

## Americans for Financial Reform 1629 K St NW, 10th Floor, Washington, DC, 20006 202.466.1885

November 6, 2014

The Honorable Mel Watt Federal Housing Finance Agency 400 7th Street, SW Washington, DC 20024

Dear Director Watt,

On behalf of the undersigned faith, community, labor, civil rights and consumer organizations we would like to again offer our congratulations on assuming the leadership of the Federal Housing Finance Agency (FHFA). We are pleased to see the measures you are beginning to put into place that emphasize making homeownership and housing financing accessible and affordable and keeping families in their homes. However, the families and neighborhoods our groups work with continue to experience widespread devastation from the ongoing foreclosure crisis.

We write to you now on behalf of the millions of families who are still struggling with negative home equity, as well as those who are in danger of losing their homes through foreclosure, and the neighbors and communities hurt by foreclosures around them. The need to swiftly reverse the GSE policy on principal reduction remains a major priority for many organizations and community members.

As you know, in too many communities the housing and foreclosure crisis is not over. Millions of homeowners are still underwater, and those homeowners tend to be concentrated in hard hit neighborhoods of color; foreclosures overall remain significantly elevated above pre-crises levels. As a result, families are needlessly losing their homes, children are being uprooted from their schools and neighborhoods are being further destabilized. As long as principal reduction is not an option for GSE loans, homeowners are denied access to the loan modification tool which the evidence shows is the most successful in preventing foreclosures. A 2012 study by Amherst Securities Group found that principal reduction is the most effective form of mortgage modification, with only 12% of borrowers re-defaulting on such modifications, compared with 23% for interest rate reduction modifications and 30% for forbearance modifications. <sup>1</sup>

We urge you to move forward quickly to end the ban on principal reduction as a loss mitigation strategy and bring policies at the GSEs in line with those that are already the norm elsewhere in

<sup>1</sup> Amherst Securities Group LP, Modification Effectiveness: The Private Label Experience and Their Public Policy Implications, May 30, 2012, p.6

the market. This step would be consistent with your 2014 Strategic Plan to serve the needs of homeowners, communities, and taxpayers, with the conclusions of data reviewed by analysts at FHFA, and with practices already in place through Treasury HAMP and other programs.

Many economists and experts on the housing and securities markets have argued for principal reduction as a key element in addressing the housing crisis. Mark Zandi, Chief Economist at Moody's Analytics, testified before the Senate Banking Committee that encouraging more principal reductions offers "the best odds of ending the housing crash more quickly and definitively." Other supporters include Ben Bernanke, former Chairman of the Board of Governors of the Federal Reserve; William Dudley, President of the Federal Reserve Bank of New York; Martin Feldstein, Chairman of the Council of Economic Advisers under President Reagan; and Alan Blinder, former Vice Chairman of the Federal Reserve.

We urge you to harness your agency's powers, resources, and financial expertise to prevent more foreclosures and reduce negative equity, and to act expeditiously to revise FHFA policy against principal reduction in order to help American homeowners and communities.

Sincerely,

## **National Signatories**

AFL-CIO

Action for the Common Good

American Civil Liberties Union Foundation

Americans for Financial Reform

Cambridge Credit Counseling Corp

Center for Popular Democracy

Center for Responsible Lending

**CNC** 

Color of Change

**Consumer Action** 

Consumers Union

Credit Advisors Foundation

Home Defenders League

HomeFree-USA

Jobs With Justice

The Leadership Conference on Civil and Human Rights

Main Street Alliance

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National Association of Neighborhoods

National Coalition for Asian Pacific American Community Development

National Community Reinvestment Coalition

National Consumer Law Center (on behalf of its low-income clients)

National Council of La Raza

National Fair Housing Alliance

National Housing Resource Center

National People's Action

NID-HCA

PICO National Network

Service Employees International Union

**Telamon Corporation** 

## **State and Local Signatories**

Abayomi CDC

A Just Harvest/Northside P.O.W.E.R. (IL)

Action NC

Affordable Homes of South Texas, Inc.

Affordable Housing Centers of Pennsylvania

Albany County Rural Housing Alliance

Alliance for a Just Society

Alliance of Californians for Community Empowerment (ACCE)

American Friends Service Committee Southeast New England (AFSC SENE)

Arizona Housing Alliance

Asian-American Homeownership Counseling, Inc.

AZ Foreclosure Prevention Task Force

**Bucks County Housing Group** 

California Reinvestment Coalition

CAMBA Legal Services, In.c

CCBHCH

CCCS of Greater Greensboro, A Division of Family Service of the Piedmont Inc.

**CEI** 

Center for NYC Neighborhoods

Centro Autonomo

CFORM/Covenant Community Development Corporation

**Champlain Housing Trust** 

Chattanooga Neighborhood Enterprise, Inc.

**CHDC** 

City Life Vida Urbana

Clarifi

Coastal Enterprises, Inc.

Colorado Foreclosure Resistance Coalition

Colorado Progressive Coalition

Communities United (Maryland)

Communities United for Action (OH)

Community Action Human Resources Agency

**Community Development Services** 

Community Housing Council of Fresno

Community Legal Services, Philadelphia

Community Services of Nevada

Community Training Works, Inc. (CTW)

Connecticut Citizen Action Group

Connecticut Fair Housing Center

Consumer Credit Counseling Service of Buffalo, Inc.

Consumer Credit Counseling Service of West Florida, Inc

Consumer Credit Counseling Service of West Georgia/East Alabama

Credit & Homeownership Empowerment Services, Inc.

Credit Card Management Services Inc

Cypress Hills LDC

DASH for LaGrange, Inc.

Direct Action for Rights and Equality (DARE)

**Durham Regional Financial Center** 

East LA Community Corporation

**Eastside Community Development Corporation** 

**Empire Justice Center** 

ESOP: Empowering and Strengthening Ohio's People

Family Credit Management Services

Financial Pathways of the Piedmont

Florida Institute for Reform and Empowerment

Genesis Housing Development Corporation

GO Northwest HRC

Greater Rochester Housing Partnership

**Greater Southwest Development Corporation** 

Green Forest CDC

HELP Community Development Corp.

HNDP, Inc.

HomeFree-USA

HomeOwnership Center of Greater Dayton

Homes on the Hill, CDC

Housing & Community Development Network of NJ

Housing Action Illinois

Housing and Education Alliance

Housing Help Inc.

Housing Opportunities of Beaver County

Housing Options & Planning Enterprises, Inc.

**Housing Preservation Project** 

Housing Resource Center of Monterey County

**HPP CARES** 

Human Development Services of Westchester

Idaho Community Action Network

Illinois/Indiana Regional Organizing Network

InCharge Debt Solutions

Inland Fair Housing and Mediation Board

Intercultural Family Services, Inc.

Iowa Citizens for Community Improvement

**ISAIAH** 

JASA/Legal Services for the Elderly in Queens

**Jewish Community Action** 

Joseph Corporation

Kingdom Communiy Inc.

LAMB Inc

Life of Victory International Christian Ministries

Long Island Legal Services

Love Progressive Center

Lower 9th Ward NENA

Lynn United for Change (MA)

Main Street Alliance of Oregon

Maine People's Alliance

Maine People's Resource Center

Maine Small Business Coalition

MaineStream Finance/Penquis

Make the Road NY

Margert Community Corporation

Massachusetts Communities Action Network

MFY Legal Services Inc.

MHANY Management, Inc

Minnesota Housing Partnership

Minnesota Neighborhoods Organizing for Change (NOC)

Minnesotans for a Fair Economy

Missourians Organized for Reform and Empowerment (MORE)

NAACP New Jersey State Conference

NAACP St. Paul Youth and Collegiate Branch

NANAY Community Economic Development Corporation

Neighborhood Home Solutions

Neighborhood House, Inc.

Neighborhood Housing Services of Greater Cleveland

Neighborhood Housing Services of Phoenix, Inc.

Neighborhood Nonprofit Housing Corporation

NeighborWorks Alliance of NYS

NeighborWorks Green Bay

NeighborWorks Orange County

New Economy Project

New Jersey Citizen Action

Newark/Essex Foreclosure Taskforce

Newtown Community Development Corporation

NJ Communities United

Nobody Leaves Mid-Hudson (NY)

Northern Circle Indian Housing Authority

Northfield Community LDC

Northwest Side Housing Center

NYS Coalition for Excellence in Homeownership Education

Occupy Denver

Occupy Homes MN

Occupy Our Homes Atlanta

Operation New Hope, Inc.

Oregon Action

Organize Now

Partners In Community Building, Inc.

Pennsylvania Interfaith Community Programs, Inc.

**PLANevada** 

POWER (CA)

Pratt Area Community Council (PACC)

Progressive Leadership Alliance of Nevada

**Project LIFT** 

Pure Hearts R Us

Queens Legal Services

Real Estate Education And Community Housing Inc

**Reinvestment Partners** 

Rhode Island Jobs with Justice

Right To The City Alliance

Rights for All People (CO)

**Rockland Housing Action Coalition** 

**RUPCO** 

**Rural Community Assistance Corporation** 

SafeGuard CCS

SEIU Local 284

Shalom Center for T.R.E.E. of Life

South Suburban Housing Center

Spanish Coalition for Housing

St. Joseph the Worker Church (Maple Grove, MN)

Sunflower Community Action (KS)

The Development Corporation of Northwest Baltimore

The Homeowners Employment Corporation

The Parodneck Foundation

The Reset Coalition

Union County Manager & Union County Foreclosure Task Force Chairman

Unite Here Local 217

Urban League of Hampton Roads, Inc.

Urban League of Morris County

Virginia Organizing

Virginia Organizing

**VOCAL-NY** 

Washington Can

Washington Community Action Network

West Chester Residential Opportunities Inc.

Westchester Residential Opportunities Inc

Woodstock Insitute

Working in Neighborhoods (OH)

York County Community Action Corporation

