



October 13, 2020

Alfred M. Pollard, General Counsel  
Attention: Comments/RIN-2590-AB04  
Federal Housing Finance Agency  
Eighth Floor, 400 Seventh Street SW  
Washington, DC 20219  
Re: 2021-2024 FHFA Strategic Plan

Re: 2021 Enterprise Housing Goals Proposed Rule, RIN-2590-AB04

Dear Mr. Pollard:

The Indiana Credit Union League (ICUL) appreciates the opportunity to provide input regarding the Federal Housing Finance Agency's (FHFA) notice of proposed rulemaking on updated housing goals for the Federal National Mortgage Association (Fannie Mae) and the Federal Home Loan Mortgage Corporation (Freddie Mac). The ICUL member credit unions represent 99% of assets and members of Indiana's credit unions, with those memberships totaling more than 2.6 million consumers.

We want to stress the importance that the goals and strategies should not result in negatively impacting credit union and other small lender access to secondary markets. We continue to support the Credit Union National Association's Housing Reform Principles which include:

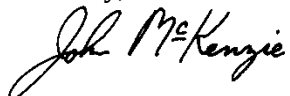
- Equal secondary mortgage market access to lenders of all sizes on an equitable basis;
- An emphasis on affordability, in recognition of the fact that smaller lenders, such as credit unions, often meet mortgage needs that banks are unwilling or unable to address in rural and working-class communities that require greater flexibility in underwriting requirements;
- A reasonable and orderly transition to a new housing finance system;
- Strong oversight and supervision to ensure the safety and soundness of secondary market entities;
- Durability, by including an explicit federally insured or guaranteed component to ensure that, even in troubled economic times, the secondary mortgage market continues to exist; and
- Preserving what works, such as cost-effective and member-oriented credit union mortgage servicing options, emphasizing consumer education and home-purchase counseling, and applying reasonable conforming loan limits that adequately consider local real estate expenses in higher cost areas.

With these principles in mind, we offer the following comments regarding the proposed rule on the 2021 Enterprise housing goals.

ICUL support the FHFA's efforts to ensure the GSEs meet their public mission and responsibilities to low-income and very-low income borrowers and communities. While we recognize that GSEs have implemented activities (e.g., forbearance, loss mitigation efforts, and loan modifications) during the pandemic, FHFA should not use those actions to meet housing goals. Although we support the GSEs' responses to the current and uncertain economic conditions, those actions should not be used to meet the housing goals.

We appreciate the opportunity to comment, and we continue to encourage the FHFA to ensure a strong secondary market accessible to all mortgage lenders and benefit low-income borrowers and communities. If you have any questions about our letter, please do not hesitate to give me a call at (317) 594-5320.

Sincerely,

A handwritten signature in black ink that reads "John McKenzie". The signature is written in a cursive style with a large, stylized initial "J" and "M".

John McKenzie  
President, Indiana Credit Union League