



**America's
Credit Unions**

November 3, 2025

Clinton Jones
General Counsel
Attention: Comments/RIN 2590-AB59
Federal Housing Finance Agency
400 Seventh Street SW
Washington, DC 20219

RE: 2026-28 Enterprise Housing Goals

Dear Mr. Jones:

On behalf of America's Credit Unions, I am writing in response to the Federal Housing Finance Agency's (FHFA) Request for Comment to address its proposed rule on its 2026-28 Enterprise Housing Goals. America's Credit Unions is the voice of consumers' best option for financial services: credit unions. We advocate for policies that allow the industry to effectively meet the needs of their over 144 million members nationwide. America's Credit Unions and its member credit unions appreciate the opportunity to provide input on the Request for Comment to FHFA for its proposed rule.

While America's Credit Unions appreciates efforts to ensure operational efficiency and minimize duplication across the secondary mortgage market, we have concerns on the reduction of the single-family low-income purchase subgoal and merging of the low-income and minority census tract benchmark subgoals.

Single-Family Housing Goal Benchmark

Our credit union members heavily rely on the FHFA and the Enterprises to access the secondary mortgage market. Credit unions are vital to the housing market, as they provide low- and moderate-income borrowers with the ability to obtain mortgage credit. Our members originate a substantial share of loans in low-income and minority census tracts. National Credit Union Administration (NCUA) and Home Mortgage Disclosure Act (HMDA) data show that approximately 16 percent of credit union mortgage originations were from low-income census tracts, while 20 percent were from minority borrowers. A report from the Credit Union Times similarly determined that 15 percent of credit union loans went to low-income members.¹ These mortgages are originated widely across lenders, meaning the rule change would affect borrowers system-wide.

¹ Jim DuPlessis, *A Health Check of the Credit Union Mortgage Market*, Credit Union Times, (June 27, 2025) available at <https://www.cutimes.com/2025/06/27/a-health-check-of-the-credit-union-mortgage-market>.

It is crucial that the FHFA ensures that credit unions and other depository institutions have continued access to the secondary mortgage market. Diminished focus on these communities by the Enterprises may lead to reduced liquidity for community lenders like credit unions and consequentially, lower rates of homeownership. As mission-driven financial institutions, the new benchmarks for low-income mortgages risk excluding numerous borrowers.

One of the FHFA's reasons for setting lower benchmarks is based on the amount of affordable inventory failing to keep pace with demand. In turn, the agency argues, higher benchmarks will yield greater competition amongst the Enterprises. The FHFA cites anecdotal testimony from stakeholders within the industry. However, the problem is precisely that—the feedback is anecdotal. The agency even concedes that it does not fully understand the unintended consequences of setting these aggressive housing goals, yet it is continuing to lower the benchmark. Further, in the FHFA's Annual Housing Report, in 2024, both Freddie Mac and Fannie met their low-income family home purchase goal, each exceeding 26 percent. Lowering the benchmark to 21 percent is far too aggressive because the market performance shows that the higher benchmarks are achievable and demand for affordable housing remains high. America's Credit Unions urges the FHFA to provide a more comprehensive and data-driven justification before determining these new standards that have a material impact on our credit union members and their borrowers.

The FHFA should not set targets below its own forecasts. It admits the low-income areas home-purchase subgoal (proposed 16.0 percent) is set below the lower bound of its forecast confidence interval (22.8 plus or minus 3.3 percent).² We request the FHFA to justify why it undercuts its model, or otherwise to raise the benchmark to at least the forecast's lower bound. If the agency's data shows that the market can support more lending to these households and neighborhoods, the benchmarks should reflect that. Lower targets than the agency's own projections reduce ambition and weaken accountability.

The FHFA should also clearly demonstrate how each required factor under 12 U.S.C. § 4562, including market need, market size, and feasibility, leads to each proposed target. A simple, step-by-step explanation would strengthen confidence in the targets and reduce the chance that the rule will be viewed as unsupported. Low-income borrowers' share of new mortgages fell in 2023 amid high rates and thin inventory, exactly when Enterprise leadership is most needed, so lowering purchase benchmarks sends the wrong signal. Difficult market conditions are exactly when targets should stay strong. With high interest rates and very little affordable inventory, lower-income families are being squeezed out.

² 2026-2028 Enterprise Housing Goals, 90 FR 47632 (Oct. 2, 2025).

The Enterprises are meant to help keep access open when conditions are toughest, not step back.

Low-Income Subgoal

The FHFA is also proposing to restore the single low-income areas subgoal to simplify the regulatory framework, improve operational clarity for the Enterprises, and better align subgoals with existing borrower-based metrics. The proposal would combine the current low-income census tracts home purchase subgoal and the minority census tracts home purchase subgoal. The FHFA argues that returning to the single low-income areas subgoal will further the FHFA's policy objectives while reducing complexity and unintended consequences.

The proposed consolidation of low-income and minority census tracts subgoals is concerning for credit unions, given their inherent focus on these communities. America's Credit Unions has previously supported the FHFA's previous increased benchmark levels and establishment of the separate subgoals in 2021. Credit unions remain committed to serving low-income *and* minority communities. In its proposed rule, the FHFA argues that because 70 percent of minority census tract borrowers would qualify for the low-income census tract, the overlap creates limited incremental benefit relative to the complexity of maintaining modeling and compliance for each subgoal. For our members, however, this change would represent a failure to consider 30 percent of the minority census tract, which is considerable. We argued in favor of the two separate subgoals for this precise reason—ensuring that underserved communities are not left out of the FHFA's housing goals. We urge the FHFA to reconsider its plan to combine the low-income and minority census tract subgoals.

We appreciate the FHFA's general efforts to reduce regulatory burden under this Administration. Clearer compliance goals for the Enterprises and an overall simpler housing framework benefit stakeholders. Nonetheless, we believe that streamlining the regulatory framework should not come at the expense of supporting low-income and minority mortgage originations, which are essential to credit unions' mission.

Conclusion

America's Credit Unions appreciate the opportunity to comment on this Request for Comment. If you have any questions, please do not hesitate to contact me at 202-961-5731 or tmaron@americascrreditunions.org.

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Sincerely,

A handwritten signature in black ink, appearing to read 'TJ Maron', with a stylized, cursive script.

Tyler J. Maron
Regulatory Affairs Counsel