Re: Improving Language Access in Mortgage Lending and Servicing

Dear Director Watt and FHFA staff:

The undersigned organizations welcome the opportunity to submit this comment in response to the Federal Housing Finance Agency (FHFA)’s Request for Input (RFI) on Improving Language Access in Mortgage Lending and Servicing issued May 25, 2017.

Language is a significant barrier to seeking homeownership in many communities. In 2014, approximately 25.3 million individuals, roughly 9 percent of the U.S. population, were considered limited English proficient (LEP). Despite this sizable need and opportunity, the language needs of many current and potential homeowners are left unmet in the mortgage marketplace.

As dominant actors in the mortgage industry with a statutory duty to facilitate underserved communities’ access to homeownership, we welcome the FHFA, Freddie Mac, and Fannie Mae’s consideration of steps to expand access to the mortgage market. We believe the FHFA and the Enterprises should improve language access in the mortgage market by taking steps to ensure that:

- language preference is collected, tracked, and transferred throughout the life of the loan;
- borrowers are provided translated disclosures and access to staff or oral interpreters who speak their preferred language;
- non-English or translated documents are accepted from borrowers;
- in-language resources are developed and distributed; and
- further policies and practices are developed in consultation with other stakeholders.

We greatly appreciate the FHFA’s attention to this critical issue and look forward to its continued engagement to expand access to homeownership.

Sincerely,

Americans for Financial Reform
Arizona Housing Coalition
Asian Services In Action, Inc
Asian-American Homeownership Counseling, Inc.

(continued on following pages)
Atlanta Legal Aid Society, Inc.
Baltimore Neighborhoods, Inc.
California Reinvestment Coalition
California Resources and Training
CCCS of Northeastern Iowa
Center for NYC Neighborhoods
Central Ohio Fair Housing Association
Centro De Apoyo Familiar (CAF)
Chinese American Service League
Community Legal Services of Philadelphia (on behalf of its low-income clients)
Connecticut Fair Housing Center
Consumer Action
Consumer Credit Counseling Service of Buffalo, Inc.
Cornerstones
Cypress Hills Local Development Corporation
East LA Community Corporation
Empire Justice Center
Empowering and Strengthening Ohio's People
Fair Housing Advocates of Northern California
Fair Housing Center
Fair Housing Center of Central Indiana
Fair Housing Center of Northern Alabama
Fair Housing Center of Southeast & Mid Michigan
Fair Housing Center of Southwest Michigan
Fair Housing Council of Northern NJ
Fair Housing Rights Center in Southeastern Pennsylvania
Family Housing Resources, Inc.

(continued on following pages)
Good Neighbor Foundation
Greater New Orleans Fair Housing Action Center
Haven Neighborhood Services
Hispanic League
HOND, INC
HOPE Fair Housing Center
Housing America Corporation
Housing and Economic Rights Advocates (HERA)
Housing Equality Law Project (HELP)
Housing Opportunities Made Equal of Greater Cincinnati
Housing Opportunities of Northern Delaware, Inc.
Human Development Services of Westchester
Impacct Brooklyn
Integra Home Counseling, Inc.
The Leadership Conference on Civil and Human Rights
Legal Services NYC
Long Island Housing Services, Inc
LUCHA (Latin United Community Housing Association)
Massachusetts Affordable Housing Alliance
Massachusetts Fair Housing Center
Metropolitan Milwaukee Fair Housing Council
Miami Valley Fair Housing Center, Inc.
Mobilization for Justice, Inc.
National Association of Consumer Advocates
National Coalition for Asian Pacific American Community Development (CAPACD)
National Community Reinvestment Coalition (NCRC)
National Consumer Law Center (on behalf of its low-income clients)

(continued on following pages)
National Fair Housing Alliance
National Housing Resource Center
Nazareth Housing Services
NCCED (National Congress for Community Economic Development)
Neighborhood Housing Services of Staten Island
New Economics for Women
North Carolina Coalition Against Domestic Violence
North Carolina Justice Center
Northwest Side Housing Center
PathStone Corporation
Project Sentinel
Prosperity Now (formerly CFED)
Public Justice Center
PUENTES NEW ORLEANS
Reinvestment Partners
Rensselaer County Housing Resources, Inc.
Residential Resources, Inc.
Rockaway Development & Revitalization Corporation
Rural Community Assistance Corporation
Southwest Fair Housing Council
St. Ambrose Housing Aid Center
Sustainable Together (New Jersey)
The Housing Council at PathStone
The Housing Partnership, Inc.
The Public Interest Law Center
U.S. PIRG
UnidosUS (formerly NCLR)

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UNITE HERE

Woodstock Institute