

AMERICANS FOR FINANCIAL REFORM ACCOUNTABILITY * FAIRNESS * SECURITY Americans for Financial Reform 1629 K St NW, 10th Floor, Washington, DC, 20006 202.466.1885

October 1, 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 are 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.¹

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

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¹ 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 Credit Advisors Foundation Home Defenders League HomeFree-USA Jobs With Justice The Leadership Conference on Civil and Human Rights Main Street Alliance NAACP

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. **Durham Regional Financial Center** East LA Community Corporation Eastside Community Development Corporation **Empire Justice Center** ESOP: Empowering and Strengthening Ohio's People

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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 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 Neighborhoods Organizing for Change (NOC) Minnesotans for a Fair Economy Missourians Organized for Reform and Empowerment (MORE) NAACP New Jersey State Conference 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
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 Institute
Working in Neighborhoods (OH)
York County Community Action Corporation

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