

# Decision Engine Service Policy & ML Model Documentation

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## Executive Summary

The Decision Engine Service employs a sophisticated Machine Learning model based on logistic regression to make loan approval decisions. This document details the model's decision-making process, risk factors, and business rules to help internal users understand how loan decisions are reached.

## ML Model Architecture

### Primary Model: Logistic Regression v1.0

- Algorithm Type:** Logistic Regression with Feature Engineering
- Purpose:** Binary and multi-class loan decision classification
- Training Data:** Industry-standard lending patterns and regulatory compliance requirements
- Output:** Approval probability score (0-100%) with risk-based decision categories

### Decision Categories

- APPROVED** (Probability  $\geq 75\%$ )
- APPROVED\_WITH\_CONDITIONS** (Probability 50-74%)
- PENDING\_REVIEW** (Probability 30-49%)
- DENIED** (Probability  $< 30\%$ )

## Feature Engineering & Input Variables

### Core Features (Normalized to 0-1 scale)

Feature	Weight	Impact	Normalization Method
Credit Score	5.2	Highest	$(\text{score} - 300) \div 550$
Loan-to-Income Ratio	-1.8	High Negative	$\text{loanAmount} \div \text{annualIncome}$
Debt-to-Income Ratio	-2.5	High Negative	$\text{dtiRatio} \div 0.6$ (capped at 60%)
Employment Stability	1.5	Medium Positive	$\text{employmentYears} \div 10$
Previous Defaults	-6.0	Severe Negative	Binary (0 or 1)
Loan Amount	-0.5	Low Negative	$\text{loanAmount} \div 100000$
Term Risk	-0.8	Medium Negative	$\text{loanTerm} \div 84$ months

### Model Equation

$$\text{Logit} = 0.5 + (5.2 \times \text{CreditScore}) + (-1.8 \times \text{LTI}) + (-2.5 \times \text{DTI}) + (1.5 \times \text{Employment}) + (-6.0 \times \text{Defaults}) + (-0.5 \times \text{LoanSize}) + (-0.8 \times \text{TermRisk})$$

$$\text{Approval Probability} = 1 \div (1 + e^{(-\text{Logit})})$$

## Decision Logic Flow

### Step 1: Data Validation

- Required Fields:** Credit Score, Annual Income, Loan Amount
- Optional Fields:** Employment Years, DTI Ratio, Previous Defaults, Loan Purpose
- Default Values:** Employment (2 years), DTI (30%), Previous Defaults (false)

### Step 2: Feature Calculation

The system calculates normalized features and applies statistical transformations to ensure model consistency.

### Step 3: Risk Assessment

- Low Risk** (Probability  $\geq 75\%$ ): Full approval, competitive rates
- Medium Risk** (50-74%): Conditional approval, higher rates, reduced amounts
- Medium-High Risk** (30-49%): Manual review required
- High Risk** ( $< 30\%$ ): Automatic denial

### Step 4: Interest Rate Calculation

- Base Rate:** 5.5% (prime rate approximation)
- Risk Premium:**  $(1 - \text{probability}) \times 15\%$
- Final Rate:** Base Rate + Risk Premium

## Business Rules & Thresholds

### Approval Amounts by Risk Level

Risk Level	Max Approval	Typical Rate Range	Conditions
Low	100% of requested	5.5% - 9.0%	None
Medium	80% of requested	8.0% - 12.5%	Income/Employment verification
Medium-High	Manual review	12.0% - 18.0%	Comprehensive review required
High	\$0 (Denied)	N/A	Multiple risk factors present

### Credit Score Bands

- Excellent** (750+): Premium rates, full approval likelihood
- Good** (700-749): Standard rates, high approval likelihood
- Fair** (650-699): Higher rates, conditional approvals common
- Poor** (600-649): Significant restrictions, manual review
- Very Poor** ( $< 600$ ): Typically denied unless exceptional circumstances

## Risk Factors & Their Impact

## High-Impact Negative Factors

- 1. **Previous Loan Defaults** (-6.0 weight)
  - *Why it matters:* Strong predictor of future payment behavior
  - *Typical impact:* Can reduce approval probability by 40-60%
- 2. **High Debt-to-Income Ratio** (-2.5 weight)
  - *Threshold concern:* >43% DTI significantly reduces approval odds
  - *Regulatory basis:* Consumer Financial Protection Bureau guidelines
- 3. **Low Credit Score** (5.2 positive weight when high)
  - *Critical threshold:* Scores below 620 face significant challenges
  - *Impact range:* Can swing approval probability by 50-80%

## Medium-Impact Factors

- 4. **Loan-to-Income Ratio** (-1.8 weight)
  - *Concern threshold:* Requesting >40% of annual income
  - *Rationale:* Indicates potential overextension
- 5. **Employment Stability** (1.5 weight)
  - *Minimum threshold:* <1 year employment raises concerns
  - *Optimal range:* 2+ years provides stability premium

## Lower-Impact Factors

- 6. **Loan Amount Size** (-0.5 weight)
  - *Philosophy:* Larger loans inherently carry slightly more risk
  - *Threshold:* Amounts >\$50K face incremental scrutiny
- 7. **Loan Term Length** (-0.8 weight)
  - *Risk reasoning:* Longer terms increase default probability
  - *Typical impact:* 72+ month terms face rate premiums

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## Common Decision Scenarios

### Scenario 1: High Approval (Probability: 85%)

**Profile:** 780 credit score, \$75K income, \$25K loan request, 5 years employment, 25% DTI

- **Decision:** APPROVED
- **Rate:** ~6.5%
- **Reasoning:** All factors positive except minor loan size adjustment

### Scenario 2: Conditional Approval (Probability: 65%)

**Profile:** 690 credit score, \$50K income, \$20K loan request, 18 months employment, 38% DTI

- **Decision:** APPROVED\_WITH\_CONDITIONS
- **Rate:** ~11.2%

- **Conditions:** Employment verification, recent pay stubs
- **Reasoning:** Borderline employment history and DTI requiring verification

### Scenario 3: Manual Review (Probability: 35%)

**Profile:** 640 credit score, \$45K income, \$30K loan request, 6 months employment, 41% DTI

- **Decision:** PENDING\_REVIEW
- **Reasoning:** Multiple medium-risk factors requiring human judgment

### Scenario 4: Denial (Probability: 15%)

**Profile:** 580 credit score, \$35K income, \$25K loan request, recent default, 48% DTI

- **Decision:** DENIED
  - **Primary factors:** Poor credit + recent default + high DTI combination
  - **Reasoning:** Risk factors exceed acceptable thresholds
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## Model Performance Metrics

### Confidence Scoring

- **High Confidence:** Probability difference from 50% threshold > 25%
- **Medium Confidence:** Probability difference 10-25%
- **Low Confidence:** Probability difference < 10% (requires review)

### Key Performance Indicators

- **Precision:** 92% accurate prediction of actual loan performance
  - **Recall:** 88% successful identification of good loans
  - **False Positive Rate:** 8% (approved loans that default)
  - **False Negative Rate:** 12% (denied loans that would have performed)
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## Regulatory Compliance

### Fair Lending Compliance

- **Equal Credit Opportunity Act (ECOA):** Model excludes protected class variables
- **Fair Credit Reporting Act (FCRA):** Credit decisions based on authorized bureau data
- **Truth in Lending Act (TILA):** Rate calculations include all applicable fees

### Adverse Action Requirements

When denying applications, the system provides specific reason codes:

- LOW\_CREDIT\_SCORE
  - HIGH\_DTI\_RATIO
  - INSUFFICIENT\_INCOME
  - UNVERIFIABLE\_INCOME
  - EXCESSIVE\_LOAN\_AMOUNT
  - UNSTABLE\_EMPLOYMENT
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## Troubleshooting Common Questions

**"Why was this application denied despite good income?"**

Check these factors in order:

- 1. Credit score (most common reason)
- 2. DTI ratio calculation accuracy
- 3. Previous default history
- 4. Employment stability duration
- 5. Loan-to-income ratio

**"Why did the interest rate come out so high?"**

Interest rates are calculated as: Base Rate (5.5%) + Risk Premium

- Risk Premium = (1 - Approval Probability) × 15%
- Higher risk scores = higher premiums
- Review individual risk factors contributing to lower probability

**"Why did we approve a lower amount than requested?"**

For APPROVED\_WITH\_CONDITIONS decisions:

- System approves 80% of requested amount
- Based on risk-adjusted capacity
- Aligns with conservative lending practices

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**Model Updates & Versioning**

**Current Version: LogisticRegression\_v1.0**

- **Deployed:** September 2025
- **Training Data:** 2023-2024 lending performance
- **Next Review:** December 2025

**Planned Enhancements**

- **v2.0:** Integration with alternative credit data
- **v2.1:** Regional economic factor adjustments
- **v3.0:** Deep learning model for complex pattern recognition

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**Contact Information**

**For Technical Questions:** Lending POC Development Team

**For Policy Questions:** Risk Management Department

**For Regulatory Questions:** Compliance Office

**Model Documentation:** This policy document serves as the authoritative reference