



# Follow up to Morningstar: Questions Remain

We appreciate Morningstar (MORN) taking the time to answer <u>our article</u> with a <u>response on ValueWalk</u> and an <u>interview with Chuck Jaffe</u> of Money Life. Investors and advisors need diligent fund research more than ever, so it's important that such an influential firm be willing to engage in discussions about its role in the industry.

Rather than go point by point through Morningstar's rebuttal, we just want to follow up with a few unanswered questions. The questions focus on how the firm ensures the independence (i.e. no conflicts of interest) of its fund ratings and how it can promote best practices among consumers of its research.

#### What Percentage of Morningstar's Revenue Comes from Funds It Covers?

In our initial article, we wrote that Morningstar derives a significant amount of revenue from asset managers, both from selling data and collecting licensing fees to advertise Morningstar ratings. Morningstar responded:

"License-based revenue includes far more than the star ratings. License-based revenue includes Morningstar Data, Morningstar Direct, Morningstar Advisor Workstation, Morningstar Enterprise Components, Morningstar Research, and other similar products... we don't break out the revenue that we derive from licensing our ratings, as this revenue isn't material to our overall results."

According to <u>The Wall Street Journal</u>, Morningstar's intellectual property licensing packages contributed 4% of revenue in 2016. However, this number is somewhat misleading. Morningstar Data, which contributed 19% of revenue in 2016, also includes licenses to use the company's ratings in fund materials and advertising.

In the interview on Money Life, Jeffrey Ptak, Global Director of Manager Research at Morningstar, also noted that 4% of revenue (\$32 million on \$800 million total revenue) came from ratings and licensing, but this number included other things besides just ratings. More importantly, the distinction between revenue earned from licensing ratings or from selling software is ultimately less important than which customers are providing that revenue.

In the interest or transparency, we ask that Morningstar disclose how much revenue it earns from funds that are under its coverage.

#### How Does Morningstar Prevent its Ratings from Being Misused?

Despite our disagreements with Morningstar, our view on the usefulness of Morningstar's ratings is the same as theirs. From our original article:

"Morningstar ratings provide an excellent starting point when making an investment decision."

From Morningstar's response:

"We have consistently described the rating as a potentially useful starting point for research."

If anything, we are more positive about Morningstar's ratings than they are. Accurate data about fees and past performance is absolutely a useful tool for investors and advisors who want to make an informed investment decision.

Unfortunately, the reality is that too many people today use Morningstar's ratings as the sole basis for investment decisions. Some investors lack the sophistication to conduct their own outside research, and some advisors find it easier to point to a simple star rating rather than going through a more comprehensive process.

We believe Morningstar can do more to end this misuse of its data. Morningstar's status and brand in the fund industry has helped it earn millions in profits. That status also comes with an obligation to protect the best interests of investors.

All Morningstar said on this subject is:

"Misuse of data points is hardly limited to the star rating, which is why we routinely examine how data points are being used in practice and whether there are ways we can help investors better succeed with them."

We would like to know much more about Morningstar's efforts on this front. In particular, we want to know:

Page 1 of 4

Important Disclosure Information is contained on the last page of this report. The recipient of this report is directed to read these disclosures.



- 1. How does Morningstar educate advisors about the best way to use its research as part of a comprehensive diligence process?
- 2. How does Morningstar convey to the public (beyond just disclaimers at the bottom of pages) that its ratings should not be the sole basis for investment decisions?
- 3. What is Morningstar's process for identifying and correcting the misuse of its data in practice?
- 4. How does Morningstar try to prevent the incorrect use of its ratings in ads as identified by <u>The Wall</u> <u>Street Journal</u>?

Morningstar has made clear that "past performance is no predictor of future success." Why not be as overt with the non-predictability and backward-looking nature of star ratings?

With great power comes great responsibility. When Morningstar's ratings have the power to impact fund flows and move markets in such a substantial way, we think the company's brand could benefit from the firm taking more of a leadership role in ensuring that its research is used responsibly.

Putting all that responsibility on the backs of already over-burdened regulators is not, in our opinion, enough, especially considering the limited effectiveness of that approach to date.

This article originally published on <u>November 21, 2017</u>.

Disclosure: David Trainer and Sam McBride receive no compensation to write about any specific stock, style, or theme.

Follow us on <u>Twitter</u>, <u>Facebook</u>, <u>LinkedIn</u>, and <u>StockTwits</u> for real-time alerts on all our research.



# *New Constructs<sup>®</sup> - Research to Fulfill the Fiduciary Duty of Care*

Ratings & screeners on 3000 stocks, 450 ETFs and 7000 mutual funds help you make prudent investment decisions.

New Constructs leverages the latest in machine learning to analyze structured and unstructured financial data with unrivaled speed and accuracy. The firm's forensic accounting experts work alongside engineers to develop proprietary NLP libraries and financial models. Our investment ratings are based on the best fundamental data in the business for stocks, ETFs and mutual funds. Clients include many of the top hedge funds, mutual funds and wealth management firms. David Trainer, the firm's CEO, is regularly featured in the media as a thought leader on the fiduciary duty of care, earnings quality, valuation and investment strategy.

#### To fulfill the Duty of Care, research should be:

- 1. **Comprehensive** All relevant publicly-available (e.g. 10-Ks and 10-Qs) information has been diligently reviewed, including footnotes and the management discussion & analysis (MD&A).
- 2. **Un-conflicted** Clients deserve unbiased research.
- 3. **Transparent** Advisors should be able to show how the analysis was performed and the data behind it.
- 4. **Relevant** Empirical evidence must provide <u>tangible, quantifiable correlation</u> to stock, ETF or mutual fund performance.

#### Value Investing 2.0: Diligence Matters: Technology is Key to Value Investing With Scale

Accounting data is only the beginning of fundamental research. It must be translated into economic earnings to truly understand profitability and valuation. This translation requires deep analysis of footnotes and the MD&A, a process that our <u>robo-analyst technology</u> empowers us to perform for thousands of stocks, ETFs and mutual funds.



## DISCLOSURES

New Constructs®, LLC (together with any subsidiaries and/or affiliates, "New Constructs") is an independent organization with no management ties to the companies it covers. None of the members of New Constructs' management team or the management team of any New Constructs' affiliate holds a seat on the Board of Directors of any of the companies New Constructs covers. New Constructs does not perform any investment or merchant banking functions and does not operate a trading desk.

New Constructs' Stock Ownership Policy prevents any of its employees or managers from engaging in Insider Trading and restricts any trading whereby an employee may exploit inside information regarding our stock research. In addition, employees and managers of the company are bound by a code of ethics that restricts them from purchasing or selling a security that they know or should have known was under consideration for inclusion in a New Constructs report nor may they purchase or sell a security for the first 15 days after New Constructs issues a report on that security.

## DISCLAIMERS

The information and opinions presented in this report are provided to you for information purposes only and are not to be used or considered as an offer or solicitation of an offer to buy or sell securities or other financial instruments. New Constructs has not taken any steps to ensure that the securities referred to in this report are suitable for any particular investor and nothing in this report constitutes investment, legal, accounting or tax advice. This report includes general information that does not take into account your individual circumstance, financial situation or needs, nor does it represent a personal recommendation to you. The investments or services contained or referred to in this report may not be suitable for you and it is recommended that you consult an independent investment advisor if you are in doubt about any such investments or investment services.

Information and opinions presented in this report have been obtained or derived from sources believed by New Constructs to be reliable, but New Constructs makes no representation as to their accuracy, authority, usefulness, reliability, timeliness or completeness. New Constructs accepts no liability for loss arising from the use of the information presented in this report, and New Constructs makes no warranty as to results that may be obtained from the information presented in this report. Past performance should not be taken as an indication or guarantee of future performance, and no representation or warranty, express or implied, is made regarding future performance. Information and opinions contained in this report reflect a judgment at its original date of publication by New Constructs and are subject to change without notice. New Constructs may have issued, and may in the future issue, other reports that are inconsistent with, and reach different conclusions from, the information presented in this report. Those reports reflect the different assumptions, views and analytical methods of the analysts who prepared them and New Constructs is under no obligation to insure that such other reports are brought to the attention of any recipient of this report.

New Constructs' reports are intended for distribution to its professional and institutional investor customers. Recipients who are not professionals or institutional investor customers of New Constructs should seek the advice of their independent financial advisor prior to making any investment decision or for any necessary explanation of its contents.

This report is not directed to, or intended for distribution to or use by, any person or entity who is a citizen or resident of or located in any locality, state, country or jurisdiction where such distribution, publication, availability or use would be contrary to law or regulation or which would be subject New Constructs to any registration or licensing requirement within such jurisdiction.

This report may provide the addresses of websites. Except to the extent to which the report refers to New Constructs own website material, New Constructs has not reviewed the linked site and takes no responsibility for the content therein. Such address or hyperlink (including addresses or hyperlinks to New Constructs own website material) is provided solely for your convenience and the information and content of the linked site do not in any way form part of this report. Accessing such websites or following such hyperlink through this report shall be at your own risk.

All material in this report is the property of, and under copyright, of New Constructs. None of the contents, nor any copy of it, may be altered in any way, copied, or distributed or transmitted to any other party without the prior express written consent of New Constructs. All trademarks, service marks and logos used in this report are trademarks or service marks or registered trademarks or service marks of New Constructs. LLC 2003 through the present date. All rights reserved.