

Exhibit F:  
**Plan Modification Request Template**

FREDDIE MAC  
MANUFACTURED HOUSING  
2025  
LOAN PRODUCT

**ACTIVITY:**

1 - Support for Manufactured Homes Titled as Real Property: Regulatory Activity

**OBJECTIVE:**

B - Design Product Flexibilities to Facilitate the Origination of Mortgages Secured by Manufactured Housing Titled as Real Property

**PROPOSED PLAN MODIFICATION:**

- X This is a proposed Plan modification for the current Plan year.
- X This is a proposed Plan modification that addresses future Plan year(s).
  - Add an action in Year 1 and Year 3 to publish policy updates; revise the number of policy updates to be published in Year 2.
  - Add an action in Year 2 and in Year 3 to facilitate delivery of the manufactured housing curriculum being developed in Year 1.
  - Add an action in Year 2 to test the concept of a service to guide potential homebuyers through the process of preparing for and achieving ownership of homes in manufactured housing developments. Also add an action in Year 3 to assess the service's potential scalability.
  - Remove the Year 2 action related to a policy update supporting originations of small-balance loans for manufactured homes.

**JUSTIFICATION FOR PROPOSED PLAN MODIFICATION:**

Freddie Mac proposes broadening our efforts to support manufactured housing titled as real property in several ways.

To enhance policies for financing manufactured homes, we will accelerate efforts in 2025 to update policies intended to help expand the use and acceptance of manufactured homes. We also will increase the number of policy updates introduced during the Plan cycle. However, we will remove from our 2026 Plan the actions for enhancing policies around small-balance lending on manufactured homes. Based on the work outlined for 2025 along with an analysis done last year on single-family small-balance lending in general, we concluded that we will make broader positive impacts by enhancing existing offerings that directly address some of the main obstacles to lending in this space. These include, but are not limited to, the condition of subject property as well

as the potential borrower's credit profile, lack of down payment funds, and debt-to-income ratio. Our findings will factor into future product decisions.

In addition, we will support the rollout of the Developer manufactured housing curriculum being completed in 2025, expanding technical assistance for developing residential properties using manufactured homes. We will facilitate delivery of the curriculum in 2026 and 2027 to Academy graduates, thereby promoting wider understanding of the benefits of manufactured homes and encouraging greater use of them in single-family property developments.

Furthermore, because people wanting to buy manufactured homes may lack the qualifications required to obtain mortgage financing, we will collaborate with a mission-focused non-profit organization to test the concept of a tailored service for prospective homebuyers. The service would be offered to help individuals interested in homes in single-family developments containing manufactured homes to navigate the path toward homeownership. After an assessment of the individual's readiness for homeownership, the service would include suggesting any necessary homeownership education and counseling as well as introductions to housing intermediaries who could provide those services, and help connect individuals with financing options when they are in a position to take on the responsibilities of ownership.

These efforts will help increase the supply of homes that are affordable to very low-, low-, and moderate-income households and advance the manufactured housing industry.

Activity 1: Support for Manufactured Homes Titled as Real Property: Regulatory Activity
Objective B: Design Product Flexibilities to Facilitate the Origination of Mortgages Secured by Manufactured Housing Titled as Real Property

Evaluation Area	Year(s)	Income Targeted	Extra Credit
Loan Product	1, and 2, 3	VLI, LI, MI	Not applicable

## Objective Background and Description

Manufactured housing has the potential to play a much larger role in addressing the nation’s housing needs than it does today.

As developers seek ways to meet homebuyer demand, they are starting to turn to manufactured housing. Developing with manufactured homes is very different from developing with site-built homes, however, and access to technical assistance focused on best practices for developing using manufactured homes is limited.

Lender participation in the market and mortgage lending on manufactured homes have increased over the last several years, but more progress needs to be made on these fronts. Industry feedback will continue to shape our efforts to enhance our financing solutions intended to move the industry forward. One significant barrier is lack of support for small-balance mortgages, which we define as loans for \$150,000 or less. The fixed origination and servicing costs make small-balance lending less profitable than higher-balance lending. Already thin profit margins may disappear if the Qualified Mortgage standard is exceeded, and the lender must reduce fees. As a result, small-balance mortgage lending is limited—one of the reasons that many manufactured homebuyers who own the land on which the home will be sited choose personal property loans. However, those loans typically have higher interest rates and lack the consumer protections available through mortgages.

Over the last Duty to Serve Plan cycles, Freddie Mac demonstrated our commitment to working collaboratively across the ecosystem to advance the manufactured housing market. Based on industry input, our experience and expertise, and our continual efforts to help ensure the usefulness and usability of our solutions, we introduced 25 policy updates, which included launching new offerings and enhancing existing ones to help increase affordable lending and access to credit. For example, we aligned many of our eligibility requirements with those for site-built homes to expand the pool of eligible borrowers and to make it easier for lenders to participate in the market. We also now allow financing for manufactured homes used as accessory dwelling units as well as single-section manufactured homes, helping to increase the supply of affordable homes. Several of the product enhancements stem from the groundbreaking research we have conducted to help fill the industry’s need for data that can help drive business decisions.

In addition, we introduced CHOICEHome® mortgage to finance CrossMod homes, which have the aesthetics of site-built homes and have wider appeal to potential homebuyers. These homes increasingly are being used in new developments and as infill in existing neighborhoods, including projects that we support in Hagerstown, Maryland, and Petersburg, Virginia, respectively. CHOICEHome also may be used to finance CrossMod homes in community land trusts, which support long-term housing affordability, especially in high-cost areas. To help address aging housing stock, we made manufactured homes eligible property types when we developed our CHOICERenovation® and GreenCHOICE Mortgages®. Importantly, members of federally recognized Native American tribes may finance manufactured homes on tribal lands with our HeritageOne® mortgage; the relative affordability of manufactured homes make them a common housing solution in tribal areas.

Freddie Mac promoted ownership of manufactured homes in other ways as well. We worked with the Appraisal Institute to develop and deliver a curriculum that prepares appraisers to evaluate manufactured homes efficiently and accurately. We also collaborated with Next Step and eHome America to develop and deliver a curriculum that prepares individuals to responsibly buy and own manufactured homes.

During the 2025-2027 Duty to Serve Plan cycle, Freddie Mac will work collaboratively with industry participants including but not limited to lenders and developers. Freddie Mac will continue refining our products to expand the manufactured home market, with consideration for safety and soundness. As part of this effort, we will explore the feasibility of introducing product enhancements to encourage small-balance mortgage lending on manufactured homes, based on industry input and the results of research that Freddie Mac performed in 2023.

Developing and implementing product enhancements, taking into account consistent safety and soundness practices, takes substantial time and resources. The complexities of lenders' internal processes affect the adoption rate, even when lenders understand the value of offerings and want to incorporate them into their businesses. The rate of adoption depends on lender priorities as well as the need for resources, systems updates, new internal policies, and training.

In addition, we will increase developers' capacity to build developments and take on infill projects using manufactured homes, which will increase the supply of affordable single-family homes. We will add a manufactured housing focus to our Develop the Developer Academy curriculum, expand the program to select markets, and continue to provide technical assistance as needed while the developers complete their projects as part of the Academy.

## Baseline

Manufactured homes are eligible for many of Freddie Mac's financing solutions.

~~Freddie Mac does not have a product offering that specifically supports small balance mortgage financing, but we encourage lending through incentives that help offset lenders' origination costs. We updated our automated underwriting tool and expanded manual underwriting borrower eligibility to increase operational efficiency for lenders and reduce the cost to originate loans for borrowers with no credit scores.~~

Freddie Mac's Develop the Developer program promotes reinvestment and development in historically underserved communities. The Develop the Developer curriculum is offered through established academies and is integrated within those local education organizations' programs. Developers who enroll in the Develop the Developer Academy complete an intensive 36-hour curriculum as well as continuing education. Academy graduates receive training in foundational development and financing instruction, technical assistance, and community connectivity. Graduates also gain access to funding sources for developers, including grants, loans, investors, and foundations that encourage economic progress. The Academy curriculum currently only covers creating developments with site-built homes.

~~During the 2018-2021 Plan cycle, Freddie Mac collaborated with a mission-focused non-profit organization on a homebuyer education program aimed at preparing individuals for attainable and sustainable ownership of manufactured homes.~~

## Actions

### Year 1 - 2025

1. Gather feedback from manufacturers, lenders, and other market participants on Freddie Mac's manufactured home loan offerings. Review and identify potential policy updates to our *Single-Family Seller/Service Guide*.

~~4.2. Publish two policy updates based on feedback gathered. Promote the product enhancements to raise awareness and encourage adoption. Channels may include, for example, conferences and events, webinars, tutorials, e-mail to target audiences, web content, and articles.~~

~~2.3. Collaborate with a non-profit organization to complete development of a manufactured housing curriculum for the Developer Academy. Incorporate the manufactured housing curriculum into the existing Developer Academy curriculum. The rollout process is outlined under Rural Housing, Activity 1: Support for All Rural Areas, Objective C: Facilitate Rural Developer Capacity Building to Increase Supply of Single-Family Homes for the rollout process.~~

3.4. Explore the feasibility of introducing product enhancements to encourage small-balance mortgage lending on manufactured homes.

- a. Analyze the findings of Freddie Mac research conducted in 2023.
- b. Gather feedback from 10 industry participants, including community development financial institutions and at least one Federal Home Loan Bank.
- c. Determine potential new product features, if needed, and the feasibility of developing and implementing them.

## Year 2 - 2026

1. Publish ~~at least one~~ two policy updates to our *Single-Family Seller/Service Guide* to support manufactured housing titled as real property, based on feedback gathered in Year 1. Promote the product enhancement(s) to raise awareness and encourage adoption. Channels may include, for example, industry conferences or learning events, webinars, tutorials, e-mail to target audiences, web content, and articles.

~~4.2. Facilitate delivery of the manufactured housing curriculum to two cohorts of Developer Academy graduates.~~

~~2. Enhance our policies to support the purchase of small-balance loans on manufactured homes, if feasible. Promote the updated policies, if applicable, to raise awareness and encourage adoption. Channels may include, for example, industry conferences or learning events, webinars, tutorials, e-mail to target audiences, web content, and articles.~~

~~3. Collaborate with a mission-focused non-profit organization to test the concept of offering a service for helping potential homebuyers navigate the process of preparing for responsible homeownership and buying homes in manufactured housing developments.~~

## Year 3 - 2027

~~1. Publish two policy updates to our *Single-Family Seller/Service Guide* to support manufactured housing titled as real property, based on feedback. Promote the product enhancements to raise awareness and encourage adoption. Channels may include, for example, conferences or events, webinars, tutorials, e-mail to target audiences, web content, and articles.~~

~~2. Facilitate delivery of the manufactured housing curriculum to two cohorts of Developer Academy graduates.~~

~~3. Assess the scalability of the homebuying navigation concept tested in Year 2.~~

## Anticipated Market Impact

Freddie Mac's continuing efforts to enhance our product offerings and features will make it easier for lenders to originate loans on manufactured homes titled as real property, promote this housing option as

an important means of increasing the supply of affordable homes, and increase opportunities for more very low-, low-, and moderate-income households to attain and sustain homeownership. Basing the enhancements on industry feedback and our experience in the market will help us design solutions that address borrower and market needs. In addition, ~~exploration of actionable solutions to~~ small-balance lending may reveal opportunities to develop actionable solutions in the future to help increase liquidity and access to credit in this market. Enhanced product offerings and features will help encourage greater lender participation, increase affordable lending on manufactured homes titled as real property, and increase the flow of liquidity in this market.

Potential resource constraints, anticipated limited volume potential, and perceived credit risk of manufactured homes, however, may cause lender adoption of the product enhancements to be slow.

~~Also, there may be limitations on the extent to which Freddie Mac could increase product flexibilities to reduce small-balance mortgage origination costs, while maintaining safety and soundness.~~

Creating and facilitating delivery of a manufactured housing curriculum as an expansion of our Develop the Developer program will help raise real estate developers' awareness of manufactured housing's benefits as a housing solution, increase interest in its use, and grow the number of developers with the knowledge, capabilities, and motivation to construct developments with this housing type. As a result, this could help improve the image of manufactured homes, increase affordable housing supply, and lead to more liquidity for financing manufactured home purchases. Nevertheless, Develop the Developer Academy participants may choose not to complete the curriculum because of a lack of interest, a decision not to invest the additional time, or other concerns, such as a lack of public subsidies for manufactured housing and traditional difficulties in identifying and securing funding for it. In addition, local zoning reform may be required to enable the use of manufactured homes in housing developments and for infill. In addition, persistent misperceptions about manufactured homes may deter some prospective homebuyers from purchasing manufactured homes.

To help allay the concerns, the Develop the Developer Academy provides a standardized curriculum that can be adapted to local market needs and delivers unique support to help developers successfully plan and execute residential housing projects. Significantly, it helps community members remove barriers to access capital. Graduates become part of a Freddie Mac alliance of developers that provides mentoring, ongoing networking opportunities, and a forum for sharing best practices. The education, resources, and connections gained by developers support their professional development and equip them to take on development projects that could help spur economic opportunities and investment.

Testing a concept for offering tailored guidance to prospective buyers of manufactured homes in single-family developments will provide us with insight into the benefits and scalability of such a service. Often, people wanting to buy manufactured homes may lack the qualifications required to obtain mortgage financing. Our collaboration with a mission-focused non-profit organization may help many more households successfully navigate the path to homeownership, especially if it proves to be scalable across the country.

Exhibit F:  
**Plan Modification Request Template**

FREDDIE MAC  
RURAL HOUSING  
2025  
INVESTMENT

**ACTIVITY:**

Activity 1: Support for All Rural Areas: Additional Activity

**OBJECTIVE:**

Objective D: Engage in LIHTC Equity Investment in All Rural Areas

**PROPOSED PLAN MODIFICATION:**

*Check the box that applies and provide a description of the proposed Plan modification.*

- This is a proposed Plan modification (~~new Objective~~) for the current Plan year.
- This is a proposed Plan modification that addresses future Plan year(s).

*Briefly describe the proposed Plan modification for the Objective.*

**JUSTIFICATION FOR PROPOSED PLAN MODIFICATION:**

*This section should provide a detailed explanation of why the proposed Plan modification is appropriate, along with any market data that supports the proposed Plan modification.*

- The proposed Plan modification ~~for is a new Objective in~~ the current Plan year.
- The proposed Plan modification addresses future Plan year(s).

Freddie Mac is proposing a modification to its 2025 - 2027 Rural Housing (RH) objective related to LIHTC Equity Investment in All Rural Areas. This request relates to our separate request to modify out the LIHTC Equity Investment in High Needs Rural Populations (RH Activity 3, Objective C) objective. Despite the request to eliminate this objective, our commitment to high-needs rural populations remains strong. We will continue to pursue and report on LIHTC equity investments in this sub-market as part of our All-Rural objective. The below modification reflects this commitment and specifically identifies our focus in this market.

## Multifamily

### Activity 1 – Support for All Rural Areas: Additional Activity

Objective D: Engage in LIHTC Equity Investment in All Rural Areas

Evaluation Area	Year(s)	Income Targeted	Extra Credit
Investment	1, 2, 3	VLI, LI, MI	Not applicable

#### Objective Background and Description

The LIHTC program is the primary resource for supporting the creation and redevelopment of affordable rental housing for low- and very-low-income households. LIHTC provides state and local housing finance agencies and other LIHTC-allocating agencies the equivalent of nearly \$9 billion<sup>1</sup> in annual budget authority to issue tax credits for the acquisition, rehabilitation, and construction of low-income affordable housing. The program awards developers tax credits that are generally allocated to investors for capital contributions that offset the costs associated with the development of affordable units and rent restrictions.

Freddie Mac re-entered the LIHTC equity investment space in 2018 and has focused a meaningful portion of our investments in support of Duty to Serve rural areas. By maintaining our focus in support of these geographies, we support competition for credits that can increase stability and improve LIHTC pricing. This can improve affordability by advancing housing supply and reducing debt financing needs at individual properties and could lower the portion of rent needed to pay for debt service.

These investments are particularly important to rural areas as the properties they support can be overlooked by investors. [Of significant importance are high-needs rural populations \(HNRP\), which include tribal housing and housing for farmworkers.](#) Most of the LIHTC-financed properties located within the identified geographies are outside of banks' CRA assessment regions and do not receive competitive pricing for credits as a result.

[In prior years, Freddie Mac included objectives specific to LIHTC Equity Investments in HNRP. We are continuing those efforts through our All-Rural objective and reporting. High needs rural populations are sensitive to state QAP LIHTC distribution, which is beyond Freddie Mac's control. However, because of the importance of our support of these markets, we continue to seek out and report these investments.](#)

As we engage in this important work, we prioritize safety and soundness. We achieve this by accounting for concentration risk and maintaining a diversity of investments at sufficient scale to ensure a stable business platform.

Exhibit F:  
**Plan Modification Request Template**

FREDDIE MAC  
RURAL HOUSING  
2025  
OUTREACH

**ACTIVITY:**

1 - Support for All Rural Areas: Additional Activity

**OBJECTIVE:**

A - Conduct Outreach to Deepen Insights into the Rural Single-Family Housing Landscape

**PROPOSED PLAN MODIFICATION:**

This is a proposed Plan modification (new Objective) for the current Plan year.

This is a proposed Plan modification that addresses future Plan year(s).

Set a baseline and loan purchase targets as required to convert the evaluation category from Outreach to Loan Purchase starting in Year 2 and update related content where needed.

**JUSTIFICATION FOR PROPOSED PLAN MODIFICATION:**

In collaboration with FHFA, Freddie Mac committed to establishing a baseline and setting 2026 and 2027 targets for loan purchases that finance homes in all FHFA-defined rural areas.

Activity 1: Support for All Rural Areas: Additional Activity
Objective A: Conduct Outreach to Deepen Insights into the Rural Single-Family Housing Landscape

Evaluation Area	Year(s)	Income Targeted	Extra Credit
Outreach	1	VLI, LI, MI	Not applicable
Loan Purchase	2 and 3	VLI, LI, MI	Not applicable

## Objective Background and Description

Duty to Serve rural market efforts during the first two Plan cycles focused mainly on increasing support for areas defined as high-needs rural regions: rural census tracts in Middle Appalachia; Lower Mississippi Delta; colonias, as defined in the revised Duty to Serve rule published on April 12, 2023; and other rural tracts in persistent-poverty counties not included in one of the other three categories. Members of federally recognized tribes in tribal areas and small financial institutions serving rural areas also have been a focus. Freddie Mac recognizes, however, that more attention needs to be paid to rural areas more broadly.

During the 2025-2027 Plan cycle, Freddie Mac will consider the knowledge and experience gained over the preceding Plan cycles as well as engage with stakeholders across the rural housing ecosystem to broaden and deepen our understanding of barriers to affordable homeownership and to increase the flow of liquidity in rural areas. The insights gained will factor into future decisions and plans for how to help clear the path for more households in rural areas with very low, low, and moderate incomes to attain and sustain homeownership. Based on analysis of our findings, we plan to increase the flow of liquidity to rural areas by establishing a baseline and appropriate purchase targets in Year 1 for Year 2 and Year 3, taking safety and soundness into consideration.

In addition, Freddie Mac will review the rural appraisals training that we created for lenders and the rural appraisals curriculum for appraisers that we developed with the Appraisal Institute. We will collaborate with industry experts to update or enhance the courses as needed, promote their availability, and deliver training.

## Baseline

Freddie Mac purchases loans secured by homes in rural areas, but we have had not analyzed rural loan data for purposes of setting a baseline or purchase targets to date before 2025.

As with our other single-family loan purchase objectives in this Plan, Freddie Mac's all-rural loan purchase targets include only purchase-money loans for the 2025-2027 Plan cycle. Macroeconomic conditions have made refinance business particularly volatile and difficult to predict over the last several years. We expect similar conditions during this Plan cycle. The focus on purchase-money loans only does not diminish Freddie Mac's commitment to purchasing refinance loans on such homes to help make homeownership more affordable and sustainable for very low-, low-, and moderate-income homeowners.

The unusually low mortgage interest rates from 2020 through most of 2022 also sparked home purchases, including by Millennials entering prime homebuying ages and many individuals wanting more or different space during the COVID-19 pandemic. As a result, single-family mortgage originations soared. Therefore, to calculate a baseline for 2026 and 2027 loan purchase targets, Freddie Mac took an average of our purchase-money loan volume in the most recent three years where purchase shares within the market were greater than 50% of our annual loan purchases areas defined as rural in FHFA's

2025-2027 Rural File. We also considered the decline in rural purchase-money loan volume observed in HMDA data since 2021, the current market environment, 2025 rural market origination volumes, current outlooks, and lender feedback. The heightened level of uncertainty caused by various external factors also were taken into account.

Home prices continue to climb, in part based on the housing supply gap. Labor, materials, and land shortages and costs affect the building of new and repair or renovation of existing homes, which also drives up home prices. In addition, repairing and rebuilding homes following natural disasters consumes substantial amounts of construction resources.

Wage growth has not kept pace with home prices and cost of living. From July 2024 through July 2025, average real wage growth, adjusted for inflation, was 1.5%.<sup>1</sup> As of March 2025, a household earning \$75,000 annually could afford about 21% of home listings, according to the National Association of REALTORS® and Realtor.com report, *2025 Housing Affordability & Supply*. A household earning \$50,000 annually could afford around 9% of listings. Median weekly earnings for full-time workers at the end of second quarter 2025 were \$1,196, or about \$62,000 annually, according to the U.S. Bureau of Labor Statistics.

Investors bought about 27% of the homes sold in first quarter 2025, the highest share in at least five years.<sup>2</sup>

In addition, the number of lenders serving rural areas is falling. FHFA's 2025-2027 Small Financial Institutions Data file includes 18% fewer SFIs than the 2022-2024 file. More broadly, the number of rurally headquartered banks declined by 57% from 1995-2022; a quarter of reported rural home purchase loans in 2022 were made by 20 lenders.<sup>3</sup> Plus, many lenders told us they hold loans in portfolio.

Under the circumstances, we reduced the loan counts in our baseline calculation by 6.5%, which is the decline in rural purchase-money loan volume observed in HMDA data from 2023 to 2024. Adjusting the loan counts helps normalize them, allowing us to set challenging yet more feasible targets. The following table reflects our rural loan purchase baseline:

Year	2019	2023	2024
<b><u>Income-Qualifying Loan Count</u></b>	<u>60,678 loans</u>	<u>63,623 loans</u>	<u>65,014 loans</u>
<b><u>Adjusted Income-Qualifying Loan Count (-6.5%)</u></b>	<u>56,734 loans</u>	<u>59,488 loans</u>	<u>60,788 loans</u>
<b><u>Baseline</u></b> <u>(An average of the three most recent years in which purchase-money loans composed &lt; 50% of purchases in this market was used to establish the baseline)</u>	<u>63,105 loans</u>		
<b><u>Adjusted Baseline</u></b> <u>(An average of the three most recent years in which purchase-money loans composed &lt; 50% of purchases in this market, less 6.5%, was used to establish the baseline)</u>	<u>59,003 loans</u>		

<sup>1</sup> U.S. Bureau of Labor Statistics, Current Employment Statistics data

<sup>2</sup> BatchData

<sup>3</sup> Housing Assistance Council, *Taking Stock, 2023*

Regarding education on rural appraisals, Freddie Mac offers an on-demand rural appraisals tutorial on FreddieMac.com, Reviewing Rural Properties. In collaboration with the Appraisal Institute, we developed the Rural Area Appraisals curriculum.

## 2026 and 2027 Targets

Freddie Mac's single-family purchase targets for home loans that meet the Duty to Serve income-qualifying definition for very low-, low-, and moderate-income borrowers in rural areas are set forth in the Actions section below. Loan targets only include purchase-money originations for owner-occupied properties. They reflect the 6.5% baseline reduction, with increases over the baseline and year-over-year that demonstrate intention to expand support for the rural market, even under challenging circumstances.

Projected volume does not consider potential market reactions to changes in the interest-rate environment or other market disruption. It also does not factor in the possibility of slower-than-expected adoption of our products or product enhancements. Lenders' business priorities and the complexities of their internal processes affect the rate of adopting new or updated mortgage offerings, even when lenders understand the value of offerings and are anxious to incorporate them into their businesses.

## Actions

### Year 1 - 2025

1. Analyze our data on loans secured by homes in rural areas to gain insights:
  - a. Concentrations of rural areas being served
  - b. Freddie Mac product usage in rural areas
  - c. Rural borrower characteristics
  - d. Lenders delivering loans on homes in rural areas
2. Identify and gather feedback from stakeholders that serve the rural housing market, such as lenders and housing intermediaries, on our existing products and rural borrower needs.
3. Review rural appraisals training resources that Freddie Mac developed during the first Plan cycle to assess their continued relevance. Identify areas for improvement. Revise rural appraisal training resources in collaboration with industry experts, if appropriate.
4. Leverage the convening of a diverse group of experts in conjunction with our Rural Research Housing Symposium to discuss the feedback gathered and exchange ideas around opportunities to increase support for rural housing.
5. Analyze the feedback and loan data insights gathered, combined with our knowledge and experience gained during previous Plan cycles. Based on our findings, identify potential opportunities for enhancements to offerings and resources.
6. Analyze historical rural loan data to calculate a baseline for loans secured by single-family homes in rural areas. Establish a baseline and set Year 2 and 3 loan purchase targets for this Plan objective through FHFA's modification process.

### Year 2 - 2026

1. Purchase 61,950 purchase-money loans secured by owner-occupied homes in FHFA-defined rural areas, ~~according to the target set by Freddie Mac in Year 1.~~

## Year 3 - 2027

1. Purchase 64,900 purchase-money loans secured by owner-occupied homes in FHFA-defined rural areas, according to the target set by Freddie Mac in Year 1.

## Anticipated Market Impact

Freddie Mac's efforts will lay the foundation to help increase liquidity and expand access to credit for making homeownership possible and more affordable throughout rural America. Through our loan data analysis, we will gain insight into where Freddie Mac is buying loans, the types of loans, and the borrowers. These insights will factor into decisions related to improving offerings and outreach, with the goal of more broadly serving underserved rural areas.

Our engagement with stakeholders across the ecosystem will strengthen our network of relationships and help ensure that a range of industry perspectives are considered as we develop strategies and plans for widening our support for affordable homeownership across all rural areas. Their buy-in also will facilitate execution of the strategies and plans. Conducting outreach, gathering feedback, and analyzing input will require extensive coordination and a significant amount of time and resources. The rural market encompasses various and diverse demographics, cultures, economics, and housing; there are differences in terms of needs, challenges, and opportunities.

Updating appraisals training and related resources, if needed, will help ensure that they are relevant and effective in preparing appraisers to complete appraisals accurately and efficiently. Through our promotional efforts, we will help make appraisers aware of the educational opportunities and their benefits. Having more appraisers informed on rural appraisals will help address an obstacle to lending in rural markets.

Setting The loan purchase targets that we set in Year 1 and work toward in years 2 and 3 for loan purchases in all rural areas highlights our commitment to supporting affordable lending that responsibly expands homeownership opportunities for rural households nationwide. We estimate that we will provide a total of close to \$25 billion in liquidity to finance rural homes in 2026 and 2027.

As we sharpen our focus on purchasing loans in all rural areas, our continuing, extensive lender engagement will result in lenders gaining more financing options and more confidence in lending in rural areas. More lenders also will gain access to the secondary market, with some likely becoming Freddie Mac lenders.

Achieving this objective will be challenging for many reasons, among them being the lack of affordable homes for sale, market conditions, and various other external factors causing a heightened level of uncertainty.

Furthermore, rural areas are primarily served by small, community-based lenders, many of which may not have the capacity to sell directly to Freddie Mac. Building relationships with aggregators through which they could deliver their loans takes time and, in some cases, may not be feasible. In addition, many lenders hold loans in portfolio so that they can extend credit to borrowers who fall outside of the Enterprises' credit box. Plus, the number of lenders serving rural areas has been shrinking significantly.

And although we have purchased loans on homes in all rural areas for decades, we did not have a loan purchase target for all FHFA-defined rural areas until Year 2 of this Plan cycle. It can take time to gain the understanding needed to develop and execute appropriate, effective, and efficient strategies for supporting such a vast market and meeting our goals.

The outreach and product enhancement efforts that we will undertake during this Plan cycle are intended to help overcome some of these potential limitations.

Activity 4: Financing by Small Financial Institutions of Rural Housing: Regulatory Activity
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Objective A: Purchase Loans from Small Financial Institutions Serving Rural Areas
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Evaluation Area	Year(s)	Income Targeted	Extra Credit
Loan Purchase	1, 2, 3	VLI, LI, MI	Not applicable

## Objective Background and Description

Freddie Mac will continue to provide liquidity to small financial institutions with assets of less than \$304 million. We plan to engage more deeply with SFIs that are already approved Freddie Mac seller/servicers to increase the purchase of rural housing loans. We also intend to expand our outreach and support to increase the number of small financial institutions approved as direct Freddie Mac seller/servicers or that sell to us through an aggregator. Our approach is intended to increase the financing options for these institutions and our purchase volume.

## Baseline

In setting Freddie Mac's baseline and targets for the 2025-2027 Plan cycle, we reviewed the volume of purchase-money and refinance loans purchased since 2018 from SFIs serving rural areas [identified in FHFA's 2025-2027 Small Financial Institutions Data file](#). We also assessed market conditions during those years to the present.

Unusually low mortgage interest rates in 2020 and into 2022 sparked a refinance boom. The timing coincided with a spike in home purchase demand from Millennials entering prime homebuying ages and the COVID-19 pandemic prompting many individuals to want more or different space. As a result, single-family mortgage originations soared to levels not experienced since the housing boom in the early 2000s.

Interest rates rose rapidly starting in 2022, more than doubling from 3.8% in second quarter 2022 to 7.79% in fourth quarter 2023. They have receded slightly since then but remained near 7% at the end of second quarter 2024. Also, during this time frame, inflation rose dramatically, and housing supply and production remained tight, further pushing up home prices. Although inflation has eased in recent months, it continues to significantly affect many households in rural areas. Loan originations and Freddie Mac's loan purchases significantly contracted as a result — most notably, refinance loans.

Macroeconomic conditions have made the refinance business particularly volatile and difficult to predict over the last several years. After reaching historic highs in 2021, refinance volume in second quarter 2024 was the lowest in nearly 28 years.<sup>1</sup> We expect continued volatility during this Plan cycle. Therefore, in developing our baseline for this Plan cycle, we included only purchase-money loans in the annual loan volume used in our calculation and used an average of the most recent three years where refinance shares within the market were below 50% of our annual loan purchases.

The following table reflects our baseline, developed according to the methodology described.

<sup>1</sup> Freddie Mac U.S. Economic, Housing and Mortgage Market Outlook – August 2024 - <https://www.freddiemac.com/research/forecast/20240820-us-economy-continues-remain-strong>

Year	2019	2022	2023
<b>Income-Qualifying Loan Count</b> <i>(Purchases from SFIs serving rural areas identified in FHFA's 2025-2027 Small Financial Institutions Data file)</i>	2,3941,113 loans	2,5241,324 loans	4,9371,069 loans
<b>Baseline</b> (An average of the three most recent years in which purchase-money loans composed < 50% of purchases in this market was used to establish the baseline)	2,2841,175 loans		

## Targets

Our purchase targets for single-family loans from SFIs serving rural areas over the Plan cycle are set forth in the following table. We intend to use various tactics to meet our targets. These may include leveraging various execution options where feasible, conducting outreach, and offering technical training to raise lenders' confidence in lending to very low-, low-, and moderate-income homebuyers.

Our economists expect home sales to increase modestly through 2025, staying below 6 million annually. We expect lower rates to loosen the rate lock-in effect, providing a minimal boost to inventory. Supported by solid demand, we expect upward pressure on home prices, rising by 2.1% and 0.6% in 2024 and 2025, respectively. Expectations for modestly improved home sales and an increase in home prices should stimulate purchase originations, which are broadly consistent with the Mortgage Bankers Association's August 2024 forecast of almost \$1.5 trillion in 2025 and almost \$1.7 trillion in 2026.

Further affecting loan purchase volume in this market, the pool of eligible lenders has shrunk each year. FHFA's 2025 small financial institutions reference file contains 18% fewer lenders than the 2022 file used for the previous Plan cycle. To assess the impact that the new file could have on our loan purchase volume going forward, we applied the 2025-2027 file to our 2024 loan purchases; the result was a 38% decrease in volume. Our 2026 and 2027 targets take into account the decrease in eligible lenders with the new file; however, we based the 2025 target on the previous data file because of the timing of our analysis. Developing relationships with small financial institutions not currently doing business with Freddie Mac will require a significant investment in resources to support and sustain the level of purchase growth targeted in the Plan cycle. Additionally, as we add new lenders to our customer base, it will take time before we realize loan purchases while lenders navigate through the onboarding process.

Projected volume does not consider potential market reactions to changes in the interest-rate environment or other market disruption. It also does not factor in the possibility of slower-than-expected adoption of our products or product enhancements. Lenders' business priorities and the complexities of their internal processes affect the rate of adopting new or updated mortgage offerings, even when lenders understand the value of offerings and are anxious to incorporate them into their businesses.

2025	2026	2027
2,000 loans	2,4001,200 loans	2,2001,350 loans

Examples of efforts we will undertake to increase loan purchases from small financial institutions that have delivered loans to us and the number of small financial institutions serving rural areas that sell loans to Freddie Mac:

- Analyze loan data to identify opportunities for additional targeted and individualized outreach to lenders, both direct Freddie Mac sellers as well as those acting as aggregators.

- Reach out to small financial institutions with presence in rural areas to encourage them to adopt and use our offerings and to sell loans to Freddie Mac either directly or through an aggregator. We will factor insights gained during our interactions into our ongoing efforts in this market.
- Purposefully promote products most relevant to rural areas in marketing and communications activities.
- Conduct strategic outreach to expand our direct and indirect loan-delivery networks; however, the timeline from reaching agreement with a lender to establishing the required channels to receiving loan deliveries can take many months.

## Anticipated Market Impact

We estimate that we will provide nearly ~~\$1 billion~~ \$710 million in liquidity over the Plan cycle to small financial institutions that serve rural areas. Deliberately increasing our engagement with small financial institutions to provide liquidity will notably improve access to credit in rural markets because we have heard from lenders that they are limited in resources, available products, and outreach capacity.

Through our outreach efforts, more lenders also will become able to sell their loans into the secondary market either directly or indirectly, with some lenders becoming direct Freddie Mac seller/servicers.

We anticipate that achieving this objective will be very challenging for many reasons, including lenders' competing internal priorities; potential operational complexities; the range of available financing options, including proprietary products offered by small financial institutions; and the large number of geographic areas served. The lack of homes available for sale and affordable to individuals with very low, low, and moderate incomes also limits mortgage lending in rural regions. In addition, many lenders hold loans in portfolio so that they can extend credit to borrowers who fall outside of the Enterprises' credit box, according to lenders we interviewed.

The outreach and product enhancement efforts that we will undertake during this Plan cycle are intended to help overcome some of these potential limitations.

Exhibit F:  
**Plan Modification Request Template**

FREDDIE MAC  
AFFORDABLE HOUSING PRESERVATION  
2025  
**LOAN PRODUCT**

**ACTIVITY:**

Activity 3: Low-Income Housing Tax Credits (Debt): Statutory Activity

**OBJECTIVE:**

Objective B: Examine the Impact and Use of the Qualified Contracts Provision in LIHTC Transactions

**PROPOSED PLAN MODIFICATION:**

*Check the box that applies and provide a description of the proposed Plan modification.*

- This is a proposed Plan modification (~~new Objective~~) for the current Plan year.
- This is a proposed Plan modification that addresses future Plan year(s).

Freddie Mac is requesting removal of the activities related to this Objective from our 2025 – 2027 Duty to Serve Plan.

**JUSTIFICATION FOR PROPOSED PLAN MODIFICATION:**

*This section should provide a detailed explanation of why the proposed Plan modification is appropriate, along with any market data that supports the proposed Plan modification.*

- The proposed Plan modification is ~~for a new Objective in~~ the current Plan year.
- The proposed Plan modification addresses future Plan year(s).

Freddie Mac is proposing a modification to remove this Objective from the 2025 - 2027 Duty to Serve Plan. After a review of external and internal research on the role of the QC provision and an extensive analysis of Freddie Mac's own portfolio, we have found minimal use of and impact on the QC provision for properties associated with loans we have purchased. We also anticipate that the affordability loss associated with QCs will be gradually eliminated into the future because of states' efforts to limit the use of the QC provision through their Qualified Allocations Plans (QAPs) and decisions by investors like the GSEs to make waiver of QC rights a component of their LIHTC Equity investment programs. Based on this work, we do not see significant potential or impact from debt product innovations that would seek to limit the market's use of the QC provision and therefore request to remove this Objective.

Throughout 2025, Freddie Mac has reviewed research on the use of the QC provision in order to develop a foundation for formulating an engagement plan that would inform our efforts to better understand how the QC provision is used, its implications for affordability, and the risks and benefits of actions Freddie Mac might take to address these implications. Many advocates have called on the GSEs to address loss of affordable units through QCs, citing an estimation that as many as 10,000 units lose affordability through the QC process each year. Although affordability loss is a concern and we can find examples of properties where this has occurred, we have not been able to independently validate this datapoint and have found it challenging to find data that shows how common it is for properties to exit LIHTC using the QC provision.

Freddie Mac used our internal data and data from the National Housing Preservation Database to estimate the potential impact of the QC process on our portfolio. From this analysis, we determined that the population of our financed loans that exit the program is extremely small: 0.1% of all loans. Given the very minimal impact of the QC on Freddie Mac loans and

that additional focus or intervention is unhelpful and distracts resources from more meaningful work, we are requesting removal of this Objective.

Given our findings, we believe the policy options we were asked to consider by advocates would be ineffective at addressing the challenge of affordability loss through the QC process. These options included: limitations on debt for properties that at any time exited LIHTC through the QC process and a requirement for a QC rights waiver as a component of our LIHTC debt offering. The first concept faces the needle-in-the-haystack problem. It would put in place a new layer of due diligence for every loan we underwrite when we know there are few (if any) loans that would be affected by the requirement. The second option would hamper our ability to provide liquidity to the LIHTC debt space by implementing a standard that no other secondary market or primary market participant has in place. Sponsors who wish to use the QC process in the future would simply sidestep our offerings in favor of lenders with no similar requirements.

State QAPs are likely the best way to address concerns related to the QC provision. This venue allows for a well-considered framework tailored by policymakers to address the unique needs of each state. If a nationalized approach to this issue is appropriate, elected federal policymakers might consider one. Our analysis has indicated that Freddie Mac should not move forward with any product innovation related to the QC provision and therefore seeks to remove this Objective from the Plan.

## Multifamily

### Activity 3 – Low-Income Housing Tax Credits (Debt): Statutory Activity

#### Objective B: Examine the Impact and Use of the Qualified Contracts Provisions in LIHTC Transactions

Evaluation Area	Year(s)	Income Targeted	Extra Credit
Loan Product	1 and 2	VLI, LI, MI	Not applicable

#### Objective Background and Description

The LIHTC program is the primary federal resource for supporting the creation and redevelopment of affordable housing for low-, very-low-, and middle-income households. LIHTC provides state and local housing finance agencies and other LIHTC-allocating agencies authority to issue tax credits for the acquisition, rehabilitation, and construction of low-income affordable housing. The program awards developers tax credits that offset the costs associated with the development of affordable units with rent restrictions:

LIHTC provides a production subsidy to developers who restrict rents at a certain level for at least a 30-year period, which is comprised of a 15-year tax compliance period and a 15-year extended use period. Many states and jurisdictions require longer periods of rent restricted affordability. Under the QC provision of the tax code, a LIHTC operator may approach the housing finance agency after year 14 of operation to request a QC. The state housing finance agency then must seek a qualified buyer at a purchase price stipulated by Section 42 of the tax code. If no qualified buyer is found within a year, the property owner is released from the affordability requirement and may either sell the property without deed restrictions or increase rents to market rate after a three-year period.<sup>1</sup> Although 39 state housing finance agencies now require and nine states incentivize LIHTC applicants to waive their QC rights, housing advocates and others have raised concerns about use of the QC provision as a means to remove a property from the LIHTC program during the extended use period.<sup>2,3</sup>

In 2025, Freddie Mac will further examine what opportunities we might have for appropriately limiting use of the QC provision in the context of loans purchased by Freddie

<sup>1</sup>National Council of State Housing Agencies, "Closing the Qualified Contract Loophole", November 2021 – <https://www.ncsha.org/wp-content/uploads/Qualified-Contract-Background.pdf>

<sup>2</sup>National Housing Trust, "Protecting Long-term Affordability by Closing the Qualified Contract Loophole", July 10, 2023 – <https://nationalhousingtrust.org/news/protecting-long-term-affordability-closing-qualified-contract-loophole>

<sup>3</sup>Local Initiatives Support Corporation, "Affordable Housing Loss Grows as 'Qualified Contracts' Sap Thousands of Housing Credit Units", Matt Josephs and Michael Skrebutenas, January 25, 2023 – <https://www.lisc.org/our-stories/story/affordable-housing-loss-grows-as-qualified-contracts-sap-thousands-of-housing-creditunits/>

Mac. This will include outreach to various LIHTC developers and syndicators, Freddie Mac lenders, affordable housing borrowers, and advocates, particularly in states that do not require or incentivize QC waivers as part of their QAP process. From this research, we will have a framework to better understand the impact of the QC provision on our portfolio and the market more broadly and a pathway to how to best ensure long-term affordability is preserved across LIHTC properties. This outreach and research will consider the impact of QC waivers on the overall safety and soundness of the market.

If deemed appropriate by our 2025 work, Freddie Mac will announce product enhancements associated with actionable opportunities to further limit use of the QC provision in the future.

### **Baseline**

Freddie Mac has not conducted sufficient outreach regarding how it might change its debt offerings to address properties exiting the LIHTC program through QC waivers. We have previously conducted research into affordability loss at LIHTC properties that exit the program and developed a preservation loan offering that incentivizes affordability preservation at properties that exit the LIHTC program during the Freddie Mac loan term, which will help inform this outreach.

### **Actions**

#### **Year 1 – 2025**

In 2025, Freddie Mac will review existing research on use of the QC provision and formulate an engagement plan to inform our efforts to better understand how the QC provision is used, its implications for affordability, and the risks and benefits of actions Freddie Mac might take to address these implications. We will then use this plan to conduct direct outreach to LIHTC developers and syndicators, Freddie Mac lenders, affordable and conventional borrowers, and key advocates. We will use this outreach to formulate a set of future actions we may take.

Through this work, we will develop a framework for understanding the most effective and efficient interventions related to our debt offerings that can build on our efforts to preserve affordability across LIHTC properties.

This work will require a high level of effort. Freddie Mac will need to engage a range of market stakeholders to identify the potential implications associated with modifying debt offerings in a way that could limit use of the QC provision. Separately, we will need to consider how changes could be operationalized. Finally, we will need to analyze the market implications through an assessment of how any changes might affect our ability to provide liquidity to the market.

#### **Year 2 – 2026**

In 2026, Freddie Mac will develop and announce product enhancements to further limit the use of QC provisions through our debt offerings if warranted by our 2025 analysis. We will

provide details related to the findings of our 2025 analysis in the rollout of any product enhancements. The product enhancements will be provided through a published term sheet or requirements added to relevant term sheets for existing loan offerings.

**Anticipated Market Impact**

The LIHTC program supports nearly 90% of all income-restricted affordable housing. Understanding the impact of the QC provision and how it is used to remove properties from their affordability obligations during the extended use period will lay a foundation for potential product changes that extend our efforts to preserve affordable housing.

The work builds on our efforts to provide leadership in developing loan products and underwriting guidelines that facilitate affordable housing preservation.

Exhibit F:  
**Plan Modification Request Template**

FREDDIE MAC  
AFFORDABLE HOUSING PRESERVATION  
2025  
**LOAN PRODUCT and LOAN PURCHASE**

**ACTIVITY:**

Activity 7: Financing of Small Multifamily Rental Properties: Regulatory Activity

**OBJECTIVE:**

Objective A: Enhance Multifamily Liquidity by Aggregating and Guaranteeing Loans from Multiple Lenders

**PROPOSED PLAN MODIFICATION:**

*Check the box that applies and provide a description of the proposed Plan modification.*

- This is a proposed Plan modification (~~new Objective~~) for the current Plan year.
- This is a proposed Plan modification that addresses future Plan year(s).

*Briefly describe the proposed Plan modification for the Objective.*

**JUSTIFICATION FOR PROPOSED PLAN MODIFICATION:**

*This section should provide a detailed explanation of why the proposed Plan modification is appropriate, along with any market data that supports the proposed Plan modification.*

- The proposed Plan modification is ~~for a new Objective in~~ the current Plan year.
- The proposed Plan modification addresses future Plan year(s).

Freddie Mac is proposing a modification to its 2025 to 2027 Affordable Housing Preservation (AHP) objective related to Aggregating and Guaranteeing Loans from Multiple Lenders through our Q-Deal structure. This request relates to our separate request to modify out the objective for Guaranteeing Loans from Rural Lenders (RH Activity 1, Objective G). We will continue progress on the AHP objective as outlined in the Plan, with a specific focus on uncovering and including rural loans into the aggregated Q-Deal. The modification below reflects our continued commitment to supporting rural transactions as they become available and make economic and financial sense.

## Multifamily

### Activity 7 – Financing of Small Multifamily Rental Properties: Regulatory Activity

#### Objective A: Enhance Multifamily Liquidity by Aggregating and Guaranteeing Loans from Multiple Lenders

Evaluation Area	Year(s)	Income Targeted	Extra Credit
Loan Product	1	VLI, LI, MI	Yes
Loan Purchase	2 and 3	VLI, LI, MI	Yes

#### Objective Background and Description

Freddie Mac Multifamily has pioneered several securitization programs designed to extend liquidity to Duty to Serve qualifying SFIs as well as other lenders/sponsors, such as those that provide debt capital for 5- to 50-unit properties.

One successful execution has been Freddie Mac's Q-Deal structure, which allows Freddie Mac to securitize and guarantee senior bonds issued by a third-party trust, which are backed by loans sold to the trust by a third-party lender. Freddie Mac is then able to sell the guaranteed bonds into the capital markets thereby enhancing the lender's balance sheet liquidity and ability to make additional loans. This is significant to SFIs and particularly depository institutions that lack liquidity, balance sheet diversity and the ability to securitize, which can be key factors to their long-term stability. Freddie Mac uses the Q-Deal structure to support affordable housing throughout the United States. The executions are a component of Freddie Mac's strategy to provide liquidity to the market while preserving safety and soundness by distributing risk.

Through our efforts to extend liquidity to CDFIs, MDIs and SFIs, including those that provide debt capital for 5- to 50-unit properties, and those that serve rural areas, Freddie Mac has discovered a potential opportunity to enhance the Q-Deal execution. A key barrier to leveraging Q-Deals faced by these smaller institutions is that often they alone cannot aggregate a sufficient volume of loans to complete a successful execution. The economics of a Q-Deal only work when transactions exceed \$150 million.

To address this problem, Freddie Mac will further develop its securitization platform, allowing multiple financial institutions to sell their loans to the same third-party trust, allowing sufficient aggregation to complete a securitization execution. Freddie Mac is building this capability for seasoned loans that are already on a lender's balance sheet and will work toward further enhancements that allow lenders to originate for the purpose of selling loans through a multi-sponsor Q-Deal. This enhancement will require

a substantial level of effort as it would require pre-approved loan documents, rolling term sheets, and consistent, programmatic issuance.

Beyond that, each transaction will require working with sponsors to locate appropriate collateral and structuring and executing the transaction based on the collateral. Finally, to maintain safety and soundness, substantial credit and legal due diligence to re-underwrite loans is required.

Once complete, this initiative has the potential to open access to liquidity to a wider range of market participants. [We will consider opportunities to include loans that support properties in rural markets and look to inform lenders that support these markets of opportunities to participate in Q-Deal executions.](#)

To support its efforts, Freddie Mac will work to complete proof of concept multi-sponsor executions.

To expand the product for use by CDFIs, MDIs and SFIs, including those that provide debt capital for 5- to 50-unit properties, and those that serve rural areas, Freddie Mac will work to identify eligible institutions and conduct targeted outreach to raise awareness and gauge interest in completing these executions. In 2026 and 2027 we will work to complete executions involving Duty to Serve qualifying SFIs.

### **Baseline**

Freddie Mac completed its first Q-Deal execution in 2014. Freddie Mac is working to develop the ability to complete Q-Deal executions with multiple parties for both seasoned loans and loans originated with the intent to sell to a third-party Q-Deal trust.

### **Actions**

#### **Year 1 - 2025**

1. Complete a proof-of-concept multi-sponsor transaction. This involves development of terms, working with lenders to locate appropriate collateral, structuring and executing the transaction based on the collateral, and substantial credit and legal due diligence to re-underwrite the loans.

#### **Year 2 - 2026**

1. Publish term sheet, including applicability for Duty to Serve qualifying SFIs, such as those that provide debt capital for 5- to 50-unit properties and those that serve rural areas. This process applies what we learned in the proof-of-concept transaction, allowing us to craft a basic structure for the offering. Formally launching the offering involves substantial internal due diligence and approvals.
2. Complete at least one transaction involving a Duty to Serve qualifying small financial institution.

#### **Year 3 - 2027**

1. Conduct targeted outreach to raise awareness of the offering with at least 10 Duty to Serve qualifying financial institutions including CDFIs, MDIs and SFIs that provide debt capital for 5- to 50-unit properties, and those that serve rural areas.
2. Complete at least two transactions involving a Duty to Serve-qualifying SFI.

### **Anticipated Market Impact**

The ability to aggregate both seasoned loans and those originated for the purpose of selling to a third-party Q-Deal trust from multiple sponsors can address what has been a major hurdle facing small institutions -that seek to enhance their liquidity and distribute risk but lack the ability to do so through in-house securitization platforms. These executions can provide balance sheet relief for smaller institutions and provide participating lenders with a clear exit strategy for new executions by eliminating concerns over aggregating sufficient like-kind collateral.

Through this work, we can support lending institutions that are a key source of debt capital for affordable housing, including 5- to 50-unit properties and multifamily properties in rural areas. The multi-sponsor Q-Deal execution will allow these institutions to hold or sell guaranteed bonds in lieu of holding balance sheet loans, enhancing liquidity and allowing for additional lending to what are often underserved markets.

Beyond that, each transaction will require working with sponsors to locate appropriate collateral and structuring and executing the transaction based on the collateral. Finally, to maintain safety and soundness, substantial credit and legal due diligence to re-underwrite loans is required.

Once complete, this initiative has the potential to open access to liquidity to a wider range of market participants. To support its efforts, Freddie Mac will work to complete proof of concept multi-sponsor executions. To expand the product for use by CDFIs, MDIs and SFIs, including those that provide debt capital for 5- to 50-unit properties, and those that serve rural areas, Freddie Mac will work to identify eligible institutions and conduct targeted outreach to raise awareness and gauge interest in completing these executions. In 2026 and 2027 we will work to complete executions involving Duty to Serve qualifying SFIs.

Exhibit F:  
**Plan Modification Request Template**

FREDDIE MAC  
AFFORDABLE HOUSING PRESERVATION  
2025  
LOAN PRODUCT

**ACTIVITY:**

1 - Financing of Energy- and/or Water-Efficiency Improvements on Single-Family Properties: Regulatory Activity

**OBJECTIVE:**

A - Develop Tools to Inform the Financing of Energy- and/or Water-Efficiency Improvements on Single-Family Homes

**PROPOSED PLAN MODIFICATION:**

- X This is a proposed Plan modification for the current Plan year.
- X This is a proposed Plan modification that addresses future Plan year(s).

Remove this objective from Freddie Mac’s Duty to Serve Underserved Markets Plan.

**JUSTIFICATION FOR PROPOSED PLAN MODIFICATION:**

Freddie Mac proposes to remove this objective from our 2025-2027 Duty to Serve Plan because of reduced emphasis on energy- and water-efficiency solutions; therefore, Freddie Mac has adjusted our priorities regarding expanding financing for such improvements. In addition, through our information-gathering efforts, we learned of existing resources intended to inform and educate consumers about home energy and water efficiency, making it unnecessary for us to create new ones.

Freddie Mac remains committed to identifying opportunities for reducing homeownership costs.

~~Activity 1: Financing of Energy and/or Water Efficiency Improvements on Single-Family Properties: Regulatory Activity~~

~~Objective A: Develop Tools to Inform the Financing of Energy and/or Water Efficiency Improvements on Single-Family Homes~~

<del>Evaluation Area</del>	<del>Year(s)</del>	<del>Income Targeted</del>	<del>Extra Credit</del>
<del>Loan Product</del>	<del>1 and 2</del>	<del>VLI, LI, MI</del>	<del>Not applicable</del>

## ~~Objective Background and Description~~

~~Energy costs have put a financial strain on many homeowners, especially those with low and very low incomes (80% of area median income or less) and in high-needs rural regions.<sup>1</sup> The U.S. Department of Energy defines a household that spends 6% or more on energy costs as energy cost burdened. Low-income households have an energy burden of 6% on average nationwide, three times the rate for other households. In some locations, households spend a much higher percentage of income on energy. Many factors contribute to the discrepancy in energy cost burden between income levels, including the use of higher-cost fuels or home energy inefficiencies, such as older appliances and a lack of insulation.<sup>2</sup>~~

~~While most consumers care about their home's environmental footprint, few are willing or financially able to pay for a sustainable home unless it guarantees a return on their investment, according to the findings of a 2023 Freddie Mac consumer survey. In addition, market participants told us that consumers and real estate professionals lack appropriate awareness about financing solutions available to pay for energy-efficiency improvements. Most improvements are financed with cash or unsecured debt.~~

~~To understand and make decisions about how to increase their homes' energy efficiency, homeowners need access to actionable information about the benefits of energy-efficient improvements, which improvements might be most cost-effective for them, and solutions for financing those improvements, including both the available options as well as lowering the cost of improvements. But relevant information is challenging to obtain and assess. Sponsors of benefits — such as financing and tax incentives — vary from state, local, and federal governments and from utility companies across electricity, natural gas, and water. In addition, each program may have unique criteria and expiration dates, and programs are likely to be altered and augmented as a result of the IRA. Also, lenders often do not have a depth of knowledge about green financing products and/or available consumer subsidies, which leads them to suggest other types of financing for improvements.~~

~~In the previous Duty to Serve Plan cycles, Freddie Mac expanded our support for increased home energy and water efficiencies that lead to utility cost savings, thereby helping to make homeownership more affordable and sustainable. We introduced and enhanced our GreenCHOICE Mortgages for financing home energy and/or water improvements, established a Green Bond framework according to International Capital Market Association standards for securitizing loans on energy-efficient homes, and expanded the framework to include newly constructed homes with Home Energy Rating System (HERS®) scores; we have issued Green Bonds since 2022, which reduce taxpayer risk while increasing market liquidity. These offerings promote industry standardization and market growth.~~

~~We helped drive further standardization through the selection and implementation of data points related to energy-efficient home features in the Uniform Appraisal Dataset (UAD) under the Uniform Mortgage Data~~

<sup>1</sup>-SEEA, Energy Insecurity in the South-

<https://storymaps.arcgis.com/stories/4377299f586a493984222bfc6ee84e60>

<sup>2</sup>-U.S. Department of Energy, Low-Income Energy Affordability Data (LEAD) Tool and Community Energy Solutions-  
<https://www.energy.gov/scep/low-income-energy-affordability-data-lead-tool-and-community-energy-solutions>

~~Program and included the energy efficiency dataset in our lender-facing loan origination systems. Standardizing this data capture will help provide insights into energy efficiency lending, the value of energy-efficient home features, and performance of energy efficiency loans, which could help increase the adoption and usage of green mortgages.~~

~~During the 2025-2027 Plan cycle, Freddie Mac will conduct outreach and education to deepen lenders' awareness of GreenCHOICE and its benefits to encourage product adoption and usage as well as to help enable them to inform potential borrowers of the offering and its benefits. We will also roll out educational materials intended to expand homebuyers' and homeowners' awareness and understanding of ways to increase energy efficiency and solutions for financing the improvements. In addition, we will introduce tools to help homebuyers and homeowners weigh the cost/benefit of energy efficiency improvements and gain insight into how long it might take to realize returns on their investments. To offer lenders, homebuyers, and homeowners insight into opportunities to lower the cost of improvements, we will expand our DPA One® tool to include information about available subsidy and incentive programs in select markets where the dollar amounts could have the most impact for borrowers.~~

## Baseline

~~Freddie Mac's GreenCHOICE finances home energy and/or water efficiency improvements. We continually promote GreenCHOICE and its benefits to housing professionals through outreach and education to help increase understanding, adoption, and use of the offering. Despite these efforts, many buyers lack knowledge about the potential utility cost savings and other returns on investment that could result from certain improvements as well as the ability to use tax credits and other incentives to make those improvements affordable.~~

~~Freddie Mac's free, on-line DPA One tool contains information about down payment assistance programs nationwide.~~

## Actions

### Year 1—2025

- ~~1. Collaborate with at least three industry stakeholders, including the Federal Home Loan Banks (FHLBs), lenders, and non-profit organizations, to gain insights into the needs and opportunities in this emerging market and inform development of educational materials and homeowner tools.~~
- ~~2. Conduct at least four information sessions on GreenCHOICE Mortgages to educate lenders and real estate professionals on product benefits and to encourage adoption and usage.~~
- ~~3. Develop borrower education materials focused on identifying current utility costs along with the potential annual savings associated with certain energy efficiency improvements based on the home's characteristics.~~
- ~~4. Create and execute a marketing campaign to promote the benefits of home energy and water efficiency improvements to lenders, real estate professionals, homebuyers, and homeowners. Channels may include, for example, industry conferences or learning events, webinars, tutorials, web content, updated marketing materials, consumer-facing blog posts, and social media posts.~~
- ~~5. Determine the feasibility of expanding the purpose and content of DPA One to include information on available government tax credits and other incentives for implementing home energy and/or water efficiency improvements.~~
- ~~6. Conduct a market analysis to identify areas in Duty to Serve high-needs rural regions with comparatively high percentages of energy cost-burdened households. Inform lenders, real estate professionals, housing organizations, potential homebuyers, and homeowners in at least one of the identified markets of the benefits of improved energy and water efficiency, Freddie Mac resources for identifying improvement opportunities, and financing options.~~

## Year 2 – 2026

1. ~~Continue promoting education materials and assessment tools through various channels, which may include industry conferences or learning events, webinars, tutorials, web content, consumer-facing blog posts, and social media posts.~~
2. ~~Research states' plans for distributing IRA funds. Identify at least three markets where expanding DPA One to highlight available subsidies could have significant market impact, given the subsidy amounts.~~
3. ~~Incorporate information into DPA One about energy-related rebates and tax credits available in the pilot markets identified.~~
4. ~~Create a marketing campaign to promote DPA One expansion to lenders and other industry professionals in the markets identified through activities such as webinars, industry events, targeted e-mail, direct outreach, and web content. Monitor DPA One activity to determine the frequency of program access in Duty to Serve markets to inform additional outreach strategies.~~
5. ~~Include energy and water efficiency as a requested research topic in the Rural Research Symposium call for papers. Invite energy and water efficiency thought leaders and stakeholders to the symposium. Include a representative of the energy and water efficiency sector on the advisory council convened in conjunction with the symposium. (Go to the Rural Housing Market, Activity 1, Objective B for details on the symposium.)~~
6. ~~Expand targeted outreach and education efforts to an additional high-needs rural region identified in Year 1 as having comparatively high percentages of energy cost-burdened households. Inform lenders, real estate professionals, housing organizations, potential homebuyers, and homeowners in at least one of the identified markets of the benefits of improved energy and water efficiency, Freddie Mac resources for identifying improvement opportunities, and financing options.~~

## Anticipated Market Impact

~~Freddie Mac's education efforts will help increase awareness and understanding among industry professionals, homebuyers, and homeowners of the potential opportunities and benefits of improving a home's energy and/or water efficiency. According to our research, such improvements can add value to the home as well as help improve the health and safety of people living in the home. By highlighting related financial incentives and promoting Freddie Mac's mortgage solutions, we also will raise the visibility of ways to make the improvements more affordable for the near and the long term. This is especially relevant in energy cost-burdened markets.~~

~~By offering these expanded education opportunities, Freddie Mac will help homeowners to achieve the following:~~

- ~~Better understand their energy usage and expenses, opportunities to reduce them, and the benefits of implementing home energy and/or water efficiency improvements.~~
- ~~Gain insights that could increase the likelihood that they will finance improvement projects.~~
- ~~Increase the home's energy and/or water efficiency that could lead to cost savings, which help lower the cost of homeownership. Improved energy efficiency also can help make homes more comfortable.~~

~~Access through DPA One to information about tax breaks and other incentives for homes with energy- and/or water-efficiency features will enable homeowners to easily identify and take advantage of opportunities to lower the overall costs of the improvements and realize returns on their investments sooner.~~

~~The added insights could lead more homeowners to seek mortgage financing for energy efficiency improvement projects. More lenders also might be encouraged to adopt and use our GreenCHOICE offering, which would enable us to increase the flow of liquidity to this market. As we purchase loans and analyze the data, we might identify additional opportunities to enhance our offerings to further support the energy efficiency market.~~

~~Personal funds and unsecured debt remain the most widely used financing options in this market, however. Logistical issues, such as unreliable or, especially in high-needs rural regions, a lack of internet coverage, also could hamper our outreach efforts. Reaching borrowers with this information will require collaboration with local trusted non-profit partners. Homeowners who learn of our solutions still may choose not to take advantage of them. The costs of energy efficiency improvements often are not properly valued in an appraisal. Loan-to-value limitations can make some energy efficiency improvements difficult to finance through first-lien mortgages.~~

~~Featuring energy efficiency during the Rural Research Symposium and including energy efficiency experts on the advisory council will bring additional focus to the challenges and opportunities around improving energy efficiency, particularly in rural areas, and will promote collaboration across the ecosystem to help identify and develop solutions.~~

Exhibit F:  
**Plan Modification Request Template**

FREDDIE MAC  
AFFORDABLE HOUSING PRESERVATION  
2025  
OUTREACH

**ACTIVITY:**

2 - Support for Shared Equity Programs for Affordable Housing Preservation: Regulatory Activity

**OBJECTIVE:**

B - Provide Technical Assistance to Establish Community Land Trusts and Facilitate Origination of Shared Equity Mortgages

**PROPOSED PLAN MODIFICATION:**

- This is a proposed Plan modification (new Objective) for the current Plan year.
- This is a proposed Plan modification that addresses future Plan year(s).

Add an action in Year 3 to publish one policy update.

**JUSTIFICATION FOR PROPOSED PLAN MODIFICATION:**

Freddie Mac proposes to add an action to publish a policy update in our *Single-Family Seller/Service Guide* in 2027. By continuing to evolve our offerings based on industry feedback, we increase the usefulness and usability of our offerings and reinforce relationships across the ecosystem. This will help increase participation and promote the flow of liquidity in this market, thereby creating more shared equity homeownership opportunities for very low-, low-, and moderate-income households.

Activity 2: Support for Shared Equity Programs for Affordable Housing Preservation: Regulatory Activity
Objective B: Provide Technical Assistance to Establish Community Land Trusts and Facilitate Origination of Shared Equity Mortgages

Evaluation Area	Year(s)	Income Targeted	Extra Credit
Outreach	1, 2, 3	VLI, LI, MI	Not applicable

## Objective Background and Description

The shared equity model provides a path to attainable, sustainable homeownership for many people who otherwise would be unable to reach that goal, especially in high-cost areas. However, several factors constrain shared equity’s advancement. For example, shared equity programs often have unique structures, documentation for originating loans under their programs, and definitions of success; the lack of standardization presents operational challenges to lenders. In addition, the potential loan origination volume from shared equity programs is small, which further affects lender participation. Yet lender participation is vital for shared equity programs to scale.

Furthermore, as more localities learn about the benefits of shared equity homeownership and opt to establish their own programs, they may find that they are insufficiently equipped to undertake the effort in a way that furthers industry standards, support, and growth. Market research and Freddie Mac’s experience have shown standing up a shared equity program involves navigating many complexities. Among them are establishing a leadership structure, staff hiring and training, identifying and securing funding, developing a property-acquisition strategy, and establishing procedures and program documentation, including legal documents. According to Grounded Solutions Network’s 2023 report, it takes an average of about two years to establish a shared equity program, acquire properties, and sell the first shared equity home.<sup>1</sup>

Currently, there is no formal training for individuals looking to work in shared equity. Shared equity programs often are in the position of hiring and training entry-level employees on their processes and procedures plus general shared equity methodology. This can be difficult for non-profit administrators that already are resource constrained. It is not uncommon for other shared equity programs to recognize seasoned staff members’ abilities and experience and offer them higher-level roles in their organizations. As a result, the programs that trained the employees have staffing gaps again and must expend additional resources to hire and train new staff, adding strain on already limited resources.

Freddie Mac made progress toward lowering barriers to the growth of the shared equity market in previous Duty to Serve Plan cycles. Working collaboratively with industry participants, we introduced and enhanced solutions for financing shared equity homes in CLTs and with income-based resale-restrictions to help increase affordable lending and access to credit as well as help ensure that loans originated could be sold into the secondary mortgage market, thereby increasing liquidity. We also promoted standardized legal documents, program best practices, and operational efficiencies to help expand lender participation in the market.

In addition, the previously mentioned research that we supported, in collaboration with Grounded Solutions and the Lincoln Institute of Land Policy, helped fill gaps in information about shared equity programs, loan performance, and the people who buy and own homes within shared equity programs,

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<sup>1</sup> The 2022 Census of Community Land Trusts and Shared Equity Entities in the United States; Ruoniu Wang, Celia Wandio, Amanda Bennett, Jason Spicer, Sophia Corugedo, and Emily Thaden; June 2023 - <https://groundedsolutions.org/community-land-trust-census/>

including CLTs. The findings helped in understanding shared equity homeownership, its importance to communities nationwide, and the business opportunities that it offers lenders. Building on the findings, Freddie Mac created a database of CLTs to help lenders identify programs in their lending footprints with homes that might need mortgage financing.

Also, the CLT Training and Certification Program that we developed in collaboration with the Florida Housing Coalition provided education, best practices, and resources to equip newly forming and established CLTs in setting up operations and processes that further industry standardization and comply with Freddie Mac requirements; Florida has one of the highest concentrations of CLTs in the country. For CLTs that become certified through the program, Freddie Mac offers a streamlined process for originating loans on homes in their inventories. In addition, the technical assistance that we provided to the City of Milwaukee helped enable it to establish a CLT that operates according to shared equity program best practices and standards and employs a property-acquisition strategy that leverages properties owned by Milwaukee's Department of City Development. Today, the Milwaukee CLT brings homeownership within reach for income-eligible households.

During the 2025-2027 Plan cycle, Freddie Mac will continue our efforts to promote the shared equity market's success by collaborating across the ecosystem to provide technical assistance that helps accelerate the creation of additional CLTs and increases the capacity of shared equity program staff. In addition, we will continue to evolve our shared equity financing solutions.

Freddie Mac will gather input from program stewards to better understand strengths and barriers to standing up new shared equity programs and collaborate with an industry-leading organization to provide technical assistance and related resources to help navigate and facilitate the processes associated with establishing programs. However, we will create our own technical assistance program if we cannot engage an organization with the required capacity. We will conduct an assessment to select localities to receive technical assistance in creating their CLTs.

Freddie Mac also will engage the industry in identifying opportunities to continue evolving our mortgage offerings in ways that could expand their adoption and usage as well as encourage more lenders to participate in the market.

## Baseline

Freddie Mac acted as a catalyst in developing CLT programs. As an example, in Omaha, we helped educate interested stakeholders on the shared equity homeownership model and provided a wide range of technical assistance to help the Omaha Municipal Land Bank strengthen its position for achieving its stated goal of prioritizing wealth building for people already living in the area. In Milwaukee, we provided significant technical assistance to support the Milwaukee Community Land Trust in establishing its nascent shared equity program in accordance with best practices and to develop a property-acquisition strategy that leverages properties owned by Milwaukee's Department of City Development.

Freddie Mac supports the financing of shared equity homes through our CLT Mortgage and flexibilities in our *Single-Family Seller/Service Guide* for underwriting mortgages on income-based deed-restricted properties.

## Actions

### Year 1 - 2025

1. In collaboration with existing CLT coalitions/networks, ~~host~~ facilitate a series of at least three working group sessions with shared equity program providers and lenders to evaluate existing conventional mortgage offerings and identify product terms and flexibilities needed to increase originations for shared equity homeownership.

2. In collaboration with existing CLT coalitions/networks, conduct three working group sessions with established shared equity providers in regions where shared equity programs are concentrated to gather feedback on the challenges, best practices, and useful resources in creating a shared equity program.
3. Identify and engage an organization with experience in standing up CLTs that could collaborate with Freddie Mac to provide technical assistance to shared equity programs. Analyze the organization's capacity; develop and implement a capacity-building plan, if needed. If no organization is identified, begin to develop a Freddie Mac program to provide ~~the~~ technical assistance.
4. Assess potential localities to receive technical assistance that helps stewards accelerate new program formation and promote industry standardization.
5. In collaboration with industry trade organizations, provide technical assistance to existing programs through a bifurcated approach, focused on advancing program development and on workforce development for individuals working in the shared equity space.
  - a. Build the capacity of one technical assistance provider to provide existing CLT programs with resources to help accelerate program growth and promote industry best practices. Technical assistance may be delivered through conferences, one-on-one coaching, or virtual delivery.
  - b. Support development and enhancement of a shared equity workforce training program aimed at preparing professionals to work in the shared equity space. Deliver workforce development training to professionals working, or aspiring to work, in shared equity programs. Professional development will be delivered in a virtual classroom setting. Depending on demand, one or more training cohorts may be offered.

## Year 2 - 2026

1. Publish at least one policy update to our *Single-Family Seller/Service Guide* based on input gathered during Year 1 of this Plan to facilitate product adoption and usage. Promote the update(s) through efforts that may include, for example, conferences and ~~learning~~ events, webinars, tutorials, e-mail to targeted audiences, web content, and articles.
2. Identify at least four localities where non-profit organizations have strong support from local stakeholders, including municipalities, other non-profit organizations, and funders to stand up shared equity programs but need technical assistance in organizing in accordance with industry standards and best practices. Analyze barriers to success and collaborate with existing shared equity programs as well as local stakeholders to determine ways to overcome barriers.
3. Provide technical assistance to the four localities identified in Year 1 to facilitate setting up or completing the process of establishing shared equity homeownership programs. Technical assistance will include a focus on education and stakeholder engagement, feasibility and business planning, and program launch and support.
4. Deliver workforce development training to an additional cohort of aspiring professionals.

## Year 3 - 2027

1. Publish one policy update to our *Single-Family Seller/Service Guide* based on ~~industry feedback~~ to facilitate product adoption and usage. Promote the update through efforts that may include, for example, conferences and events, webinars, tutorials, e-mail to targeted audiences, web content, and articles.

- 4.2. Provide technical assistance to four additional localities to facilitate setting up or completing the process of establishing shared equity homeownership programs.
- 2.3. Deliver technical assistance to establish the framework for programs in the selected markets. Examples of technical assistance that may be provided include designing a CLT's organizational and board structures, training the board and staff, coaching and mentoring, developing property-acquisition plans, developing strategic partnerships, financial planning, and designing marketing and communications and membership structures.
- 3.4. Collaborate with an existing CLT technical assistance provider in modernizing its curriculum intended to replicate best practices across existing and newly forming CLTs.
- 4.5. Deliver workforce development training to an additional cohort of aspiring shared equity professionals.

## Anticipated Market Impact

Freddie Mac's efforts around enhancing our shared equity financing solutions based on industry input will help increase effectiveness of our mortgage offerings and strengthen relationships with shared equity organizations, program stewards, and practitioners. Our outreach activities will raise lenders' awareness of the enhancement and encourage them to adopt and use our shared equity financing options. As lenders increase their participation in the market, more people will achieve sustainable homeownership, and Freddie Mac will increase market liquidity through shared equity loan purchases.

Providing technical assistance to non-profits and localities will accelerate the creation of CLT programs that increase long-term affordable homeownership opportunities for income-eligible households. Establishing a new CLT is a difficult and complicated process; each program addresses particular needs, audiences, and stakeholders. Without proper preparation and insight, the locality may expend more time, effort, and resources than expected and risks developing a program that does not effectively support the locality and may not incorporate industry best practices.

According to Grounded Solutions Network's "2022 Census of Community Land Trusts and Nonprofits with Shared Equity Homeownership Programs", the shared equity market grew 30% from 2011 to 2022, an average of 2.7% organic growth each year over the 11-year period. Our efforts to provide technical assistance in establishing CLTs during this Plan cycle will result in expedited growth of 2.5% in each year of the program.

Freddie Mac's involvement in facilitating the set-up of additional CLTs also will help ensure that the new CLTs are structured to increase industry standardization, including the use of industry-recognized model legal instruments. In addition, collaborating with a technical assistance provider to ~~modernizing~~modernize its existing CLT curriculum for promoting industry standardization and best practices will enable the provider to expand its footprint. With a growing number of CLTs and broader standardization, lenders will have more confidence in participating in the shared equity market, financing homes in the CLTs' inventories, and selling the loans into the secondary mortgage market. This, in turn, will increase the flow of liquidity to the shared equity market.

The workforce development program will help alleviate the need for programs to train new employees on the basics of shared equity and to focus instead on internal processes and procedures. As a result, new employees will be productive faster and may be more likely to stay longer with an employer.

Exhibit F:  
**Plan Modification Request Template**

FREDDIE MAC  
 MANUFACTURED HOUSING  
 2025  
 OUTREACH and LOAN PRODUCT

**ACTIVITY:**

Activity 2: Manufactured Housing Communities Owned by a Governmental Instrumentality, Non-Profit Organization, or Residents: Regulatory Activity

**OBJECTIVE:**

Objective A: Conduct Outreach and Develop Product to Support Manufactured Housing Resident Owned Communities

**PROPOSED PLAN MODIFICATION:**

*Check the box that applies and provide a description of the proposed Plan modification.*

- This is a proposed Plan modification (~~new Objective~~) for the current Plan year.
- This is a proposed Plan modification that addresses future Plan year(s).

Freddie Mac is requesting removal of this objective from the 2025 – 2027 Duty to Serve Plan.

**JUSTIFICATION FOR PROPOSED PLAN MODIFICATION:**

*This section should provide a detailed explanation of why the proposed Plan modification is appropriate, along with any market data that supports the proposed Plan modification.*

- The proposed Plan modification is ~~for a new Objective in~~ the current Plan year.
- The proposed Plan modification addresses future Plan year(s).

After six years of working to provide liquidity in support of Manufactured Housing Resident Owned Communities (MHROC), Freddie Mac is seeking to remove its MHROC objective for the 2025 – 2027 Duty to Serve Plan.

Freddie Mac has contributed a sustained effort to provide liquidity to these communities, starting with the 2018 MHROC loan program, which provided the most flexible underwriting guidelines we could offer while maintaining safe and sound lending practices. Soon thereafter, we published a 2019 research paper that identified the challenges these communities face in obtaining financing. We later established loan purchase targets for MHROC loans, which we continuously found infeasible due to the high leverage needs for these properties, which exceeded the standards of any Freddie Mac loan product. As we identified in our 2019 research, the challenge these communities face from a financing perspective is the availability of equity investment, not debt.

In our 2025-2027 plan, our objective sought to support MHROC transactions through an affirmative marketing plan, further support for MHROC technical assistance, and a product that would incentivize borrowers to expand upon Duty to Serve Manufactured Housing Protections by including a resident's right of first offer to support residents' ability to purchase their manufactured housing community (MHCs).

Through our work in 2025, we determined that these outreach efforts will have little to no impact on supporting our ability to supply liquidity to this market, which is our ultimate goal. Despite continually promoting our MHROC offering, we have received very few loan inquiries. We also identified that significant technical assistance resources are already available to

these communities. Additionally, our exploration of ROFR laws revealed that this concept has seen minimal traction in states that offer it, likely because of the challenging economics and complexities of these transactions. Our evaluation suggests that a ROFR product would require significant uneconomic and unsustainable subsidy to drive adoption. Furthermore, our evaluation suggests that this change would increase maturity risk for GSE loans. Finally, based on our understanding of the market, we determined that the level of incentive required to encourage adoption of a right of first offer protection would make the product infeasible.

The work identified by the objective is not likely to achieve a level of impact that would warrant its further inclusion in the Duty to Serve Plan and given that the objective is not likely to result in loan volume, it also does not support a direct or indirect business purpose.

For the remainder of this plan cycle, we will identify this activity within the “Statutory and Regulatory Activities Considered but Not Included” section of our plan, pursuant with the Evaluation Guidance.

Despite dedicated resources and efforts, we have continually found a limited market for this offering as well as a complex and difficult process for converting communities into MHROCs. We believe the funding model for MHROCs is not conducive to attracting private capital investment or creating significant additional growth in the number of MHROCs in the market. Additionally, the leverage requirements, debt stacks, and credit parameters of these deals are typically beyond what Freddie Mac considers prudent and beyond the levels necessary for the appropriate distribution of risk through credit risk securitization, limiting the feasibility and scalability of our work in this market.

## Multifamily

### Activity 2 – Manufactured Housing Communities Owned by a Governmental Instrumentality, Non-Profit Organization, or Residents: Regulatory Activity

#### Objective A: Conduct Outreach and Develop Product to Support Manufactured Housing Resident Owned Communities

Evaluation Area	Year(s)	Income Targeted	Extra Credit
Outreach	1 and 3	VLI, LI, MI	Yes
Product	2	VLI, LI, MI	Yes

#### Objective Background and Description

MHROCs provide residents with more control over their housing than they would have in a typical investor-owned community. In an MHROC, the residents govern and collectively own their community through a cooperative, corporation, or similar legal framework. Typically, the community is set up as a non-profit entity. The cooperative owns the entire community, including the land, amenities, infrastructure, and facilities, but the residents continue to own their own homes. The members vote on major decisions and elect a board of directors (Board) to oversee the day-to-day operations. The Board may choose to hire a professional management company to oversee operations and bookkeeping, especially if the community is large.

In a 2019 white paper<sup>1</sup> Freddie Mac examined the MHROC market, finding that there were just over 1,000 MHROCs nationwide and that they were primarily concentrated in California and Florida. As described in more detail below, this market segment is so small, in part, because converting an investor-owned MHC to resident ownership is difficult.

Since publishing our paper, Freddie Mac has established an MHROC offering and purchased three loans through our lender network as a result. We have continued promoting our offering through our lender network but have found limited opportunities for loan purchases.

In our 2025-2027 Plan, our approach to supporting MHROCs will be to conduct affirmative outreach designed to help MHROCs and those that wish to form them have clear awareness and understanding of how to access multifamily loans leveraging Freddie Mac's offering. Freddie Mac will also communicate with stakeholders that provide technical assistance to MHROCs to determine what opportunities exist to support their efforts to assist MHROCs. This work will include considerations of climate risks faced by these communities.

Beyond these efforts, in 2025 Freddie Mac will explore ROFR laws that are designed to give residents of MHCs the opportunity to purchase their community before it is sold to an external buyer. These laws can empower residents to form an MHROC by providing ample time to form a governing structure and secure financing. Freddie Mac will examine the effectiveness of these laws in states like Massachusetts, New Hampshire, Oregon, Washington and elsewhere, communicating with housing finance agencies and other stakeholders in these states as appropriate to facilitate our understanding. The goal of this outreach is to support our efforts to craft a product for MHC conventional borrowers that would provide a residents with a right to purchase the property in the event of a sale of the property during the loan term per the terms of the loan agreement.

This product innovation will require significant work to understand the real-world implications and effectiveness of existing policies, how a Freddie Mac policy associated with our conventional product could be implemented, monitored and enforced (which can be especially complex), and what steps would be necessary to make such an offering market adoptable.

### **Baseline**

Freddie Mac undertook a survey of the MHROC market and published research on these communities in 2019. We will use this work as a baseline for our efforts to better understand the technical assistance and financing needs of MHROCs in a substantially different market than existed even just five years ago.

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<sup>1</sup>Freddie Mac Multifamily Research, "Manufactured Housing Resident Owned Communities", 2019 — [https://mf.freddiemac.com/docs/dts\\_mhroc\\_report.pdf](https://mf.freddiemac.com/docs/dts_mhroc_report.pdf)

~~Freddie Mac has consistently delivered communications to our lender network and worked frequently with loan originators that focus on the broader MHC space to locate and finance MHROC transactions. We have also consistently published and promoted successful MHROC transactions and conducted direct outreach to non-profits and other organizations that focus on the needs of MHROCs. In 2023, Freddie Mac introduced additional promotional activities for our MHROC offering, including articles, social media posts, podcasts, and additional outreach to stakeholders. Going forward, we will leverage and expand upon the techniques used previously as we enhance our affirmative marketing plan. This work is important to raise the profile of our ability and desire to finance MHROC transactions, as a key challenge we face in financing these transactions is the infrequency and inconsistency with which we see them.~~

~~Our work to establish a product that incentivizes the inclusion of a right to purchase for MHC residents also builds on our 2019 research and subsequent work in the market, which clearly identified the challenges residents face in forming a new MHROC. This component of the objective also leverages our already scaled conventional MHC offering.~~

### **Actions**

#### **Year 1—2025**

##### **Outreach**

- ~~1. Conduct affirmative marketing plan, including three or more of the following tactics:
 
  - a. Quarterly (4 annually) mentions each in lender and sponsor e-newsletter
  - b. Web site news article highlighting our engagement with MHROCs
  - c. Media outreach to publications that are read by lenders, borrowers, manufactured housing market participants and other relevant industry participants to promote awareness of MHROC offering
  - d. Social media promotion of offering and/or other resident-owned community content
  - e. Promotion at events~~
- ~~2. Continue to report MHROC transactions.~~
- ~~3. Identify and conduct outreach with at least one MHROC technical assistance provider and request to review existing technical assistance materials available to the market.~~
- ~~4. In support of product development, conduct analysis of ROFR laws and how they can be translated to a Freddie Mac policy and product through outreach to lenders, borrowers, state housing finance agencies, and other market participants.~~

#### **Year 2—2026**

##### **Outreach**

- ~~1. Conduct affirmative marketing plan, including three or more of the following tactics:~~

- a. ~~Quarterly (4 annually) mentions each in lender and sponsor e-newsletters~~
- b. ~~Web site news article highlighting our engagement with MHROCs~~
- c. ~~Media outreach to publications that are read by lenders, borrowers, manufactured housing market participants and other relevant industry participants to promote awareness of MHROC offering~~
- d. ~~Social media promotion of offering and success stories and/or other resident-owned community content~~
- e. ~~Promotion at events~~

~~2. Continue to report MHROC transactions:~~

~~3. Continue outreach to MHROC technical assistance providers and develop a technical assistance support scoping document, detailing gaps in the current provision of technical assistance where Freddie Mac can lend expertise. Potential gaps may include the availability of resources and training related to Freddie Mac's loan process and underwriting requirements, how subordinate debt can be used with Freddie Mac's offering, the assumption process for Freddie Mac loans, navigating ROFR laws, and climate resilience issues.~~

#### ~~Product~~

~~4. Based on 2025 ROFR Research, design a new offering that incentivizes conventional borrowers to include a resident right to purchase obligation along with other tenant protections required by the Freddie Mac loan agreement. Like other protections, notice to residents of the right would be required. Due to the complexity of including such a requirement in a loan independent of state or local law, it will likely take considerable time and effort to develop and release to the market.~~

~~5. Publish a term sheet.~~

~~6. Promote the term sheet throughout our lender network.~~

#### **Year 3—2027**

##### **Outreach**

~~1. Conduct affirmative marketing plan, including three or more of the following tactics:~~

- a. ~~Quarterly (4 annually) mentions each in lender and sponsor e-newsletters.~~
- b. ~~Website news article highlighting our engagement with MHROCs~~
- c. ~~Media outreach to publications that are read by lenders, borrowers, manufactured housing market participants, and other relevant industry participants to promote awareness of MHROC offering~~

- d. ~~Social media promotion of offering and/or other resident-owned community content~~
- e. ~~Promotion at events~~

2. ~~Continue to report MHROC transactions.~~

3. ~~Support technical assistance providers as warranted by 2026 analysis. This may include webinar trainings for technical assistance providers related to navigating the gaps identified in the 2025 analysis or publications of fact sheets or guides.~~

4. ~~Promote resident right to purchase product term sheet throughout our lender network.~~

5. ~~Solicit market feedback on the offering to improve resident right to purchase product offering marketability. This will include an assessment of volume and further analysis of the economic incentive required to drive the offering. We will use this information to adjust terms or set future purchase targets if appropriate.~~

6. ~~Adjust terms or set purchase target through a Duty to Serve Modification if deemed appropriate by 2026 analysis. Continue to solicit market feedback on the proposed offering to improve its marketability.~~

#### **Anticipated Market Impact**

Since 2019, Freddie Mac has made a substantial effort to understand and extend debt liquidity to the MHROC market. Our goal through this work is to provide a clear pathway to debt capital that can support those who wish to form an MHROC and help preserve existing MHROCs through favorable financing terms. Despite these efforts, the opportunities to finance MHROCs have been limited. This is in part due to high loan-to-value ratios and low debt service coverage ratios (DSCRs) that often exceed safe and sound lending standards. Our approach to the MHROC market is to maintain safe and sound lending standards while considering alternative opportunities to strengthen the pipeline of eligible transactions.

Our actions in the 2025-2027 Plan are designed to do three things: First, promote and educate MHROC stakeholders on our offerings; second, evaluate current assistance to MHROCs and identify additional assistance necessary to further generate a pipeline of potential debt transactions; and third, create more opportunities for MHROC formation leveraging our already scaled conventional MHC offering.

We believe this third outcome will be highly impactful. A resident right to purchase requirement in the loan documents can give residents a much greater opportunity to organize and purchase their community. It addresses one of the most substantial barriers residents face when competing against external buyers. While we recognize that there are other ROC financing offerings in the market, and the conversions that result from a resident right to purchase requirement may not be financed by Freddie Mac, our primary aim is to help residents gain the opportunity and access the best financing options available to them and their unique situations.

Each of these activities require a substantial level of effort and staffing resources to complete and draw upon a comprehensive set of functions within Freddie Mac.

Although the MHROG space is likely to remain small relative to the overall MHC market, our efforts can help preserve existing MHROCs and may enable new MHROCs to form.

# MANUFACTURED HOUSING

## Strategic Priorities 2025-2027

### Meeting the Needs of the Manufactured Housing Market

Our mission in the manufactured housing market is to provide innovative financing solutions that help very low-, low-, and moderate-income households to affordably rent or own manufactured homes. We are committed to expanding liquidity for manufactured homes titled as real property, enhancing our product offerings, and integrating manufactured homes into broader housing developments. We are also committed to promoting tenant protections and affordability within manufactured housing communities (MHCs) and supporting residents' efforts to own their communities. We aim to make manufactured housing a reliable, attractive, and affordable solution for more households and part of the housing solution for vibrant communities nationwide.

Freddie Mac's strategy takes into account the public input we received regarding manufactured housing market needs, while enabling us to make informed decisions about an appropriate level of loan purchases within the bounds of safety and soundness.

To continue moving the manufactured housing market forward over the next three years, Freddie Mac will work to continue to provide steady liquidity as well as expand our support through innovations for the market in the following ways:

- Purchase loans secured by manufactured homes
- Enhance our mortgage offerings to help make homes titled as real property easier for lenders and homebuyers and homeowners.
- Incorporate a manufactured housing curriculum into Academy to enable and encourage more real estate manufactured homes in housing developments and areas.
- Purchase loans secured by MHC properties that to Serve tenant pad lease protections.
- Examine the potential for enhancing multifamily affordability preservation option for MHC loan

forward over the next three steady liquidity as well as manufactured housing

titled as real property.

financing for manufactured more accessible to

our Develop the Developer<sup>SM</sup> developers to use as infill, especially in rural

commit to implementing Duty

offerings to include an products.

### Highlights – 2018-2023

- 46,000 manufactured homes titled as real property
- \$6.7 billion in market liquidity for manufactured homes titled as real property

- More than two dozen new products or enhancements to expand affordable financing for manufactured homes titled as real property
- Innovation in using manufactured homes in single-family real estate developments
- 445 MHCs financed with tenant protections since launching an offering in 2019
- 65,182 MHC pads financed with tenant protections
- Expand outreach to support the purchase of loans for Manufactured Housing Resident-Owned Communities (MHROCs).
- Facilitate the creation of MHROCs by leveraging our conventional offerings to further extend a resident right to purchase.

## Manufactured Housing Market Overview

### A Key Source of Affordable Housing

Manufactured housing is the largest source of unsubsidized affordable homes nationwide and provides vital housing, especially for households with very low, low, and moderate incomes and those outside of metropolitan areas. According to the American Community Survey (ACS), as of 2021, households living in manufactured homes had a median income of \$40,000, compared with \$70,000 for all other households.

Because manufactured homes are constructed in factories, they can be built faster and more efficiently than site-built homes. They also are built to high standards of quality and energy efficiency and offer designs that appeal to a wide range of potential homebuyers. According to research by the Joint Center for Housing Studies of Harvard University, 3.2 million low- and moderate-income renters across the country who would be priced out of the site-built housing market could afford to buy manufactured homes.

Manufactured homes are built to U.S. Department of Housing and Urban Development's (HUD's) national Manufactured Home Construction and Safety Standards, known as the HUD Code, whereas site-built homes are built to individual state codes.

### Significant Potential to Increase Manufactured Housing Supply

At the end of 2020, the U.S. had a housing supply deficit of 3.8 million units. Between 2018 and 2020, the deficit grew by approximately 52%.<sup>2</sup> The number of entry-level homes — typically defined as 1,400 square feet or smaller — represent less than 10% of all newly constructed homes, compared to about 35% in the 1970s.<sup>3</sup> Manufactured homes built since 2000 average about 1,400 square feet in size.<sup>4</sup> Yet manufactured homes compose

<sup>2</sup> Freddie Mac Research Note, "Housing Supply: A Growing Deficit", May 7, 2021 - <https://www.freddiemac.com/research/insight/20210507-housing-supply>

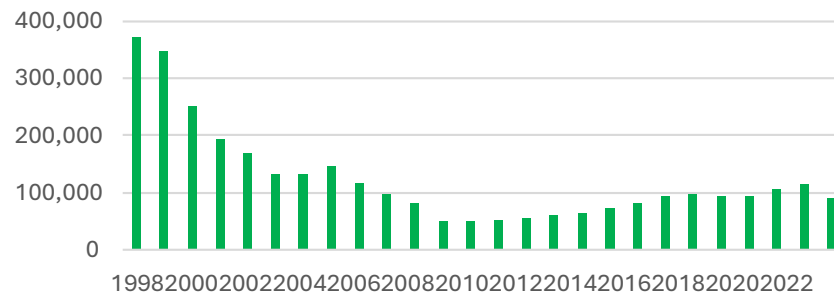
<sup>3</sup> Council of Economic Advisors, "Alleviating Supply Constraints in the Housing Market"; Jared Bernstein, Jeffery Zhang, Ryan Cummings, and Matthew Maury; September 1, 2021 - <https://www.whitehouse.gov/cea/written-materials/2021/09/01/alleviating-supply-constraints-in-the-housing-market/>

<sup>4</sup> Joint Center for Housing Studies of Harvard University; "A Review of Barriers to Greater Use of Manufactured Housing for Entry-Level Homeownership"; Christopher Herbert, Alexander Hermann, Daniel McCue, and Chadwick Reed; January 2024 - <https://www.jchs.harvard.edu/research-areas/working-papers/review-barriers-greater-use-manufactured-housing-entry-level>

only around 6% of existing and 10% of new homes. In rural areas, they make up more than 12% of the housing stock.<sup>5</sup>

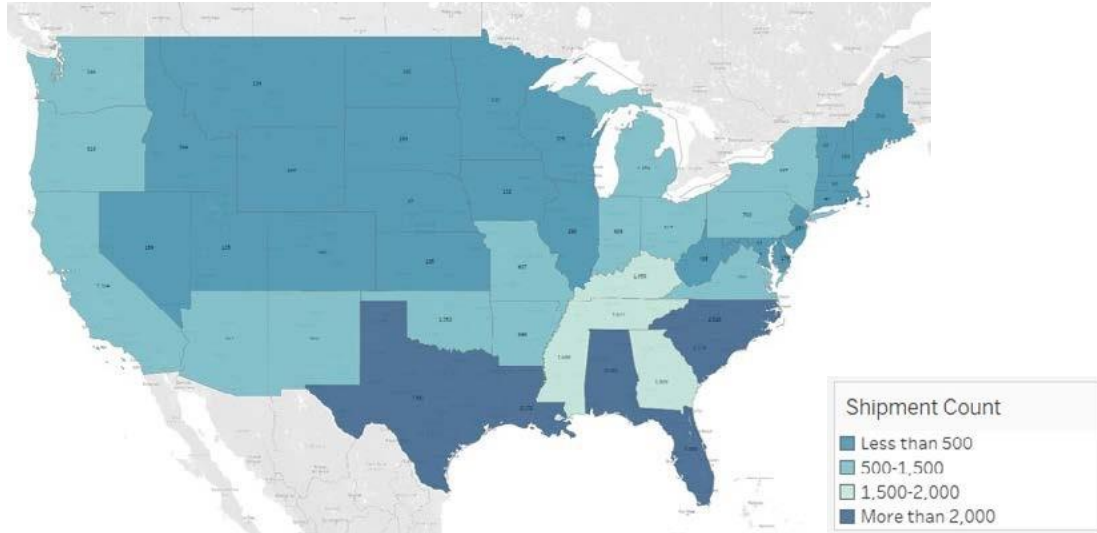
According to the U.S. Census Bureau, manufactured home shipments consistently exceeded 250,000 units before 2000 but then began declining significantly, bottoming at less than 50,000 units in 2009. Shipments have remained below 100,000 units since 2007, except in 2021 and 2022; they fell again to just over 89,000 units in 2023.<sup>6</sup>

### Manufactured Housing Units Annual Shipments 1998-2023



Source: U.S. Census Bureau

Manufactured home shipments are largely concentrated in the Southeast, Southwest, Pacific Coast, and Michigan.<sup>7</sup>



Source: U.S. Census Bureau

Of the 6.7 million occupied manufactured homes nationwide, 74% — or around 5 million — are owneroccupied, according to the ACS. In total, 46% of households in

<sup>5</sup> Housing Assistance Council tabulations of the U.S. Census Bureau's 2017-2021 American Community Survey Data

<sup>6</sup> U.S. Census Bureau, Manufactured Housing Survey data - <https://www.census.gov/programs-surveys/mhs/data.html>

<sup>7</sup> U.S. Census Bureau's Manufactured Housing Survey 2023 - <https://www.census.gov/programs-surveys/mhs.html>

manufactured homes own both the home and the land where it is sited; there is an even split between households owning the home but renting the land where it is sited and those renting both the home and the land. More than 44% of manufactured homes are located in rural areas around the country, and manufactured homes make up around 13% of all occupied homes in rural communities.<sup>8</sup>

The cost of a single-section home is 35% that of a comparable site-built home, excluding the cost of the land. A double-section home costs 60% as much as a comparable site-built home; a CrossMod® home, with features and aesthetics of a site-built home, costs 73% as much.<sup>9</sup> More than 70% of households who financed manufactured homes in 2021 had annual incomes of less than \$75,000, compared with 36% of those who financed site-built homes.<sup>10</sup> Although they are an affordable, high-quality housing stock, persistent negative perceptions affect market growth and participation. Many potential homebuyers may not consider manufactured homes as an attractive housing option and many lenders may stay out of the market or limit their participation. These perceptions also have led to zoning regulations that partially or completely constrain manufactured home placements. No U.S. state allows manufactured homes to be placed in a single-family residential neighborhood simply based on their construction in compliance with the HUD Code. There is significant opportunity to expand the use of manufactured homes in new singlefamily developments and as infill in existing neighborhoods nationwide.

### **MHCs Face a Range of Issues**

About half of manufactured homes are located within the more than 43,000 MHCs nationwide. A small subset of MHCs, just over 1,000 of them,<sup>11</sup> are MHROCs. The availability of stable sources of debt capital for these communities is important to any effort to serve the manufactured housing market.

Residents of MHCs face many challenges, including gaps in tenant protections, natural disaster resiliency needs, and limited availability of equity capital and technical assistance for MHROCs. More broadly, many MHCs face affordability loss due to changing market dynamics that put upward pressure on pad rents.

Precise data on pad rents in MHCs is limited, but there is an upward trend in rents paid for manufactured housing generally that correlates with increases in incomes. Data from the ACS Public Use Microdata Sample (PUMS) shows that manufactured housing rents have risen steadily since 2017, although at a slower pace than the remainder of the multifamily market. The average annual rent increase over this period is 4.1%. The median annual

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<sup>8</sup> Housing Assistance Council; Taking Stock; Lance George, Christina Davila, Manda LaPorte, Natasha Moodie, Leslie Strauss, Keith Wiley; October 2023 - <https://takingstockrural.org/>

<sup>9</sup> Joint Center for Housing Studies of Harvard University; "Comparison of the Costs of Manufactured and Site-Built Housing"; Christopher Herbert, Chadwick Reed, And James Shen; July 2023 - [https://www.ichs.harvard.edu/sites/default/files/research/files/harvard\\_ichs\\_pew\\_report\\_1\\_updated\\_0.pdf](https://www.ichs.harvard.edu/sites/default/files/research/files/harvard_ichs_pew_report_1_updated_0.pdf)

<sup>10</sup> Urban Institute Housing Finance Policy Center, "The Role of Manufactured Housing in Increasing the Supply of Affordable Housing", Karan Kaul and Daniel Pang, July 2022 - <https://www.urban.org/sites/default/files/2022-07/The%20Role%20of%20Manufactured%20Housing%20in%20Increasing%20the%20Supply%20of%20Affordable%20Housing.pdf>

<sup>11</sup> Manufactured Housing Institute, "2023 Manufactured Housing Facts", June 2023 - [manufacturedhousing.org/wp-content/uploads/2023/10/2023-IndustryOverview.pdf](https://manufacturedhousing.org/wp-content/uploads/2023/10/2023-IndustryOverview.pdf)

increase in pad rent is 3.64%. The average annual income gain was 4%, and the median was 3.55%.

### Rent and Income Growth in for Manufactured Housing Renters

Rent	Measure	2017	2021	2022	Annualized Growth Rate
Growth Rate	Mean	\$747	\$861	\$913	4.10%
	Median	\$700	\$800	\$837	3.64%
Household Income	Mean	\$36,417	\$42,832	\$44,305	4.00%
	Median	\$28,400	\$33,400	\$33,800	3.54%

Source: ACS PUMS

Separately, the Manufactured Housing Institute’s 2023 Industry Overview<sup>12</sup> reports a 6.2% average annual site rent increase within MHCs, but many public reports from tenants demonstrate substantially higher rent increases that jeopardize their own housing stability. Although MHCs remain one of the most affordable components of the housing market, affordability loss is a significant challenge.

### Manufactured Housing Market Challenges and Needs

Through our efforts to support manufactured housing, including our outreach to market stakeholders, we have identified several challenges that are broadly shared across the market.

**Volatile and elevated interest rate environment:** Elevated interest rates have reduced lending for single-family and multifamily properties. The interest rate environment and mortgage rate lock-in effect exacerbate a single-family housing market already challenged with high home prices and a severe shortage of affordable homes. In multifamily, volatility in Treasury rates has uniquely impacted MHROC transactions, which have a longer-than-normal deal cycle. Significant movements in benchmark rates can quickly alter transaction economics.

**Zoning and land-use restrictions:** The states typically have authority over residential land use, and zoning in particular; however, they can delegate authority to local governments. Zoning regulations often have the effect of partially or completely constraining manufactured home placements. While site-built homes are built to individual state codes, manufactured homes are built to the national HUD Code. However, none of the states allow manufactured homes to be placed in a single-family residential neighborhood simply based on compliance with the HUD Code.

**Perceptions of manufactured homes:** Images of pre-HUD Code mobile homes as well as beliefs that loans on manufactured homes perform poorly or that manufactured homes do

<sup>12</sup> Ibid

not appreciate in value are outdated and incorrect but have proven stubbornly persistent. These and other negative misperceptions affect the acceptance and expansion of manufactured housing.

**Limited supply of manufactured homes:** According to the U.S. Census Bureau, annual manufactured home shipments have trended significantly downward since 2000.<sup>13</sup> Manufacturers have been affected by supply chain issues, rising cost of building materials, and a lack of skilled labor, which have increased production times and costs. In addition to the low volume of new units, a limited number of units are available for resale because of financing issues on older units and title constraints.

**Titling manufactured housing as real property:** Manufactured homes are typically initially titled as personal property; a title-conversion process must be completed to title the homes as real property and make them eligible for mortgage financing. The additional effort may discourage borrowers from converting the titling. Also, the titling laws vary by state, which causes complications for lenders.

**Aging infrastructure and natural disaster resilience of MHCs:** Manufactured housing is often sited in areas that are prone to natural disaster related damage, including flood zones. In addition, many communities have a deferred maintenance backlog. The availability of debt capital that can help recapitalize MHCs and MHROCs is often essential to the ability of MHCs to invest in capital improvements.

**Gaps in tenant protections:** At the time of our 2018 analysis, no state had in place the full set of MHC Duty to Serve tenant protections. Although some states and localities have updated their approach to MHCs, gaps remain.

**Market pressures on MHC pad rents:** Census microdata shows that incomes have kept pace with manufactured housing rents generally. The Manufactured Housing Institute's most recent estimate of rent growth shows a 6.2% growth rate. Many residents report substantially greater rent increases, which can create significant financial pressures for MHC residents who may not be able to, or simply cannot afford to, relocate their manufactured homes.

**Limited equity capital for MHROCs:** Our 2019 analysis found that a key challenge facing MHROCs is limited availability of equity capital, necessitating debt capital that can exceed the value of the community. The need for loan-to-value ratios that often exceed 100% limits our ability to responsibly finance these properties in a safe and sound manner.

**Limited technical capacity and opportunity to form MHROCs:** Forming an MHROC requires significant technical expertise and advanced planning, which can be challenging for residents with a limited timeframe in which to organize and assemble financing. Residents also have limited time to form an MHROC in the event that their community is listed for sale. Although Duty to Serve tenant protections require a notice of sale, a right to purchase may better facilitate their ability to assemble the financial

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<sup>13</sup> See footnote 5.

and other resources needed to execute a purchase. At this time, such a requirement exists in only a handful of states.

### Regulatory Activities Considered but Not Included

Freddie Mac considered but has not included a regulatory activity related to Support Manufactured Homes Titled as Personal Property in our 2025-2027 Duty to Serve Plan. We continue to work with our regulator on evaluating the safety, soundness, and viability of pursuing an initiative focused on manufactured housing titled as personal property.

Additionally, Freddie Mac has considered but not included a regulatory activity related to Manufactured Housing Communities Owned by a Governmental Institution, Non-profit, or Residents in our 2025 – 2027 Plan. Freddie Mac included a purchase objective for these loans in prior plan cycles, which we found to be generally infeasible given the limited market for transactions that can meet safe and sound credit parameters. We will continue to seek out opportunities to finance these properties through our MHROC offering and will work to otherwise support MHROCs where appropriate based on our role in the multifamily secondary mortgage market.

Exhibit F:  
**Plan Modification Request Template**

FREDDIE MAC  
 MANUFACTURED HOUSING  
 2025  
**PRODUCT**

**ACTIVITY:**

Activity 3: Manufactured Housing Communities with Certain Pad Lease Protections: Regulatory Activity

**OBJECTIVE:**

Objective B: Preserve Manufactured Housing Community Affordability Through Loan Terms

**PROPOSED PLAN MODIFICATION:**

*Check the box that applies and provide a description of the proposed Plan modification.*

- This is a proposed Plan modification (~~new Objective~~) for the current Plan year.
- This is a proposed Plan modification that addresses future Plan year(s).

Freddie Mac is requesting the removal of this Objective from the 2025 – 2027 Duty to Serve Plan.

**JUSTIFICATION FOR PROPOSED PLAN MODIFICATION:**

*This section should provide a detailed explanation of why the proposed Plan modification is appropriate, along with any market data that supports the proposed Plan modification.*

- The proposed Plan modification is ~~for a new Objective in~~ the current Plan year.
- The proposed Plan modification addresses future Plan year(s).

As part of our 2025 Duty to Serve activities, we have examined the potential for expanding Duty to Serve MHC tenant protections with an offering that would provide favorable financing to borrowers who agree to the preservation of affordable pad lease rents as a condition of their Freddie Mac loan agreement. The loan product we envisioned for this objective would have set some form of limitation of rent increases or other affordability standards as a condition of the loan agreement. After careful examination of the structure and implementation of this offering, we have determined that a scalable offering is not feasible without a significant and uneconomical subsidy and would likely not be impactful in achieving reduced rent growth for properties where that is a concern.

The MHC structure differs from a typical multifamily property as residents typically own the structure but rent the pad. This structure limits our ability to target specific pad lease affordability and overall community affordability requires an evenly applied rent limit across every pad in a property. Achieving this would require either a deep and costly subsidy to incentivize owner participation in the program or a higher cap level that would be ineffectual for preserving affordability at properties.

Additionally, in speaking to MHC operators and other industry participants we learned that imposing a limit on pad lease rents might be perceived by many as an allowable level of increase, pushing many to raise rents to the cap in excess of what the market might otherwise have yielded.

For owners of MHCs, the growth in expenses is unpredictable from year to year. A cap on rent increases, even if voluntarily agreed to, may lead operators to raise rents as a precautionary measure. This strategy might counteract potential future expense spikes that could surpass the limits on rent increases. Consequently, an operator might choose to increase rents to the level of the cap to hedge against the market's unpredictable nature, even if the natural rent growth would have been lower. This posture might be intensified by recent bouts of inflation and other market disruptions.

This risk is acute for MHC residents that face a high cost of relocating if they own their home. A renter in a traditional multifamily property might simply leave if rent increases exceeded what the market would bear, but there are barriers to exit for manufactured homeowners.

In addition, Freddie Mac determined that we would need to offer stronger terms and pricing to persuade borrowers to accept a rent cap or other affordability requirement. Relatedly, those borrowers whose business strategy includes a significant rent increase, would simply sidestep the offering. In addition, it's likely that those operators who already had no intention or history of significant rent increases would access the offering, which would benefit them through lower pricing, but also achieve little benefit across the market.

Based on our outreach, we do not see a viable path forward with an MHC preservation offering and therefore seek to remove this objective from the 2025-2027 plan.

### Activity 3 – Manufactured Housing Communities with Certain Pad Lease Protections: Regulatory Activity

#### Objective B: Preserve Manufactured Housing Community Affordability through Loan Terms

Evaluation Area	Year(s)	Income Targeted	Extra-Credit
Loan Product	†	VLI, LI, MI	Not applicable

#### Objective Background and Description

The role MHCs play in providing affordable housing, especially in rural areas, is substantial. However, this vital source of naturally occurring affordable housing is at risk. Like all affordable housing, MHCs face significant upward pressure on rents that is driven primarily by housing shortages, and more recently, by pandemic-driven market dislocations and inflation.

In 2021, Freddie Mac pioneered efforts to require tenant protections for all of our MHC transactions. These include requirements that tenants receive sufficient notification of rent increases, community sales, or other events that might affect housing stability. Outside the MHC space, Freddie Mac was the first to market, starting in 2018, with an

offering that offered favorable financing terms in exchange for multifamily sponsors agreeing to maintain the affordability of a percentage of units. Freddie Mac preserved affordability for more than 3,000 units through our various preservation offerings in 2023 and has significantly increased this volume in 2024.

To help address affordability challenges in the MHC space, Freddie Mac will work to establish a new loan product that provides favorable financing to borrowers that agree to the preservation of affordable pad lease rents as a condition of the Freddie Mac loan agreement. A substantial level of effort is required with any new product, including work to understand market opportunities and needs, product design that accounts for those needs while maintaining safe and sound lending standards, feedback on the proposed offering to improve the marketability, product launch, and, finally, promotion through our lender network.

### **Baseline**

Freddie Mac has made tenant pad lease protections mandatory for all its MHC transactions. Separately, Freddie Mac has introduced conventional loan product offerings that preserve unit affordability as a condition of our loan agreements. Freddie Mac does not presently have a preservation offering that applies to MHCs.

### **Actions**

#### **Year 1 – 2025**

1. Examine market opportunities through outreach to lenders, borrowers, and other market participants to determine how best to apply the preservation concept to MHC lending.
2. Examine trends in rent and income levels in MHCs to better understand affordability loss and support future product innovations.
3. Design a new offering to meet market needs while preserving safe and sound lending standards.
4. Solicit market feedback on the proposed offering to improve its marketability.
5. Publish a term sheet.
6. Promote the term sheet throughout our lender network.

In future years, we will solicit market feedback on the proposed offering to improve its marketability. This will include analyzing loan volume trends and the economic incentive required to drive this offering. We will use this information to adjust terms or set future purchase targets if appropriate.

### **Anticipated Market Impact**

Our goal in developing an MHC preservation offering will be to encourage operators to maintain affordability at MHCs, further enhancing housing stability for manufactured housing residents who are often low-income and subsisting on a fixed income.

Preserving MHC affordability through loan terms will require innovation. Freddie Mac's preservation offerings to date have focused on preserving rents for a percentage of units in a rental community, relative to area median income (AMI) levels. It may not be feasible to preserve rents on only a percentage of pads in MHCs where residents' total housing costs are typically split between a home loan and pad rent. Separately, it is not possible to use AMI calculations alone as a baseline for preserving affordability given that pad rents are just one component of an MHC resident's housing costs. Freddie Mac will need to develop a unique approach that appropriately preserves rents and is market adoptable. This adds to the complexity of already challenging work detailed in the steps laid out above. Beyond these challenges, the market adoptability of an MHC preservation offering will be subject to market conditions:

Despite these challenges, we believe this product has the potential to have a substantial impact on the market and will lay a foundation for a market standard for rent preservation that presently does not exist for MHCs:

Exhibit F:  
**Plan Modification Request Template**

FREDDIE MAC  
 RURAL HOUSING  
 2025  
 OUTREACH

**ACTIVITY:**

Activity 1 Support for All Rural Areas: Additional Activity

**OBJECTIVE:**

Objective F: Enhance Outreach to Financial Institutions and Borrowers that Serve Rural Areas through a Multifamily Emerging Correspondent Program and Emerging Borrower Initiative

**PROPOSED PLAN MODIFICATION:**

*Check the box that applies and provide a description of the proposed Plan modification.*

- This is a proposed Plan modification (~~new Objective~~) for the current Plan year.
- This is a proposed Plan modification that addresses future Plan year(s).

Freddie Mac is requesting removal of this objective from the 2025 – 2027 Duty to Serve Plan.

**JUSTIFICATION FOR PROPOSED PLAN MODIFICATION:**

*This section should provide a detailed explanation of why the proposed Plan modification is appropriate, along with any market data that supports the proposed Plan modification.*

- The proposed Plan modification is ~~for an a-new~~ Objective in the current Plan year.
- The proposed Plan modification addresses future Plan year(s).

Freddie Mac is proposing a modification to its 2025 through 2027 Rural Emerging Correspondents Program (ECP) and Emerging Borrowers Initiative. After sustained efforts and dedicated resources, we do not find these programs to be successful for supporting future business opportunities and believe that lenders will naturally maintain the relationships they have established if those relationships provide business value. Therefore, we are requesting the removal of this objective for this Plan cycle.

In 2022, Freddie Mac introduced our Emerging Correspondents Program with the goal of extending liquidity to CDFIs, Minority Depository Institutions (MDIs), smaller regional banks, and other small financial institutions. This effort resulted in emerging correspondent relationships for 18 of our 26 Optigo lenders during the 2024 DTS Plan. Despite these relationships, our lender network has not achieved notable volume through these relationships, which is the result of challenging market conditions, a drop in brokered business which has declined by half since 2021, and the time it takes to uncover transactions that meet program criteria. As part of the 2025-2027 Plan cycle, we established an objective that would extend the ECP and the Emerging Borrowers Initiative to rural lenders and borrowers. We now view this expansion as not additive to the market and do not believe it will provide substantial liquidity to the market. Additionally, we do not view Freddie Mac as the appropriate market entity for developing these relationships.

Although we will continue our Emerging Borrower Initiative, this component of the DTS objective is likely not significant enough to warrant standalone inclusion in the plan. We will continue to encourage our lenders and the broader market to

support rural and smaller financial institutions, including through already established ECP and Emerging Borrowers Initiative relationships, but we do not find there is a direct or indirect business benefit to requiring these relationships.

**Multifamily**

**Activity 1 – Support for All Rural Areas: Additional Activity**

**Objective F: Enhance Outreach to Financial Institutions and Borrowers that Serve Rural Areas through a Multifamily Emerging Correspondent Program and Emerging Borrower Initiative**

Evaluation Area	Year(s)	Income Targeted	Extra Credit
Outreach	1, 2, 3	VLI, LI, MI	Not applicable

**Objective Background and Description**

In our 2022-2024 Duty to Serve Plan, Freddie Mac Multifamily developed an Emerging Correspondent Program to help extend liquidity to CDFIs, minority depository institutions (MDIs) and smaller regional banks or small financial institutions. These institutions often have specialty programs and a great level of expertise with programs and financing directed towards the hardest-to-serve areas in their states and communities. Through this work, Freddie Mac has required each of our lenders to establish relationships with at least one emerging correspondent.

Separately, Freddie Mac has developed a diverse and emerging borrower strategy that aims to help close the knowledge, relationship, and financing gaps faced by newer multifamily operators.

For the 2025-2027 Plan, Freddie Mac will leverage the work from our Emerging Correspondent Program and our emerging borrower efforts to enhance liquidity to financial institutions and borrowers that serve rural areas.

To achieve this, we will define “rural correspondents” as a category within our Emerging Correspondent Program, which will allow us to track participants that serve rural areas and assess progress in establishing these relationships over time. Once the rural correspondents are identified as a category in the Emerging Correspondent Program, Freddie Mac will encourage our lenders to establish rural correspondent relationships. Separately, we will work to identify, survey, and conduct focused outreach to financial institutions that serve rural areas through multifamily lending programs. The findings of

this outreach will inform improvements to our Emerging Correspondent Program and other efforts to extend multifamily liquidity to rural areas:

Freddie Mac will also work with our lender network to identify emerging multifamily borrowers that serve rural areas and invite their participation in our diverse and emerging borrower initiative. This work will focus on smaller operators that are typically focused on 5- to 50-unit properties. To complement this effort, Freddie Mac will begin including a discussion of issues facing multifamily operators that develop properties in rural areas in at least one diverse and emerging borrower event annually. These forums are important opportunities for Freddie Mac and other participants to identify and consider potential solutions to market challenges. These initiatives build on existing work but will require substantial effort and staff work to be successful. The work of locating and attracting multifamily lenders and borrowers that focus on rural markets is highly tactical, requiring relationship management and development over an extended period. The work is both iterative and cumulative. Each additional year we work to include rural correspondents and borrowers in our initiatives, we further strengthen connections and networks that can advance opportunities to extend liquidity to rural markets:

#### **Baseline**

Freddie Mac has established an Emerging Correspondent Program and a separate initiative to support emerging borrowers. Although each of these initiatives are open to financial institutions and borrowers that serve rural areas, they do not presently include specific outreach to these parties:

#### **Actions**

##### **Year 1 – 2025**

Emerging Correspondent Program:

1. Define “rural correspondents” and begin tracking rural correspondent relationships within the Emerging Correspondent Program:
  - a. This work will involve developing a clear understanding of financial institutions that serve rural areas and developing parameters for rural correspondents based on that understanding.
2. Encourage Freddie Mac lenders to consider relationships with rural correspondents through annual Emerging Correspondent Program communications:
  - a. This work will involve inclusion of the category in annual Emerging Correspondent Program communications, including emails and conference calls, to lenders and continuous follow-up communications throughout the year.
  - b. Add at least one rural correspondent lender relationship to the program and report resulting transactions, if applicable.

~~Emerging Rural Borrower Initiative:~~

- ~~1. Conduct outreach to lenders to identify emerging borrowers, including those that focus on 5- to 50-unit properties, which serve rural areas, and invite borrowers to participate in diverse and emerging borrower events:
  - ~~a. This work will be achieved through ongoing communications, including email, conference calls, and collateral materials, for Diverse and Emerging Borrower initiative stakeholders.~~~~
- ~~2. Include rural borrower discussion topics during at least one diverse and emerging borrower event:
  - ~~a. This work will be incorporated through agenda-setting discussions that take place prior to events.~~~~

**Year 2 - 2026**

~~Emerging Correspondent Program:~~

- ~~1. Encourage Freddie Mac lenders to consider relationships with rural correspondents through annual and frequent Emerging Correspondent Program communications, including emails and conference calls:
  - ~~a. Add at least one new rural correspondent lender relationship to the program and report resulting transactions if applicable.~~~~
- ~~2. Survey and conduct focused outreach to sample of previously identified financial institutions to understand characteristics of multifamily lending in rural areas and needs of multifamily lenders serving rural areas:
  - ~~a. This work will involve sample selection, survey development, fielding a survey and data analysis.~~~~

~~Emerging Rural Borrower Initiative:~~

- ~~1. Conduct outreach to lenders to identify emerging borrowers, including those that focus on 5- to 50-unit properties, which serve rural areas and invite borrowers to participate in diverse and emerging borrower events:
  - ~~a. This work will be achieved through ongoing communications, including emails, conference calls and other materials, for Diverse and Emerging Borrower initiative stakeholders.~~~~
- ~~2. Include rural borrower discussion topics during at least one diverse and emerging borrower event:
  - ~~a. This work will be incorporated through agenda-setting discussions that take place prior to events.~~~~

**Year 3 – 2027****Emerging Correspondent Program:**

1. Encourage Freddie Mac Optigo<sup>a</sup> lenders to consider relationships with rural correspondents through annual Emerging Correspondent Program communications:
  - a. This work will involve inclusion of the category in annual Emerging Correspondent Program communications to lenders and continuous follow-up communications throughout the year.
  - b. Add at least one new rural correspondent lender relationship to the program and report resulting transactions, if applicable.
2. Consider Emerging Correspondent Program rural correspondent initiative enhancements based on Freddie Mac lender and stakeholder outreach efforts.

**Emerging Rural Borrower Initiative:**

1. Conduct outreach to lenders to identify emerging borrowers, including those that focus on 5- to 50-unit properties, which serve rural areas and invite borrowers to participate in diverse and emerging borrower events:
  - a. This work will be achieved through ongoing communications, including emails, conference calls and collateral materials, for Diverse and Emerging Borrower initiative stakeholders.
2. Include rural borrower discussion topics during at least one diverse and emerging borrower event:
  - a. This work will be incorporated through agenda-setting discussions that take place prior to events.

**Anticipated Market Impact**

Our goal through this objective is to help bridge gaps between rural lending institutions, borrowers and Freddie Mac. This work can help both lenders and borrowers grow in scale and impact, laying a foundation for increased liquidity in the rural market.

By including lending institutions that serve rural areas in our Emerging Correspondent Program, we can help extend access to Freddie Mac capital and foster mentoring relationships between our lender network and smaller lenders that face challenges such as balance sheet and geographic concentration limitations and limited access to capital markets:

Separately, by including borrowers that serve rural areas in our emerging borrower work, we can help to close gaps through relationship building and knowledge sharing. These challenges are uniquely faced by smaller borrowers, including those who focus on 5- to 50-unit properties:

More specifically, we hope to achieve advancements in three key areas by including rural

developers in our Diverse and Emerging Borrower initiative. First, we will enhance knowledge exchange by including the unique perspectives and experiences borrowers have as it relates to supporting multifamily development in rural areas. Second, we will help foster new connections within the multifamily ecosystem, facilitating new partnerships and collaborations that bridge geographic and market divides. Finally, this work will also help strengthen access to capital, by providing Freddie Mac with insights related to the challenges rural borrowers encounter in accessing our debt offerings and by providing rural borrowers with insights that can streamline their efforts to work within our existing offerings.

The work of this objective will require Freddie Mac and our lenders to go beyond our typical activities and roles in the market. Lenders will not only function as an intermediary for smaller rural lenders but will also provide mentoring for these lenders over time.

As we work with our lenders to develop rural correspondent relationships, we will continue to leverage our existing suite of seasoned and affordable loan pool offerings to provide liquidity to CDFIs, MDIs and SFIs when possible and develop new offerings over time specifically targeted to small lenders.

Exhibit F:  
**Plan Modification Request Template**

FREDDIE MAC  
RURAL HOUSING  
2025  
INVESTMENT

**ACTIVITY:**

Activity 3: Support for High-Needs Rural Populations: Regulatory Activity

**OBJECTIVE:**

Objective C: Engage in LIHTC Equity Investment

**PROPOSED PLAN MODIFICATION:**

*Check the box that applies and provide a description of the proposed Plan modification.*

- This is a proposed Plan modification (new Objective) for the current Plan year.
- This is a proposed Plan modification that addresses future Plan year(s).

Freddie Mac is requesting removal of this objective for the 2025 – 2027 Duty to Serve Plan cycle. We will continue our efforts to support high-needs rural populations (HNRP) as part of our broader All Rural LIHTC Equity Investment objective.

**JUSTIFICATION FOR PROPOSED PLAN MODIFICATION:**

*This section should provide a detailed explanation of why the proposed Plan modification is appropriate, along with any market data that supports the proposed Plan modification.*

- The proposed Plan modification is for the current Plan year.
- The proposed Plan modification addresses future Plan year(s).

Freddie Mac is proposing a modification to remove its Rural Housing Market objective related to LIHTC Equity Investment in High-Needs Rural Populations (HNRP) from the 2025 – 2027 Duty to Serve Plan. We will continue to support and report on LIHTC equity investments that benefit these populations as a component of our broader All-Rural LIHTC Equity objective.

Meeting the specific targets set by the HNRP objectives has been challenging for us because our ability to do so is premised on a limited and inconsistent allocation of tax credits to these projects.

State Qualified Action Plans (QAPs) allocate a small number of credits to rural markets annually, and even fewer of these reach HNRPs. To execute HNRP transactions, we must also navigate fragmented markets and overcome unique regional challenges. Consequently, to meet the HNRP target, each year we must bid on nearly every available deal and win almost all of them. This task is becoming more difficult as we see more CRA-motivated investors bid on these transactions, signaling no lack of non-Agency investor interest. As a result of these factors, the HNRP investment goal can impose a regulatory burden on Freddie Mac, potentially excluding other investment capital without clear justification.

In the absence of a goal, we will continue to pursue these transactions in the context of our all rural LIHTC Equity objective. We have established strong relationships with lenders, rural developers, and LIHTC syndicators who are experts in these areas. They will continue to bring us potential deals, which we will pursue when feasible, ensuring we do not crowd out other market participants.

We do not believe our approach to HNRP should be premised on a need to win every transaction simply to meet a target we ourselves set. Rather, it should be incorporated as a component of our overall LIHTC Equity strategy which will continue to prioritize these areas. These investments are already captured and scored within the All-Rural LIHTC Equity Objective. Eliminating this standalone objective streamlines our reporting and ensures that our focus remains on delivering high-impact investments where opportunities exist.

Despite this proposed change, our commitment to HNRP remains strong. We will continue to pursue and report on LIHTC equity investments in these geographies and benefiting these populations as part of our All-Rural LIHTC Equity strategy. This modification will allow us to maintain that focus while ensuring our objectives reflect the structure and constraints of the market.

## Multifamily

### Activity 3 – Support for High-Needs Rural Populations: Regulatory Activity

#### Objective C: Engage in LIHTC Equity Investment

Evaluation Area	Year(s)	Income Targeted	Extra Credit
Investment	1, 2, 3	VLI, LI	Yes

#### Objective Background and Description

The LIHTC program is the primary resource for supporting the creation and redevelopment of affordable housing for low- and very low-income households. LIHTC provides state and local housing finance agencies and other LIHTC-allocating agencies the equivalent of nearly \$9 billion<sup>3</sup> in annual budget authority to issue tax credits for the acquisition, rehabilitation, and construction of low-income affordable housing. The program awards developers tax credits that are generally allocated to investors for capital contributions that offset the costs associated with the development of affordable units and rent restrictions.

Freddie Mac re-entered the LIHTC equity investment space in 2018 and has focused a meaningful portion of its investments in support of Duty to Serve high-needs rural populations, which include members of a federally recognized Indian tribe located in an Indian area, or agricultural workers. By maintaining our focus in support of these populations, through investments in properties that are located within Duty to Serve rural geographies, we support competition for credits that can increase stability and improve LIHTC pricing. This can improve affordability by advancing housing supply and reducing debt financing needs at individual properties and could lower the portion of rent needed to pay for debt service.

These investments are particularly important to high-needs rural populations as the properties they support are often overlooked by investors. Most of the LIHTC-financed properties located

<sup>3</sup>See footnote 24.

~~within the identified geographies for these populations are outside of banks' CRA assessment regions and do not receive competitive pricing for credits as a result.~~

~~As we engage in this important work, we must act in a safe and sound manner. We achieve this by accounting for concentration risk and maintaining a diversity of investments at sufficient scale to ensure a stable business platform.~~

**Baseline**

Our baseline transactions for the 2025-2027 Duty to Serve Plan is two transactions, which is the five-year average of the transactions we have completed in support of high-needs rural populations between 2019 and 2023. A five-year baseline for our LIHTC equity objectives captures our expectations for the market going forward. It accounts for a range of market environments and the year-over-year fluctuations in allocations associated with investment opportunities that can meet our targets.

2019	2020	2021	2022	2023	5-Year Average
0 transactions	2 transactions	2 transactions	4 transactions	4 transactions	2 transactions

**Targets**

The targets for this plan cycle are based on our experience in supporting high-needs rural populations, including market trends, throughout the past five years. During this time, we have developed a clearer understanding of how we can support these populations, including the opportunities and limitations. Although we will seek to continually increase our work in support of these communities, we are maintaining an investment target of three transactions annually for the Plan.

We anticipate years in which we surpass this goal, and years during which completing three transactions will be challenging. This is due to the way LIHTC is distributed at the state and local levels. Annual allocations that are both rural and support high-needs populations are both low and inconsistent and not all transactions are viable. Although competition for credits in these regions tends to be low, like all investors, we are subject to being outbid.

There are few transactions available in any given year that support high-needs rural populations, and an even smaller subset of these transactions are in a Duty to Serve-designated rural area, indicating a very small market opportunity. Additionally, only eight states have tribal set-asides as part of their Qualified Allocation Plans (QAPs), which means that outside those states high-needs population transactions face competition from other high-priority transactions. Similarly, there are a very limited number of transactions each year that benefit rural agriculture workers, and no states have farmworker set-asides as part of their QAPs.

Despite the small number of available transactions in the high-needs rural population space, our targets are set to represent an impactful share of annual transactions. We believe that our transactions target balances our need to maintain safety and soundness and support high-needs rural populations while considering LIHTC investment opportunities.

2025	2026	2027
3 transactions	3 transactions	3 transactions

As we continue building our LIHTC equity investments in support of high-needs rural populations, Freddie Mac will maintain ongoing engagements with its network of LIHTC

syndicators to identify eligible LIHTC investment opportunities. This requires dedicated staffing and constant work with syndicators to locate, bid on, and invest in these opportunities.

A separate but important factor in sourcing potential LIHTC transactions our work to identify and build strong partnerships with qualified consultants who have experience completing developments that benefit high-needs rural populations. Freddie Mac will continue its efforts to identify and work with new consultants as we work meet the targets of this objective.

The ability to identify opportunities is also dependent on continual outreach to other market participants, including non-profit organizations, developers, and affordable housing financiers, which can foster relationships that expand awareness of Freddie Mac's LIHTC investments. We will also continue to use these engagements as opportunities to gather more information on market needs and the best paths forward for continued or increased investment.

Our work in the space has revealed that few state QAPs have set-asides that prioritize high-needs rural populations, which continues to limit the competitiveness of these transactions. To help continually identify investment opportunities, we will maintain our efforts to monitor and identify any changes to QAPs that might improve the number of investment opportunities we see.

### **Anticipated Market Impact**

Investments benefiting high-needs rural populations face inherent market volatility and a limited investor base. Through our work in these markets, Freddie Mac has become a stabilizing force and reliable source of equity investment. Our presence in the market is helping provide a higher degree of confidence to developers as they consider opportunities that benefit high-needs rural populations.

Our work also provides critically needed support to households in rural communities who gain access to safe, decent, and affordable housing when we invest. Additionally, our investments increase competition in the market, which may influence the price per credit. This can provide more equity to developers, reducing their debt capital needs and even make more projects viable, allowing developments to move forward that would have otherwise stalled.

Exhibit F:  
**Plan Modification Request Template**

FREDDIE MAC  
 RURAL HOUSING  
 2025  
 OUTREACH

**ACTIVITY:**

Activity 1: Support for All Rural Areas: Additional Activity

**OBJECTIVE:**

Objective E: Establish and Implement a Multifamily Rural Developer Capacity Building Program

**PROPOSED PLAN MODIFICATION:**

*Check the box that applies and provide a description of the proposed Plan modification.*

- This is a proposed Plan modification (~~new Objective~~) for the current Plan year.
- This is a proposed Plan modification that addresses future Plan year(s).

Freddie Mac is requesting removal of this Objective for the 2026 and 2027 years and a removal of the 2025 actions related to exploring and selecting future RCB markets.

**JUSTIFICATION FOR PROPOSED PLAN MODIFICATION:**

*This section should provide a detailed explanation of why the proposed Plan modification is appropriate, along with any market data that supports the proposed Plan modification.*

- The proposed Plan modification is ~~for a new Objective in~~ the current Plan year.
- The proposed Plan modification addresses future Plan year(s).

Freddie Mac is proposing a modification to its 2026 and 2027 Rural Developer Capacity Building Program objective that would remove the objective for these Plan years and modify out 2025 actions related to future curriculum implementation. Our Duty to Serve Plan indicates that we will conduct the rural capacity development curriculum in one rural market in year 1 and two rural markets for both years 2 and 3 to encourage the development of new multifamily supply in difficult to serve rural markets. Since initially drafting the plan, Freddie Mac has recalibrated its focus to how we can best extend meaningful liquidity to the market, which aligns to the Duty to Serve statute and program purpose.

Although capacity building is important, this work is not aligned to our core business function as a secondary mortgage market participant. In addition, the initiative is not likely to provide meaningful levels of liquidity or support a secondary market for mortgages for the Duty to Serve target populations.

There is a lengthy delay between academy attendance and attendees' participation in multifamily development, and even later on the acquisition of debt capital may or may not be supported by Freddie Mac. In addition to not being a direct or indirect mechanism to support the secondary mortgage market, Rural Developer Capacity Building is also not aligned to our business objectives. We also believe that the initial scale envisioned for the program will not achieve a broad impact nationally and it is not presently likely that we would significantly increase our footprint in capacity building given the issues identified above. Continuing this effort will divert staff resources that could be better allocated to higher impact initiatives that are more directly related to our secondary market function.

Freddie Mac’s product offerings will continue to meaningfully extend liquidity to rural markets, helping rural developers finance their housing projects. We believe these offerings are the best tool we have to extend liquidity and support the rural market, and we therefore request the removal of this objective for years 2 and 3 of the Plan and the future market development actions in year 1.

**Multifamily**

**Activity 1 – Support for All Rural Areas: Additional Activity**

**Objective E: Establish and Implement a Multifamily Rural Developer Capacity-Building Program**

Evaluation Area	Year(s)	Income Targeted	Extra Credit
Outreach	1, <del>2</del> , <del>3</del>	VLI, LI, MI	Not applicable

**Objective Background and Description**

Many rural communities are subject to underinvestment and face challenges in multifamily development, which in turn limits residents’ access to quality, affordable housing. The development, preservation, and rehabilitation of multifamily housing in rural areas is heavily dependent on public subsidy, primarily driven by the LIHTC and USDA programs like Section 538 and Section 515. These subsidy programs involve complex processes and require certain expertise to navigate. The complexity makes it difficult for local developers to enter the market or expand their role in the market without additional assistance from more experienced developers and technical assistance organizations.

Additionally, emerging developers, who are typically focused on smaller 5- to 50-unit properties often face barriers to market entry, including the limited availability of training that applies to rural markets generally or their markets specifically.

Recognizing these complexities and barriers to entry, Freddie Mac sought to explore and establish a rural developer capacity-building program as part of our 2022-2024 Duty to Serve Plan. Through a landscape analysis and concentrated outreach, Freddie Mac uncovered some of the challenges associated with rural multifamily development, including the complexity of accessing subsidy, understaffing at developer and organization levels, and financing challenges. In 2024, we partnered with a national rural development capacity builder and technical assistance organization to support the creation of a rural developer capacity building curriculum. Leveraging this curriculum, we will continue to implement multifamily-focused rural developer capacity-building education in new markets over the next three years.

**Baseline**

Freddie Mac's work in rural developer capacity-building began in years 2 and 3 of our previous Duty to Serve Plan. In 2023, we conducted comprehensive market outreach, including a landscape analysis of rural developers, non-profits, and housing organizations as well as outreach meetings with leading rural developer capacity-building programs. We will leverage that research and outreach and explore other capacity-building programs that exist in different markets as we implement a rural developer capacity-building program, which will help local rural developers enter or grow their footprints in the local multifamily housing market. In 2024, Freddie Mac supported the development of a specialized rural developer curriculum and began examining how this curriculum might be leveraged in various rural markets.

### Actions

The goal of our rural developer capacity-building initiative is to spur investment in rural communities and empower rural developers to enter or expand their presence in the market. Our work will help developers navigate programmatic complexities, financing obstacles, and other barriers to entry, while connecting new and emerging rural developers to more established partners and technical assistance organizations.

Our actions for [each](#) year [1](#) of this Duty to Serve Plan cycle include conducting a rural developer training either through a third-party training provider or as a specialized rural multifamily module conducted in conjunction with a Freddie Mac Develop the Developer Academy in a rural market. Because of the level of planning, recruitment, staffing, time, and investment involved in conducting this curriculum, we will [conduct begin with](#) a training cohort in one new market in 2025., [adding two training cohorts in new markets in both 2026 and 2027.](#)

[Ahead of each year of the Plan, Freddie Mac will work to determine rural markets that will most significantly benefit from a rural capacity development curriculum. This will include an assessment of several factors, including but not limited to:](#)

- [1. \*\*Population served:\*\* We will consider whether the population served is within a Duty to Serve Rural Area, with a focus on high-needs rural regions and markets that can be inclusive of members of a high-needs rural population.](#)
- [2. \*\*Multifamily housing needs:\*\* We will consider the unique multifamily housing needs of the market, including the current state of the affordable housing supply, its quality and availability. We will also consider issues like affordability loss for properties with maturing USDA Section 515 debt.](#)
- [3. \*\*Local partners:\*\* We will consider the availability of local partner organizations or other infrastructure that can support the efficient deployment of training, helping ensure resources are available to the maximum number of developers.](#)
- [4. \*\*Climate risk and resilience challenges:\*\* We will consider how our trainings can incorporate modules that address resiliency.](#)

~~After selecting a market, Freddie Mac will identify a partner organization to complete its rural multifamily training module and support curriculum changes based on the unique aspects of the market.~~

### **Year 1 - 2025**

Conduct the rural capacity development curriculum in one rural market.

1. Identify a rural market for the rural developer capacity-building academy with consideration for market needs and opportunities, including those related to 5- to 50-unit properties and climate risk and resilience challenges.
2. Identify a partner organization to complete training.
3. Revise the curriculum as needed to account for market differences.

### **Year 2 - 2026**

~~Conduct the rural capacity development curriculum in two rural markets:~~

- ~~1. Identify rural markets for the rural developer capacity-building academy with consideration for market needs and opportunities, including those related to 5- to 50-unit properties and climate risk and resilience challenges.~~
- ~~2. Identify a partner organization to complete the training.~~
- ~~3. Revise the curriculum as needed to account for market differences.~~
- ~~4. Apply learnings from the prior year.~~

### **Year 3 - 2027**

~~Conduct the rural capacity development curriculum in two rural market and evaluate further expansion opportunities based on years 1 and 2:~~

- ~~1. Identify rural markets for the rural developer capacity-building academy with consideration for market needs and opportunities, including those related to 5- to 50-unit properties and climate risk and resilience challenges.~~
- ~~2. Identify partner organization to complete training.~~
- ~~3. Revise the curriculum as needed to account for market differences.~~
- ~~4. Apply learnings from the prior year.~~

### **Anticipated Market Impact**

Through Freddie Mac's specialized curriculum and resources, we will aim to empower rural developers in [the identified markets](#). Rural multifamily developers face a unique set of challenges and opportunities, including financing complexity, knowledge gaps, and limited access to mentors in the space.

We anticipate that our targeted curriculum and partnerships with technical assistance providers will help increase the capacity of rural developers and improve their ability to efficiently and effectively access USDA and LIHTC subsidies and access debt capital from Freddie Mac and other sources. Additionally, our focus on emerging developers and those focused on smaller 5- to 50-unit properties will aid our efforts to build a more equitable and inclusive multifamily industry and equip new developers with the tools they need to improve multifamily housing stock in their communities.

Exhibit F:  
**Plan Modification Request Template**

FREDDIE MAC  
RURAL HOUSING  
2025

**LOAN PRODUCT and LOAN PURCHASE**

**ACTIVITY:**

Activity 1: Support for All Rural Areas: Additional Activity

**OBJECTIVE:**

Objective G: Enhance Rural Multifamily Liquidity by Guaranteeing Loans from Rural Lenders

**PROPOSED PLAN MODIFICATION:**

*Check the box that applies and provide a description of the proposed Plan modification.*

- This is a proposed Plan modification (~~new Objective~~) for the current Plan year.
- This is a proposed Plan modification that addresses future Plan year(s).

Freddie Mac is requesting removal of this objective from the 2025 – 2027 Duty to Serve Plan. We will still work to incorporate rural transactions into our AHP Q-Deal Objective (AHP Activity 7, Objective A).

**JUSTIFICATION FOR PROPOSED PLAN MODIFICATION:**

*This section should provide a detailed explanation of why the proposed Plan modification is appropriate, along with any market data that supports the proposed Plan modification.*

- The proposed Plan modification is ~~for a new Objective in~~ the current Plan year.
- The proposed Plan modification addresses future Plan year(s).

Freddie Mac is requesting a modification to remove its 2025 through 2027 Rural Housing objective related to enhancing rural multifamily liquidity by guaranteeing loans from rural lenders. This work relies upon innovations to our Q-Deal transactions, which we will continue with through our Affordable Housing Preservation Objective (Activity 7, Objective A).

Throughout 2024 and 2025 we have worked to enhance our Q-Deal product to allow for multiple sponsors to participate in a single transaction. This innovation, when fully operationalized, will help address the aggregation challenge smaller lenders, including CDFIs and other small financial institutions, face when seeking a secondary market for the loans they originate. Although we are continuing this work, we do not see a continued value in a standalone objective for the Rural Market.

Through the product development process, we discovered that despite our innovation it would remain difficult for rural-focused sponsors or lenders to participate in our Q-Deal program due to the very small loan size that is common for rural loans. This challenge will likely make it economically inefficient to support rural participation in the program at scale. Additionally, we have also learned that rural-focused CDFIs, which are a key source of rural lending, prefer to maintain servicing rights in a way that is typically incompatible with the Q-Deal execution. The Q-Deal program requires a rigorous servicing standard and

forfeiture of servicing. Another consideration is that CDFIs we would target for this effort focus primarily on ground up construction loans and bridge financing. Permanent financing products are what create viable loans for a Q-Deal transaction.

Although we will continue to invite the participation of rural-focused lenders to our Q-Deal program, we do not feel there is sufficient potential in this area to warrant a standalone Duty to Serve objective.

**Multifamily**

**Activity 1—Support for All Rural Areas: Additional Activity**

**Objective G: Enhance Rural Multifamily Liquidity by Guaranteeing Loans from Rural Lenders**

Evaluation Area	Year(s)	Income Targeted	Extra-Credit
Loan Product	1 and 2	VLI, LI, MI	Not applicable
Loan Purchase	3	VLI, LI, MI	Not applicable

**Objective Background and Description**

Freddie Mac has included an Affordable Housing Preservation product objective, which would enhance existing “Q-Deal<sup>SM</sup>” securitizations by allowing for multi-sponsor transactions involving seasoned loans and those executed with the intent to sell to a third-party trust. The executions are a component of Freddie Mac’s strategy to provide liquidity to the market while preserving safety and soundness by distributing risk.

This objective is to extend these executions to rural lenders or sponsors, including those that provide debt capital for 5- to 50-unit properties. As noted in the separate objective, a key barrier to leveraging Q-Deals faced by smaller institutions, including those that serve rural areas, is that they alone cannot aggregate a sufficient volume of loans to complete a successful Q-Deal execution. As a result, these loans remain on the balance sheets of smaller lenders and may constraining their ability to further extend liquidity to the market as a result.

In addition to the activities described in the AHP objective, Freddie Mac will work to raise awareness of the multi-sponsor Q-Deal with the institutions it identifies through the rural outreach work described in Rural Housing Activity 7, Objective A.

**Baseline**

Freddie Mac completed our first Q-Deal execution in 2014. Freddie Mac is working to develop the ability to complete Q-Deal executions with multiple parties for both seasoned loans and loans originated with the intent to sell to a third-party Q-Deal trust.

## **Actions**

### **Year 1 – 2025**

1. Complete a proof-of-concept multi-sponsor transaction.<sup>1</sup> This transaction involves development of terms, working with lenders to locate appropriate collateral, structuring and executing the transaction based on the collateral, and substantial credit and legal due diligence to re-underwrite the loans.

### **Year 2 – 2026**

1. Publish a term sheet, including applicability for Duty to Serve-qualifying small financial institutions, such as those that provide debt capital for 5- to 50-unit properties and those that serve rural areas. This process applies what we learned in the proof-of-concept transaction, allowing us to craft a basic structure for the offering. Formally launching the offering involves substantial internal due diligence and approvals.
2. Seek to include rural loans in at least one multi-sponsor transaction through targeted outreach to raise awareness of the offering with at least 10 Duty to Serve-qualifying financial institutions, including CDFIs, MDIs and SFIs that provide debt capital for 5- to 50-unit properties, and those that serve rural areas.

### **Year 3 – 2027**

1. Seek to include rural loans in at least one multi-sponsor transaction through targeted outreach to raise awareness of the offering with at least 10 Duty to Serve-qualifying financial institutions, including CDFIs, MDIs, and SFIs that provide debt capital for 5- to 50-unit properties, and those that serve rural areas.

## **Anticipated Market Impact**

The ability to aggregate both seasoned loans and those originated for the purpose of selling to a third-party Q-Deal trust from multiple sponsors can address what has been a major hurdle facing small institutions that seek to enhance their liquidity and distribute risk but lack the ability to do so through in-house securitization platforms. These executions can provide balance sheet relief for smaller institutions and provide participating lenders with a clear exit strategy for new executions by eliminating concerns over aggregating sufficient like-kind collateral.

Through this work, we can support rural institutions that are a key source of debt capital for rural affordable housing, including rural 5- to 50-unit properties and multifamily. The multi-sponsor Q-Deal executions will allow these institutions to hold or sell guaranteed bonds in

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<sup>1</sup>A proof-of-concept transaction may not include Duty to Serve-qualifying financial institutions and is designed to ensure that the structure can work as we develop final terms.

~~tieu of holding balance sheet loans, enhancing liquidity, and allowing for additional lending to what are often underserved markets.~~

Activity 1: Support for All Rural Areas: Additional Activity
Objective B: Facilitate Thought Leadership Related to Housing and Mortgage Financing in Rural Communities

Evaluation Area	Year(s)	Income Targeted	Extra Credit
Outreach	1, 2, 3	VLI, LI, MI	Not applicable

## Objective Background and Description

Freddie Mac’s Rural [Research-Housing](#) Symposium reflects our leadership in and commitment to supporting positive housing outcomes in rural communities nationwide. It brings together a broad spectrum of single-family and multifamily housing experts — academics, policy makers, finance industry professionals, and housing intermediaries focused on rural issues — to share research findings and build relationships across the ecosystem that could lead to innovative, market-relevant solutions. When we established the symposium in 2019, to our knowledge, it was the first-ever event to encompass such a variety of participants and research focused exclusively on rural housing and finance. Since then, it has become an annual event and inspired other leading organizations focused on affordable housing to hold rural-centered events.

We have held the symposium annually to highlight research into existing and emerging challenges and opportunities in rural communities, with a goal of encouraging discussions around expanding prosperity. Topics have included, for example, population movement and growth, the effects of climate change and weather on housing sustainability, manufactured housing, rental affordability, poverty and hardship, and Native homeownership. Overall, the Rural [Research-Housing](#) Symposium shines a light on the unique issues affecting rural housing related to housing finance needs, trends, and opportunities in rural markets where data has traditionally been very limited and narrowly available.

Freddie Mac will continue to host the Rural [Research-Housing](#) Symposium each year of the 2025-2027 Plan cycle. ~~Based on participants’ feedback, we will alternate between in-person and virtual attendance, with Year 1 and Year 3 in person and Year 2 virtual.~~ Each year’s topics will center on current rural market dynamics, top-of-mind matters, and trends. As we have in the past, Freddie Mac will ask the housing industry’s top thought leaders to collaborate in shaping the annual agendas by submitting research papers or detailed abstracts for research that highlight implications for consumers, households, communities, or financial institutions in rural housing areas for consideration.

In combination with the event each year, Freddie Mac will facilitate a session with a set of key stakeholders from across the ecosystem to discuss the research findings presented and exchange ideas for how to bring about impactful change and solutions.

## Baseline

Freddie Mac established the Rural [Research-Housing](#) Symposium – ~~originally called the Rural Research Symposium~~ – in 2019. We have hosted it each year since then. ~~After holding the inaugural symposium in person, we moved to a virtual platform in 2020, 2021, and 2022 for health and safety reasons during the COVID-19 pandemic. It was held in person in 2023 and virtually in 2024.~~

While Freddie Mac previously has established specialized advisory groups to share insights and exchange ideas with leaders from across the ecosystem, we have not had a group focused on rural housing.

## Actions

### Year 1 - 2025

1. Host a Rural Research-Housing Symposium that focuses on new research and insights developed since the 2024 symposium on rural mortgage markets to better understand who is being served and the effectiveness of mortgage products, services, and financing as well as the effect on communities, consumers, and financial institutions.
  - a. Call for research papers and proposed topics. Communication channels may include direct engagement with members of the research community as well as broader-based e-mail to academics, researchers, and previous symposium registrants, for example. Aim to obtain research that highlights issues that affects rural households and crosses Duty to Serve markets, with special focus on Native housing, ~~energy efficiency and resiliency,~~ and manufactured housing.
  - ~~b.~~ Conduct a marketing campaign to raise the target audience's awareness of the event, generate interest in attending, and drive registrations. Example channels include but may not be limited to e-mail sent using targeted distribution lists and including links to relevant material, social media, and content on Freddie Mac Single-Family and Rural Research Housing Symposium web pages.
  - ~~c.b.~~ ~~Select a location for the 2027 event that is convenient, easily accessible, and optimizes attendance of the target audience.~~
2. Convene a diverse group of experts selected to discuss research findings and determine their potential for helping to drive impactful solutions in the market.

### Year 2 - 2026

1. Host a Rural Research-Housing Symposium that focuses on rural mortgage markets to better understand who is being served and the effectiveness of mortgage products, services, and financing as well as the effect on communities, consumers, and financial institutions. The symposium will focus on new research and insights developed since the 2025 event.
  - a. Call for research papers and proposed topics. Communication channels may include direct engagement with members of the research community as well as broader-based e-mail to academics, researchers, and previous symposium registrants, for example. Aim to build an agenda that highlights rural housing matters and includes touchpoints to the manufactured housing and affordable housing preservation markets.
  - b. Conduct a marketing campaign to raise the target audience's awareness of the event, generate interest in attending, and drive registrations. Example channels include but may not be limited to e-mail sent using targeted distribution lists and including links to relevant material, social media, and content on Freddie Mac Single-Family and Rural Research Housing Symposium web pages.
2. Convene a diverse group of experts selected to discuss research findings and determine their potential for helping to drive impactful solutions in the market.

### Year 3 - 2027

1. Host a Rural Research-Housing Symposium that focuses on rural mortgage markets to better understand who is being served and the effectiveness of mortgage products, services, and

financing as well as the effect on communities, consumers, and financial institutions. The annual symposium will focus on new research and insights developed since the 2026 event.

- a. Call for research papers and proposed topics. Communication channels may include direct engagement with members of the research community as well as broader-based e-mail to academics, researchers, and previous symposium registrants, for example. Aim to build an agenda that highlights rural housing matters and includes touchpoints to the manufactured housing and affordable housing preservation markets.
  - b. Conduct a marketing campaign to raise the target audience's awareness of the event, generate interest in attending, and drive registrations. Example channels include but may not be limited to e-mail sent using targeted distribution lists and including links to relevant material, social media, and content on Freddie Mac Single-Family and Rural [Research Housing](#) Symposium web pages.
2. Convene a diverse group of experts selected to discuss research findings and determine their potential for helping to drive impactful solutions in the market.

## Anticipated Market Impact

Freddie Mac is uniquely positioned within the industry to bring together a variety of thought leaders and influencers from across the housing ecosystem. By hosting the Rural [Research-Housing](#) Symposium during this Plan cycle, we will continue to act as a catalyst to expand access to new research and to spark cross-disciplinary relationships as well as ideas for additional research and new approaches to supporting rural housing. The deeper understanding, collaboration, and energy that the annual symposium inspires can encourage the broader industry to explore opportunities and create possibilities for improving the future of home and boosting mortgage liquidity in rural America. The symposium's success to date reflects the industry's need for such a knowledge-sharing forum and Freddie Mac's industry leadership.

In addition, the adjunct convening will focus leaders from across the ecosystem on considering potential next steps and collaborations that could help meet current and emerging market needs. Together, findings will provide insights to the marketplace that will enable the industry to better support rural households.

The symposium, combined with the convening, will motivate additional research, collaboration, and innovation, which is greatly needed to help improve outcomes in rural communities nationwide.

Exhibit F:  
**Plan Modification Request Template**

FREDDIE MAC  
RURAL HOUSING  
2025  
OUTREACH

**ACTIVITY:**

1 - Support for All Rural Areas: Additional Activity

**OBJECTIVE:**

C - Facilitate Rural Developer Capacity Building to Increase Supply of Single-Family Homes

**PROPOSED PLAN MODIFICATION:**

- This is a proposed Plan modification (new Objective) for the current Plan year.
- This is a proposed Plan modification that addresses future Plan year(s).

Consolidate Freddie Mac's rural developer capacity-building efforts under a single Duty to Serve Plan objective and change the objective's title accordingly.

**JUSTIFICATION FOR PROPOSED PLAN MODIFICATION:**

Freddie Mac proposes consolidating single-family and multifamily rural developer capacity-building efforts under a single Plan objective to reflect a shift in strategy and to create programmatic efficiencies. Accordingly, we also propose revising this objective's title to reflect the broader scope.

Activity 1: Support for All Rural Areas: Additional Activity
Objective C: Facilitate Rural Developer Capacity Building to Increase <u>Housing</u> Supply of <del>Single-Family Homes</del>

Evaluation Area	Year(s)	Income Targeted	Extra Credit
Outreach	1, 2, 3	VLI, LI, MI	Not applicable

## Objective Background and Description

Rural regions have less access to resources for building and revitalizing housing than elsewhere in the country, which further discourages real estate developers from pursuing projects in those areas. Community-based intermediary organizations are important sources of support for rural housing development initiatives. Given their financial and staffing constraints, however, they often rely on partnerships with other entities to carry out their missions.<sup>1</sup>

Multifamily housing development in rural areas involves additional complexities related to the heavy reliance on public subsidy, primarily driven by Low-Income Housing Tax Credits (LIHTC) and USDA Section 538 and Section 515 programs. In addition, emerging developers, who typically focus on 5- to 50-unit properties, often face barriers to market entry, including the limited availability of relevant training.

During the 2025-2027 Duty to Serve Plan cycle, Freddie Mac will expand our Develop the Developer<sup>SM</sup> capacity-building program in collaboration with rural intermediary organizations to help increase the number of qualified-knowledgeable real estate developers undertaking development projects in rural communities.

## Baseline

Freddie Mac's Develop the Developer program promotes a community-based approach, engaging area stakeholders across the ecosystem to gain buy-in and help lower barriers to housing development. Freddie Mac's Develop the Developer program promotes reinvestment and development in historically underserved communities. The Develop the Developer Academy is offered through established academies and is integrated within those local educational organizations' programs. Developers who enroll in the Develop the Developer Academy complete an intensive 36-hour curriculum as well as continuing education. Academy graduates receive training in foundational development and financing instruction, technical assistance, and community connectivity. Graduates also gain access to funding sources for developers, including grants, loans, investors, and foundations that encourage economic progress.

At the end of 2024, the Develop the Developer program was operating in Baltimore, Milwaukee, Omaha, and Tulsa, with a total of 20 active development projects.

<sup>1</sup> Housing Assistance Council, Rural Voices, Conference 2018 Edition, December, 4, 2018 - <https://ruralhome.org/wp-content/uploads/storage/documents/rural-voices/rv-conference-2018.pdf>

## Actions

### Year 1 - 2025

1. Host a series of at least four working group sessions with various industry partners, including housing intermediaries, to collaborate in identifying rural localities that could benefit most from additional support for housing development, including with manufactured housing. Assess the development potential of the identified localities based on input gathered. Select at least four localities for Develop the Developer Academies; rank localities in priority for expansion of the Develop the Developer program.
2. Identify and develop relationships with intermediary organizations capable of coordinating the creation of Academies in the selected markets.
3. Hold at least two working group sessions with partner intermediary organizations and rural Academy graduates to assess the curriculum. Determine potential enhancements to increase the curriculum's effectiveness in rural areas. Create or enhance curriculum based on working session feedback.
4. Hold at least two working group sessions with Native coalitions with relationships with Freddie Mac to determine curriculum needs specific to development in tribal areas. Create or enhance curriculum based on working session feedback.

### Year 2 - 2026

1. Incorporate updates to the curriculum developed in Year 1, if any, and launch the curriculum as continuing education in existing Develop the Developer Academies.
2. Launch a Develop the Developer Academy in at least three localities identified in Year 1 in collaboration with the selected local partner organization, with at least 15 developers completing the curriculum.

### Year 3 - 2027

1. Monitor progress of the rural developers who completed the curriculum in Year 2 and their development projects. Provide the developers with continuing education opportunities through existing Academies, if needed.
2. Launch a Develop the Developer Academy in at least three more localities with the selected local partner organization, with at least 15 developers completing the curriculum.
3. Convene rural Develop the Developer Academy graduates to share best practices, exchange ideas for future program enhancements, and facilitate introduce-introductions the graduates-to housing intermediaries and lenders within their project areas ~~that can connect them with potential buyers for the homes in their projects.~~

## Anticipated Market Impact

The expansion of Freddie Mac's Develop the Developer program will prepare more rural real estate developers to increase the number of quality homes affordable to households in rural regions with very low, low, and moderate incomes. Working in partnership with key stakeholders and local organizations will help ensure that the program is expanded thoughtfully and through a holistic, community-driven approach. Developers will be equipped to continue to develop in rural regions going forward. These efforts will lay the foundation to increase homeownership and rental opportunities and liquidity in rural regions.

Given the lack of developers, development, and investment in these communities, however, rural enrollment in the Academy may be lower than anticipated. In addition, securing the resources needed to undertake developments in rural communities may be difficult and more time consuming than anticipated. Land, construction labor, and materials may not be available or may be cost prohibitive. Investors and other participants needed for successful projects may deem the development efforts too risky. Also, unexpected zoning, permitting, and infrastructure matters may need to be addressed before construction could start in earnest.

To help overcome some of those concerns, the Develop the Developer Academy provides a standardized curriculum that can be adapted to local market needs and delivers unique support to help developers successfully plan and execute residential housing projects. Significantly, the Academy helps community members remove barriers to access capital. Graduates become part of a Freddie Mac alliance of developers that provides mentoring, ongoing networking opportunities, and a forum for sharing best practices. The education, resources, and connections gained by developers support their professional development and equip them to take on development projects that could help spur economic opportunities, investment, and additional affordable housing supply.

Exhibit F:  
**Plan Modification Request Template**

FREDDIE MAC  
RURAL HOUSING  
2025  
OUTREACH

**ACTIVITY:**

1 - Support for All Rural Areas: Additional Activity

**OBJECTIVE:**

D - Increase Access to Homeownership Education and Resources in Rural Areas

**PROPOSED PLAN MODIFICATION:**

- This is a proposed Plan modification (new Objective) for the current Plan year.
- This is a proposed Plan modification that addresses future Plan year(s).

Add an objective in Year 2 and Year 3 to expand access to homebuyer education and resources in rural areas.

**JUSTIFICATION FOR PROPOSED PLAN MODIFICATION:**

Freddie Mac proposes to add an objective in 2026 and 2027 to increase access to homeownership education and resources intended to help prepare very low-, low-, and moderate-income households in rural areas for sustainable homeownership.

During conversations with housing intermediaries and lenders, Freddie Mac heard about the continuing need for a comprehensive approach to financial and homeownership education to strengthen and increase the pool of potential homeowners in rural areas. Some of the participants' comments also highlighted an opportunity to make connections across the ecosystem – specifically, between housing counseling agencies and lenders – to help increase potential homebuyers' chances of attaining homeownership, including individuals who previously had been denied mortgage loans because of their credit profiles.

Research reinforces the feedback that we gathered. Rural residents face challenges in maintaining high credit scores, which are crucial for obtaining traditional mortgage products.<sup>1</sup> According to the Consumer Financial Protection Bureau, a substantial percentage of rural residents in the South have credit scores of less than 600, below the typical threshold for qualifying for standard mortgage options. Furthermore, many rural residents are considered credit invisible – lacking sufficient credit history to generate a score. The targeted education and resources that we help provide will equip more individuals with the necessary knowledge and skills to position themselves to navigate the homebuying process successfully.

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<sup>1</sup> Pew; “3 Major Obstacles Limit Rural Homeownership”; Adam Staveski; December 19, 2024 - <https://www.pew.org/en/research-and-analysis/articles/2024/12/19/3-major-obstacles-limit-rural-homeownership>

Collaboration across the housing ecosystem is needed to help individuals in rural areas navigate the path to buying homes once they are prepared for responsible homeownership. Freddie Mac will act as a catalyst, facilitating relationships among key stakeholders.

Our efforts under this new objective will help expand the pool of potential homebuyers and enhance collaboration across the ecosystem to improve housing outcomes.

Activity 1: Support for All Rural Areas: Additional Activity

Objective D: Increase Access to Homeownership Education and Resources in Rural Areas

<u>Evaluation Area</u>	<u>Year(s)</u>	<u>Income Targeted</u>	<u>Extra Credit</u>
<u>Outreach</u>	<u>2 and 3</u>	<u>VLI, LI, MI</u>	<u>Not applicable</u>

Objective Background and Description

Through our work to better understand the needs of the broader rural market, Freddie Mac learned about the continuing need for greater access in rural areas to financial and homeownership education to strengthen and increase the pool of potential homeowners. More specifically, there was a demand for a comprehensive approach to pre-purchase homebuyer education and post-purchase education to promote sustainable homeownership. The conversations also highlighted an opportunity to make connections between housing counseling agencies and lenders to help increase potential homebuyers' chances of attaining homeownership, including individuals who previously had been denied mortgage loans because of their credit profiles. Typically, individuals who are denied mortgages are not informed of a potential path forward and become discouraged from continuing to pursue homeownership.

A lack of internet service in rural areas is an additional challenge to accessing homeownership education and resources. The Federal Communications Commission reported that approximately 19 million U.S. households, primarily in rural areas, lacked access to fixed broadband at threshold speeds as of 2021. The Pew Research Center found that 24% of rural households consider high-speed internet access a major issue, compared to 13% in urban areas.

Freddie Mac has supported community-based education to increase financial capability in rural areas through HUD-approved housing counseling agencies as well as through increasing the capacity of other housing intermediaries to provide education and counseling services for many years. These partners deliver a full spectrum of counseling services, including pre-purchase, post-purchase, foreclosure prevention, and financial education services to rural households.

During Year 2 and Year 3 of the 2025-2027 Plan cycle, Freddie Mac will leverage our relationships and tools to facilitate an integrated, collaborative approach to expanding access to education and resources. These efforts will expand the pool of individuals prepared to become homeowners in rural areas, which may create opportunities for Freddie Mac to provide additional liquidity to this market.

Baseline

Freddie Mac provides support to HUD-approved housing counseling agencies and non-profit organizations dedicated to serving rural communities. Over the last three years, the demand for services has grown, with the number of individuals served increasing from 20,000 in 2022 to 30,000 in 2024.

During the first Duty to Serve Plan cycle, Freddie Mac facilitated collaboration between housing counseling agencies, lenders, and other industry stakeholders in support of a program that provided manufactured housing homebuyer education and guidance on the process of buying a manufactured home.

## Actions

### Year 2 - 2026

1. Collaborate with three trusted housing counseling agencies in rural regions that are active in affordable housing and who are closest to the communities to facilitate delivery of counseling services, including pre-purchase, post-purchase, foreclosure prevention, and financial education services to rural households virtually and/or in person.
2. Expand access to and awareness of homeownership services and resources for homebuyers in rural areas.
  - a. Organize and facilitate one in-person homebuyer fair to expand access to homeownership information.
  - b. Collaborate with non-profit housing intermediaries and faith-based organizations to raise awareness of counseling services and mortgage offerings through marketing efforts.
  - c. Promote the availability of a dedicated call center that provides access to an array of homeownership resources, including information on the homebuying process, one-on-one counseling sessions, and referrals to local providers of workshops and webinars.
3. Collaborate with lenders to conduct three training sessions for loan officers to educate them on affordable mortgage products available in rural areas.
4. Facilitate three working group sessions between lenders and counseling agencies to exchange information about their respective offerings, share feedback from prospective homebuyers, and identify potential process improvements. Identify opportunities to establish two-way communication, enhance education materials, and build relationships intended to mutually support prospective homebuyers aiming to realize responsible homeownership.

### Year 3 - 2027

1. Collaborate with two additional trusted housing counseling agencies in these regions that are active in affordable housing and who are closest to the communities to provide housing counseling services, including pre-purchase, post-purchase, foreclosure prevention, and financial education services to rural households virtually and/or in person.
2. Facilitate development of materials that counseling agencies will use to educate prospective homebuyers about lenders' affordable product offerings.
3. Expand access to and awareness of homeownership services and resources for homebuyers in rural areas.
  - a. Organize and facilitate one in-person homebuyer fair to expand access to homeownership information.
  - b. Collaborate with non-profit housing intermediaries and faith-based organizations to raise awareness of counseling services and mortgage offerings through marketing efforts.
  - c. Promote the availability of a dedicated call center that provides access to an array of homeownership resources, including information on the homebuying process, one-on-one counseling sessions, and referrals to local providers of workshops and webinars.
4. Collaborate with lenders to conduct three training sessions for loan officers to educate them on affordable mortgage products available in rural areas.

5. Implement an approach to facilitating collaboration between housing counseling agencies and lenders based on solutions identified through working group sessions in Year 2.
6. In coordination with housing counseling agencies, ask prospective homebuyers to complete surveys on the education and support received to help inform potential future enhancements.

## Anticipated Market Impact

Extending access to comprehensive financial and homeownership education will help equip more rural households with the necessary knowledge and resources to achieve sustainable homeownership. Our multifaceted approach recognizes the need to employ a combination of on-line and in-person activity to reach rural audiences effectively.

In addition, fostering relationships between housing counseling agencies and lenders bolsters collaboration across the ecosystem. This will improve support for potential homebuyers through the entire homebuying process and increase their likelihood of success. It also will help keep more individuals who were denied mortgages on the path toward future homeownership.

Through this objective, we will lay the foundation for increasing affordable lending and responsible access to credit in rural areas.

Exhibit F:  
**Plan Modification Request Template**

FREDDIE MAC  
RURAL HOUSING  
2025  
LOAN PRODUCT

**ACTIVITY:**

5 - Support for Certified Community Development Financial Institutions Serving the Rural Housing Market: Additional Activity

**OBJECTIVE:**

A - Design Product Flexibilities to Facilitate Origination of Conventional Mortgages from Community Development Financial Institutions

**PROPOSED PLAN MODIFICATION:**

- X This is a proposed Plan modification for the current Plan year.
- X This is a proposed Plan modification that addresses future Plan year(s).

Remove the actions to collaborate with Federal Home Loan Banks (FHLBs) to develop and execute an outreach strategy from Years 1 and 2 of this Plan objective.

**JUSTIFICATION FOR PROPOSED PLAN MODIFICATION:**

Freddie Mac proposes removing the actions to collaborate with FHLBs to develop and execute a strategy for informing community development financial institutions (CDFIs), including their members, about Freddie Mac flexibilities and FHLB programs that help promote mortgage financing through CDFIs. In conversations with several FHLB teams to gather insights into their CDFI programs and potential synergies, we learned that very few of their members are CDFIs. As a result, the opportunity to collaborate and the potential impact are far smaller than anticipated when we created our 2025-2027 Duty to Serve Plan.

We will continue to seek opportunities to collaborate with FHLBs in ways that expand our positive impacts on rural housing and homeownership.

Activity 5: Support for Certified Community Development Financial Institutions Serving the Rural Housing Market: Additional Activity
Objective A: Design Product Flexibilities to Facilitate Origination of Conventional Mortgages from Community Development Financial Institutions

Evaluation Area	Year(s)	Income Targeted	Extra Credit
Loan Product	1, 2, 3	VLI, LI, MI	Yes

### Objective Background and Description

CDFIs that serve rural areas facilitate investment and provide affordable financing for a wide range of needs in some of the nation’s most economically distressed areas. To support affordable home financing, CDFIs often allow terms that do not meet conventional mortgage standards. CDFI staff we interviewed told us that they would like to sell more of the loans they originate into the secondary mortgage market but typically hold them in portfolio because the loans often do not meet Enterprise requirements. The population that CDFIs serve often earn very low or low incomes, have thin or no credit histories, and have low capacity to set aside savings.

During the previous Duty to Serve Plan cycles, Freddie Mac formed partnerships with CDFIs that enabled them to become direct or indirect sellers to us, opening their access to the secondary mortgage market. Through these relationships, we increased their capacity to deliver localized financial and homebuyer education to help prepare more people for responsible homeownership in high-needs rural regions, including Native American tribal areas.

We also updated our policies based on industry feedback to help meet the specialized needs of CDFIs and their borrowers. We offered the new flexibilities to CDFIs through a term of business (TOB), to help ensure safety and soundness as we expand our presence in this part of the market.

During the 2025-2027 Plan cycle, we will obtain industry feedback on our offerings to identify and, if appropriate, introduce improvements intended to make it easier for CDFIs to originate loans that can be sold to Freddie Mac. Through this iterative approach, we will strategically expand the flexibilities to increase our support for CDFIs in rural areas. We also will continue to expand the network of CDFIs that are eligible to deliver loans under the TOB. ~~In addition, we will explore additional opportunities to support CDFIs, including through partnerships with FHLBs.~~

Developing and implementing product enhancements, taking into account consistent safety and soundness practices, takes substantial time and resources. The complexities of lenders’ internal processes affect the adoption rate, even when lenders understand the value of offerings and want to incorporate them into their businesses. The rate of adoption depends on lender priorities as well as the need for resources, systems updates, new internal policies, and training.

### Baseline

Freddie Mac updated our affordable lending policies in 2024 to provide flexibilities supportive of CDFIs in originating loans that are eligible for sale to the secondary mortgage market. The flexibilities were offered through a proprietary TOB to a small number of CDFIs to assess their effectiveness.

## Actions

### Year 1 - 2025

1. Gather feedback through direct engagement with CDFIs that adopted the TOB introduced in 2024 to help identify potential enhancements that could help increase loan production.
  - a. Conduct working sessions with CDFIs that have the TOB and have delivered loans under the TOB to Freddie Mac to gather insight into strengths and areas for improvement.
  - b. Conduct working sessions with CDFIs that have the TOB but have not delivered loans under the TOB to gain insight into obstacles preventing loan originations and deliveries.
2. Obtain commitment from at least two additional CDFIs that can support direct selling relationships with Freddie Mac to adopt the TOB and/or to serve as aggregators to expand access to the secondary mortgage market.
3. Provide technical assistance to support CDFIs that enter into the TOB. For example, conduct individual walk-throughs to help ensure that each CDFI understands the TOB terms, educate each CDFI on how to originate and deliver loans to Freddie Mac, and provide each CDFI with a single point of contact for support.
4. Engage FHLBs to gain insight into their CDFI programs and potential synergies. ~~Collaborate to develop and begin to execute a strategy to work together to support CDFIs. Tactics may include, for example, participating in industry events together to inform attendees on how to take advantage of Freddie Mac and FHLB offerings aimed at CDFIs as well as educating FHLB member CDFIs on the TOB and other Freddie Mac offerings.~~

### Year 2 - 2026

1. Obtain commitments from at least three CDFIs that can support a direct selling relationship with Freddie Mac to adopt the TOB and/or to serve as aggregators to expand access to the secondary mortgage market.
2. Provide technical assistance to support CDFIs that adopt the TOB in Year 2 and/or become aggregators.
- ~~3. Continue to execute the strategy for collaborating with FHLBs developed in Year 1, if applicable.~~
- 4.3. Analyze data from loans delivered by CDFIs under the TOB. Assess loan characteristics and performance as well as feedback gathered in Year 1. Determine potential policy updates that could help increase the likelihood that CDFIs will deliver loans to Freddie Mac, based on our analysis. Either expand the flexibilities allowed through the TOB, make the existing terms available through a policy update to our *Single-Family Seller/Service Guide*, or consider a new CDFI loan product, with consideration for safety and soundness matters.

### Year 3 - 2027

1. Based on the path selected in Year 2, either move forward with expanded flexibilities through the TOB, an update to our *Single-Family Seller/Service Guide* to support CDFIs, or a CDFI loan product.
2. Promote the offering to industry participants to raise awareness and encourage adoption. Efforts may include, for example, industry conferences and learning events,

webinars/tutorials, targeted e-mail, social media posts, marketing collateral, updated web site content, Freddie Mac-supported housing forums, and articles or blog posts.

3. Conduct working sessions with participating CDFIs to gain insight into additional market potential needs for further product enhancements and assess the feasibility of including a loan purchase objective to the 2028-2030 Duty to Serve Plan.

## Anticipated Market Impact

Through our efforts under this objective, Freddie Mac will help boost CDFIs' ability to provide affordable lending and access to credit for the purchase or refinance of homes in rural areas. By promoting the product flexibilities offered through the TOB, deepening relationships with CDFIs, and providing technical assistance, we will encourage adoption of the offering and help CDFIs use it efficiently and effectively.

~~Working collaboratively with FHLBs, if appropriate, will contribute to the expansion of and support for our mutual efforts in this space.~~

The feedback that we gather from CDFIs on their experience with the flexibilities and the insights that we gain from assessing loan data will contribute to continued refinement of our policies. We anticipate that the updates will enable CDFIs to originate and deliver more loans that meet our requirements, which will help increase liquidity to high-needs rural regions.

In addition, expanding the number of CDFIs with the TOB will create channels into the secondary mortgage market for a more diverse set of lenders and could increase access to credit for more rural households. Because the flow of liquidity to these areas currently is low, our loan purchases will make a meaningful difference.

Building direct and indirect selling relationships may be challenging. For example, a CDFI may want to sell loans through an aggregator but not meet the capital requirements to become a participating correspondent lender. For CDFIs that want to expand support for their communities by becoming aggregators, the financial resources, time, technology infrastructure, and staffing needed may limit them.

In addition, CDFIs' internal processes will affect the rate of adopting new or updated offerings, even when the organizations understand the value of offerings and are anxious to incorporate them into their businesses. The speed to market depends on priorities as well as resources, systems updates, new internal policies, and training. The process can take a year or more.

Our outreach and technical assistance efforts during this Plan cycle are intended to help overcome some of these potential challenges.

Exhibit F:  
**Plan Modification Request Template**

FREDDIE MAC  
RURAL HOUSING  
2025  
LOAN PURCHASE

**ACTIVITY:**

3 - Support for High-Needs Rural Populations: Regulatory Activity

**OBJECTIVE:**

A - Purchase Single-Family Loans to Members of Federally Recognized Native Tribes in Tribal Areas

**PROPOSED PLAN MODIFICATION:**

- This is a proposed Plan modification (new Objective) for the current Plan year.
- This is a proposed Plan modification that addresses future Plan year(s).

Remove this objective from Year 2 and Year 3 of Freddie Mac’s 2025-2027 Duty to Serve Underserved Markets Plan.

**JUSTIFICATION FOR PROPOSED PLAN MODIFICATION:**

Freddie Mac proposes removing the high-needs rural populations loan purchase objective from our Plan for 2026 and 2027. This does not diminish Freddie Mac’s commitment to supporting responsible homeownership in Native communities.

Our HeritageOne® product provides a conventional mortgage solution in addition to the HUD 184 program – the predominant financing option in this market – for members of federally recognized tribes buying or refinancing homes in tribal areas. We continually conduct outreach and education to raise awareness of and interest in HeritageOne at conferences, through targeted engagement, and in individual conversations. We also work with lenders in navigating the processes of adopting the term of business (TOB) and originating and delivering loans; when needed, we help identify and clear roadblocks.

However, uptake has been slower than expected, even though key industry stakeholders contributed to the product development process and lenders expressed excitement about having another financing option. Adopting the TOB, rolling out HeritageOne, and learning to originate loans efficiently requires lenders to invest time and resources. Lenders already having success with HUD 184 loans may not see the cost-benefit of introducing another solution.

In addition, lenders often try to qualify a potential borrower for a HeritageOne loan only after confirming ineligibility for a HUD 184 loan. Because of this, the HeritageOne loans that lenders deliver to Freddie Mac often do not qualify for Duty to Serve credit. Lenders typically do not sell HUD 184 loans to us; they may not find our terms advantageous. We have purchased only a handful of HUD 184 loans over the last five years.

In addition, we have learned that concentrations of poverty in tribal areas may prevent many Native households earning 100% of AMI or less from pursuing or achieving homeowners. Compounding matters, for-sale housing is in very short supply on tribal lands, which severely limits opportunities to purchase loans for homes in these areas in general.

We are proud of the difference that HeritageOne makes in this market. We will continue to offer it as well as work with industry participants to expand its adoption and use. Information that we gather through loan purchases and outreach efforts in 2025 and beyond will help inform future decisions about how we can best support Native homeownership in tribal areas.

Activity 3: Support for High-Needs Rural Populations: Regulatory Activity
Objective A: Purchase Single-Family Loans to Members of Federally Recognized Native Tribes in Tribal Areas

Evaluation Area	Year(s)	Income Targeted	Extra Credit
Loan Purchase	1, <del>2</del> , <del>3</del>	VLI, LI, MI	Yes

## Objective Background and Description

During previous Plan cycles, Freddie Mac worked closely with stakeholders across the ecosystem to take a thoughtful and strategic approach to entering and supporting housing opportunities for members of federally recognized Native tribes living in tribal areas. Freddie Mac collaborated with the South Dakota Native Homeownership Coalition (SDNHC), Oweesta Corporation, and other trusted non-profit housing intermediaries that support Native communities to expand their capacity to provide financial management and homebuyer education that prepares more Native households to become and remain homeowners. We also supported Enterprise Community Partners in the creation and delivery of curricula for developing tribal organizations’ homeownership programs and for building individuals’ financial management skills. Those and other resources are widely available on Freddie Mac’s Native American Homeownership Preparedness web page. We collaborated with all three organizations on a wide range of knowledge-sharing forums, technical assistance programs, and educational opportunities.

Freddie Mac launched our HeritageOne loan product in the fall of 2023. It reflects insights and input from Native organizations and other industry participants, gathered during our extensive outreach efforts over several years. The conventional mortgage offering is designed to meet the housing finance needs of Native American households on tribal land, including tribal trust, allotted trust, and fee simple lands. Because of the prevalence of manufactured homes on tribal lands and their relative affordability, HeritageOne may be used to finance manufactured as well as site-built homes. Lenders began to adopt HeritageOne in 2024 through a term of business with Freddie Mac. HeritageOne offers a mortgage financing option in addition to the HUD Section 184 product.

During the 2025-2027 Duty to Serve Plan cycle, we will continue our efforts to provide liquidity that helps create more affordable homeownership opportunities for members of federally recognized tribes in tribal areas. Related activities will include enhancing our offerings in a safe and sound manner, conducting outreach, and expanding lender participation in the tribal lending market. Our commitment to this market extends beyond purchasing HeritageOne loans. Freddie Mac will remain ready and willing to purchase [eligible](#) HUD Section 184 loans as well. Freddie Mac’s purchase targets will include only purchase-money loans during the 2025-2027 Plan cycle; however, this does not diminish our commitment to purchase refinance loans to help make homeownership more affordable and sustainable for very low-, low-, and moderate-income tribal members.

## Baseline

Lenders delivered zero HUD Section 184 loans to Freddie Mac in 2019, one in 2020, four in 2021 (while interest rates were at their lowest), and zero in 2022 and 2023. Given the late 2023 introduction of HeritageOne, Freddie Mac does not have a full year of reported loan volume for that offering. Therefore, we set our baseline for the 2025-2027 Plan at zero.

## Targets

With a baseline of zero, we leveraged our 2024 purchase target to determine our 2025-2027 targets, which ~~are~~ is set forth in the following table. Loan counts only include purchase-money originations for owner-occupied properties.

Projected volume does not consider potential market reactions to changes in the interest-rate environment or other market disruption. It also does not factor in the possibility of slower-than-expected adoption of our products or product enhancements. Lenders' business priorities and the complexities of their internal processes affect the rate of adopting new or updated mortgage offerings, even when lenders understand the value of offerings and are anxious to incorporate them into their businesses.

2025	2026	2027
5 loans	<del>10 loans</del>	<del>15 loans</del>

## Anticipated Market Impact

Freddie Mac's purchases of loans made to Native households in tribal areas will help more Native Americans realize affordable homeownership. Our loan purchases also will provide much-needed liquidity and capital for CDFIs and other lenders financing homes in tribal areas, where conventional mortgage lending historically has been limited or nonexistent. Because of the relatively small size of the tribal housing market, any origination volume will be significant in terms of market impact.

In addition, given the complexity of this market, having a purchase target for one year will allow us to gather additional data and real-life experience that could factor into future decisions about how best to help create Native homeownership opportunities.

Many lenders currently serving Native borrowers are small community banks and CDFIs that would need to sell loans to Freddie Mac indirectly through aggregators. They might not meet the capital requirements to become participating correspondent lenders, and aggregators often lack an effective channel for small lenders. Freddie Mac would need to expend significant time and effort to expand our direct and indirect seller network.

HeritageOne provides an option to transfer servicing to approved Freddie Mac servicing agents. Many lenders that lend in tribal areas want to service the loans that they originate so that they can maintain a relationship with the borrower; however, the time, funding, knowledge, and staffing required to become a servicer may be prohibitive and curb adoption of HeritageOne in the market.

The outreach and product enhancement efforts that we will undertake during this Plan cycle are intended to help overcome some of these potential limitations.

Activity 3: Support for High-Needs Rural Populations: Regulatory Activity
Objective B: Develop Product Flexibilities to Facilitate Loan Originations for Members of Federally Recognized Native Tribes in Tribal Areas

Evaluation Area	Year(s)	Income Targeted	Extra Credit
Loan Product	1, 2, 3	VLI, LI, MI	Yes

## Objective Background and Description

Freddie Mac has worked strategically and collaboratively across the ecosystem to help lower barriers that industry participants told us inhibit mortgage lending in tribal areas, including tribal trust, allotted trust, and fee simple lands. During the first two Duty to Serve Plan cycles, we conducted extensive, continual outreach to industry participants — such as non-profit housing intermediaries, housing finance agencies, tribally designated housing entities (TDHEs), and CDFIs, including Native CDFIs — to gather insights into tribal governance, the unique aspects of Native housing and homeownership, potential borrowers’ needs, how to make loan origination processes more efficient, and appraising homes on tribal lands.

From that foundation, we designed HeritageOne. Throughout the development process, we continually engaged participants across the ecosystem to help ensure that HeritageOne would meaningfully address some of the main hurdles to affordable access to credit facing Native households in tribal areas. To maximize potential usage, members of the more than 225 tribes included on HUD’s Section 184 Participating Tribes List are eligible to use HeritageOne. In addition, working with the Appraisal Institute and Native housing finance professionals, we also developed an appraisal curriculum to support property valuations for homes in tribal areas.

To educate lending institutions and Native organizations on conventional mortgage lending and to facilitate knowledge sharing and best practices across the ecosystem, we collaborated with the SDNHC, Enterprise Community Partners, and Oweesta Corporation to establish, expand, and facilitate regional coalitions of tribal housing organizations, tribes, and lenders that serve tribal areas. The forums and technical assistance led to collaboration, information sharing, and stronger relationships across the ecosystem.

During the 2025-2027 Plan cycle, we will assess HeritageOne’s effectiveness and endeavor to enhance the offering to help increase its adoption and usage. We will continue our efforts to expand access to the secondary market by engaging with lenders already active in this market and connecting with others that would be new to it. Continuing our efforts in tribal areas will entail coordination across the ecosystem, including leveraging our existing relationships and strengthening partnerships with lenders of all sizes, ~~and~~ governmental agencies, ~~and FHLBs~~ as well as tribal housing entities, appraisers, trade groups, non-profit housing intermediaries serving Native populations, and other industry stakeholders. As part of these efforts, we will continue and build on our support for regional Native coalitions.

## Baseline

Freddie Mac introduced HeritageOne in October 2023 and began outreach to potential lenders as well as executing terms of business (TOBs) with approved lenders in 2024. We conducted extensive outreach and education efforts to promote the offering to industry stakeholders, educate them on its usage and benefits, and encourage lenders to adopt the TOB.

Since 2020, Freddie Mac has worked with Native non-profit housing organizations to help establish and expand coalitions that facilitate collaboration, technical assistance, peer learning, and sharing of best practices that lead to the creation and financing of homeownership opportunities in tribal areas.

## Actions

### Year 1 - 2025

1. Work in collaboration with at least two of our existing non-profit partners, the FHLBs, the lending community, Native American Advisory Council, and Native homeownership coalitions to engage with lenders, tribal leadership, and TDHEs to socialize the product, identify additional down-payment assistance opportunities, and share best practices.
2. Provide HeritageOne to at least one additional lender via a negotiated TOB. Provide technical assistance to support the lender in implementing and using the product effectively.
3. Collect HeritageOne loan data and analyze loan performance to help inform a potential product enhancement.
4. Obtain feedback on the product.
  - a. Survey all lenders with the TOB to determine usability in the market.
  - b. Hold at least three focus groups with industry partners and Native housing intermediaries to gather feedback on potential enhancements.
5. Determine at least one potential product enhancement based on findings from the assessments conducted.
6. Continue to support ~~the Native Tribal Housing Ecosystem Summit as well as~~ existing and emerging Native housing coalitions. Convene tribal housing stakeholders to discuss topics related to challenges, opportunities, and potential barriers and solutions.

### Year 2 - 2026

1. Publish at least one policy update to our *Single-Family Seller/Service Guide* based on feedback gathered in Year 1.
2. Update training materials to reflect the Guide change.
3. Promote the product enhancement through various channels to encourage additional lender adoption and usage. Example activities:
  - a. Post product information and resources on Freddie Mac's web site.
  - b. Inform housing industry professionals, ~~including FHLB members,~~ of HeritageOne product enhancements through learning opportunities, such as webinars and industry events.
  - c. Publish articles to Freddie Mac's Single-Family News & Insights web pages and distribute via targeted e-mail.
4. Provide HeritageOne to at least one additional lender via a negotiated TOB. Provide technical assistance to support the lender in implementing and using the product effectively.
5. Continue to support ~~the Native Tribal Housing Ecosystem Summit as well as~~ existing and emerging Native housing coalitions. Convene tribal housing stakeholders to discuss topics related to challenges, opportunities, and potential barriers and solutions.

## Year 3 - 2027

1. Provide HeritageOne to at least one additional lender via a negotiated TOB. Provide technical assistance to support the lender in implementing and using the product effectively.
2. Continue to promote HeritageOne through various channels to encourage additional lender adoption and usage. Example activities:
  - a. Review product information and resources on Freddie Mac's web site and refresh content, if needed.
  - b. Provide learning opportunities, such as webinars and participation in industry events, to inform housing industry participants of HeritageOne.
  - c. Publish articles on FreddieMac.com and distribute via targeted e-mail.
3. Continue to support ~~the Native Tribal Housing Ecosystem Summit as well as~~ existing and emerging Native housing coalitions. Convene tribal housing stakeholders to discuss topics related to challenges, opportunities, and potential barriers and solutions.

## Anticipated Market Impact

Our efforts under this objective will lay the foundation to expand conventional mortgage lending and access to affordable credit for Native homebuyers and homeowners in tribal areas.

Our enhancements to HeritageOne will aim to increase lenders' adoption and usage of the product and boost their confidence in lending in tribal areas. Basing the enhancements on feedback from lenders with experience in using HeritageOne as well as other professionals who specialize in Native housing will help strengthen relationships across the ecosystem and facilitate industry buy-in. Also factoring loan performance data into decisions will help ensure that enhancements are developed within safety and soundness parameters.

Through our outreach, promotion, and education activities, lenders will gain understanding of HeritageOne's benefits and how to use it efficiently and effectively to support sustainable homeownership opportunities. Our goal is to increase adoption and usage of HeritageOne, providing lenders and Native borrowers in tribal areas with a mortgage solution in addition to the HUD Section 184 product. Enabling and encouraging lenders to sell HeritageOne loans to Freddie Mac will help increase the flow of liquidity to this market.

~~The Native Tribal Housing Ecosystem Summit will put a spotlight on housing challenges and opportunities for Native populations in tribal areas. We will be among the leaders from across the ecosystem who come together to gain insights, exchange ideas, and build relationships that could ultimately lead to innovative solutions that help expand access to credit and affordable homes.~~

Also, ~~w~~Working with non-profit organizations to build on our collaboration model will further homeownership programming and opportunities. Continuing and expanding state coalitions of stakeholders across the ecosystem will put a spotlight on housing for Native populations in tribal areas. As an industry leader, we will help facilitate broader engagement, the exchange of ideas and best practices, and education on conventional mortgage lending and Freddie Mac's offerings that help more households attain and sustain homeownership.

While our efforts create significant potential to help move Native homeownership opportunities forward, adoption and usage of HeritageOne product may be slow. Through our extensive industry outreach, we found that few lenders have experience lending in tribal areas and many lenders made the business decision not to enter the market, given the complexities and relatively small opportunity associated with lending in tribal areas.

In addition, many lenders currently serving Native borrowers are small community banks and CDFIs that would need to sell loans to Freddie Mac indirectly through aggregators. They might not meet the capital requirements to become participating correspondent lenders, and aggregators often lack an effective channel for small lenders. Freddie Mac would need to expend significant time and effort to expand our direct and indirect seller network.

Activity 2: Support for High-Needs Rural Regions: Regulatory Activity
Objective B: Increase Resources for Resolving Heirs' Property Rights

Evaluation Area	Year(s)	Income Targeted	Extra Credit
Outreach	1, 2, 3	VLI, LI, MI	Yes

## Objective Background and Description

Heirs' property rights issues occur when a property is inherited without benefit of a will or other legal documentation of ownership. Reasons include inheriting land without a legal title, distributing property among multiple descendants, or an incomplete formal transfer process, such as unfinished probate proceedings. The issues are compounded if the property passes to additional generations without clear title, resulting in increasingly fractional ownership.

Navigating the complexities and costs of clearing title and estate planning can be daunting for many heirs. In addition, access to the needed legal and housing counseling services may be limited, especially in rural areas. In colonias, language can be an additional barrier.

During the 2025-2027 Duty to Serve Plan cycle, Freddie Mac will assess geographical areas most affected by heirs' title issues and prioritize our outreach efforts based on our findings and industry input. We will work in partnership with ~~non-profit organizations and FHLBs~~ key industry stakeholders to develop and promote resources that assist in resolving heirs' property rights issues, such as a toolkit that offers easy access to a collection of resources that help homeowners understand and navigate resolution of property title issues. We also will explore the feasibility of developing product flexibilities that help homeowners who are committed to resolving their property rights issues to benefit from their home equity faster, which will better enable them to sustain affordable homeownership — or to improve their homes in preparation for resale, if desired.

## Baseline

Freddie Mac has not worked in supporting heirs' property rights or resolving title issues.

## Actions

### Year 1 - 2025

1. Increase understanding of heirs' property rights issues.
  - a. Collaborate with at least two FHLBs that have established heirs' property rights programs to gain insights into needs and opportunities associated with heirs' rights challenges in rural areas. ~~For example, hold sessions with the FHLBs member banks and present with the FHLBs at industry events.~~
  - b. Solicit feedback from at least one trusted housing organization with experience resolving heirs' rights challenges in each of the high-needs rural regions to determine programs and resources that need to be developed to increase support for homeowners in resolving these issues, including homeowner education.
  - c. Solicit feedback from at least two title companies to gain their perspectives on the market challenges and needs.

2. In collaboration with the selected housing organizations experienced in resolving heirs' property rights, create a strategy for increasing access to education and resources designed to aid in heirs' rights retention and identify several markets within high-needs rural regions where access to these tools could create the largest potential impact. Select at least one locality in each of the high-needs rural regions in which to execute the strategy.

## Year 2 - 2026

Execute the strategy developed in Year 1.

1. Create a toolkit to provide a range of tools and resources intended to support industry stakeholders, ~~including FHLB members and other lenders, non-profit housing intermediaries, housing counselors,~~ in their efforts to educate homeowners on heirs' property rights resolution. Promote the toolkit ~~in collaboration with the selected FHLBs and~~ through channels that may include, for example, targeted e-mail, industry conferences or learning events, webinars, tutorials, and web content.
2. Facilitate at least four homeowner education sessions in collaboration with the selected housing organizations to increase understanding of heirs' property issues and paths to resolution. Topics may include estate planning, legal services, home financing options, homeowners' insurance, home preservation and protection, financial management, and housing counseling. Also address opportunities for accessing the home's equity once title is cleared, including providing information on Freddie Mac's low down payment and renovation suite of products.
  - a. Ask participants to complete a survey on our program at each session to inform potential enhancements.
  - b. Assess participant survey results and adjust the program as appropriate. Include findings on survey results in a report to FHFA.
3. Assess the feasibility of a policy enhancement to allow flexibilities that would increase access to credit for homeowners committed to clearing their title issues.

## Year 3 - 2027

Continue to execute the strategy developed in Year 1.

1. Facilitate at least 10 homeowner education sessions in collaboration with selected non-profit organizations to increase understanding of heirs' property issues and paths to resolution. Topics may include estate planning, legal services, home financing options, homeowners' insurance, home preservation and protection, financial management, and housing counseling. Also address opportunities for accessing the home's equity once title is cleared, including providing information on Freddie Mac's low down payment and renovation suite of products.
2. Develop a policy update to increase access to credit for homeowners committed to clearing their title issues, if determined in Year 2 to be feasible in a safe and sound manner.

## Anticipated Market Impact

With assistance from trusted, experienced intermediaries who can offer guidance in navigating a complex and emotional issue, Freddie Mac will provide homeowners in selected high-needs rural regions with heirs' property issues with education and tools needed to clear title and move forward with plans for their futures. ~~In addition, our collaboration with FHLBs will help expand use of their heirs' property rights programs.~~ These collaborative efforts will expand access to information and resources for resolving tangled title and may increase the likelihood that more homeowners will be willing to begin the process.

Navigating the legal issues associated with resolving heirs' property rights can be difficult, complex, and time consuming. Processes and requirements vary by state. Therefore, there is no singular road map to resolving these issues. Finding professionals with expertise in working through the complexities and

unique requirements in this space could prove challenging, given limited access to resources in high-needs rural regions.

Homeowners who resolve their title issues and are creditworthy will have the opportunity to employ their equity to repair or renovate their homes to improve the integrity, comfort, energy efficiency and resiliency, and longevity of their homes, thereby also enhancing the properties' value and, potentially, their neighborhoods' stability. Clear title also opens the opportunity for these rural homeowners to sell their homes, leading to wealth generation. Home sales could result in new loan originations and increased liquidity in these regions. However, some heirs who clear their title may choose not to employ the equity in their homes. Distrust of the banking system and fear of the potential to lose the home if they fall behind on mortgage payments are two main reasons.<sup>1</sup>

If Freddie Mac determines that we can develop product flexibilities in a safe and sound manner to accommodate potential borrowers committed to resolving their title issues, more families will have the opportunity tap into the equity in their homes sooner.

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<sup>1</sup> "Heirs' Property, Access to Capital, and the Racial Wealth Gap", 2023 Housing Assistance Council Annual Conference presentation delivered by Cassandra Johnson Gaither, USDA Forest Service