

HOEPA & Truth in Lending Archive

HOEPA Policy Analysis

Comments

- Comments on High-Cost Mortgage and Homeownership Counseling Amendments to the Truth in Lending Act (Regulation Z) and Homeownership Counseling Amendments to the Real Estate Settlement Procedures Act (Regulation X), Sept. 7, 2012
- Comments to the Federal Reserve Board re Truth in Lending Act proposed rule on mandatory escrow accounts for higher-priced mortgage loans and other topics - [Docket R-1406, 76 Fed. Reg. 11,598], May 2, 2011
- Comments Regarding Interim Regulations under the Mortgage Disclosure Improvement Act, (Interim Rule issued), November 23, 2010
- Comments to the FRB re Regulation Z, February 28, 2011 (amended definition of “negative amortization loan”)
- Comments to the FRB re Truth in Lending Interim Final Rule on Appraisal Independence Standards [Docket No. R-1394], Dec. 27, 2010
- Comments to the Federal Reserve Board re Truth in Lending - Right of Rescission, Reverse Mortgages and other topics - Proposed Rule [Docket No. R-1390], Dec. 23, 2010
- Comments to the Federal Reserve Board re Truth in Lending - Interim Rule Requiring Notice to Consumers by Owners of Mortgage Loans, January 19, 2010
- Comments to the Federal Reserve Board regarding its proposed Truth in Lending (TILA) rules for closed end and open-end mortgage credit, December 24, 2009: Docket No. R-1366 (closed-end) and Docket No. R-1367 (open-end)
- Comments to the Federal Reserve Board Regarding Proposed Regulations under the Mortgage Disclosure Improvement Act, February 9, 2009
- Comments, Summary and Press Release of Consumer Groups to the Board of Governors of the Federal Reserve System Regarding Proposed Regulations, April 9, 2008 and Summary of to the Comments and Press release
- Comments Regarding the Proposed Illustrations of Consumer Information for Subprime Mortgage Lending, October 2007
- Comments to the Board of Governors of the Federal Reserve System regarding the Board’s Authority under HOEPA to Prohibit Unfair Acts or Practices in Connection with Mortgage Lending, August 2007
- Comments to the Federal Reserve Board regarding Home Equity Lending Market, August 2006
- Comments to the Federal Reserve Board regarding Proposed Changes to HOEPA, March 2001

Letters

- Letter supporting Senator Boxer’s Amendment Requiring New Owners of Loans Provide Essential Information to Homeowners, May 4, 2009
- Letter Opposing Bond’s Amendment, June 19, 2008
- Letter to Governors regarding Early Disclosures for Non-purchase Money Loans, November 2007
- Group Letter to Federal Reserve Board on HOEPA Authority, August 2007
- Letter supporting the Homeownership Protection and Enhancement Act (“HOPE Act”) of 2007, July 2007
- Letter to FRB re ARM Disclosures, January 2006
- Letter to HUD General Counsel Richard Hauser regarding HUD’s Response to Yield Spread

Litigation, July 2001

Truth in Lending Policy Analysis

Comments

- Comments on High-Cost Mortgage Amendments to the Truth in Lending Act (Regulation Z), November 6, 2012
- NCLC Comments to the CFPB re: 2012 Truth in Lending Act (Regulation Z) Mortgage Servicing and NCLC Comments to the CFPB re: Real Estate Settlement Procedures Act (Regulation X) Mortgage Servicing, Oct. 9, 2012.
- NCLC Comments on High-Cost Mortgage and Homeownership Counseling Amendments to the Truth in Lending Act (Regulation Z) and Homeownership Counseling Amendments to the Real Estate Settlement Procedures Act (Regulation X), Sept. 7, 2012

Policy Briefs, Reports, & Press Releases

- Statement re: CFPB's new mortgage disclosure rules disappoint, Nov. 20, 2013

Litigation

- Amicus Brief: National Consumer Law Center and National Housing Law Project seeking reversal of the Ninth Circuit's decision in *Burns v HSBC Bank USA National Assoc.*, April 10, 2014

Government Sponsored Enterprises Archive

Briefs, Reports, & Press Releases

- Issue brief: Housing Finance Reform Should Improve Upon Existing Mortgage Servicing Rules, October 2013
- Press release: Consumer Groups Decry FHFA Billion Dollar Force-Placed Insurance Giveaway, February 13, 2013
- Press Release: Civil Rights and Consumer Groups Respond to Takeover of Fannie Mae and Freddie Mac, September 15, 2008

Letters

- Group letter to the Federal Housing Finance Agency (FHFA) raising concerns about the Government Sponsored Enterprises' (GSEs) performance on some of their Single Family Housing Goals, Dec. 8, 2016
- Group letter to the Federal Housing Finance Agency (FHFA) urging inclusion of preferred language data fields in the redesigned Uniform Residential Loan Application, June 23, 2016
- Group follow-up letter to the Federal Housing Finance Agency (FHFA) re: adding preferred language data fields to redesigned Uniform Residential Loan Application, July 29, 2016
- Letter in Support Budget Amendment Limiting Use of Guarantee Fees for Unrelated Initiatives, March 18, 2015
- Coalition Letter to FHFA in Response to the Request for Input on Guarantee Fee (updated

- Sept. 8, 2014 for additional signatories)
- Coalition Letter to FHFA Regarding Draft Private Mortgage Insurance Eligibility Requirements, Sept. 8, 2014
 - Response to ULAD Proposed Revision of Uniform Residential Loan Application, June 17, 2014
 - Letter to FHFA regarding issues regarding special mortgage markets including manufactured housing, May 15, 2014
 - Letter of support for Senator Sherrod Brown's amendment to the current version of the housing finance reform bill (section 803 amendment to the Johnson Crapo amendment to S. 1217.), April 28, 2014
 - Group Letter to U.S. Senate Committee on Banking and Housing and Urban Affairs regarding Housing Finance Reform and Taxpayer Protection Act of 2014, April 26, 2014
 - Coalition Letter to Senator Corker and Senator Warner in response to the Housing Finance Reform and Taxpayer Protection Act of 2013, June 2013
 - Letter from civil rights groups regarding pending GSE reform, April 5, 2011
 - Coalition Letter on Senate Housing Package, June 19, 2008
 - Coalition Letter not in support of H.R. 1728, May 5, 2009
 - Coalition Letter detailing concerns about H.R. 1728 - Mortgage Reform and Anti-Predatory Lending Act, April 7, 2009
-

General Predatory Lending Archive

Briefs, Reports, & Press Releases

Land Installment Contracts

- Toxic Transactions: How Land Installment Contracts Once Again Threaten Communities of Color, July 2016

Property Assessed Clean Energy (PACE) Loans

- Press Release: Housing and Consumer Groups Statement on California A.B. 1284's PACE Loan Ability-to-Repay Provisions, Sept. 15, 2017
- Issue brief: [Residential Property Assessed Clean Energy \(PACE\) Loans: The Perils of Easy Money for Clean Energy Improvements](#), Sept. 2017
There has been a sharp increase in homeowner problems with PACE loans. The laudable goal of improving home energy efficiency is being overshadowed by the lack of adequate consumer protections for these loans. This brief catalogs consumer stories and summarizes some of the abuses and challenges of PACE financing.
- The Department of Energy: Best Practice Guidelines for Residential PACE Financing: Consumer Protections, Dec. 15, 2016 (PowerPoint)
- Press Release: PACE Mortgages Still Risky Despite New Dept. of Energy Guidelines, Nov. 18, 2016
- Policy brief: PACE Energy Efficiency Loans: Good Intentions, Big Risks for Consumers, Sept. 2016
- Homeowner Stories: San Diego, CA (Elder Law & Advocacy)

PACE Loans in the News

- April 30, 2016 CBS Los Angeles “ Goldstein Investigation: How Going Green Might Have You Seeing Red In The End” || Summary and quotes
- Oct 10, 2016 MarketWatch “These government-approved high-interest green loans are turning mortgage lending upside down” || Summary
- June 2, 2016 San Gabriel Valley Tribune “Watch out for these green-energy improvement loans that put homeowners at financial risk” || Summary
- November 14, 2016 The San Diego Reader “Solar-power financing could spell trouble: “I hate to see people lose their homes over something I was involved with” || Summary
- February 23, 2016 Comstock’s Business Insight for the Capital Region “A Growing Green Debt? As PACE takes off, realtors warn that unwary homeowners are complicating their finances” || Summary
- September 27, 2016 The Sacramento Bee “Is rooftop solar worth it? Californians consider the questions as use, complaints rise” || Summary and quotes
- May 3, 2016 The Sacramento Bee “Solar panel loans have spun out of control” || Summary
- BiggerPockets.com “Southern California Hero Program - Renovate America - Scam” || Summary
- July 19, 2016 California Association of Realtors “C.A.R. Statement on HUD Insuring FHA Mortgages with PACE Loans” || Summary
- March 28, 2015 Pedersen Real Estate “Some Big Problems with HERO PACE program - Homeowners Beware!” || Summary
- June 12, 2015 The Press Enterprise “MORENO VALLEY: Homebuyer files lawsuit over HERO-financed transaction” || Summary
- Oct. 5, 2015 The National Real Estate Post “Run From PACE Loans... Run” || Summary
- July 17, 2015 The Sacramento Bee “Energy Improvement program can hobble home sales” || Summary
- April 9, 2016 Ventura County Star “Opinion: Mark Chacon: Energy-efficiency loans could cause homeowner headaches” || Summary

Other Resources

- Federal Regulation of Consumer Credit: The Cause or the Cure for Predatory Lending, March 2004

Comments

- Coalition comments on Draft Best Practice Guidelines for Residential PACE Financing, August 18, 2016 || Press release
- Comments to the CFPB regarding Truth in Lending Act - Regulation Z, Qualified Mortgage Rule, June 5, 2014
- Comments to the CFPB regarding Mortgage Closing Process, February 7, 2014
- Comments to the CFPB regarding Truth in Lending Act - Regulation Z: Loan Originator Compensation, Oct. 16, 2012
- Comments to the Federal Trade Commission regarding Advance Notice of Proposed Rulemaking: Mortgage Acts and Practices Rulemaking, July 31, 2009
- Comments of the NCLC and NACA Regarding Advance Notice of Proposed Rulemaking Relating to Unfair or Deceptive Acts or Practices, November 2007
- Comments Regarding the Proposed Illustrations of Consumer Information for Subprime Mortgage Lending, October 2007
- Comments to the Board of Governors of the Federal Reserve System regarding the Board’s

Authority under HOEPA to Prohibit Unfair Acts or Practices in Connection with Mortgage Lending, August 2007

- Comments to the Office of the Comptroller of the Currency to Federal Banking Regulators regarding Proposed Statement on Subprime Mortgage Lending, May 2007
- Comments to Federal Bank Regulators on Proposed Illustrations Regarding Non-Traditional Mortgages, November 2006
- Comments to the Federal Reserve Board regarding Home Equity Lending Market, August 2006
- Comments to the federal banking regulators regarding nontraditional mortgages, March 2006
- Comments to the Massachusetts Division of Banks regarding 209 CMR §§ 32.32, 34, 40: Predatory Home Loan Practices, March 2005
- Comments on Community Reinvestment Act Regulations, April 2003
- Comments to the Federal Reserve Board regarding Proposed Changes to HOEPA, March 2001
- Comments to the FDIC on Predatory Mortgages, January 2001
- Comments to the Federal Reserve Board on Its Authority to Expand Protections Against Predatory Lending and HOEPA, August 2000
- Comments regarding the Advance Notice of Proposed Rulemaking re: whether and how OTS should amend its regulations under the Alternative Mortgage Transactions Parity Act, July 2000
- Comments: NCLC's Proposal for Predatory Mortgage Reform, February 2000
- Comments to Senate Special Committee on Aging on Predatory Lending, April 1998

Letters

- Group letter to CFPB re Public disclosure of new HMDA data points, Nov. 23, 2016
- Letter to CFPB regarding mortgage disclosures through *Know Before You Owe*, Feb. 11, 2016
- Memo to HUD urging them to reverse course on changes to the form/note mortgage, which were made without notice or comment opportunities, April 9, 2015
- S. 3085 (Boxer/Menendez), The Responsible Homeowner Refinancing Act of 2012. Opposition to Corker Safe Harbor Amendment, Nov. 13, 2012
- Letter by Coalition Opposing H.R. 3915, November 2007
- Group Letter to Federal Reserve Board on HOEPA Authority, August 2007
- Letter supporting the Homeownership Protection and Enhancement Act ("HOPE Act") of 2007, July 2007
- Group Letter Supporting Borrower's Protection Act of 2007, June 25, 2007
- Coalition Letter to House Financial Services Committee on Predatory Mortgage Lending, May 21, 2007 PDF 26KB
- Letter to Banking Regulators regarding the Guidance on Nontraditional Mortgage Product Risk, February 2007
- Letter to Senate Regarding Inclusion of Hybrid ARMs in Interagency Guidance on Non-Traditional Mortgages, February 2007
- Letter in Support the "Preservation of Federalism in Banking Act", July 2005
- Letter to Chairman Oxley and Ranking Member Frank regarding predatory lending in the subprime mortgage market, February 2005
- Letter to Chairman Oxley of House Financial Services Committee: Foreclosures Are Escalating, November 2003
- Group letter to HUD General Counsel Richard Hauser regarding HUD's Response to Yield Spread Litigation, July 2001

Testimony

- Testimony before House Financial Services Committee regarding on Accelerating Loan Modifications, Improving Foreclosure Prevention, and Enhancing Enforcement, December

2007

- Testimony by National Consumer Law Center and Consumer Federation of America Regarding Non-Traditional Mortgage Products, September 2006
 - Testimony of J. Robert Hunter before the House Committee on Financial Services Subcommittee regarding Title Insurance Cost and Competition, April 2006
 - Testimony of Margot Saunders to the Subcommittee on Housing and Community Opportunity and Subcommittee on Financial Institutions and Consumer Credit on Protecting Homeowners: Preventing Abusive Lending While Preserving Access to Credit, November 2003
 - Testimony to the Senate Committee on Banking, Housing and Urban Affairs re: the Increase in Predatory Lending and Appropriate Remedial Actions, July 2001
 - Testimony by Elizabeth Renuart re: Amendments to 209 CMR §§ 32.32, 42, 40 High Cost Mortgage Loan Provisions in Massachusetts, October 2000
 - Testimony of Margot Saunders re: The Increase in Predatory Lending and Appropriate Remedial Actions, May 2000
 - Testimony of Margot Saunders on Banking and Financial Services regarding the proposed The “Financial Institution Regulatory Streamlining Act of 1998”, July 1998
 - Testimony of Margot Saunders re: S. 1405 The “Financial Regulatory Relief and Economic Efficiency Act of 1997”, March 1998
 - Testimony of Margot Saunders re: H.R. 607 HOMEOWNERS INSURANCE PROTECTION ACT, March 1997
 - Testimony re: H.R. 1362 FINANCIAL INSTITUTIONS REGULATORY RELIEF ACT OF 1995, May 1995
 - Testimony of Margot Saunders and Kathleen Keest re: S. 650 ECONOMIC GROWTH AND REGULATORY PAPERWORK REDUCTION ACT, May 1995
-

Dodd Frank Policy Analysis Archive

Briefs, Reports, & Press Releases

- Press Release re: Testimony of Margot Saunders on Mortgage Reform and Anti-Predatory Lending Act House Financial Services Committee (HR 1728), April 23, 2009

Comments

- Comments to the CFPB regarding the Small and Rural Creditor Exemptions to the Qualified Mortgage Ability to Repay Rule, March 30, 2015
- Comments to the CFPB regarding Truth in Lending Act - Regulation Z, Qualified Mortgage Rule, June 5, 2014
- Comments to CFPB regarding amendments to the 2013 Mortgage Rules Under the Real Estate Settlement Procedures Act (Regulation X) and the Truth in Lending Act (Regulation Z), Nov. 22, 2013
- Comments on Qualified Mortgage Definition for HUD Insured and Guaranteed Single Family Mortgages, October 30, 2013
- Comments on the proposed credit retention rule relating to home mortgages and its exceptions: the QRM, October 30, 2013
- Comments to the CFPB re Amendments to the 2013 Mortgage Rules under the Real Estate Settlement Procedures Act (Regulation X) and the Truth in Lending Act (Regulation Z), July 22,

2013

- Comments to the CFPB re: Amendments to the 2013 Mortgage Rules Under the Real Estate Settlement Procedures Act (Regulation X) and the Truth in Lending Act (Regulation Z), May 31, 2013
- Comments to the CFPB re: Truth in Lending Act - Regulation Z, Loan Originator Compensation Requirements and Prohibition on Financing Credit Insurance Premiums, May 24, 2013.
- Comments to CFPB on Truth in Lending Act - Regulation Z: Ability to Repay Standards under the Truth-in-Lending Act, Feb. 25, 2013
- Comments on collection of Home Mortgage Disclosure Act (HMDA) data, Nov. 26, 2012
- Integrated Mortgage Disclosures under the Real Estate Settlement Procedures Act, November 6, 2012 Short Group Comments
- Comments on High-Cost Mortgage Amendments to the Truth in Lending Act (Regulation Z), November 6, 2012
- Comments to the CFPB regarding Truth in Lending Act - Regulation Z: Loan Originator Compensation, Oct. 16, 2012
- Comments of the National Consumer Law Center and the National Association of Consumer Advocates on Truth in Lending (Regulation Z: Supplemental Comments on Ability-to-Pay and Qualified Mortgages, July 9, 2012
- Comments on the Consumer Financial Protection Bureau's Interim Final Rule on the preemption rules under the Alternative Mortgage Transaction Parity Act, September 22, 2011
- NCLC-CRL Comments Regarding Ability to Pay and Qualified Mortgages, July 22, 2011
- Comments on Credit Risk Retention by National Consumer Law Center and National Association of Consumer Advocates to the U.S. Department of Treasury, August 1, 2011
- Comments to the Federal Reserve Board re: Truth in Lending Act proposed rule on mandatory escrow accounts for higher-priced mortgage loans and other topics - [Docket R-1406, 76 Fed. Reg. 11,598], May 2, 2011

Testimony

- Testimony of Alys Cohen on The Impact of Dodd-Frank's Home Mortgage Reforms: Consumer and Market Perspectives, July 11, 2012

Letters

- Coalition letter to Congress opposing oppose HR 1210, the Portfolio Lending and Mortgage Access Act, Nov. 16, 2015
- Coalition letter opposing H.R. 3192, Homebuyers Assistance Act., Oct. 2015
- Group letter opposing H.R. 1210 (Barr), Portfolio Lending and Mortgage Access Act, July 27, 2015
- Group letter opposing H.R. 3192, Homeowners Assistance Act, July 27, 2015
- Group letter to the U.S. Senate Judiciary Subcommittee on the Constitution defending the constitutionality of Dodd-Frank Act and the CFPB, July 23, 2015
- Letter opposing Chairman Shelby's "Financial Regulatory Improvement Act of 2015," which undermines the essential, reasonable consumer protections passed by Congress in 2010 in the Dodd-Frank Act (Press release)., May 20, 2015
- Opposition Letter to CFPB opposing H.R. 2213 which insulates lenders from accountability when they make misleading disclosures to homeowners (Letter to Congress), May 14, 2015
- H.R. 685 Mortgage Choice Act (coalition letter opposing), March 18, 2015
- H.R. 650: Coalition Opposition Letter, Feb. 26, 2015
- Group letter opposing H.R. 3211, the "Mortgage Choice Act of 2014.", Sept. 15, 2014
- Group letter to CFPB regarding improvements to the Home Mortgage Disclosure Act (HMDA)

website, March 6, 2014

- Letter opposing H.R. 3211 which undermines the Dodd-Frank Ability to Repay rules, October 17, 2013
 - Coalition letter opposing H.R. 1077, April 9, 2013
 - Letter supporting amendments to H.R. 1728, May 7, 2009
 - Coalition Letter not in support of H.R. 1728, May 5, 2009
 - Coalition Letter detailing concerns about H.R. 1728 - Mortgage Reform and Anti-Predatory Lending Act, April 7, 2009
 - Coalition Letter in Support of S. 2452, January 22, 2008
-

Predatory Mortgage Archive

Comments

- Comments to the Commonwealth of Massachusetts Office of the Attorney General regarding Mortgage Lenders and Mortgage Brokers, June 28, 2007
- Comments: HUD Opinion Will Cost Homeowners Millions in Kickbacks, October 2001

Letters

- Coalition Letter opposing a proposal (HR 6254) to relax FHA's certification rules to permit more mortgage brokers instant access to the FHA loan program, June 16, 2008
- Group letter to HUD General Counsel Richard Hauser regarding HUD's Response to Yield Spread Litigation, July 2001

Testimony

- Testimony of Margot Saunders re: the Rewrite of Truth in Lending Act and Real Estate Settlement Procedures Act and Proposed Moratoria on HUD Employee Compensation Rule and Class Action Suits Challenging Lender Paid Mortgage Broker Fees, July 1997
-

HAMP & Other Loan Modification Programs Archive

HAMP Supplemental Directives

- Testimony of Alys Cohen before the Senate Banking Committee re: Helping Homeowners Harmed by Foreclosures: Ensuring Accountability and Transparency in Foreclosure Reviews and Press Release, Dec. 13, 2011; Response to Questions for the Record from the Senate,

January 10, 2012; related press statement, January 7, 2013

- Testimony of Diane Thompson Before the Senate Subcommittee on Housing, Transportation, and Community Development re: The Need for National Mortgage Servicing Standards, May 12, 2011
- Ms. Thompson's answers to questions posed by Senator Menendez, May 12, 2011
- Testimony of John Rao re: Foreclosure Mediation Programs: Can Bankruptcy Courts Limit Homeowner and Investor Losses?, Feb. 2011
- Answers for the Record before the Senate Committee on Banking, Housing, & Urban Affairs regarding Problems in Mortgage Servicing From Modification to Foreclosure, November 2010 hearing
- Testimony of Diane Thompson before the Senate Committee on Banking, Housing, & Urban Affairs regarding Problems in Mortgage Servicing From Modification to Foreclosure, November 2010
- Testimony of John Rao before Senate Judiciary Subcommittee: Mortgage Modifications During the Foreclosure Crisis: Is There a Role for Bankruptcy Courts?, August 2009
- Testimony before the Senate Subcommittee on Administrative Oversight and the Courts of the Committee on the Judiciary: The Worsening Foreclosure Crisis: Is It Time to Reconsider Bankruptcy Reform?, July 2009
- Testimony of Diane Thompson before the Senate Committee on Banking, Housing, & Urban Affairs: Preserving Homeownership: Progress Needed to Prevent Foreclosures, July 2009
- Testimony of Margot Saunders on Mortgage Lending Reform: A Comprehensive Review of the Current Mortgage System, March 11, 2009
- Testimony of Tara Twomey before the House of Representatives Committee on Financial Services on the Implementation of the HOPE for Homeowners Program and a Review of Foreclosure Mitigation Efforts, September 2008
- Testimony before the US House of Representatives Subcommittee on Housing and Community Opportunity Regarding H.R. 5679, the Foreclosure Prevention and Sound Mortgage Servicing Act of 2008, April 16, 2008

Reports

Congressional Oversight Panel

- December Oversight Report: What Has the Troubled Asset Relief Program Achieved?, December 9, 2009
- October Oversight Report: An Assessment of Foreclosure Mitigation Efforts After Six Months, October 9, 2009
- March Oversight Report: Foreclosure Crisis: Working Toward a Solution, March 6, 2009

HAMP Policy Analysis

Analysis & Recommendation

- Homeowners Need Mandatory Loan Modifications and Expanded Access to Mediation; Current Programs Fall Short, September 2009
- NCLC's Home Affordable Modification Program Recommendations, July 2009
- NCLC's Home Affordable Modification Program Recommendations, March 2009

Policy Briefs, Reports, & Press Releases

- HAMP Changes Urgently Needed, September 2010
- Press Release: Why Servicers Foreclose, When They Should Modify, and Other Puzzles of

Servicer Behavior, October 2009 and Report

- NCLC Reports: Special Issue on Mortgage Modification Programs, March/April 2009

Testimony

- Testimony of Alys Cohen before Subcommittee on Housing: Progress of the Making Home Affordable Program: What Are the Outcomes for Homeowners and What are the Obstacles to Success?, September 9, 2009
 - Testimony of Diane Thompson before the Senate Committee on Banking, Housing, & Urban Affairs: Preserving Homeownership: Progress Needed to Prevent Foreclosures, July 2009
 - Testimony of Tara Twomey before the House of Representatives Committee on Financial Services on the Implementation of the HOPE for Homeowners Program and a Review of Foreclosure Mitigation Efforts, September 2008
-

Mortgage Servicing Archive

FHA Loans

Policy Briefs, Reports and Press Releases

- Issue brief sent to HUD containing examples of problems with FHA reverse mortgage loss mitigation in the HECM program, Nov. 2016
- Press release: FHA Note Sales Should Cease until Homeowners are Fully Protected, July 1, 2016
- Press release and Report: HUD's Sales of FHA-Defaulted Mortgage Loans Benefit the Big Mortgage Servicers and Hedge Funds While Homeowners Lose, May 10, 2016
- FHA's Distressed Asset Sale Program Should Strengthen Home Retention Goals, December 2012
- FHA's Distressed Asset Sales and Loss Mitigation Should Be Reformed to Maximize Sustainable Homeownership Solutions, Recommendations Aug. 31, 2012

Letters

- July 19, 2016 California Association of Realtors "C.A.R. Statement on HUD Insuring FHA Mortgages with PACE Loans" || Summary
- Letter urging HUD to reverse its decision to remove homeowner-protective language from FHA's form single family note and mortgage, June 6, 2016
- Letter Addressing Form Note Change in Response to FHA's June Letter, September 2, 2015
- Coalition letter to Secretary Castro seeking reversal on recent change to FHA form note language, August 20, 2015
- Group letter urging the FHA to reduce the cost of its single-family mortgage insurance premiums and enhance access to affordable credit, Jan. 7, 2015
- Group letter to federal regulators re: real-estate owned (REO) developments and bulk/asset sales by FHA/FHFA, March 3, 2014
- Letter to CFPB re: FHA violation of Equal Credit Opportunity Act, March 2012
- Letter to House Financial Services Committee Leaders Supporting Enhanced Lending Duties under FHA, May 2007

- Letter to the Financial Services Committee regarding the Accessibility of FHA Programs, January 2007

Comments and Testimony

- Center for American Progress and NCLC Comments on Proposed Changes to the Application for FHA Insured Mortgages, Oct. 1, 2015
- Comments to HUD on FHA Draft Servicing Handbook, Nov. 14, 2014
- Comments to HUD re: FHA Single Family Housing Policy Handbook, Aug. 14, 2014
- Comments to the Federal Housing Authority on FHA's Single Family Housing Policy Handbook (Application through Endorsement Section), Dec. 15, 2013
- Group Comments to U.S. Housing and Urban Development re: Revisions to Application for FHA Insured Mortgage, July 14, 2015
- Testimony of Margot Saunders, Gary Klein and Elizabeth Renuart on FHA's Foreclosure Avoidance Program, June 1998

Servicing Policy Analysis

Policy Briefs

- Press Release, Narratives, Summary and Policy brief: The CFPB and Other Federal Agencies Should Adopt Strong Language Access Protections for Homeowners and Other Consumers, May 2016 (Press Release in Arabic, Chinese, Creole, Korean, Spanish, Tagalog, Russian, Vietnamese)
- NCLC Survey Reveals Ongoing Problems with Mortgage Servicing, May 2015
- NCLC statement re: CFPB's proposed mortgage servicing rules, Nov. 20, 2014
- Examples of Cases Where Successors in Interest and Similar Parties Faced Challenges Seeking Loan Modifications and Communicating with Mortgage Servicers, July 2014
- Analysis and Legislative Text Recommendations for Servicing Provisions in Johnson-Crapo Discussion Draft, April 2014
- Top Priorities for CFPB Servicing Regulations, April 2014
- Housing Finance Reform Should Improve Upon Existing Mortgage Servicing Rules, October 2013
- CFPB's Proposed Mortgage Servicing Rules Provide Some Benefits but Sets Back Progress on Loan Modifications, August 2012
- The CFPB Should End Dual Track and Mandate Sensible Loan Modifications, May 31, 2012
- NCLC and Center for Economic Justice Issue Brief: CFPB Should Rein In Mortgage Servicers' Abuses of Force-Placed Insurance, May 2012
- Servicers Continue to Wrongfully Initiate Foreclosures: All Types of Loans Affected, February 22, 2012
- Legal Waivers Harm Homeowners: Federal Foreclosure Reviews Should Protect Consumer Rights, January 2012
- Bank Agency Settlement Statements Make No Meaningful Progress Towards National Servicing Standards, May 2011
- Model State Law on Mortgage Servicing: An Outline, January 2011

Reports and Press Releases

- Press Release: NCLC Statement re: CFPB Final Mortgage Servicing Rules, Aug. 4, 2016
- Report: Opportunity Denied: How HUD's Note Sale Program Deprives Homeowners of the Basic Benefits of Their Government-Insured Loans, May 2016
- Report: Snapshots of Struggle Saving the Family Home after a Death or Divorce, March 2016

- “Surviving the Borrower: Assumption, Modification, and Access to Mortgage Information after a Death or Divorce” by Sarah Bolling Mancini and Alys Cohen, *Pepperdine Law Review*, Vol 43: 2, February 2016
- CFPB rule improves mortgage rights for heirs, July 8, 2014
- NCLC Statement on Passage of Housing Finance Bill (S.1217) in Senate Banking Committee, May 15, 2014
- Statement re: CFPB’s new mortgage rules, January 9, 2014
- Federal Magistrate Finds Wells Fargo Not Credible in National Mortgage Servicing Compliance Settlement, July 15, 2013
- Statement re: IRS Tax Treatment for Mortgage Mods, Jan. 24, 2013
- Statement re: CFPB Mortgage Servicing Rule, Jan. 17, 2013
- Statement: Regulators Settle with Banks on Foreclosure Reviews, Jan. 7, 2013
- CFPB’s Mortgage Servicing Rules Fall Short, Oct. 10, 2012
- “Mortgage Servicing” by Georgetown University Law Associate Professor Adam J. Levitin and NCLC Of Counsel Tara Twomey, published in 28 *Yale Journal on Regulation* 1 (Winter 2011)
- “Foreclosing Modifications: How Servicer Incentives Discourage Loan Modifications” by NCLC Of Counsel Diane E. Thompson, *Washington Law Review*, Dec. 2011
- Servicers Continue to Wrongfully Initiate Foreclosures, December 15, 2010
- Press Release: Robo-Signing: Symptom of Mortgage Servicers’ Lawless Attitude That Pushes Homeowners into Foreclosure, November 2010
- Press Release and Report: Why Servicers Foreclose, When They Should Modify, and Other Puzzles of Servicer Behavior, October 2009
- Press Release and Report: Desperate Homeowners: Loan Mod Scammers Step in When Loan Servicers Refuse to Provide Relief, July 2009
- Failed Regulatory Policy, Not Low Income Housing, Cause of Mortgage Crisis, October 2008
- Press Release: Civil Rights and Consumer Groups Respond to Takeover of Fannie Mae and Freddie Mac, September 2008
- Report: Avoiding Home Repair Fraud: Lessons From Hurricane Katrina by Rick Jurgens, Nov. 2008

Comments

- Comments of NCLC and Connecticut Fair Housing Center to the Federal Reserve Bank of New York re: draft of National Mortgage Note Repository Act of 2016, March 11, 2016
- Consumer comments to the OCC on mortgage successors in interest, Mar. 21, 2016
- NCLC Supplemental Comments, Docket 2014-0033, Jan. 26, 2016
- Comments to CFPB regarding proposed amendments dealing with the bankruptcy exemptions to mortgage servicing regulations, March 16, 2015
- Comments to CFPB regarding proposed amendments to mortgage servicing regulations, March 16, 2015
- Comments to federal regulators regarding proposed changes to the rules for homes in special hazard flood zones, Dec. 29, 2014
- Comments to CFPB regarding the harms experienced by successor homeowners (widows, orphans, and divorcées) who are unable to obtain mortgage information or approval for a loan modification., Dec. 2014
- Comments to OCC regarding protections for successors in interest, Sept. 2, 2014
- Comments on Joint Notice of Proposed Rulemaking regarding Loans in Areas Having Special Flood Hazards, December 2010, 2013
- NCLC Comments on Amendments to the 2013 Mortgage Rules Under the Real Estate Settlement Procedures Act (Regulation X) and the Truth in Lending Act (Regulation Z) filed on

Nov. 22, 2013.

- Group comments to the FHFA re: Lender-Based Insurance, Terms, & Conditions, May 28, 2013
- NCLC Comments re: 2012 Truth in Lending Act (Regulation Z), and NCLC Comments re: Real Estate Settlement Procedures Act (Regulation X), Oct. 9, 2012
- NCLC and NACA Comments on NCUA Loan Workout Reporting Proposal, Feb. 2012
- Comments by the National Consumer Law Center and the National Association of Consumer Advocates to the Federal Housing Finance Agency (FHFA) re: Alternative Mortgage Servicing Compensation Discussion Paper, December 26, 2011
- Comments on Credit Risk Retention by National Consumer Law Center and National Association of Consumer Advocates to the U.S. Department of Treasury, August 1, 2011
- Comments to the Federal Reserve Board re Truth in Lending - Interim Rule Requiring Notice to Consumers by Owners of Mortgage Loans, January 2010
- Comments to the Federal Trade Commission re: Advance Notice of Proposed Rulemaking: Mortgage Acts and Practices Rulemaking, July 31, 2009

Letters

- Letter to CFPB re Best Practices Recommendations for the Handling of Imminent Mortgage Complaints, Nov. 10, 2016
- Group follow-up letter to the Federal Housing Finance Agency (FHFA) re: adding preferred language data fields to redesigned Uniform Residential Loan Application, July 29, 2016
- Group letter to the Federal Housing Finance Agency (FHFA) urging inclusion of preferred language data fields in the redesigned Uniform Residential Loan Application, June 23, 2016
- Group letter to Mel Watt asking FHFA to allow principal reduction at Fannie Mae and Freddie Mac, Oct. 1, 2014
- Group letter to HUD regarding problems with the distressed asset sales program, May 6, 2014
- Letter of support for Senator Sherrod Brown's amendment to the current version of the housing finance reform bill (section 803 amendment to the Johnson Crapo amendment to S. 1217.), April 28, 2014
- Group letter to the Federal Housing Finance Agency re: force-placed insurance, Sept. 18, 2013
- Group Letter to Treasury Department Seeking Improvements to the Home Affordable Modification Program (HAMP) , July 15, 2013
- Coalition Letter to OCC and Federal Reserve on Recommendations regarding Foreclosure Reviews, Jan. 17, 2013
- Letter from Coalition Regarding Standards for Attorney General and Federal Agency Settlement with Mortgage Servicers, August 24, 2011
- Coalition Letter to FHFA on Mortgage Servicing Standards, June 29, 2011
- Letter from past and present members of the Consumer Advisory Council (CAC) of the FRB regarding Proposed Consent Orders Regarding Mortgage Servicing, April 11, 2011
- Coalition Letter to Regulators regarding Withdrawal of Proposed Consent Orders Regarding Mortgage Servicing Illegalities, April 6, 2011
- Coalition Letter in Support of H.R. 5679, the Foreclosure Prevention and Sound Mortgage Servicing Act of 2008, March 31, 2008
- Letter to House Financial Services Committee: Oppose Bills that Shut Out Homeowners and Abandon Communities, March 3, 2011
- Letter from civil rights and consumer protection agencies regarding regulation of securitizers of residential mortgage loans, Jan. 25, 2010
- Coalition Letter: Aiding Those Facing Foreclosure Act of 2010, Dec. 8, 2010
- Coalition Letter: Fund Foreclosure Legal Assistance Now. October 28, 2010
- Legal Aid and other groups call on AGs to ensure that resolution of their investigation of

mortgage servicers help homeowners avoid foreclosure, October 18, 2010

- Letter to Treasury Secretary Geithner and National Economic Council Director Summers regarding loan modification program, March 2009
- Letter to Treasury Secretary Paulson regarding Implementation of the Trouble Assets Relief Program (“TARP”), November 2008
- Letter re Section 102 of the Emergency Economic Stabilization Act of 2008, October 2008
- Letter to Congress on Public Interest/Main Street Principles To Guide the Wall Street Rescue, September 2008
- Coalition Letter to the IRS Commissioner concerning Revenue Procedure 2008-28 regarding the impact of loan modifications on the tax status of securitization vehicles, July 2008

Disaster Relief

Reports

- Avoiding Home Repair Fraud: Lessons From Hurricane Katrina by Rick Jurgens, Nov. 2008

Debt Settlement Archive

Policy Analysis

- Comments to the Federal Trade Commission regarding the Telemarketing Sales Rule Regulatory Review, Nov. 13, 2014
- Group letter opposing MA HB 3569 that would allow “unlimited fees” on Massachusetts consumers by for-profit debt-relief firms, Nov . 7, 2013 || Press release
- Comments on Uniform State Laws (NCCUSL) Uniform Debt Management Services Act, Mar. 2006
- FTC Notice of Proposed Rulemaking to amend the FTC’s Telemarketing Sales Rule (“TSR” or “Rule”) to address the sale of debt relief services, 74 Fed. Reg. 41,988 (8/19/09) and NCLC’s Comments

Reports and Press Releases

- Report: Searching for Relief: Desperate Borrowers and the Growing Student Loan “Debt Relief” Industry, June 2013
- Consumers Need Relief from Debt Settlement Rip-Offs: Consumer and Privacy Groups Support Senate and House Bills to Curb Debt Settlement Abuses (Press Release), June 2010
- U.S. Senate Committee on Commerce, Science, and Transportation hearing on The Debt Settlement Industry, Apr. 2010: The Consumer’s Experience with webcast and written testimony
- GAO report on debt settlement industry, April 2010
- NCLC Special Report: An Investigation of Debt Settlement Companies: An Unsettling Business for Consumers, Mar. 2005

Unfair & Deceptive Acts & Practices Archive

Reports, Press Releases and Policy Briefs

- Policy brief: PACE Energy Efficiency Loans: Good Intentions, Big Risks for Consumers, Sept. 2016
- Statement: FTC Affirms Consumer Rights Under the Holder Rule, May 11, 2012
- Press Release: Consumer Protection in the States: A 50-State Report on Unfair and Deceptive Acts and Practices Statutes, February 2009
- State-by-State Analysis of State UDAP Statutes

Policy Analysis

- Coalition comments on Draft Best Practice Guidelines for Residential PACE Financing, August 18, 2016 || Press release
- Comments to the Federal Trade Commission regarding the Telemarketing Sales Rule Regulatory Review, Nov. 13, 2014
- Comments of NCLC on behalf of its low income clients and multiple other groups to the federal banking agencies on federal regulations against unfair and deceptive practices, Oct. 27, 2014
- NCLC Comments to the Consumer Financial Protection Bureau re: Senior Financial Exploitation, Aug. 20, 2012
- Consumer Groups' Letter to Senate Opposing S. 881 (Landrieu) -- Unfair To Rent-to-Own Consumers, August 2011
- Consumer Groups' Letter to the House Opposing HR 1588 (Canseco) -- Unfair To Rent-to-Own Consumers, August 2011
- Protecting and Improving the Best Thing The FTC Has Ever Done: The Holder Rule
- Comments of the NCLC and NACA Regarding Advance Notice of Proposed Rulemaking Relating to Unfair or Deceptive Acts or Practices, November 2007

Litigation

- Amicus Brief (joint): Grimes v. Enterprise Leasing, May 23, 2014
- Amicus Brief (joint): Raysoni v Payless Auot Deals, LLC to the Georgia Supreme Court, May 19, 2014

Privacy Archive

Big Data & Identity Errors

Policy Analysis

Policy Briefs, Reports & Press Releases

- Big Data: A Big Disappointment for Scoring Consumer Credit Risk, March 6, 2014
- Broken Records: How Errors by Criminal Background Checking Companies Harm Workers and Businesses, April 2012
- Automated Injustice: How a Mechanized Dispute System Frustrates Consumers Seeking to Fix Errors in Their Credit Reports, Report and Press Release, Jan. 2009

Comments, Letters & Testimony

- Letter from NCLC and 38 other advocacy organizations urging the FCC to oppose opt-in customer consent for broadband & other telecom. providers and to prohibit forced arbitration clauses in contracts, Sept. 7, 2016
- CFA et al Comments to FCC on Broadband Privacy NPRM, May 27, 2016
- Comments to the Federal Trade Commission re Big Data: A Tool for Inclusion or Exclusion?, Aug. 15, 2014
- Letter to the FCC re: consumer group meetings with the FCC about the importance of protecting consumers from auto-dialed calls to cell phones without consumers' consent, June 6, 2014
- Group letter to FCC regarding notice of Ex Parte presentation, May 12, 2014
- Testimony before the U.S. Senate Banking Committee Subcommittee Re: Making Sense of Consumer Credit Reports, Dec. 19, 2012
- Testimony before the U.S. House regarding "Examining the Uses of Consumer Credit Data", Sept. 13, 2012
- Testimony before the U.S. House regarding Use of Credit Reports in Employment and Restoring Consumer Rights for Adverse Action Disclosures, Use of Credit Information beyond Lending: Issues and Reform Proposals, May 12, 2010
- Comments to the Federal Trade Commission (FTC): Prevent Deceptive Marketing of Credit Reports, Consumer Group Comments, Dec. 2009

Electronic Technologies & Communications

Fair Debt Collection and Intrusive Calls

- NCLC's testimony at Senate hearing on TCPA and robocalls, May 18, 2016 Press Release
- Ex parte letter to the FCC re ongoing attempts by industry to weaken the consumer protections of the Telephone Consumer Protection Act, Jan. 16, 2015
Class Actions and the Telephone Consumer Protection Act - Who Benefits? Seven Myths and Facts
- Press Release: FCC Set to Open Floodgates for Robocalls to Cell Phones, Jan. 14, 2015
- Group comments to the FCC re: preserving the Telecommunications Consumer Protection Act (TCPA) protections for cell phones, Nov. 17, 2014.
- Comments to the Federal Communications Commission re: Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991, Sept. 26, 2014
- Comments to the FCC opposing change to the Telephone Communications Protection Act to allow marketing robo-calls to cell phones, Aug. 8, 2014
- Group letter to FCC letter regarding notice of Ex Parte presentation, May 12, 2014
- Testimony to the FCC Opposing HR 3035, the Mobile Informational Call Act of 2011 by the National Association of Consumer Advocates and National Consumer Law Center Nov. 4, 2011
- Group Letter to House Committee on Energy & Commerce Opposing Plan to Allow Debt Collector Robo-Calls to Cell Phones, Sept. 22, 2011
- Comments to the FTC: Collecting Consumer Debts: The Challenges of Change, June 2007
- Comments to the FCC Opposing Debt Collectors Autodialing Personal Cell Phones, 2006

Electronic Transactions

- NCLC and NACA comments to the FCC re: ACA International's Reply Comments re: for Consumer Bankers Association petition re: exemption to the Telecommunications Consumer Protection Act, Jan. 12, 2015
- Group comments to the FCC re: opposing the American Bankers Association exemption to the Telecommunications Consumer Protection Act to allow robocalls to cell phones, Dec. 19, 2014
- Group comments re: Operating Rules Amendments to Improve Network Quality to NACHA-the Electronic Payment Association, January 13, 2014
- Group Comments to the FTC re: Telemarketing Sales Rule (Remotely Created Checks and Payment Orders), Aug. 2, 2013
- Testimony before the U.S. House Subcommittee on Social Security re: Protecting Social Security Benefits from Predatory Lending and Other Harmful Financial Institution Practices, June 24, 2008

Protecting Financial Information

- Advocates' letter to the FCC urging rulemaking on broadband privacy, Jan. 20, 2016 and fact sheet

Domestic Violence Survivors

- Credit Reporting and Repair for Domestic Violence Survivors Webinar, PowerPoint Presentation, April 27, 2010

Litigation

- Amicus brief of NCLC and NACA in *Carvalho v. Equifax*
- FCRA preemption and furnisher liability, Amicus Brief of NCLC and NACA in *Gorman v. Wolpoff & Abramson* case, April 2009

Brochures & Other Consumer Information