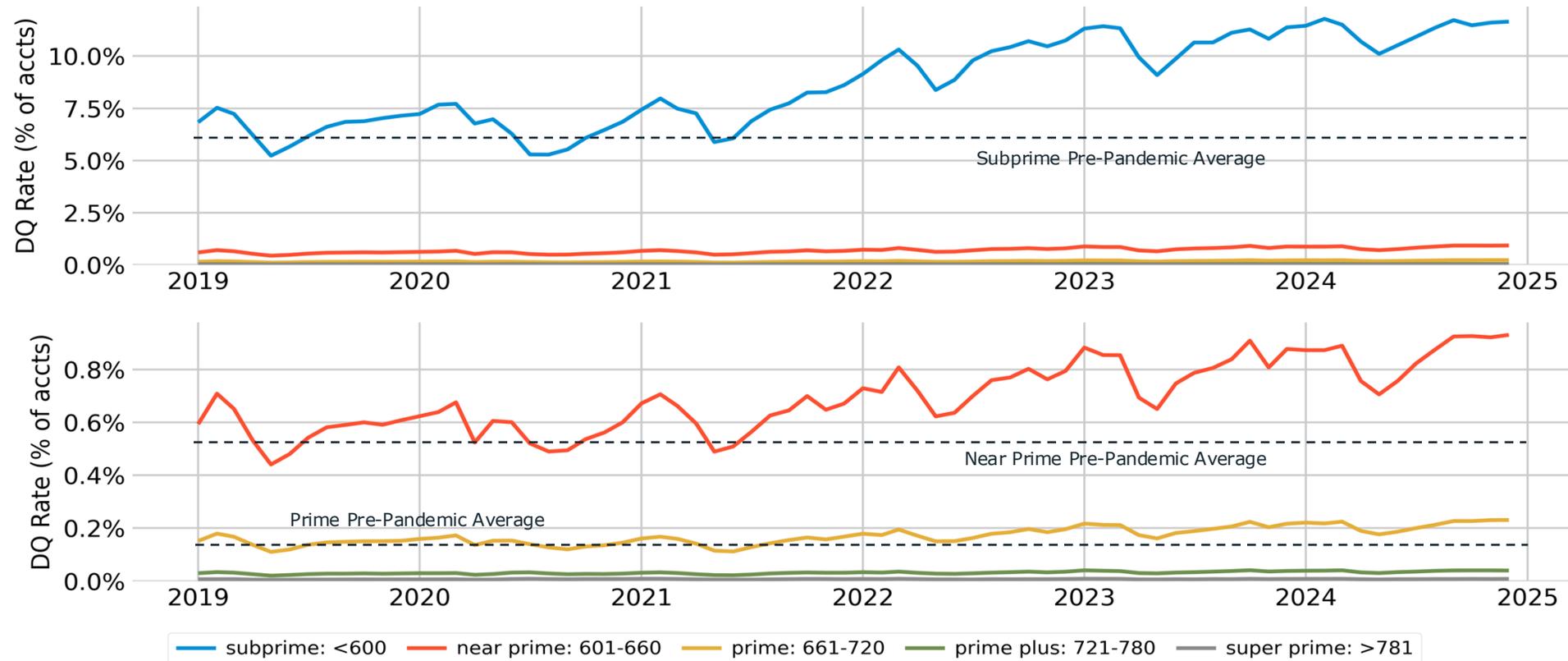
Auto Loan Monthly 60+DPD Rate



Source: 2OS, Equifax Ignite. Data as of Dec. 31st, 2024

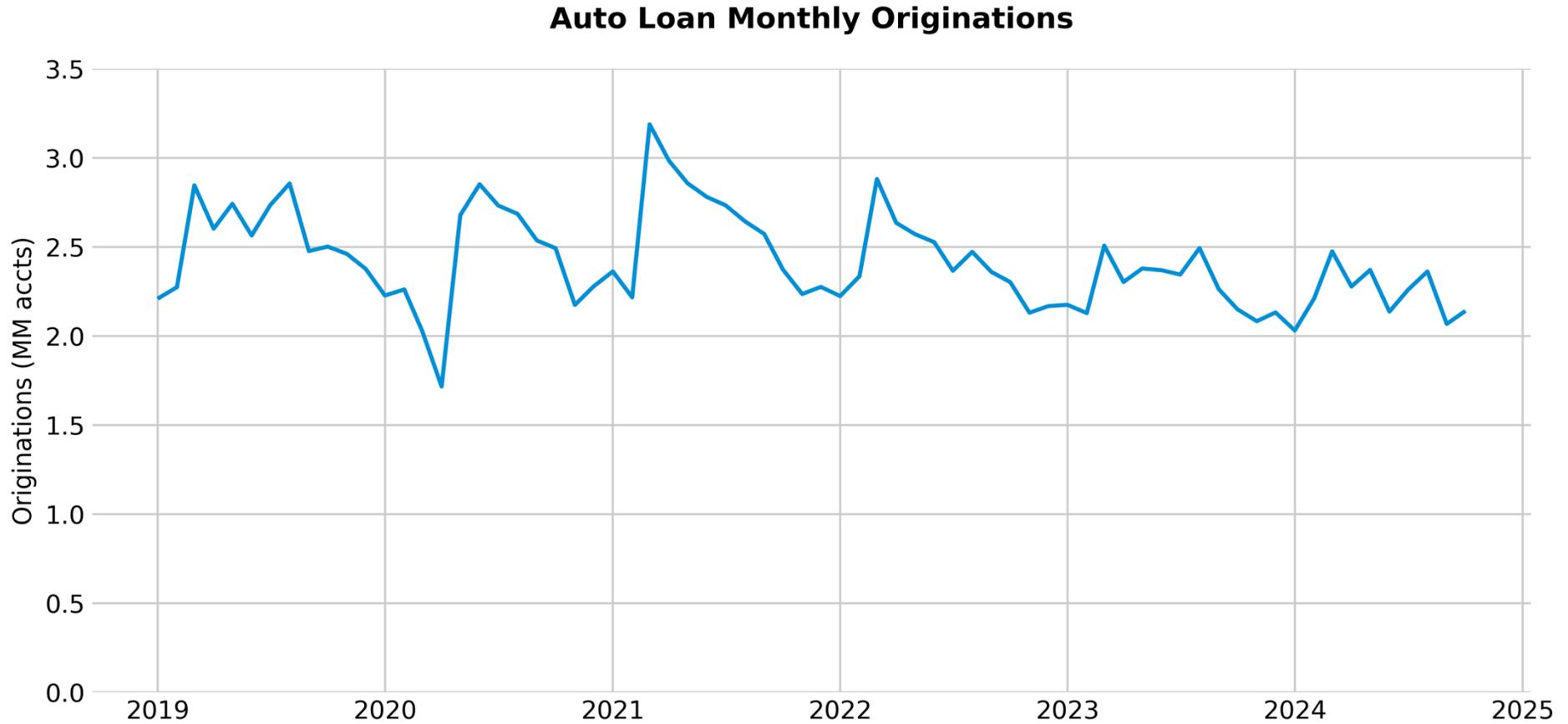
Delinquency rates rose across all risk bands, particularly among near prime and subprime borrowers

Auto Loan Monthly 60+DPD Rate by Vantage



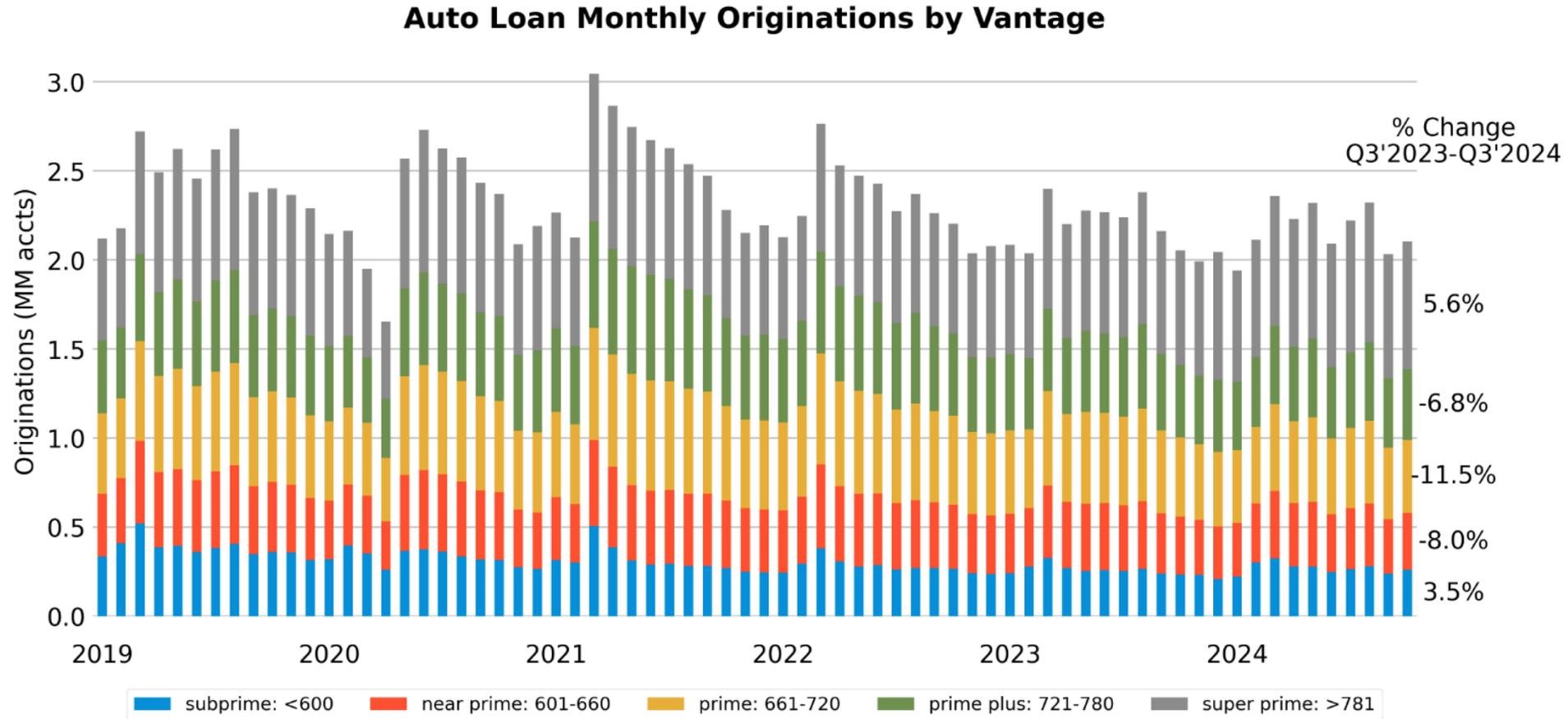
Source: 2OS, Equifax Ignite. Data as of Dec. 31st, 2024

Overall auto loan originations remained low in response to increasing delinquency rates and were relatively stable through 2024



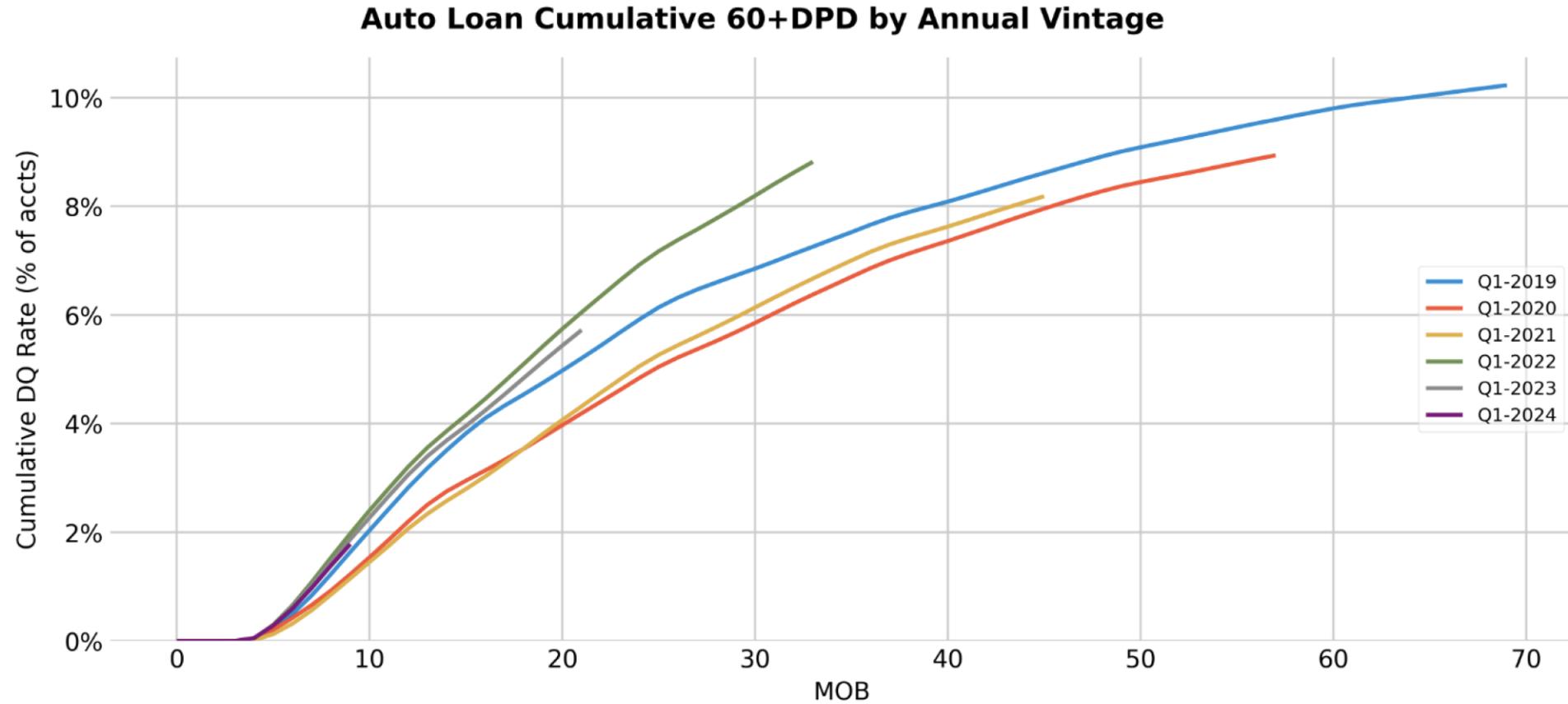
Source: 2OS, Equifax Ignite. Data as of Dec. 31st, 2024

**Originations
grew in Q4,
driven primarily
by super prime
and subprime**



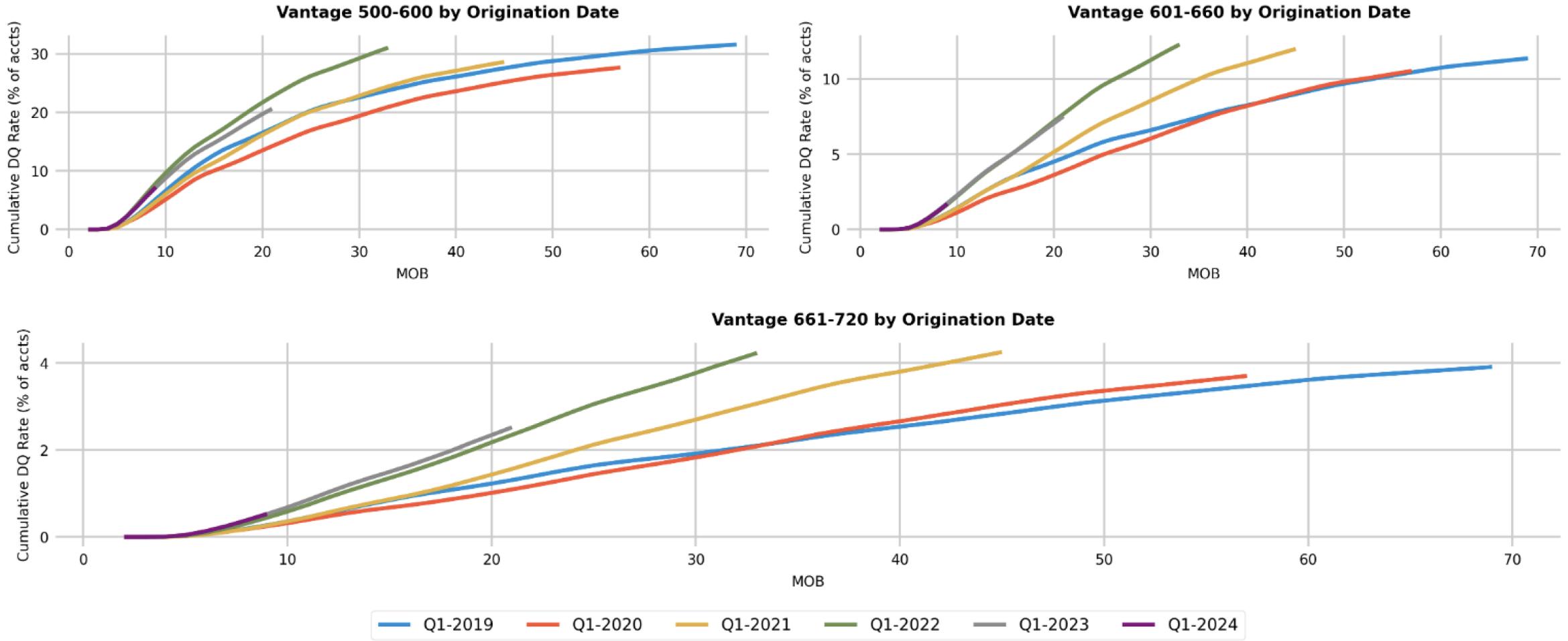
Source: 2OS, Equifax Ignite. Data as of Dec. 31st, 2024

Overall, early 2024 delinquency rates are slightly lower than recent years' rates



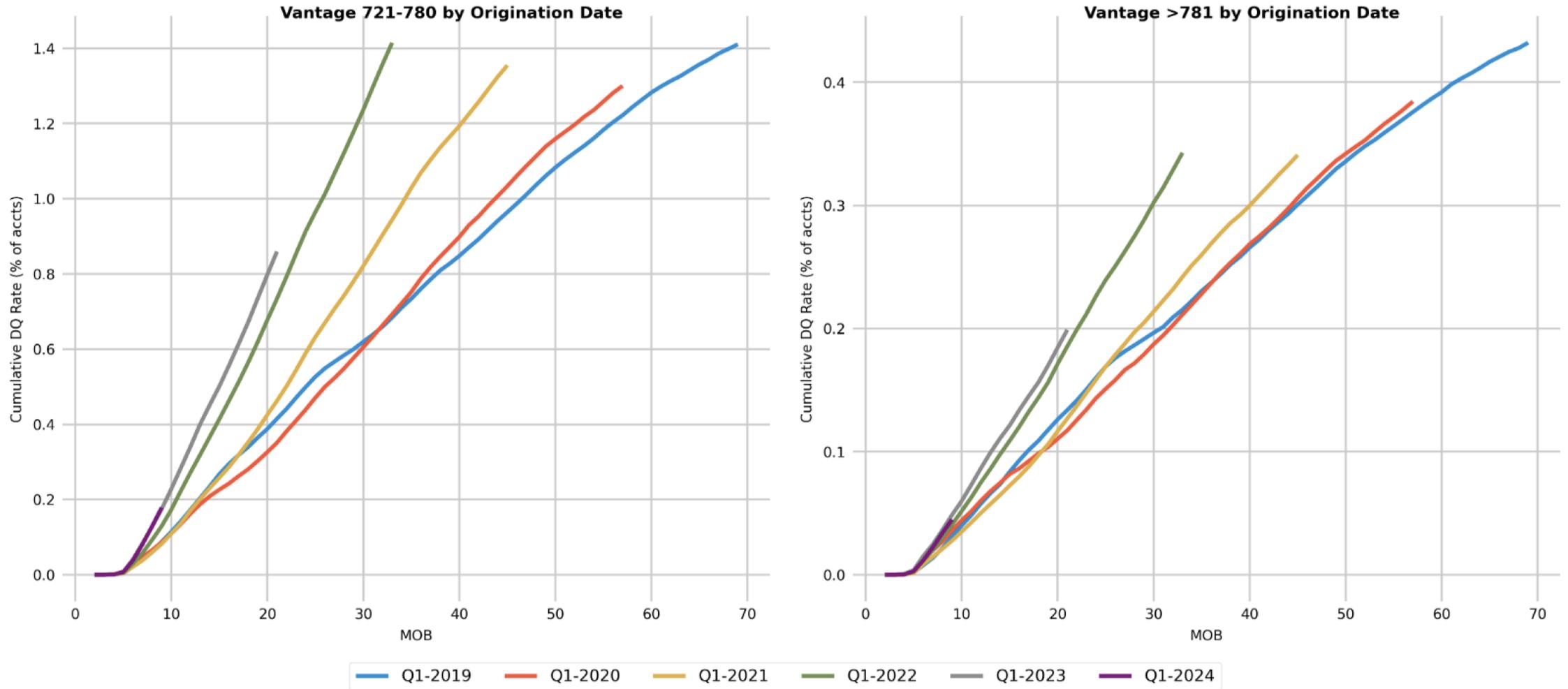
The improved performance of early 2024 vintages is less apparent when broken out by risk, as it aligns with recent years across all Vantage groups

Auto Cumulative 60+DPD Rate by Annual Vintage and Risk

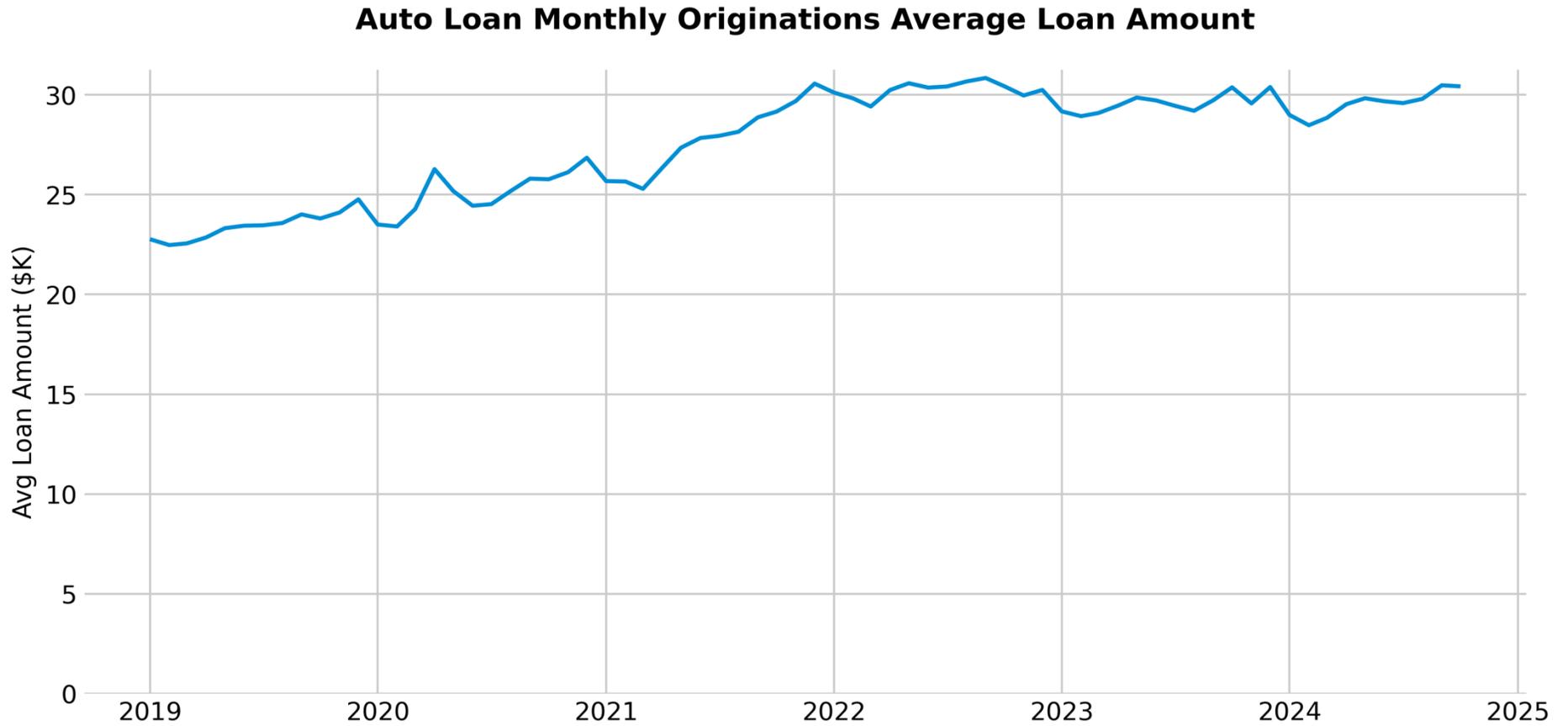


Early 2024's lower overall delinquencies are likely driven by the higher share of low-risk borrowers rather than improved performance within risk bands

Auto Cumulative 60+DPD Rate by Annual Vintage and Risk

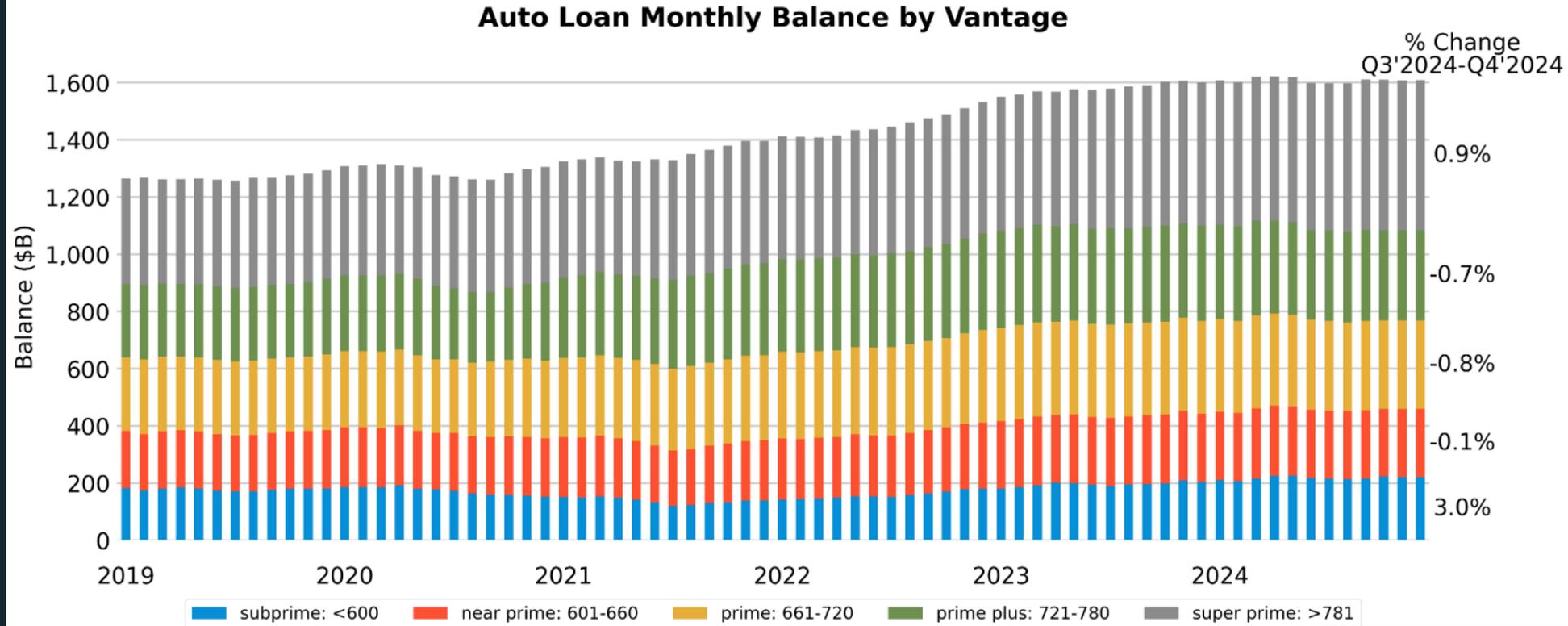


Average loan amount remained high, aligning with high vehicle prices and the shift of originations towards lower-risk accounts



Source: 2OS, Equifax Ignite. Data as of Dec. 31st, 2024

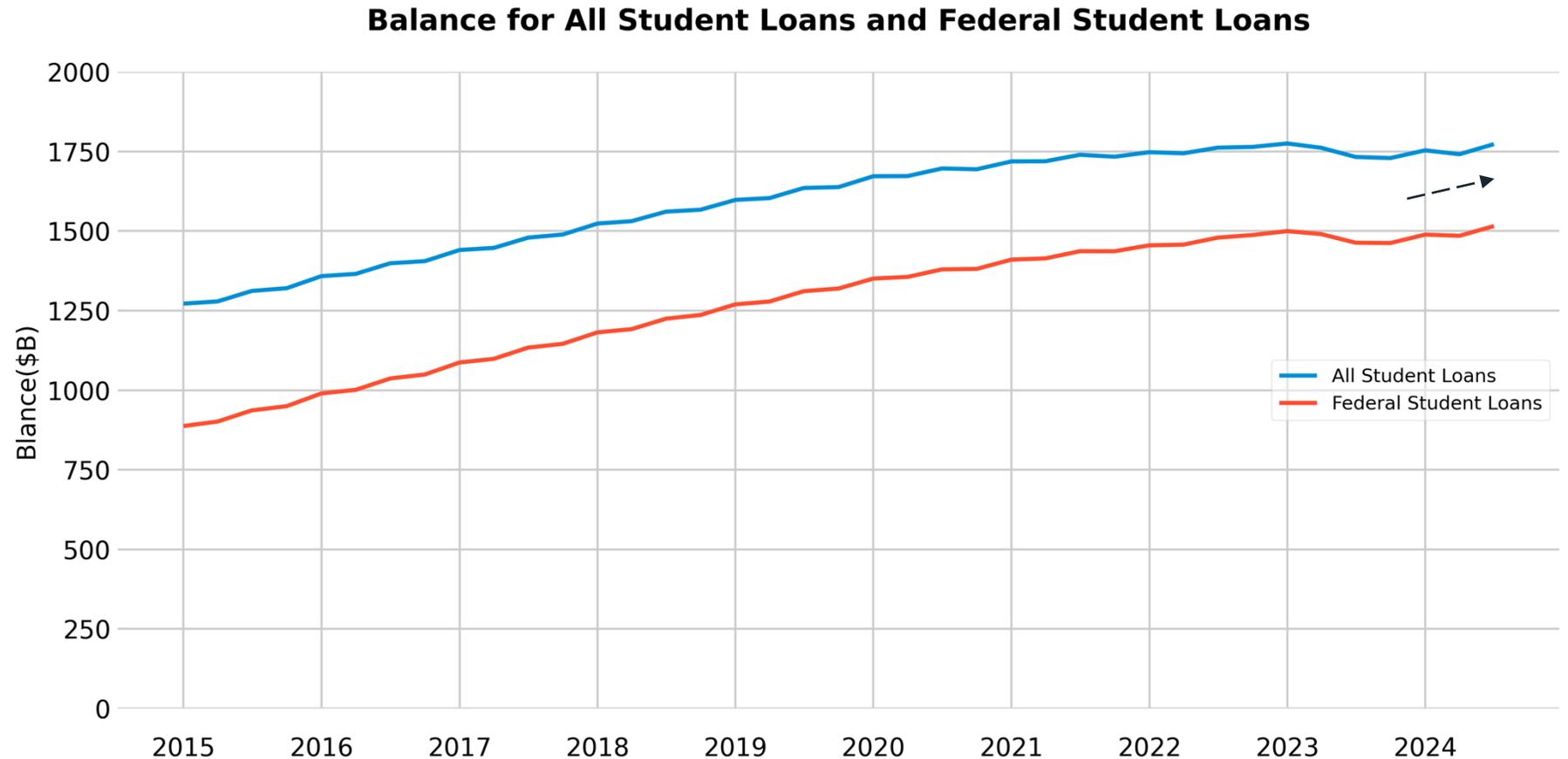
Total loan balances remained relatively stable with moderate continued growth in subprime



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Both the total student loan balance* and total federal student loan balance continued to rise in late 2024



Source: 2OS, [Total SL](#), [Federal SL](#). Data as of Dec. 31st, 2024

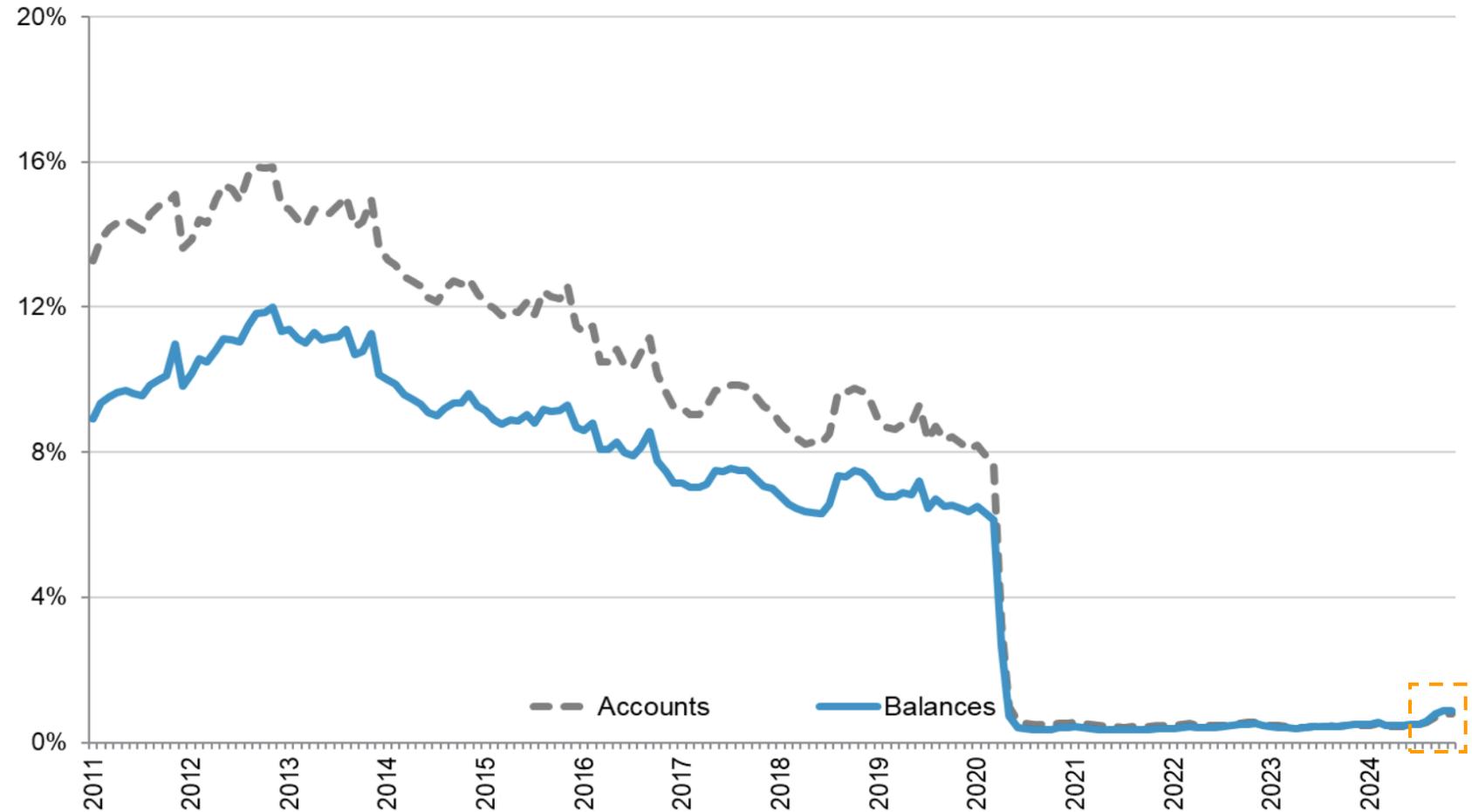
*Note: Slight discrepancies may be found in student loan balance totals depending on the government source used

Severe Delinquency Rate

90+ Days Past Due or in Bankruptcy

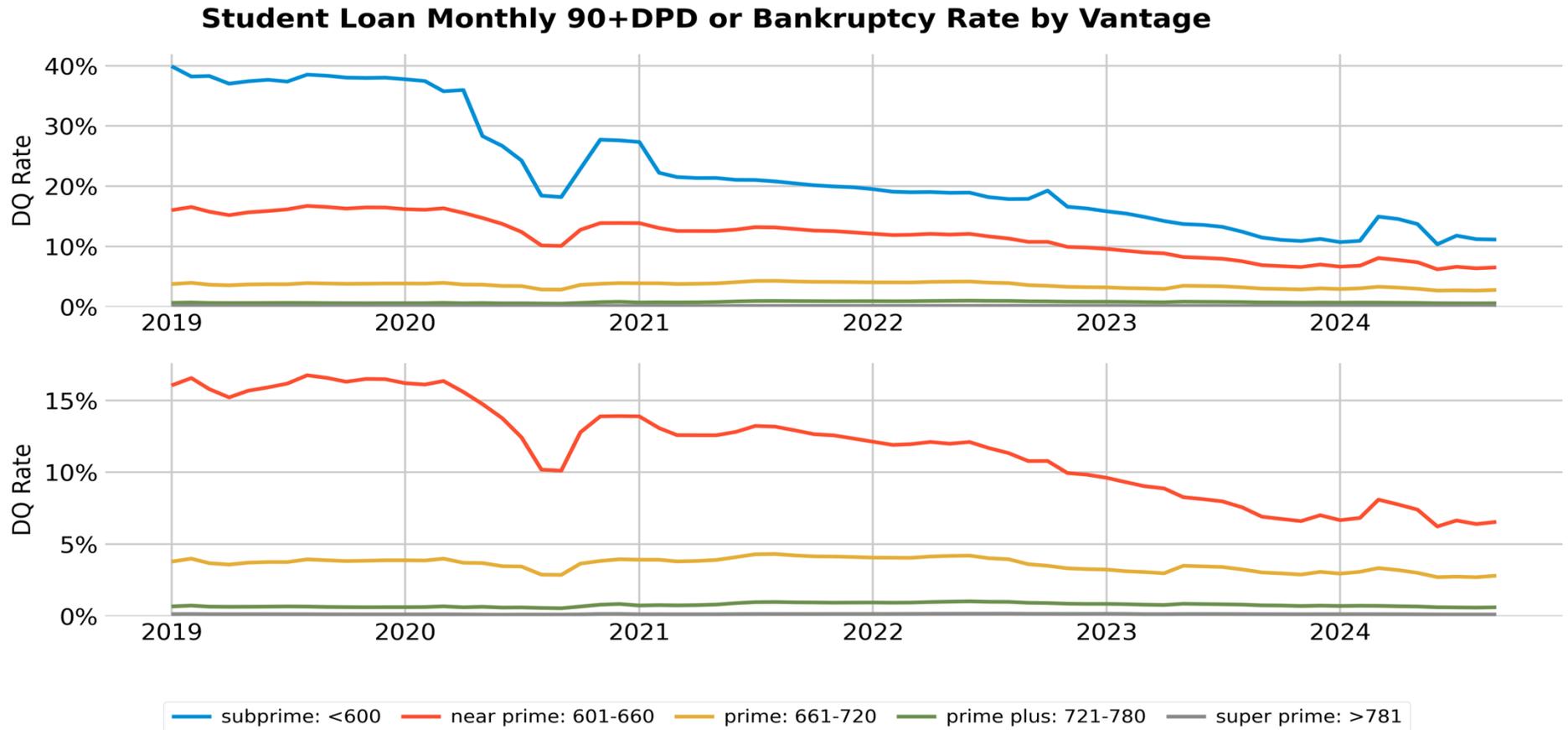
Percent of Non-deferred Accounts and Balances; NSA; Excludes Severe Derogatory

Recent data showed a slight uptick in severe student loan delinquencies, which are expected to increase once the 90-day post-on-ramp period ends



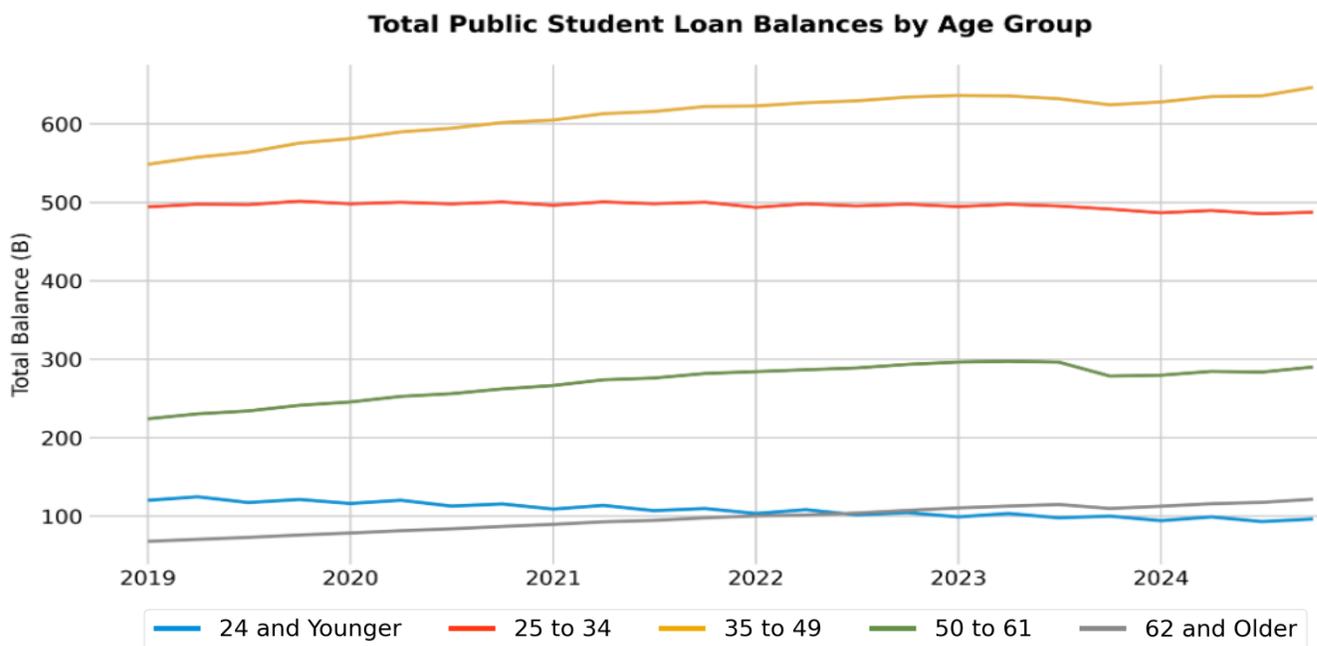
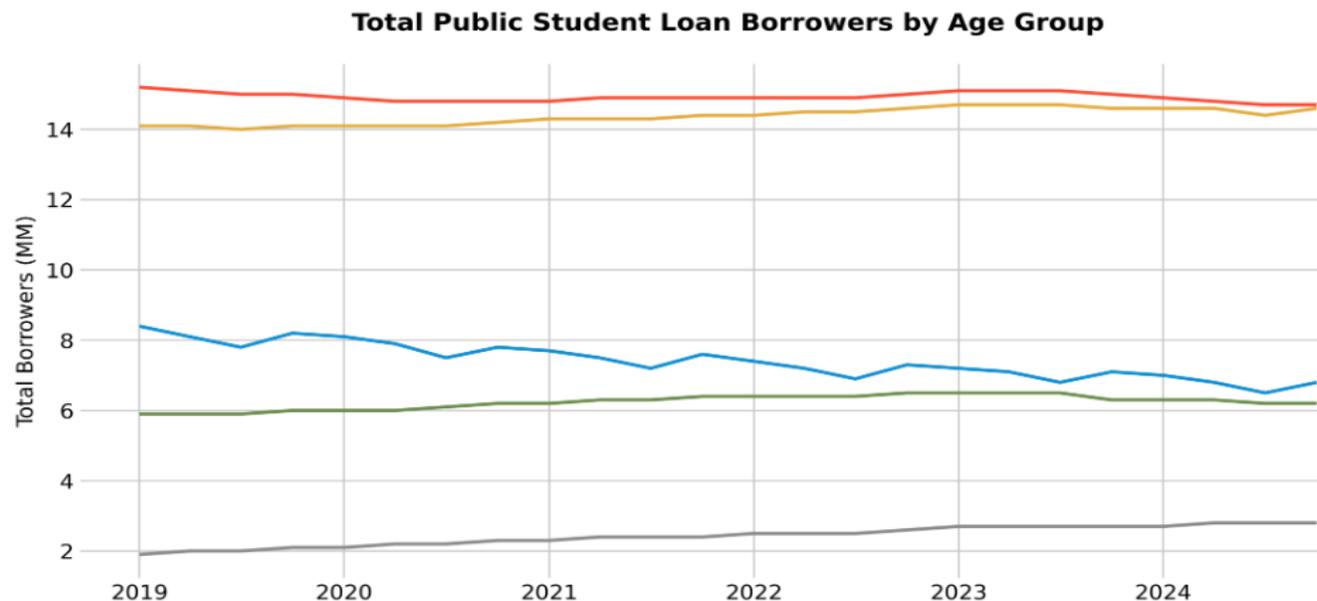
Source: 2OS, [Equifax](#). Data up to Dec. 31st, 2024

As student loan DQ rates begin to increase, credit scores for millions of student borrowers are expected decrease



Source: 2OS, Equifax Ignite. Data as of Dec. 31st, 2024

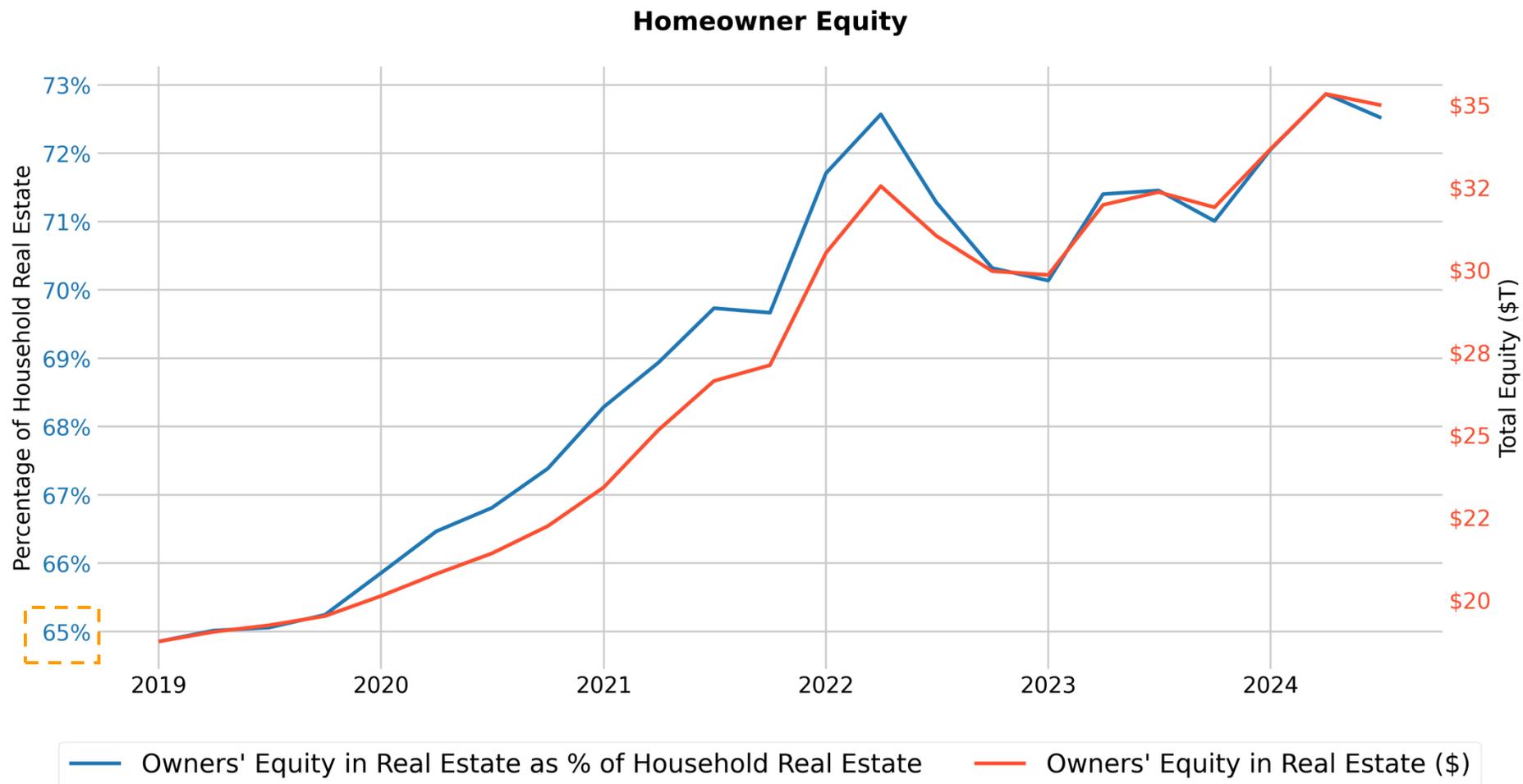
The volume of older student loan borrowers continued growing while the volume of younger borrowers continued decreasing



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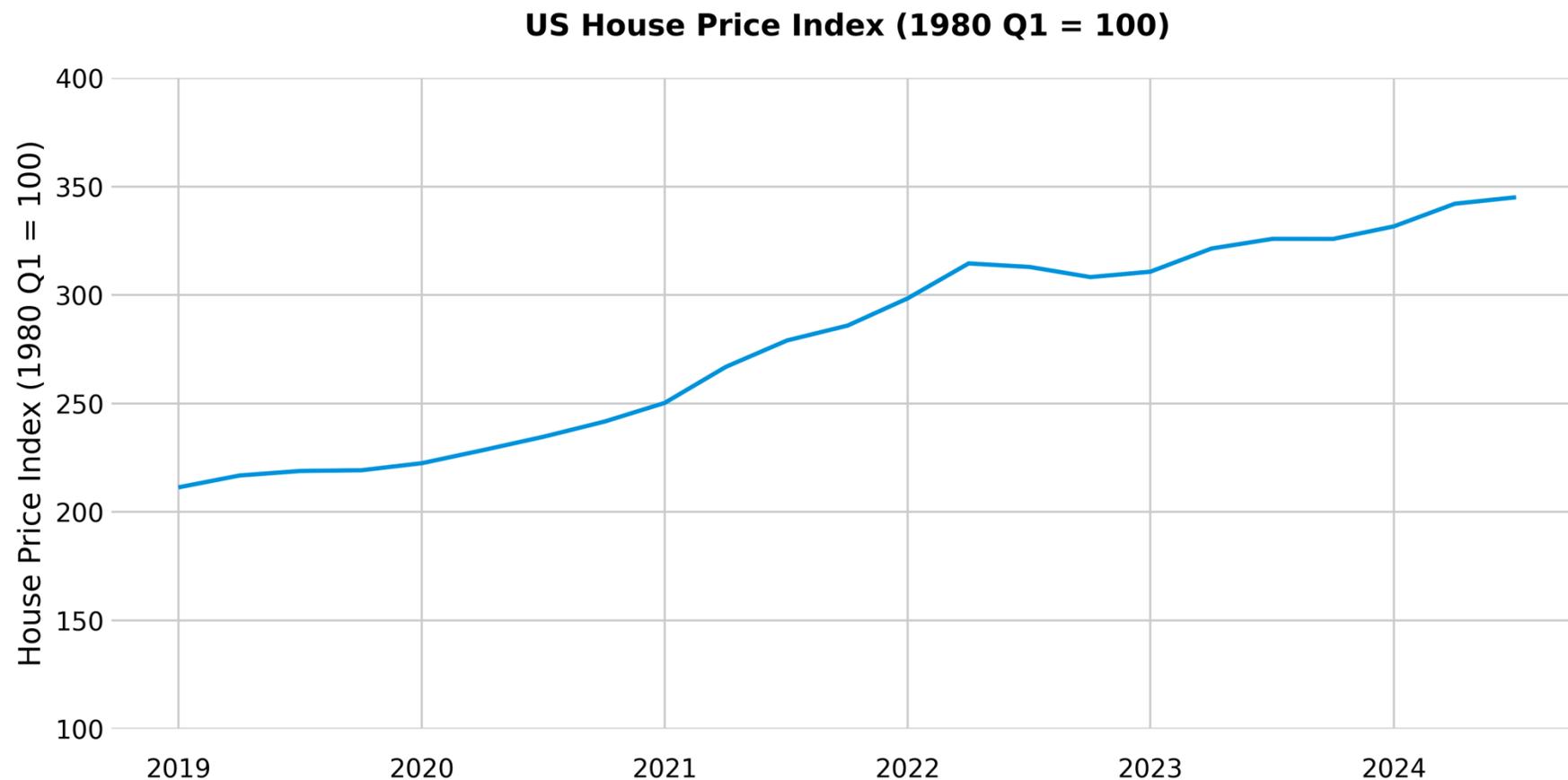


Homeowner equity reached an all-time high in 2024



Source: 2OS, FRED ([blue line](#), [red line](#)). Data as of Dec. 31st, 2024

US housing prices and overall home value continued to grow in Q4

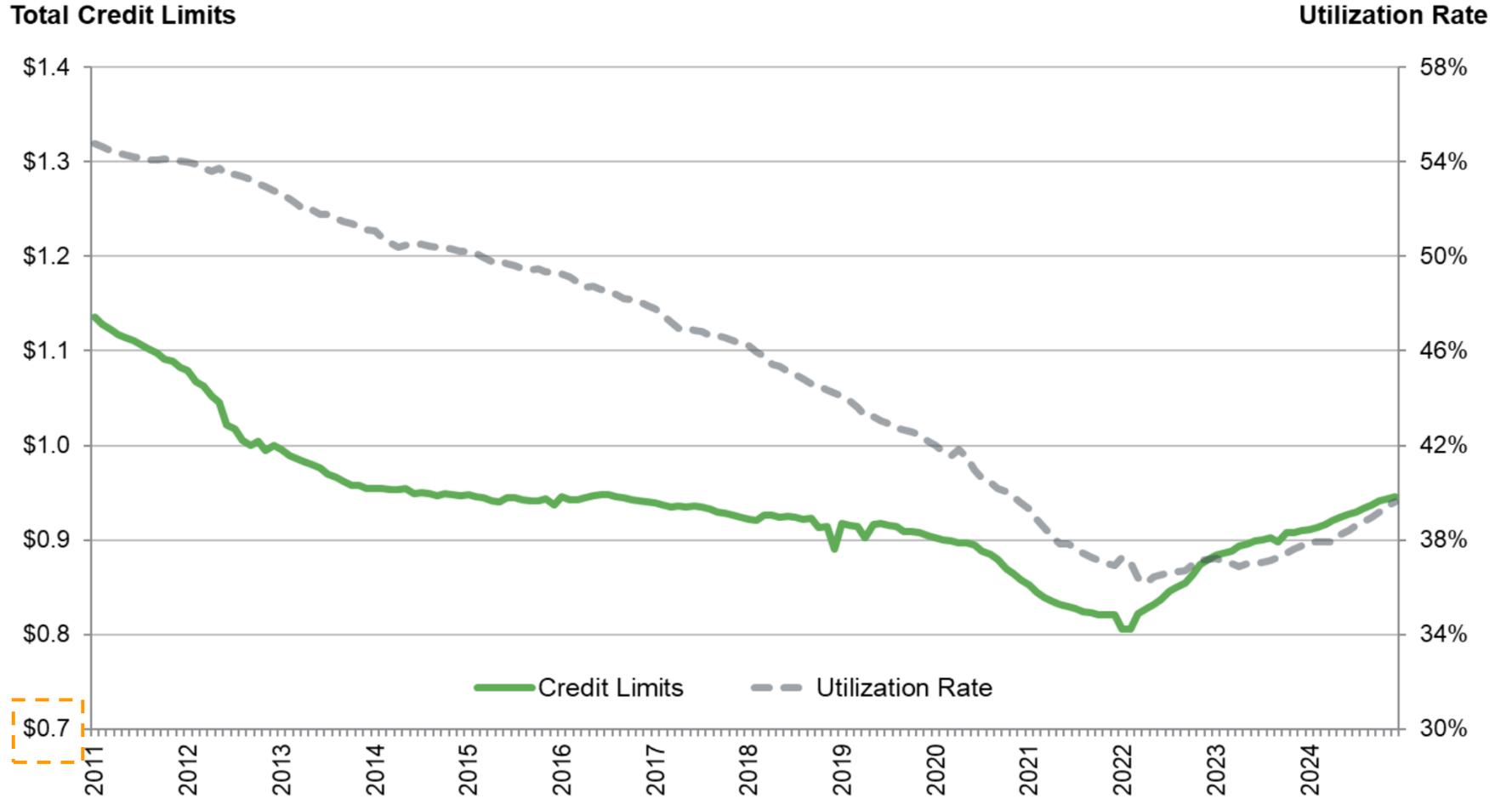


Source: ZOS, [FRED](#). Data as of Dec. 31st, 2024

Utilization and Credit Limit

Utilization Rate in %; NSA
Credit Limit in \$Trillions; NSA

Increased homeowner equity and housing value drove an increase in both HELOC total credit limit and utilization in 2024



Source: [Equifax](#). Data as of Dec. 31st, 2024

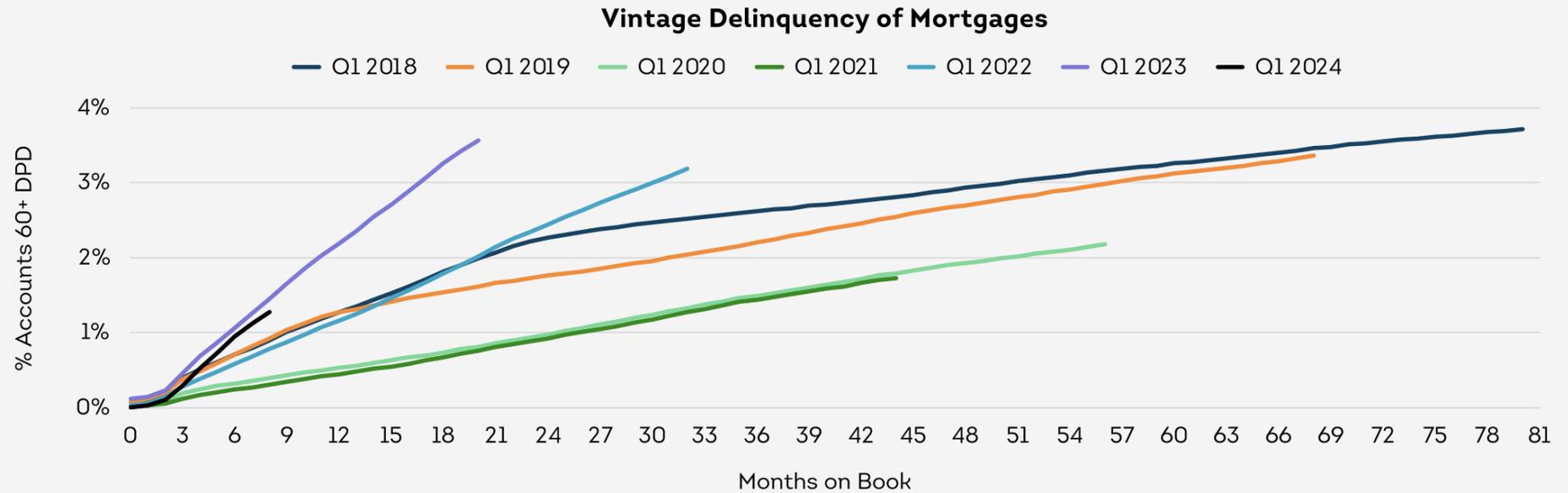
The average mortgage rate saw an uptick in recent months after softening over the last two quarters

30 Year Fixed Rate Mortgage Average



Source: 2OS, [FRED](#). Data as of Dec. 31st, 2024

Early 2024's mortgage origination vintage is slightly outperforming 2023, but remains worse than other recent vintages

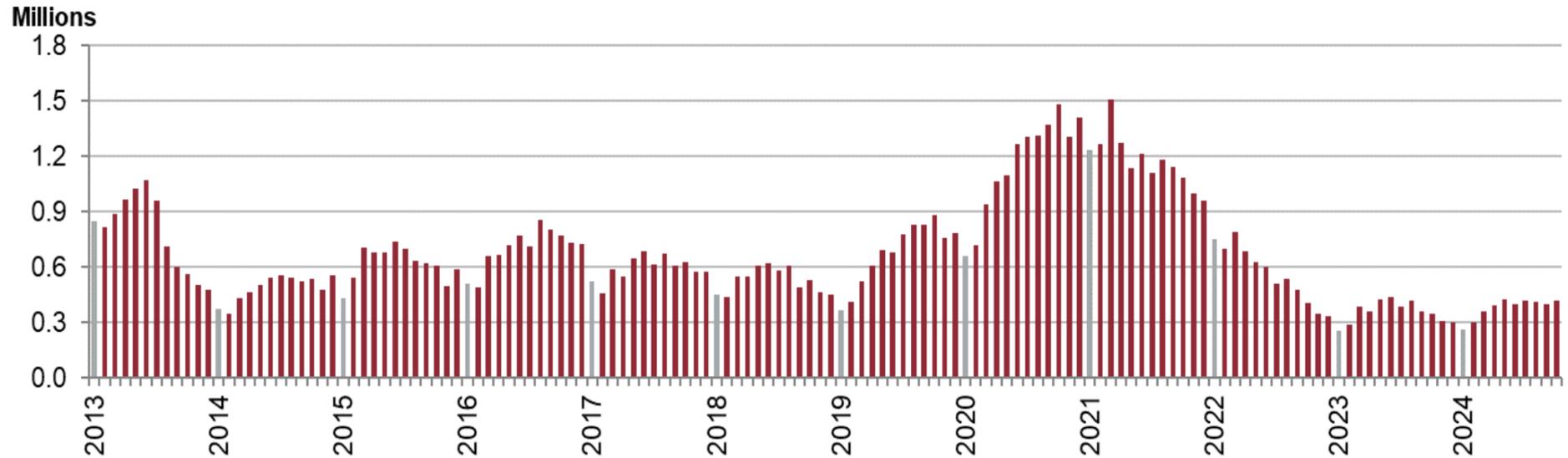


Source: [Transunion](#). Data as of Dec. 2024. DQ rates are cumulative

First Mortgage Originations: Accounts

Number of Accounts in Millions; NSA

**Mortgage
account
originations in
2024 mirrored
2023 levels, yet
remained below
pre-pandemic
levels**



Source: [Equifax](#). Data as of Dec. 31st, 2024

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About 2OS

2nd Order Solutions (2OS) is a boutique credit risk advisory firm that specializes in solving the world's most challenging credit problems. 2OS was founded 12 years ago and consults to a wide range of banks, card issuers, fintechs, and specialty finance companies in the US and abroad.

2OS has deep experience with lending businesses across Card, Auto, Small Business, and Personal Loans, at all points in the credit lifecycle. 2OS partners have vast expertise in all aspects of Collections, both as operating executives and as consultants.

For more insights and commentary on the lending industry, visit us at <https://2os.com/insights/>

Equifax Ignite Definitions

Active Accounts: This includes all accounts that have a reported status in the most recent three months. Accounts categorized as closed are included in the month in which that status was first reported and are excluded from active accounts thereafter.

Credit Cards: Our credit card cohort is limited to what Equifax Ignite categorizes as general purpose bankcards, which excludes Private Label Credit Cards.

Definition of delinquency: For credit car, auto loans, and personal loans, accounts are classified as delinquent at 60+ days past due. Specifically, they are included in 60-90 DPD, 90-120 DPD, and 120+ DPD buckets; charged off/severe derogatory and bankrupt accounts are excluded. For student loans, accounts are classified as delinquent at 90+ DPD. These accounts are included in 90-120 DPD, 120+ DPD and bankruptcy buckets; charged off accounts are excluded. Vintage performance views are cumulative. Due to reporting lags, slight variations in DQ rate may occur between quarterly reports as data is updated.

Definition of Personal Loans: Personal finance installment trades that are non-revolving, non-HELOC, and non-mortgage related are classified as personal loans.

Origination timing: Originations are lagged by 2 months from the current archive date. Hence, the most recent origination datapoint is from July 31st, 2024.

Pre-pandemic average: Where specified on charts, pre-pandemic average is the average from January to December 2019.

Vantage bucket: In any charts where borrowers are split out by Vantage bucket, borrowers without a Vantage score are excluded. They are included in overall views. We did not observe any notable correlation between missing Vantage score and performance.

Vantage bucket timing: To better observe movements within Vantage buckets (and reduce the effect of re-classification of accounts across buckets), the vantage score is observed at a 3-month lag from the current archive date.

Vantage 4.0 Overview

Starting from Q3 2024, 2OS quarterly reports will be using Vantage 4.0 instead of Vantage 3.0 as the consumer credit score metric. Despite of the score shift between Vantage 4.0 and Vantage 3.0, the credit tiers and their corresponding scores were not changed. We did not observe significant changes to our analysis using Vantage 4.0.

The official statistics on score shift between Vantage 3.0 and Vantage 4.0 is as follows:

Score Range	VantageScore 4.0								
VantageScore 3.0	300-450	451-500	501-550	551-600	601-650	651-700	701-750	751-800	801-850
300-450	51.5%	38.4%	8.9%	1.1%	0.1%	0.0%	0.0%	0.0%	0.0%
451-500	7.5%	41.1%	41.8%	8.8%	0.7%	0.0%	0.0%	0.0%	0.0%
501-550	0.7%	11.7%	45.6%	36.0%	5.7%	0.3%	0.0%	0.0%	0.0%
551-600	0.0%	1.1%	14.6%	48.0%	32.1%	4.1%	0.1%	0.0%	0.0%
601-650	0.0%	0.0%	0.9%	13.6%	48.4%	31.5%	5.3%	0.2%	0.0%
651-700	0.0%	0.0%	0.1%	1.7%	16.2%	47.1%	30.7%	4.0%	0.1%
701-750	0.0%	0.0%	0.0%	0.0%	1.0%	16.6%	52.4%	26.3%	3.7%
751-800	0.0%	0.0%	0.0%	0.0%	0.0%	1.0%	15.5%	51.5%	32.0%
801-850	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.3%	23.1%	76.6%



Providing World-Class Credit Risk
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