



November 5, 2025

ADVOCACY GROUP
Shannon McGahn
Chief Advocacy Officer

The Honorable William Pulte
Director
Federal Housing Finance Agency
400 7th Street, SW
Washington, DC 20024

Dear Director Pulte:

On behalf of the members of the National Association of REALTORS® (NAR), I submit this response to the request for input on the proposed Strategic Plan: Fiscal Years 2026-2030. NAR's members appreciate your efforts to improve the safety and soundness of the government sponsored enterprises. To this end, REALTORS® urge the FHFA to continue its request of Congress for additional powers that would enhance the FHFA's ability to oversee the Enterprises' counterparties and to enforce transparency at the Enterprises. These powers are critical to supporting a competitive market and proper market incentives for the Enterprises and their counterparties.

The National Association of REALTORS® is America's largest trade association, including NAR's five commercial real estate institutes and its societies and councils. REALTORS® are involved in all aspects of the residential and commercial real estate industries and belong to one or more of some 1,200 local associations or boards, and 54 state and territory associations of REALTORS®. REALTORS® consist of agents, brokers, builders, lenders, appraisers, and a host of trades all involved in the real estate business.

The GSEs play a critical role in supporting the steady flow of affordable mortgage finance that US homeownership depends on. NAR believes that stability begins with the regulator of the GSEs. Weak oversight and enforcement of Fannie Mae and Freddie Mac (the GSEs) and the Federal Home Loan Banks (FHLBs) can impact taxpayers, homebuyers, and the entire economy. While the FHFA may be right to shrink its strategic plan to those activities authorized under statute, the FHFA should seek authority from congress for the powers it used under conservatorship and which it needs to effectively monitor and oversee its regulated institutions in the future.

Changing Direction: An Eye on Statute

Stability in the secondary markets resonates in the primary market for real estate. The proposed strategic plan places increased emphasis on safety and soundness and taxpayer protections including fraud, which REALTORS® appreciate. Likewise, REALTORS® applaud the FHFA for its goal of expanding and improving the use of technology and infrastructure for oversight in support of agency staff. The FHFA is tasked with oversight of some of the largest financial institutions in the US let alone the world. Arming FHFA staff with the tools needed to meet the fight is important.

More broadly speaking, the proposed strategic plan seeks to align the FHFA's efforts with authority as granted from Congress and a closer adherence to statute. These changes include eliminating data sharing and research with the market, pulling back on fair housing and equal credit efforts, eliminating the goal of supporting an equal playing field for lenders in the primary market, and withdrawing its efforts to support the spread of technology in the mortgage process. REALTORS® appreciate the FHFA's efforts to align itself with guidance from congress. However, REALTORS® also recognize the ever-expanding challenge the FHFA has in supporting market liquidity and safety and soundness.

Competition in the Second Market and Existing Authority

Fannie Mae and Freddie Mac play a critical role in housing finance, helping to finance nearly half of all home purchases. Competitive markets thrive on transparency and the free flow of information, which allows participants to react to actions of competitors and counterparties. Opacity and asymmetric information allowed the GSEs to abuse their relationship with the government prior to conservatorship. Today, competitive markets for CRT, MBS, and both sellers and servicers can act as a check against the GSEs because they have robust data and information about the markets. Reducing data sharing and transparency could allow the GSEs to revert to past anti-competitive behavior.

Furthermore, allowing the market to curb bad behavior reduces the onus for oversight on the FHFA and lessens the potential for regulatory missteps. The FHFA should work to promote transparency in the markets while respecting the intellectual and entrepreneurial capital of the GSEs.

The FHFA was created in the wake of the subprime crisis and reflects the then understanding of the GSEs and the prevailing challenges to reform. Many changes were made under conservatorship with powers that do not exist outside of conservatorship. To maintain market liquidity and safety and soundness, while protecting taxpayers and supporting homeownership, the FHFA should seek additional powers from Congress.

FHFA should request authority from Congress to:

- Oversee the GSEs' third-party service providers for safety and soundness,
- Actively share mortgage data with other agencies to facilitate market liquidity, safety and soundness, and compliance with fair housing laws and the equal credit opportunities act (ECOA), and
- Actively share more granular and higher frequency mortgage data, data about some GSE activities, and research on market developments with the public and encourage the GSEs to do the same.

It should also be noted that the last two directors of the FHFA have requested the ability to oversee the third party-service providers of the GSEs. With these Congressionally authorized powers in place, the FHFA would greatly improve efficiency of oversight and expand its role to improve transparency and accountability in the markets after conservatorship.

Once again, thank you again for your efforts to support the nation's housing finance system. REALTORS® see opportunities to modernize oversight of the GSEs and look forward to working with the FHFA to support its mission. Please feel free to reach out Ken Fears (KFears@NAR.REALTOR), Director of Conventional Financing and Valuation Policy if you have any questions.

Sincerely,



President, National Association of REALTORS®