

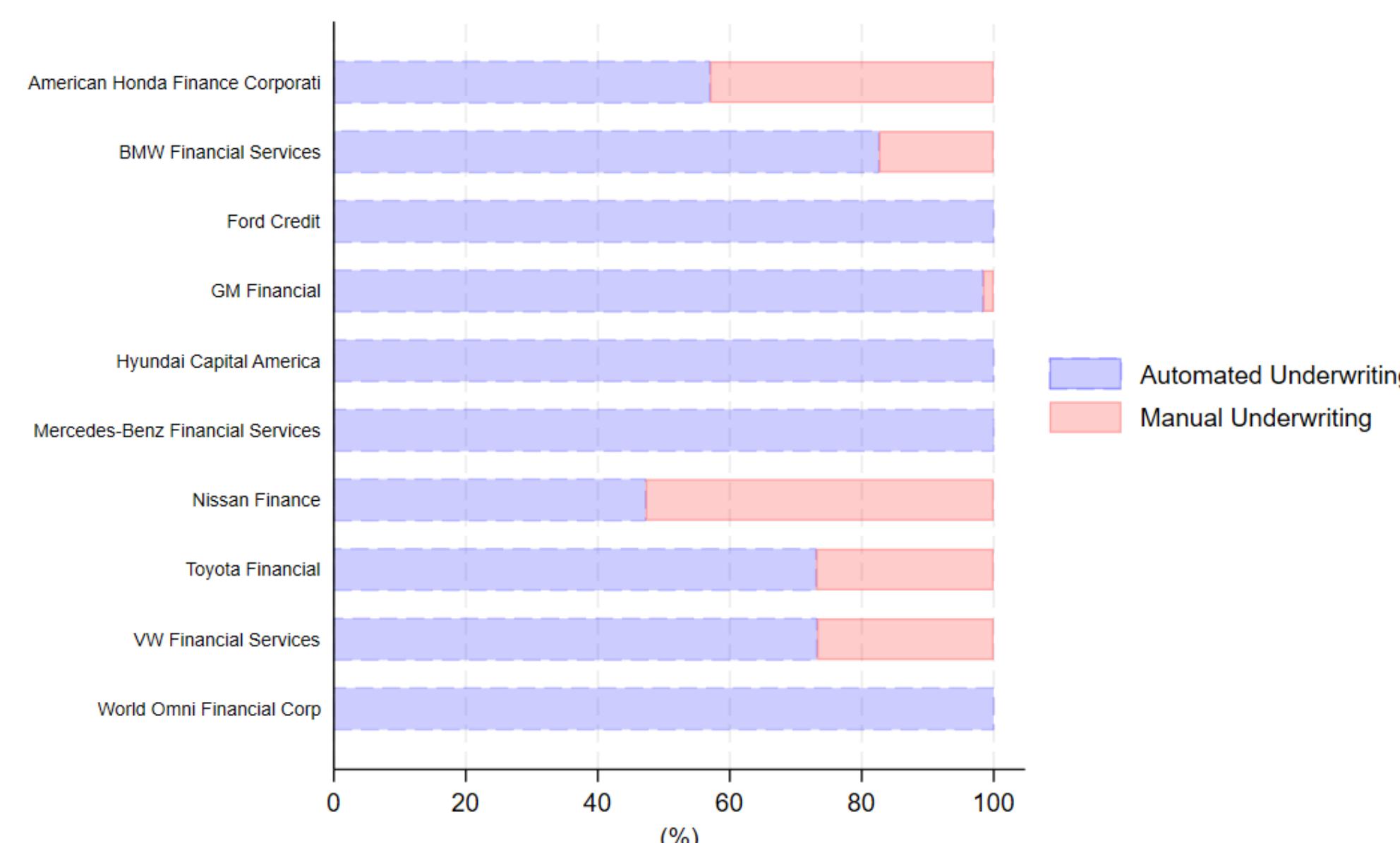
# When Models Fail: Evidence from Automated Underwriting in Auto Loan Markets

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## 1. Motivation

Automation is transforming consumer credit markets. It improves efficiency, expands access, reduces bias, and boosts profits (Fuster et al., 2019; Howell et al., 2024; Gao et al., 2024; Jansen et al., 2024).

Yet many lenders still rely on human underwriters, and time series do not explain this variation.



Puzzle: If automation works so well, why retain humans?

This paper: Model Risk

This risk arises when models rely on training data that does not include unexpected shocks, leading to errors when conditions change.

Hypothesis: Humans act as a **safeguard against model risk**—when algorithms fail under unexpected shocks.

Specific Research Setting: COVID-19 shock in the auto loan market as a natural test of automated vs. manual underwriting resilience.

## 3. Data & Identification Strategy

Data: Granular loan-level data from Regulation AB II, covering millions of auto loans from top U.S. lenders

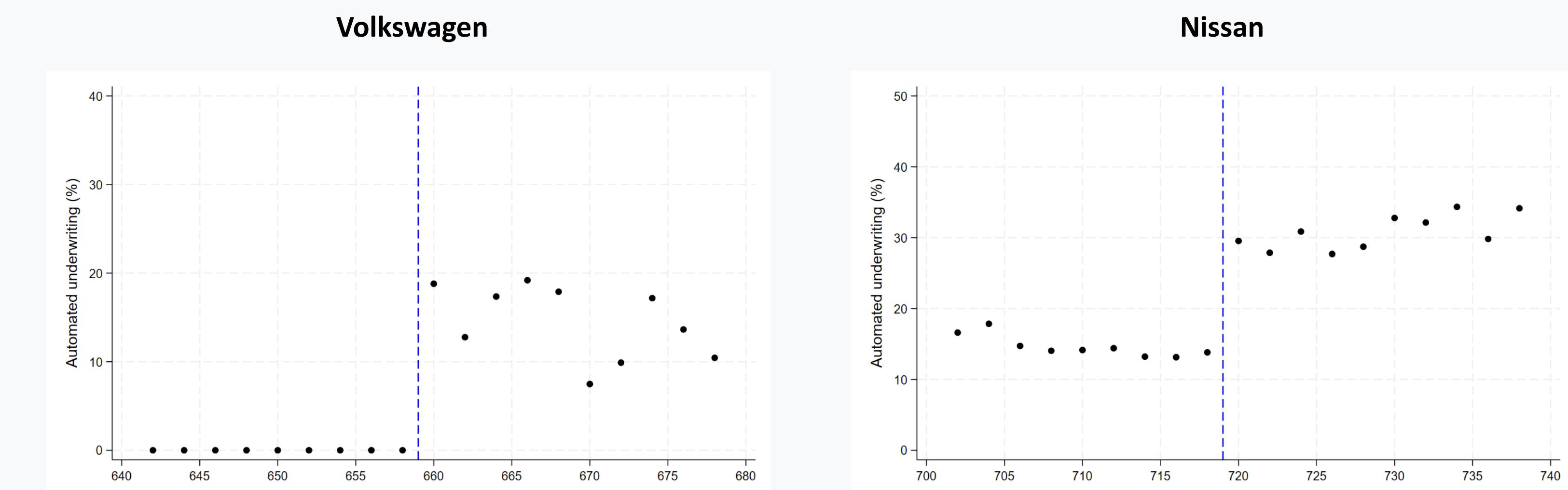
Data includes:

- 12 captive + 11 non-captive lenders
- Loan, vehicle, borrower characteristics
- Underwriting indicator
- Ex-post performance: delinquency, charge-off

Identification Strategy:

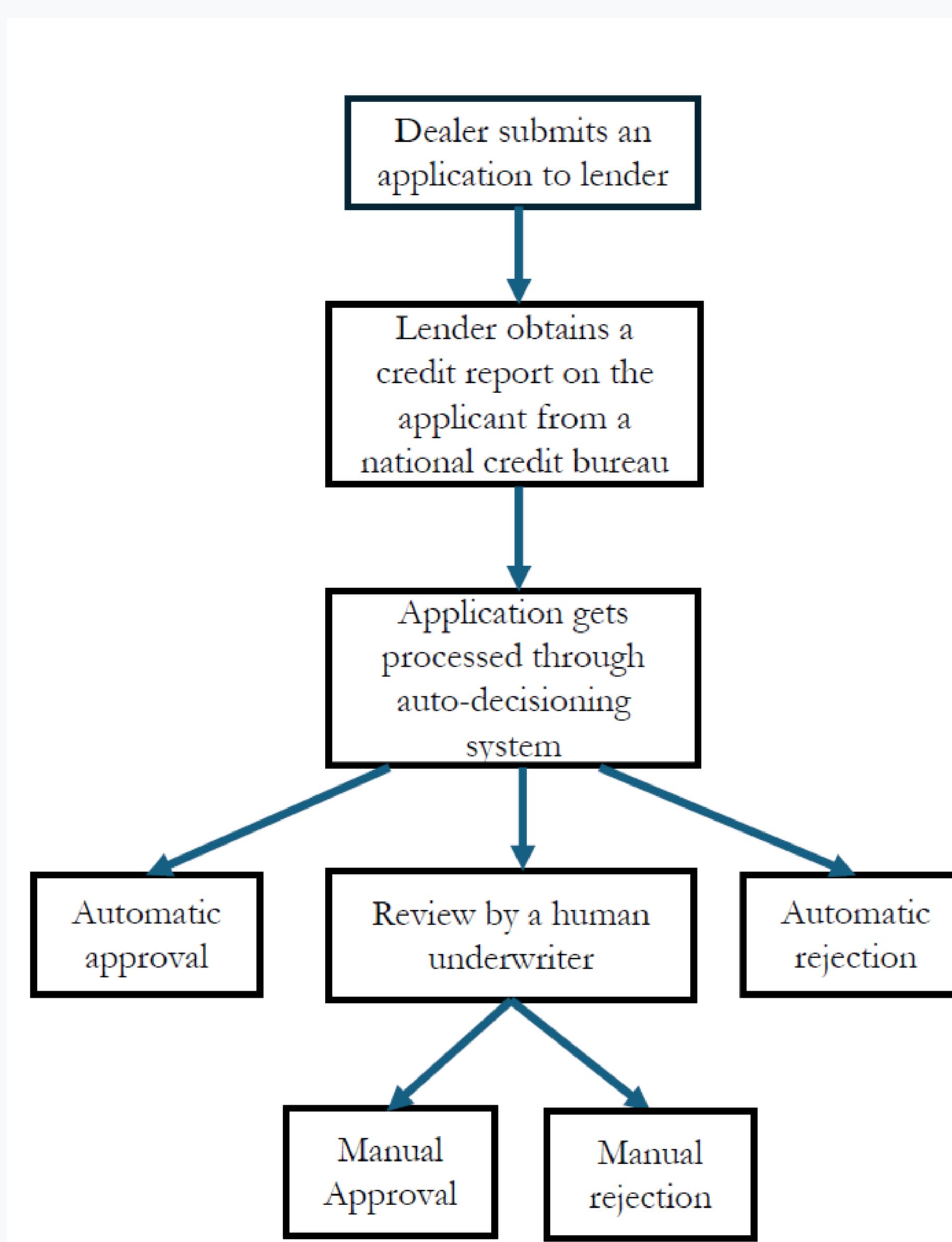
1- **Within-lender variation:** Difference-in-differences comparing loan performance for quasi-random assignments to human vs. automated underwriting before and after the pandemic.

Leverage **lender-specific underwriting discontinuities** that generate quasi-random assignment to human vs. automated review.



2- **Across-lender variation:** Difference-in-differences comparing the performance of loans originated by fully automated lenders to those originated by mixed-underwriting lenders before and after the pandemic.

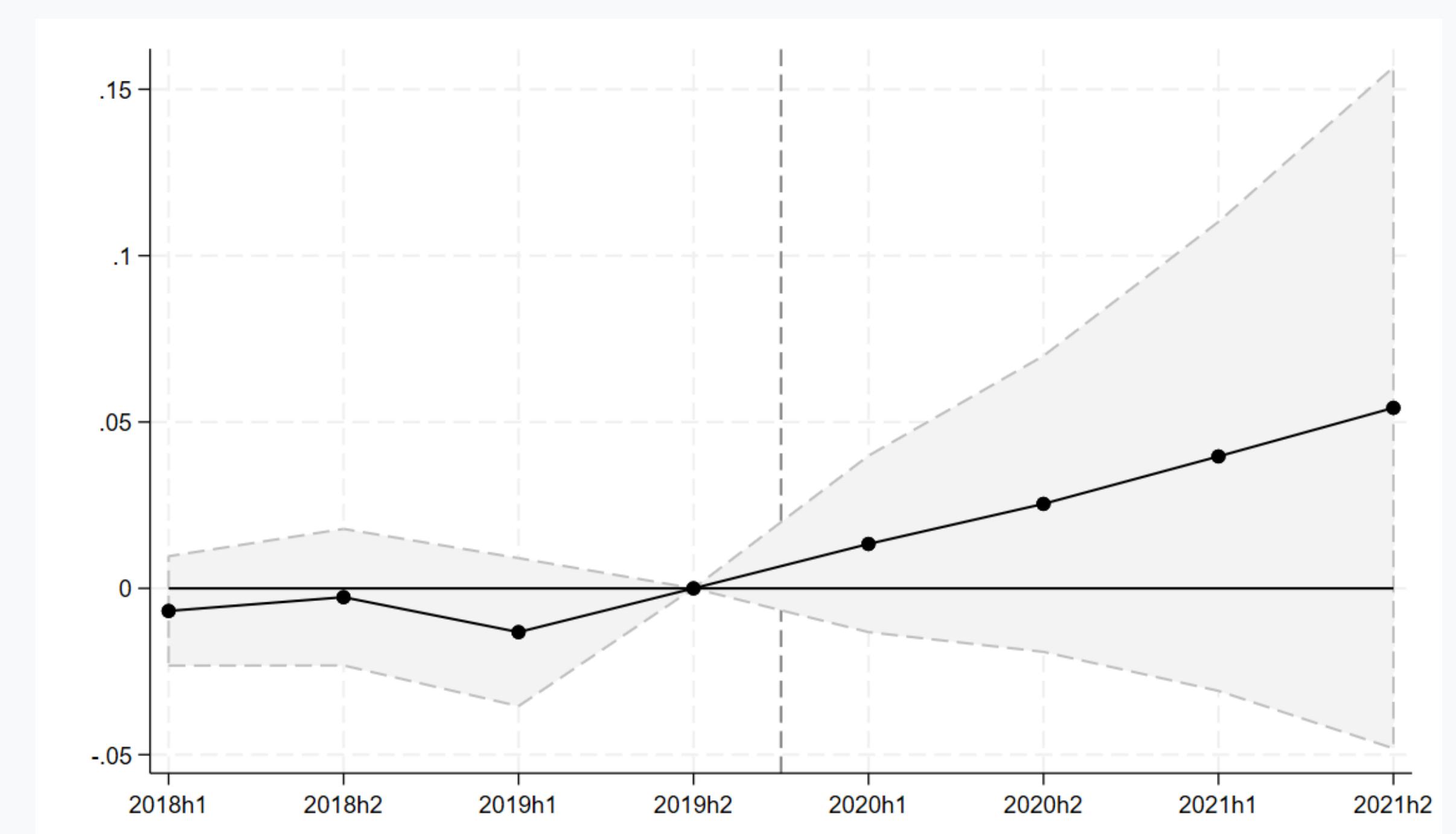
## 2. Automated vs Manual Underwriting in Auto Lending Market



## 4. Main Findings

### • At the loan-level:

After COVID  $\Rightarrow$  Automated performance significantly deteriorates relative to humans.



### • At the lender-level:

Lenders relying exclusively on automation faced systematically higher default risk when economic conditions shifted abruptly, whereas mixed lenders were better able to adapt through discretionary review.

### Channel: Model Risk

- Models trained on pre-COVID data mispredict outcomes for borrowers more exposed to shocks and uncertainty.
- Concentrated impact: Performance drops most for high-risk borrowers.

Fully automated lenders pass on a portion of model risk to consumers by charging higher prices.

