**Corresponding actions or deliverables** 

#### Exhibit G:

## **Annual Loan Products Narrative Reporting Template**

FREDDIE MAC
RURAL HOUSING
2022
LOAN PRODUCT

## **ACTIVITY:**

2 – Support for High-Needs Populations: Regulatory Activity

Objective's components detailed in the Plan

### **OBJECTIVE:**

A – Facilitate Conventional Lending to Members of Federally Recognized Native Tribes in Tribal Areas

#### **SUMMARY OF RESULTS:**

Freddie Mac met our goals under this objective in 2022 to develop a product offering for American Indians and Alaska Natives, which will advance homeownership for Native households in tribal areas. We designed our HeritageOne<sup>SM</sup> Mortgage offering based on input gathered through extensive engagement with stakeholders. In addition, we developed a curriculum for educating appraisers on how to appraise homes on tribal lands more effectively, efficiently, and accurately.

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Develop product enhancements that support financing for members of a federally recognized tribe in a tribal area.	<ul> <li>Developed a product, HeritageOne, to facilitate conventional mortgage lending to members of federally recognized tribes living in tribal areas.</li> <li>Collected and analyzed feedback from lenders who serve Native communities to identify product features and guidelines needed to support mortgage financing and sustainable homeownership opportunities in tribal areas.</li> <li>Hosted and/or participated in multiple events with Native non-profit housing organizations to gather industry insights as input to the design of our new HeritageOne mortgage offering (release pending FHFA approval).</li> <li>Supported and participated in South Dakota Native Homeownership Coalition's (SDNHC's) Annual Tour and Convening in Flandreau, South Dakota. The 72 attendees at this two-day event represented tribes, lenders active and not active in tribal areas, Native community development financial institutions (CDFIs), tribally designated housing entities (TDHEs), non-profits, appraisers, state, and federal agencies, and both Enterprises. Attendees came together from 12 states and the District of Columbia to exchange ideas on challenges, opportunities, and successful models for Native homeownership.</li> </ul>

- As an extension of the SDNHC annual event, held a separate one-day symposium in Sioux Falls, "Empowering Native American Homeownership," to gather additional input for the new product offering. The 28 participants represented lenders active and not active in tribal areas, a Federal Home Loan Bank, Native CDFIs, a law firm, TDHEs, and both Enterprises.
- Collaborated with Enterprise Community Partners to facilitate the Alaska Housing Innovation Summit in Anchorage. (See action 3 for details.)
- Held a virtual workshop, titled "Moving Housing Forward with Manufactured Homes," with members of Oweesta, a Native CDFI. Presented on Freddie Mac's existing affordable mortgage products and explored possible enhancements that could help support conventional mortgage lending in tribal areas.
- Participated in the New Mexico Housing Summit in Albuquerque hosted by the New Mexico Mortgage Finance Authority. Presented on Freddie Mac's support for manufactured homes as an affordable housing solution at the Manufactured Homes Roundtable to 35 attendees representing lenders, real estate professionals, the New Mexico State Manufactured Housing Association and New Mexico Mortgage Finance Authority.
- Participated in the SDNHC's Annual Planning Session in Pierre, South Dakota. This one-day symposium brought together 24 stakeholders to discuss strategies to improve lender engagement on tribal lands.
- Participated in the National American Indian Housing Council's Legal Symposium in Las Vegas. Topics included community development projects and updates on legislative priorities, funding sources, and policies/regulations related to tribal housing programs.
- Analyzed feedback gathered from stakeholders across the ecosystem through our outreach efforts.
- Drafted the term sheet, including eligibility and servicing specifications, factoring in stakeholder feedback.
- Submitted the term sheet to FHFA for review and approval.
- Develop an appraisal curriculum to support property valuations for homes in tribal areas. Development activity will be in partnership with the Appraisal Institute and industry professionals supporting financing on tribal lands.

#### Completed

- In collaboration with the Appraisal Institute, developed a curriculum to educate appraisers on appraising properties on tribal lands, titled, "Appraising Residential Property on Tribal Lands in Closed Market Areas."
- Designed the coursework to educate appraisers on the issues, realities, principles, and procedures of appraising residential

			property in tribal areas. Also highlighted the option to
			develop an appraisal based on the cost approach if sufficient comparable sales are unavailable within a reasonable distance
			from the home being appraised. Incorporated feedback from the SDNHC to help ensure the curriculum's relevance and
			effectiveness.
3.	Participate in the inaugural Rural Housing	Col	Aligned the content with the requirements of HeritageOne.  mpleted
Ο.	Innovation Summit, being coordinated by one of our non-profit partners to promote	•	Partnered with Enterprise Community Partners to facilitate the Alaska Housing Innovation Summit in Anchorage.
	and support housing for AIAN populations living in tribal areas.	•	The two-day summit attracted 260 attendees representing lenders active and not active in the Native space, Native CDFIs, TDHEs, housing authorities, government agencies, and non-profit housing organizations. Major themes included partnership across the housing ecosystem; housing finance challenges, solutions, and best practices; and the need for culturally sensitive and environmentally responsible housing.
			Presented "Mortgage Financing Options on Alaska Native Land." Informed the 52 attendees of Freddie Mac's financing solutions for purchases and refinances, home renovations, shared equity homeownership, and accessory dwelling units.
		•	Conducted a listening session, "Testing Conventional Capital for Homeownership," to gather feedback on how to improve mortgage financing for homes on Alaskan tribal lands. Topics discussed with the 40 attendees:
		•	<ul> <li>Appraisals</li> <li>Income considerations</li> <li>Lending considerations</li> <li>Fee structures</li> <li>Servicing</li> <li>Land issues</li> <li>Construction methods</li> <li>Potential future product enhancements</li> <li>After the symposium, Freddie Mac and Enterprise staff toured the remote village of Nome at Bering Seas Regional Housing Authority's invitation.</li> </ul>
			<ul> <li>Spoke with housing authority staff at their offices, where a state representative also joined us. Learned from them about the 20 regions of Alaska.</li> </ul>
			<ul> <li>Toured various areas of Nome to deepen our understanding of property types, the land, and borrower characteristics.</li> </ul>

☐ No milestones achieved	
PARTIAL CREDIT JUSTIFICATION:	
Not applicable.	
IMPACT:	
□ 50 – Very Large Impact	
⊠ 40	
□ 30 – Meaningful Impact	
□ 20	
□ 10 – Minimal Impact	
□ 0 – No Impact	

#### IMPACT EXPLANATION:

1. How and to what extent were the actions or deliverables under this objective impactful in addressing the applicable underserved market's needs, or in laying the foundation for future impact in addressing the underserved market's needs?

Freddie Mac laid the foundation to fill significant gaps in support for Native homeownership in tribal areas, where housing inventory and financing options are in short supply, governance and processes around property can be complex, and residential property appraisers face challenges that raise the cost of appraisals.

The conventional mortgage product that we developed, HeritageOne, will give lenders a solution to offer in addition to HUD Section 184 mortgages and will make it easier for lenders to originate loans for members of federally recognized Native tribes in tribal areas. This will create more opportunities for responsible homeownership. Being able to sell the loans to Freddie Mac will reduce lenders' risk and increase market liquidity. HeritageOne will launch in 2023.

Freddie Mac understands that creating a meaningful, useful product requires feedback from stakeholders across the lending ecosystem. This is especially important when entering a new market – and this market involves an array of factors that differ from others. For example, complexities around land titling, the need to navigate and interact with various distinct governments and federal programs, and unique borrower profiles. Through our industry leadership and collaboration with Native non-profit organizations, we were positioned to host and/or participate in events meant for sharing information about Freddie Mac and our existing offerings; learning from other participants about challenges, opportunities, and solutions regarding Native homebuying and homeownership in tribal areas; and discussing parameters that would make our new offering relevant and successful. Participating in these forums and touring tribal areas in several parts of the country helped deepen our understanding. Each of the events also provided opportunities for us and the other participants to form and strengthen relationships, which are essential to creating an environment for industry collaboration and growth.

While each outreach event was valuable, the Alaska Housing Innovation Summit hosted with our support by Enterprise Community Partners highlighted broad recognition of the need for affordable housing solutions for Native people in Alaska and elsewhere across the country. Close to 300 industry participants from across the ecosystem gathered in Anchorage for the two-day event to learn from and share ideas with each other. The Alaska convening built on the success of the 2021 Empowering Native American Homeownership symposium, held in partnership with SDNHC and Oweesta, which showed our leadership and promoted collaboration and the exchange of ideas toward developing our conventional mortgage lending product for tribal areas.







At the Alaska Housing Innovation Summit

The insights gained from our extensive outreach were invaluable to designing our new HeritageOne mortgage product. The industry's input enabled us to design a distinctive, relevant offering for members of federally recognized tribes living on tribal lands. Among the proposed highlights:

- It lowers barriers to homeownership related to down payment and closing costs.
  - It finances a home purchase or refinance with a down payment as low as 3%.
  - It does not require the borrower to use personal funds for down payment and closing costs.
     Allows the use of sweat equity in lieu of cash for as much as 100% of down payment and closing costs. It also allows gifts and grants.
- It has no limit on the borrower's income level.
- It recognizes required interactions with tribal governance and various federal government agencies to help lenders navigate those processes. It also accounts for various land types.
- It may be used to finance manufactured homes and accessory dwelling units, which help make homeownership more affordable and facilitate increasing the available housing supply.
- It may be paired with our CHOICERenovation®, CHOICEReno eXPress<sup>SM</sup>, and GreenCHOICE Mortgage®. These offerings support much-needed financing to renovate existing homes for a wide range of reasons, such as to bring them up-to-date, accommodate changing household needs, enable aging in place, increase resilience to natural disasters, and improve energy efficiency to help lower utility costs.
- It allows for appraisals using the cost approach when sufficient comparable sales are not available, which
  saves time and money. In addition, it provides an appraisal-offset credit, which the lender must pass along
  to the borrower.

HeritageOne shares certain eligibility features with our Home Possible® low down payment mortgage that stakeholders told us will serve Native borrowers well, which could facilitate lender adoption once the new offering rolls out.

The appraisal curriculum created with the Appraisal Institute, and with input from the SDNHC, will help fill the need for more appraisers who understand how to appraise properties on tribal lands efficiently and effectively. Currently, relatively few appraisers have this knowledge. They typically must travel long distances to the properties being appraised and then might not find comparable sales nearby, requiring additional travel. As a result, appraisals can be time consuming, expensive, and potentially flawed. Educating more appraisers about the best practices for appraising homes in tribal areas, including using the cost approach when comparable sales are unavailable within a reasonable distance, will help reduce appraisal time and cost as well as improve accuracy. In addition, aligning the curriculum with Freddie Mac's standards will help ensure that appraisers provide the information needed to support loan originations using our mortgage products.

Freddie Mac's effort to develop and introduce a conventional mortgage offering and a specialized appraisal curriculum follows several years of expanding access to financial management and homebuyer education as well as housing counseling in collaboration with Native non-profit housing intermediaries. Many resources and tools also are available on our Native American Homeownership Preparedness web page. Our support has helped prepare more households to become successful homeowners and enhanced housing intermediaries' capabilities to fulfill their missions. In addition, the Native Homeownership Learning Communities Cohort that we established in partnership with Enterprise Community Partners in the last Plan cycle also gave participating organizations

technical assistance, peer learning opportunities, and resources to tackle obstacles and create additional homeownership opportunities in their communities.

#### 2. What did the Enterprise learn from its work about the nature of the underserved market's needs and how to address them?

We learned that appraising homes in tribal areas can present various challenges, from the lack of qualified appraisers serving tribal areas, to higher appraisal costs because of the distances appraisers may travel, to the difficulty in finding comparable sales that are not time bound or nearby. Appraisals can take four to six months to complete. For those reasons, participants in our outreach events mentioned that allowing the cost approach to appraisals would help alleviate many of those challenges and benefit the market. Freddie Mac incorporated that flexibility in our HeritageOne product requirements. Furthermore, we worked collaboratively with the Appraisal Institute to create a curriculum to educate appraisers in appraising homes on tribal lands, which will help increase the number of knowledgeable appraisers. SDNHC reviewed and provided feedback on the curriculum to help ensure its thoroughness, relevance, and effectiveness.

We learned that some tribes have worked with federal government agencies on standardized lease agreements, whereas others encourage development of lease agreements, to outline the tribe's rights if the homeowner defaults on the mortgage to help ensure that properties on fee-simple land cannot be sold to outside investors or speculators. Accordingly, we designed HeritageOne to allow tribes the right of first refusal in cases of default and retain ownership of the home.

We learned that mortgage offerings intended to support Native homeownership in tribal areas should allow for flexibility around the borrower's income level. Many tribe members with very low, low, and moderate incomes qualify for grants and other forms of financial assistance. We designed HeritageOne without an income limit relative to area median income to enable more households to qualify for financing through this offering.

We learned that the market is significantly constrained by the lack of affordable housing supply. Compounding the issue are unique land challenges regarding where homes can be placed and the impact of permafrost on home construction, which requires some homes to be elevated several feet off the ground. We factored these circumstances into our product guidelines.







In Nome, Alaska

We also learned that many homebuyers purchase older homes for their affordability. However, older homes may require updates in the near term. In addition, homeowners may need to make home improvements over time – for example, to accommodate household changes or to accommodate aging in place. Participants told us that Native homebuyers and homeowners would benefit from renovation offerings that help make a wide range of renovations and repairs affordable. Even where tribes receive Indian Housing Block Grants and/or Native American Housing Assistance and Self-Determination Act (NAHASDA) funds that may be allocated to new homes, renovations, or other construction projects, sufficient funds might not be available for the renovations needed. HeritageOne may be combined with Freddie Mac's CHOICERenovation, CHOICEReno eXPress, and GreenCHOICE mortgages to finance improvements to homes in tribal areas.

In addition, through our outreach, we were reminded of the value of welcoming customer feedback and incorporating suggestions to better serve the market, while maintaining safety and soundness. Increasing access to credit – especially for very low-, low-, and moderate-income households – requires unique product offerings and collaboration across the ecosystem.

3. Optional: If applicable, why was the Enterprise unable to achieve the Plan target?

Not applicable.

# Exhibit C:

## **Second Quarter Loan Products Narrative Reporting Template**

FREDDIE MAC RURAL HOUSING Q2: JANUARY-JUNE 2022 LOAN PRODUCT

ACTIVITY:						
2 - High-Needs Rural Populations: Regulatory Activity						
SUMMARY OF I	progress during the first half of 2022 toward our	ized Native Tribes in Tribal Areas goals under this objective to develop a product offering for r tribal members. We are on track to meet or exceed expectations.				
	Action	2022 Achievements through Q2				
members of	oduct enhancements that support financing for f a federally recognized tribe in a tribal area and policy update in our Single-Family cer Guide.	In progress  • Began to draft a term sheet and servicing specifications, leveraging initial feedback gathered from stakeholders through our outreach efforts year-to-date. Product enhancements are being managed to Freddie Mac's and FHFA's approval processes.				
valuations f will be in pa	appraisal curriculum to support property or homes in tribal areas. Development activity rtnership with the Appraisal Institute and offessionals supporting financing on tribal lands.	<ul> <li>In progress</li> <li>Entered into an agreement with Appraisal Institute and subject matter experts to form the partnership necessary to start development activity.</li> <li>Began to develop the appraisal curriculum.</li> </ul>				
Summit, bei	n the inaugural Rural Housing Innovation ing coordinated by one of our non-profit promote and support housing for AIAN living in tribal areas.	In progress  In partnership with a non-profit organization and tribal entities, began to plan the Rural Housing Innovation Summit. Scheduled for August in Alaska.				
SELF-ASSESSME	ENT RATING OF PROGRESS:					
☐ Progress del	meet or exceed the target ayed and/or partial completion of the object chieve any milestones of the objective	tive expected				
ADDITIONAL IN	FORMATION (IF APPLICABLE):					
Not applicable.	,					