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Dr. Mark A. Calabria  
Director  
Federal Housing Finance Agency  
Constitution Center  
400 7th Street SW  
Washington, DC 20219

December 18, 2019

Dear Director Calabria:

On behalf of the 1.4 million members of the National Association of REALTORS® (NAR), thank you for your tireless efforts to improve the availability of mortgage credit to borrowers across the country. REALTORS® believe that homeownership – and the mortgage credit foundation it rests upon – is the bedrock of the American Dream and that mortgage credit foundation it rests upon.

The Uniform Residential Loan Application (URLA) is a critical document in the process of vetting and underwriting borrowers for mortgage credit. The data collected can also be used for both compliance and research, in addition to providing an important signal to borrowers.

Recently, the URLA was revised to shift information on preferred language, financial counseling, and military service to a separate page following the signature block, rendering the fields less likely to be seen by the applicant. Worse, these questions were made voluntary, thus negating the many benefits of the collected information for regulators, lenders, and borrowers.

A stated goal of the FHFA for including the preferred language question was to, “allow borrowers who prefer to communicate in a language other than English to identify that language and to enable mortgage industry participants to connect borrowers to available language access resources.” This goal dovetails with the work the FHFA has done to expand language options through its Limited English Proficiency (LEP) program. With these changes to the URLA, the stated goal is diminished.

NAR supports efforts to facilitate homeownership and expand access to financing, and REALTORS® appreciate that FHFA, Fannie Mae and Freddie Mac, are exploring ways to allow for broader access to individuals with LEP. Maintaining the preferred language question in the body of the URLA and not after the signature block provides the right signal to consumers and the market.

In a similar way, the military service question may aid Veterans and current military personnel to access mortgage financing through the Department of Veterans Affairs program. The FHFA has also previously argued in support of a financial counseling question for reasons similar to its support of language preference question. Housing counseling has been shown to promote sustainable homeownership for some



families, which helps to improve mortgage outcomes. REALTORS® value Veterans and housing counseling services, recognizing that raising financial awareness can improve safety and soundness for the enterprises and mortgage market while protecting taxpayers and supporting the FHFA's 2019 Strategic Plan.

The FHFA and the enterprises they oversee play a critical role in securing mortgage access and providing stability in the secondary mortgage market. Improving access to better financial options and information for Veterans, military personnel, and borrowers with limited financial or English proficiency can only improve mortgage outcomes and strengthen the enterprises. Thank you for your diligence in updating the URLA. If you have any questions, please contact NAR Senior Policy Representative, Ken Fears, at 202-383-1066 or [KFears@NAR.REALTOR](mailto:KFears@NAR.REALTOR). On behalf of REALTORS® and homebuyers across the country, thank you for your leadership in reforming our nation's housing finance system.

Sincerely,

A handwritten signature in black ink, appearing to read "Vince Malta", written in a cursive style.

Vince Malta  
2020 President, National Association of REALTORS®