

May 21, 2019

Mr. Brian Montgomery
Acting Deputy Secretary and Assistant Secretary for Housing
U.S. Department of Housing and Urban Development
451 7th Street, SW
Washington, DC 20410

RE: Request for Extension of Time to Provide Comments on FHA's Proposed Changes to
Certifications and Defect Taxonomy

Dear Mr. Montgomery:

The undersigned civil rights, housing, and consumer organizations respectfully request a 30-day extension of time to provide comments on FHA's proposed changes to the loan-level certifications, annual lender certifications, and defect taxonomy for FHA-insured loans.

We appreciate FHA's efforts to revise and fine-tune these documents as well as the opportunity to provide public feedback. Providing greater clarity to lenders on how FHA will address potential loan defects will encourage more lenders, particularly larger depository institutions, to participate in the FHA program. Greater lender participation has the potential to expand homeownership opportunities for the borrowers FHA serves, which can help working families gain access to affordable mortgage credit.

The proposed revisions address complex issues that play a major role in FHA's quality control and risk management processes. We believe it is important to have additional time to fully assess the changes, their impact, and provide thoughtful feedback. Therefore, we respectfully request that FHA extend the comment period for 30 additional days. A 60-day comment period will better permit commenters to provide meaningful feedback to FHA.

Thank you for considering this request. We look forward to sharing our comments and working with FHA on this important issue.

Sincerely,

Center for Responsible Lending
The Leadership Conference on Civil and Human Rights
National CAPACD
National Community Reinvestment Coalition
National Consumer Law Center (on behalf of its low-income clients)
National Fair Housing Alliance
National Urban League