

As a real estate finance professional that has the pleasure of working with many different borrowers, I am writing to urge you not to amend the Uniform Residential Loan Application (URLA) to include a question on the language preferences of potential borrowers.

As a Californian, I am well aware of the need for further resources for first-time homebuyers, prospective LEP buyers, and other creditworthy applicants who may not be able to access homeownership. Recent census data shows that 27% of California residents are foreign born, and 19% report that they speak English less than “very well.” When you couple these facts with other demographic trends, it is clear that this growing population will present both challenges and opportunities for mortgage companies.

The mortgage industry strives to provide homeownership opportunities for all creditworthy borrowers. We understand our obligation to be a resource to our communities and know the value and importance of homeownership as a fundamental piece of the American Dream. This opportunity should be reasonably available to all that want to participate, and we work hard to market our services to the communities where we live and work.

It is this close connection with consumers and my practical understanding of how these transactions are conducted that makes me believe that FHFA should not put a question on the URLA inquiring about a borrower’s language preference. Such a question could be confusing to the borrower or may create an expectation of service in a language that we may not be able to reasonably fulfil. In the worst case scenario, such a question may lead a borrower to erroneously believe that they are possibly being discriminated against or that providing this information may be harmful to their loan application. Neither outcome is consistent with the type of customer service I try to provide.

The phrasing of the question in the RFI suggests that data collection is the primary goal of this change to the URLA. However, I also know that there are existing data sources available to study and improve availability of resources without injecting confusion and uncertainty into my relationship with my customers. The American Survey of Mortgage Borrowers, U.S. Census, and other government resources track demographic information and are updated with some frequency. These are far more appropriate venues for data collection and tracking than the URLA.

In sum, I believe it is unwise to include an inquiry into a borrower’s language preference on the URLA. For the reasons cited above, doing so will simply result in more confusion on the part of consumers and damage my relationships with customers. I urge FHFA not to make this change.

Respectfully,

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