Transportation Cost Volatility, Rural Coverage Risk, Inspection Volume Compression, Lawn Maintenance, and Debris Disposal Additional Expense

A White Paper on Fuel Cost Stabilization in the Mortgage Field Services Industry

Prepared by

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Purpose of this white paper
This document provides a data-supported framework for requesting a Transportation Cost Stabilization Adjustment from mortgage servicers, GSEs, and federal housing regulators. It is designed to support stakeholder meetings, pilot proposals, regulatory comments, and congressional briefings.

Executive Summary

Mortgage field services are transportation-dependent by design. Property inspections & property preservation, and recurring maintenance require inspectors and contractors to travel to geographically dispersed assets, often across low-density and rural routes.

Since 2020, U.S. retail fuel prices have moved through extraordinary volatility. EIA monthly data show regular gasoline falling below $2.00 per gallon in April 2020, rising above $4.90 in June 2022, easing during 2024-2025, and rising again during early 2026. Diesel prices show an even sharper commercial transportation burden, exceeding $5.70 in June 2022 and exceeding $5.50 in April 2026. [1][2]

At the same time, field-service inspection economics have changed. GSE policy changes directed by FHFA moved the initial delinquency inspection trigger from roughly the 60th day of delinquency to the 90th day, with completion or reporting by the 120th day. Current Fannie Mae guidance requires inspection ordering on or after the 90th day of delinquency and completion no later than the 120th day, subject to exceptions when the property is occupied and borrower engagement, payment, workout performance, or bankruptcy-plan performance exists. [3][4][5]

This timing change reduces early-delinquency inspection volume by excluding loans that cure, enter loss mitigation, or otherwise resolve before the 90-day threshold. FHFA Enterprise performance reports show 60+ day delinquency rates declining from 3.07% in 4Q2020 to 0.83% in 4Q2024 and 0.76% in 2Q2025, while serious delinquency declined from 2.78% in 4Q2020 to 0.57% in 4Q2024 and 0.54% in 2Q2025. [7]

The combined effect is a smaller and more operationally challenging inspection universe: fewer reimbursable stops, reduced route density, and a higher cost per completed assignment, especially in rural and high-mileage territories. Public data can support fuel volatility, timing changes, and broad volume compression. NAMFS has previously documented the increase in rural and higher-mileage assignment mix in our Industry Pricing Initiative, which is updated quarterly and can be found HERE.

Property preservation creates additional transportation burdens that are not fully captured by simple property-to-property route mileage. Debris removal requires travel from the asset to a certified location (construction-and-demolition facility, landfill, or recycling/disposal location) and then return for additional loads or continue to the next assignment. This disposal-related travel adds fuel, labor, vehicle wear, and cycle-time costs to preservation work. [21]

Comparable transportation-dependent industries already use fuel-indexed adjustments. UPS and FedEx apply weekly fuel surcharges tied to published EIA diesel or jet-fuel indices; EIA notes that many shippers and truckers use its diesel price data in fuel-pricing formulas; federal contracting clauses and highway construction programs recognize fuel price adjustment mechanisms; and waste/recycling companies use recurring fuel or energy recovery fees. [10][11][13][15][17][19][20]

Core recommendation

NAMFS proposes a Transportation Cost Stabilization Framework (TCSF) using EIA fuel indices, 30-day or quarterly rolling-average triggers, tiered adjustments, and rural/mileage modifiers. Recommended initial trigger levels are $3.75 per gallon for gasoline and $4.25 per gallon for diesel.

Recommended Initial Ask

Component	Recommendation
Fuel benchmark	EIA national gasoline and diesel retail price indices
Trigger method	30-day rolling national average, not a single-day price
Gasoline trigger	$3.75 per gallon
Diesel trigger	$4.25 per gallon
Initial adjustment	3%-5% transportation cost adjustment
Pilot scope	National application
Pilot duration	6-12 months with operational metrics

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1. Purpose and Policy Thesis

This paper recommends a standardized Transportation Cost Stabilization Framework for the mortgage field services industry. The framework is intended to address abnormal fuel volatility and the resulting pressure on service continuity, route coverage, vendor capacity, and rural market access.

The policy thesis is straightforward: fuel volatility is not merely a vendor expense issue. In a geographically distributed field-services network, transportation instability can reduce contractor participation, increase work-order declines, slow service-level performance, and increase asset deterioration risk. A transparent, index-based adjustment mechanism can reduce ad hoc price disputes while improving service continuity for servicers, GSEs, investors, and taxpayers.

Primary Policy Objective

- Preserve field-service network capacity during abnormal transportation-cost volatility.
- Reduce rural coverage gaps and high-mileage assignment refusals.
- Protect collateral and reduce avoidable property deterioration.
- Create a predictable and administratively simple cost-adjustment mechanism.
- Support GSE, servicer, and regulator risk-management objectives without creating an open-ended rate escalator.

2. Transportation Dependency, Debris Disposal Costs, and Lawn Maintenance Additional Fuel Exposure

Mortgage field services are mobile operations. Unlike fixed-site businesses, field service providers create economic value by moving trained personnel, vehicles, tools, equipment, materials, and inspection technology across a geographically dispersed inventory of properties.

Core services include occupancy determination inspections and property preservation (securing, lock changes, winterization, lawn maintenance, debris removal, hazard remediation, conveyance preparation, and disaster response). Each service depends on route planning and transportation availability.

Fuel costs are not incidental. They directly affect the marginal cost of each work order, especially when property density is low, when work is located outside urban clusters, or when expedited response requires non-optimized routing.

Operational Characteristics that Increase Fuel Exposure

- High daily vehicle mileage across dispersed portfolios.
- Multiple stops per route with variable completion success.
- Rural and low-density territories where stops cannot be efficiently clustered.
- Expedited dispatch for securing, weather events, and hazard conditions.
- Seasonal weather response, including winterization, freeze checks, storm response, and lawn maintenance cycles.

Debris Disposal Adds a Second Transportation Layer

For property preservation services, contractors often incur transportation costs beyond the trip to the property itself. Debris removal can require loading materials at the asset, transporting them to an approved transfer station, construction-and-demolition debris facility, landfill, recycling facility, or other disposal site, paying any applicable tipping or disposal charges, and then returning for additional loads or continuing to the next assignment.

This creates a different cost profile than an inspection-only work order. Preservation crews may use trucks, trailers, dump equipment, or multiple vehicles; may make multiple disposal trips; and may experience wait time at disposal facilities. In rural or low-density markets, the disposal facility may be far from both the subject property and the next

reimbursable stop. These miles are usually operationally necessary but may not be visible when reimbursement discussions focus only on the service address.

EPA materials-waste data classify construction and demolition materials across generation, recycling, combustion with energy recovery, and landfilling categories. While mortgage preservation debris varies by property condition and scope, the practical implication is the same: debris has to be transported to an appropriate downstream facility or disposal path. [21]

Lawn Maintenance: Additional Fuel Exposure from Equipment Operation

Lawn maintenance is one of the mortgage field services industry's most fuel-sensitive recurring preservation services. Unlike a single inspection visit, lawn maintenance typically requires both transportation fuel and direct equipment fuel. Contractors must travel to the property, often towing trailers loaded with commercial mowers, trimmers, blowers, fuel containers, safety equipment, and disposal tools. Once onsite, the service itself requires additional fuel consumption through gasoline-powered mowing and landscape equipment.

This creates a **dual fuel exposure**:

1. **Vehicle and route fuel**, including travel from the contractor's operating base to the property, travel between route stops, and return travel; and
2. **Equipment fuel**, including fuel consumed by commercial mowers, string trimmers, blowers, edgers, and related landscape equipment.

The U.S. Energy Information Administration publishes weekly national gasoline and diesel price data, and EIA also notes that many shipping, delivery, and freight carriers use EIA diesel price data in fuel-pricing formulas. That precedent is directly relevant to mortgage field services because lawn maintenance is also a route-based, transportation-dependent service model.

Recurring Seasonal Service Magnifies Fuel Exposure

Lawn maintenance is not a one-time cost event. During active grass seasons, properties may require recurring service cycles to prevent code violations, complaints, fines, overgrowth, pest harborage, and neighborhood blight. As a result, fuel exposure compounds across repeated visits.

This recurrence is especially important where overall inspection or preservation volumes are declining but the remaining properties are more geographically dispersed, rural, or low-density. In that operating environment, contractors may drive farther between properties while completing fewer work orders per route. Lower route density reduces the ability to spread fuel costs across multiple jobs, increasing the fuel cost per completed lawn maintenance order.

Larger Lots and Rural Properties Increase the Burden

Lawn maintenance is particularly impacted in rural and low-density areas because these properties often involve:

- Longer drive distances;
- Lower work-order density;
- Larger lots or acreage-style cuts;
- Longer onsite service time;
- Fewer nearby work orders to offset travel costs.

A contractor servicing a rural lawn maintenance order may incur fuel costs before arrival, during service, and again after leaving the property. Where the property requires larger mowing equipment or extended trimming, direct equipment fuel becomes a material cost factor independent of the travel expense.

Overgrowth and Delayed Service Increase Fuel and Labor Consumption

The current two (2) week cycle for lawn maintenance often leads overgrown lawns which can require slower mowing speeds, multiple passes, heavier trimming, additional cleanup, and increased equipment runtime which often results in more fuel-intensive work. This service can be further impacted by weather conditions. These conditions increase both labor time and fuel consumption.

The impact is similar to debris removal: the contractor is not merely traveling to a property to complete a simple task. The contractor is deploying fuel-consuming equipment, often with trailers or commercial vehicles, to perform physical property preservation work that directly protects collateral condition and neighborhood appearance.

Equipment Fuel Should Be Recognized Separately from Travel Fuel

Lawn maintenance differs from many inspection services because the contractor's fuel exposure does not end when the vehicle arrives at the property. Gasoline-powered lawn and garden equipment includes equipment categories such as trimmers, tractors, and similar tools, meaning the onsite work itself directly consumes fuel.

Accordingly, any Transportation Cost Stabilization Framework should recognize that lawn maintenance has a broader fuel profile than simple route mileage. A fair model should consider:

- Base travel mileage;
- Trailer or truck requirements;
- Equipment runtime;
- Rural or low-density routing;
- Seasonal recurrence;
- Larger lot conditions;
- Overgrowth or code-risk urgency.

Policy Implication

Without a fuel adjustment mechanism, contractors may be forced to reduce coverage in rural or low-density markets, decline unprofitable routes, consolidate service schedules, or exit seasonal lawn maintenance work entirely. These outcomes increase the risk of overgrowth, municipal violations, neighborhood complaints, and avoidable deterioration of vacant or distressed properties.

3. Fuel Price Volatility Since 2020

EIA data demonstrate that fuel volatility has been substantial since 2020. This volatility matters because the field-services reimbursement model is typically built around flat or capped service pricing, while fuel costs move daily and can spike regionally or nationally.

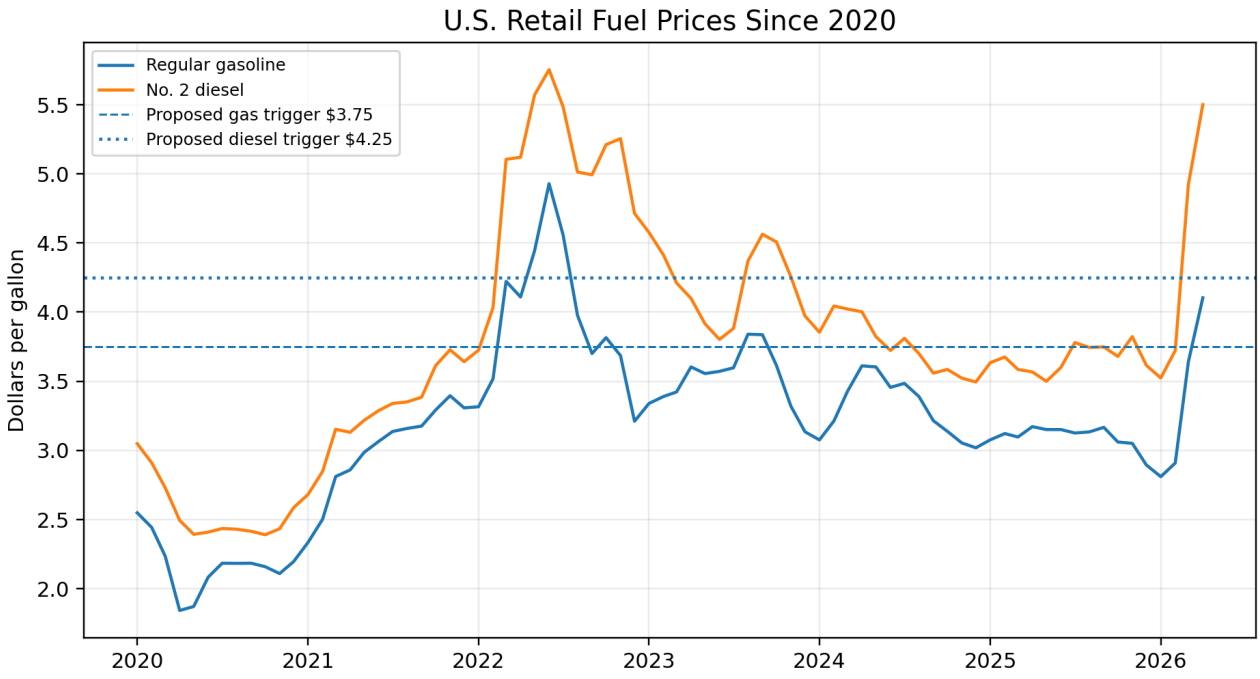

Figure 2. U.S. retail regular gasoline and No. 2 diesel prices since 2020.

Source note: Monthly EIA retail price data, January 2020-April 2026. Proposed trigger lines are NAMFS policy recommendations, not EIA thresholds. [1][2]

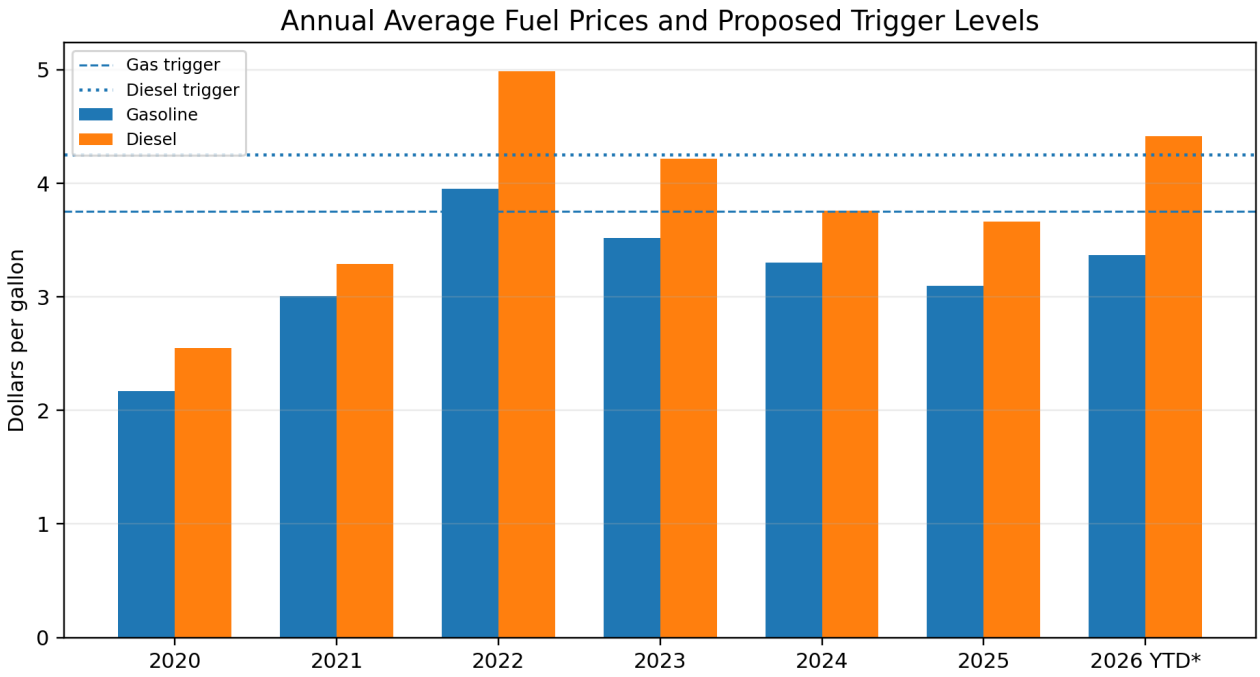

Figure 3. Annual average fuel prices with proposed trigger levels.

Source note: Annual EIA price averages for 2020-2025; 2026 YTD is the January-April monthly average from EIA monthly data. [1][2]

The trigger levels recommended in this white paper are intentionally not set at the lowest recent prices. A credible framework should activate only when fuel costs exceed ordinary business variation.

Using rolling averages is essential. A 30-day or quarterly average avoids overreacting to a single-week spike while still providing relief when fuel prices remain elevated long enough to affect operational capacity.

4. Inspection Volume Compression from GSE Timing Changes

Inspection economics changed materially when GSE requirements shifted the initial delinquency inspection timeframe. Freddie Mac Bulletin 2021-35 stated that prior requirements called for an inspection to be ordered on or after the 60th day of delinquency and for the complete inspection report to be obtained by the 75th day, and changed that requirement to ordering by the 90th day and reporting by the 120th day. [4]

Fannie Mae announced a similar change in 2021, updating its initial delinquency inspection order date from no earlier than the 60th day to no earlier than the 90th day, with implementation by February 1, 2022. [3] Current Fannie Mae guidance now requires the servicer to order a property inspection on or after the 90th day of delinquency and complete it no later than the 120th day, with monthly inspection requirements continuing while a loan remains 90+ days delinquent unless an exception applies. [5]

Fannie Mae operational guidance also indicates that loans are generally submitted at 90 days delinquent, with a vacant-property exception as early as 45 days; Fannie Mae may wait to order inspections closer to 110 days delinquent when necessary, and additional data may show occupancy information that eliminates the need for inspection. [6]

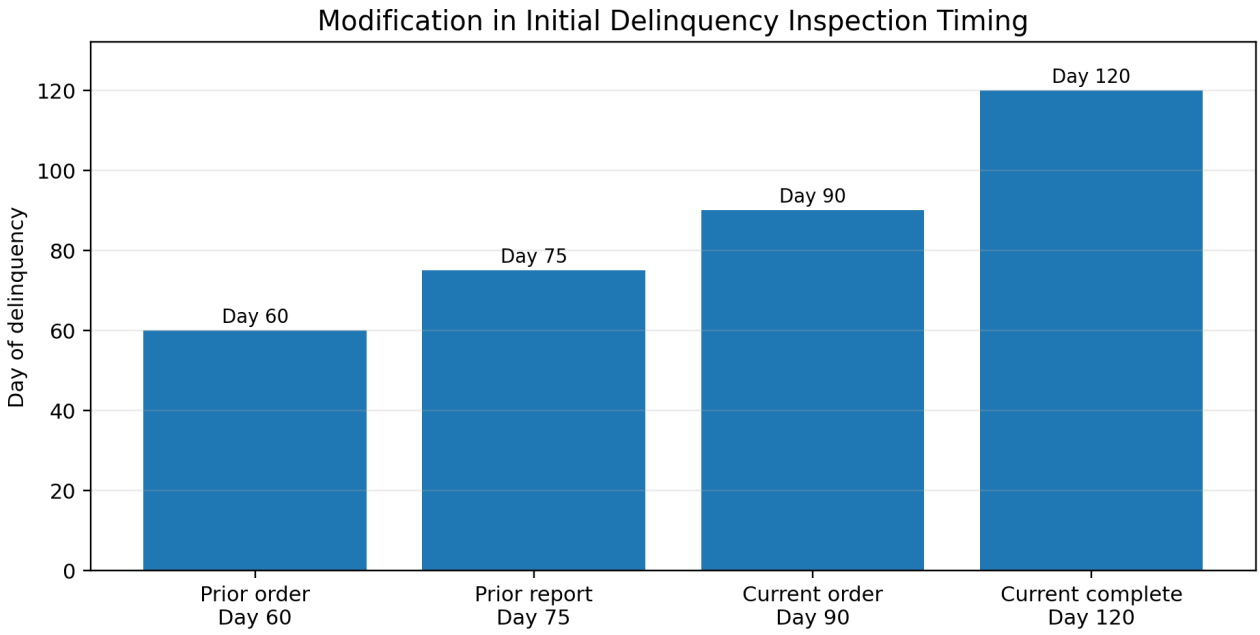

Figure 4. Initial delinquency inspection timing shifted from approximately 60/75 days to 90/120 days.

Source note: Freddie Mac Bulletin 2021-35 and Fannie Mae SVC-2021-08 documented the initial inspection timing change. [3][4]

This timing shift changes inspection-route economics. Early-stage delinquent loans that cure, become engaged through QRPC, receive payment, enter an approved workout, or perform under a bankruptcy plan may no longer generate inspection activity. That reduces total reimbursable stops available to field vendors and can make routes less dense.

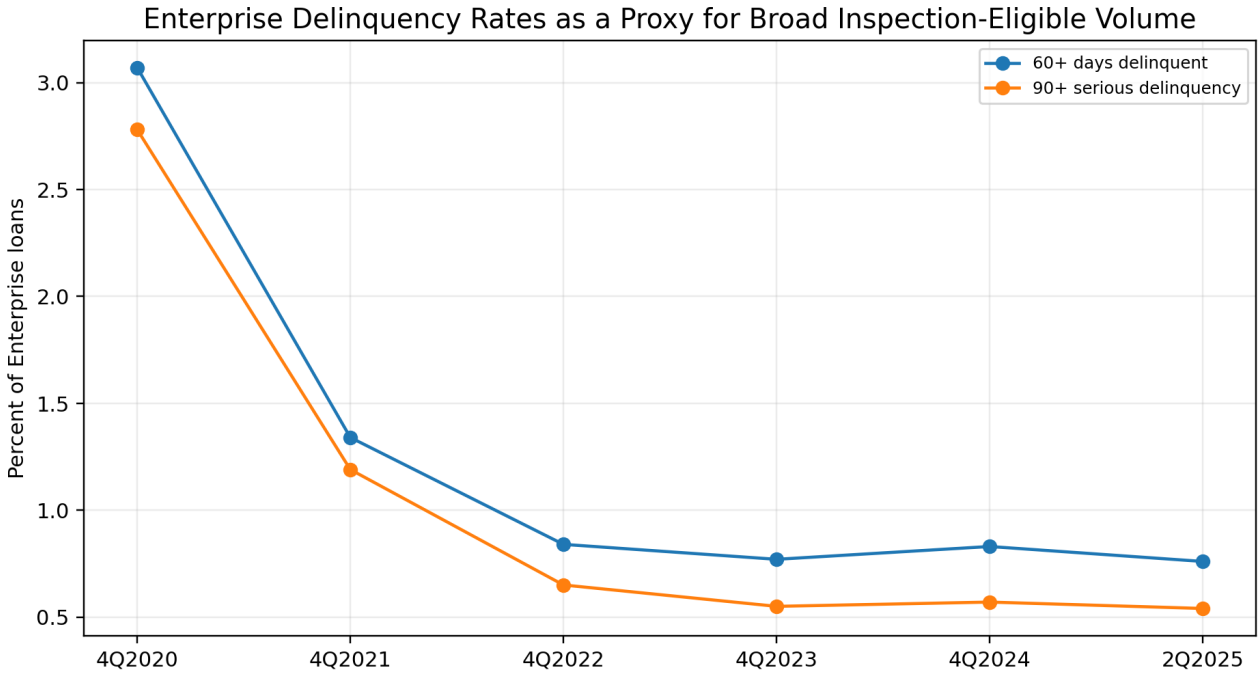

Figure 5. FHFA Enterprise delinquency rates as a proxy for broad inspection-eligible volume compression.

Source note: FHFA quarterly foreclosure-prevention and refinance reports, 4Q2020-2Q2025. This is not a direct work-order count; it is a public proxy for the delinquent-loan pool from which inspections may arise. [7]

5. Rural Coverage and Route-Density Risk

NAMFS vendors and contractors have reported that remaining work is increasingly difficult to route profitably, particularly where rural, high-mileage, and low-density assignments remain even as overall inspection volume declines. Public datasets do not provide a clean national count of mortgage field-service work orders by rural/non-rural status. As a result, NAMFS should treat the increase in rural-property assignments as a member-data claim and support it through a structured work-order data collection.

Public sources do support the relevance of rural classification and rural coverage. FHFA Duty to Serve data identify specific rural and high-needs rural geographies, and FHFA dashboards track the share of Enterprise single-family loans located in Duty to Serve rural and high-needs rural areas. CFPB mortgage performance data can be analyzed by state, metro area, non-metro area, and county, creating a public framework for comparing delinquency trends across rural and non-rural markets. [8][9]

The economic issue is route density. When total volume declines, fewer reimbursable stops are available on a route. If rural assignments remain geographically dispersed, the cost per completed order rises because drive time, mileage, fuel, insurance, and vehicle costs are spread across fewer paid work orders.

Important evidentiary distinction

This white paper does not claim that public data alone proves a national increase in rural field-service work-order counts. NAMFS has previously exhibited the increase in rural vendor work which was validated by Fannie Mae. Public sources do support the fuel-volatility, GSE timing-change, delinquency-pool, and rural-classification components of the argument.

6. Comparable Industry Fuel-Adjustment Precedents

A Transportation Cost Stabilization Adjustment would not be unusual or unprecedented. Many transportation-dependent sectors already use transparent fuel-index or energy-recovery mechanisms because fuel is volatile and difficult to price accurately into static base rates.

The strongest precedents are industries that combine route-based work, distributed assets, fleet operations, remote-area service, or public contract obligations. These are the same types of operational characteristics present in mortgage field services.

Industry / Program	Implemented Mechanism	Relevance to Mortgage Field Services
Parcel delivery - UPS	Ground fuel surcharge based on the national U.S. average on-highway diesel fuel price and adjusted weekly; air surcharges tied to jet fuel indices. [10]	Demonstrates weekly, public-index adjustments for dense and remote route networks.
Parcel / freight - FedEx	Ground, Home Delivery, International Ground, LTL freight, and pickup fuel surcharges adjusted weekly using EIA on-highway diesel prices. [11]	Shows fuel adjustments applied to route-based pickup and delivery operations.
Express delivery - DHL	Surcharges may apply for remote delivery, remote pickup, high operational demand, and specialized handling. [12]	Supports the concept of additional charges where distance, remoteness, and specialized service increase cost.
Freight / trucking market	EIA states many shippers and truckers use EIA diesel price data in fuel-pricing formulas, although EIA does not regulate the surcharges. [13]	Closest economic analogy for mileage-driven, diesel-exposed contractor operations.
Federal contracting - VA	VA acquisition rules include an Economic Price Adjustment - Fuel Surcharge clause using the Weekly Retail On-Highway Diesel Prices Index. [15]	Shows federal procurement recognizes fuel volatility as a contract-adjustment issue.
Defense transportation - DFARS	DFARS includes a clause requiring pass-through of motor carrier fuel surcharge adjustments to the cost bearer. [16]	Supports the principle that fuel-related adjustments should reach the party bearing the actual fuel cost.

Highway / infrastructure construction	FHWA Federal Lands publishes fuel price information for projects with fuel price adjustment provisions; MassDOT requires price adjustment clauses for gasoline and diesel in certain public works contracts. [17][18]	Relevant because preservation, debris, lawn, winterization, and securing work are field-based asset-maintenance services.
Waste / recycling collection	WM and Republic Services disclose recurring fuel, environmental, or fuel-recovery charges for waste and recycling services. [19][20]	Strong preservation analogy because debris removal combines collection, hauling, transfer/disposal, and route-based service.

7. Proposed Transportation Cost Stabilization Framework

NAMFS should request a Transportation Cost Stabilization Framework rather than framing the proposal as a generic fuel surcharge. The terminology matters: the framework is designed to preserve operational continuity during abnormal transportation-cost volatility.

Framework Components

Component	Recommended Design
Fuel benchmark	EIA national regular gasoline and No. 2 diesel retail prices; regional fuel indices may be used where state/regional cost differences are material.
Activation method	30-day or quarterly rolling average. The adjustment should not activate based on a single-day price.
Gasoline baseline trigger	$3.75 per gallon. Below this threshold, transportation volatility should generally be treated as ordinary business variance.
Diesel baseline trigger	$4.25 per gallon. Diesel is critical for trucks, trailers, generators, and commercial operations.
Tier structure	Escalating percentages as fuel exceeds trigger levels, capped or reviewed periodically to avoid uncontrolled escalation.
Rural/mileage modifier	Additional consideration for low-density, long-distance, and high-cost service territories.
Review period	Quarterly review, with automatic sunset or reset when rolling averages fall below threshold.

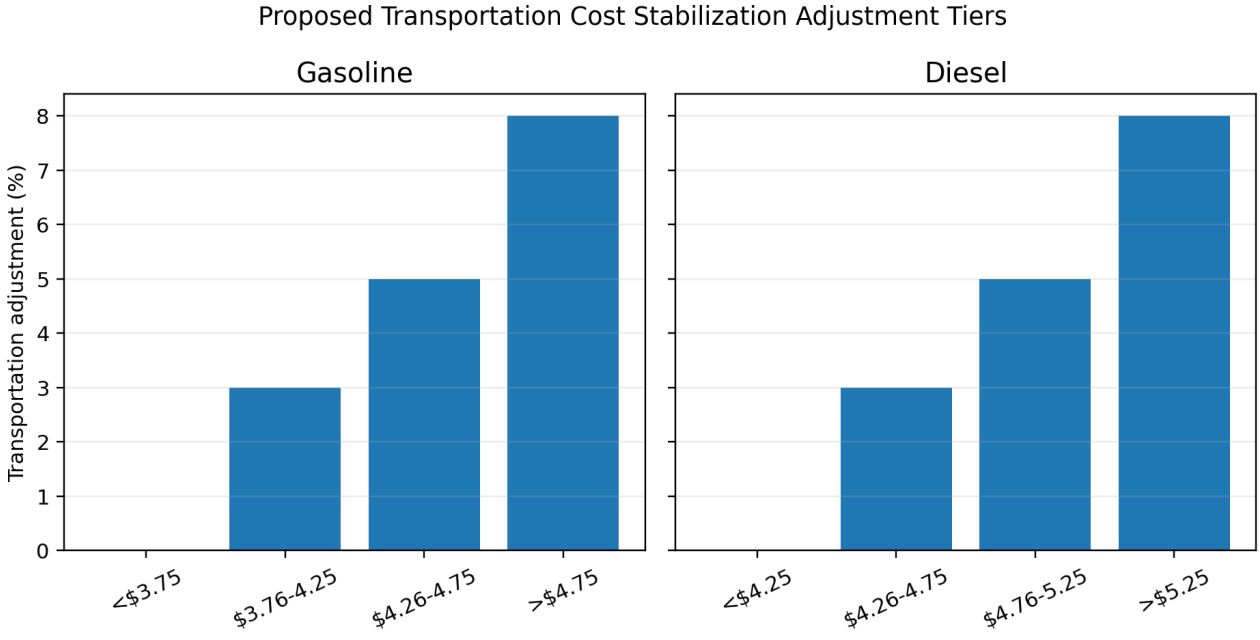

Figure 7. Proposed tiered Transportation Cost Stabilization Adjustment.

Source note: Recommended NAMFS policy framework. Exact percentages may be negotiated during pilot design.

Recommended Adjustment Tiers

Fuel Type	Average Fuel Price	Recommended Adjustment
Gasoline	Under $3.75	No adjustment
Gasoline	$3.76-$4.25	+3%
Gasoline	$4.26-$4.75	+5%
Gasoline	Above $4.75	+8%
Diesel	Under $4.25	No adjustment
Diesel	$4.26-$4.75	+3%
Diesel	$4.76-$5.25	+5%
Diesel	Above $5.25	+8%

8. Recommended Pilot Program

NAMFS should initially seek a limited pilot rather than immediate national adoption. A pilot lowers stakeholder resistance and allows servicers, GSEs, FHFA, vendors, and contractors to evaluate whether transportation stabilization improves service continuity and rural coverage.

Pilot Element	Recommendation
Duration	6-12 months
Geographic scope	Rural, low-density, high-mileage, and disaster-prone territories
Fuel index	EIA national index, with regional overlay where needed
Services included	Inspections, preservation, securing, winterization, expedited response, and recurring maintenance where travel burden is material
Metrics	SLA performance, accepted/declined order rates, contractor retention, average route mileage, rural coverage continuity, rework rate, and property condition outcomes
Governance	Quarterly review by participating servicers, GSE representatives, vendors, contractors, and NAMFS
Sunset/adjustment	Automatic expiration unless data show operational benefit; thresholds reset if rolling averages fall below baseline

9. Policy Recommendations

- Convene a servicer, GSE, vendor, and contractor roundtable focused on transportation cost volatility and rural coverage risk.
- Adopt a 6-12 month National Transportation Cost Stabilization Pilot using the $3.75 gasoline and $4.25 diesel trigger thresholds.
- Apply adjustments only when a 30-day or quarterly rolling average exceeds the applicable trigger level.
- Include rural, low-density, disaster-prone, and high-mileage territories in the first phase of the pilot.
- Measure SLA performance, work-order acceptance, route mileage, disposal-related travel, contractor retention, and rural coverage continuity.
- Recognize debris-disposal travel in preservation scopes where contractors must transport removed materials to transfer stations, C&D facilities, landfills, or recycling/disposal locations.
- Use comparable-industry precedent from parcel delivery, freight, federal contracting, construction, and waste-management sectors to support the reasonableness of indexed transportation adjustments.
- Use a quarterly review process and automatic sunset/reset provisions to preserve cost discipline.
- Create a broader annual operational cost review that considers fuel, labor, insurance, compliance, materials, and technology burdens.

10. Conclusion

The mortgage field services industry protects housing assets through a mobile, route-based operating model. Fuel volatility, reduced inspection route density, and rural coverage risk now place pressure on the sustainability of that model.

Public evidence supports three key points: fuel prices have been volatile since 2020; GSE inspection timing changes reduced early-delinquency inspection activity; and Enterprise delinquency rates declined significantly from pandemic-era levels, compressing the broad pool of potentially inspection-eligible loans. NAMFS member data should now be used to validate the operational claim that rural and high-mileage assignments have become a larger or more costly share of remaining work.

A Transportation Cost Stabilization Framework would give servicers, GSEs, FHFA, vendors, and contractors a transparent mechanism to manage abnormal transportation-cost volatility without relying on ad hoc price negotiations. Comparable industries already use fuel-indexed or fuel-recovery mechanisms, and preservation services add a distinct disposal-related transportation layer that should be considered when assessing field-service economics. NAMFS is well positioned to lead a pilot framework that protects service continuity, rural coverage, housing assets, communities, investors, and taxpayers.

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