November 28, 2022

Federal Housing Finance Agency
Eighth Floor, 400 Seventh Street, S.W.
Washington, D.C. 20219

Attn: Duty to Serve 2022 RFI

Dear Marcea Barringer,

The undersigned organizations are among those concerned about the deadline for the Duty to Serve plan changes for Fannie Mae and Freddie Mac. As our colleagues in the Underserved Mortgage Markets Coalition (UMMC) mentioned in our in-person meeting with you on November 8th, we appreciate the RFI on the proposed plan changes and look forward to providing substantive comments in response to the RFI. We respectfully ask that the comment period be extended to allow for carefully curated and thoughtful comments.

Currently there are several other RFIs our coalition’s members are working on that are due at about the same time, such as:

* FHA RFI on small balance mortgages,
* CFPB RFI on refinancing and loss mitigation,
* EPA RFI on greenhouse gas funds,
* Interagency Community Investment Committee RFI on opportunities and challenges in community investment programs, and
* FHFA RFI on the definition change for Colonias.

To maximize our input, we ask for a 45-day extension. This extension would allow us to thoughtfully respond to the proposed Duty to Serve changes and appropriately evaluate the modifications.

Thank you in advance for consideration of this request.

Sincerely,

Center for Community Progress

Enterprise Community Partners

Grounded Solutions Network

Lincoln Institute of Land Policy

Local Initiatives Support Coalition

National Community Law Center (on behalf of its low-income clients)

National Community Stabilization Trust

National Council of State Housing Agencies

NeighborWorks America

NextStep

Novogradac

Pew Charitable Trust

Prosperity Now

RMI