From: Randall Lowell <RLowell@greenfieldadvisors.com>
Sent: Thursday, March 8, 2018 6:44 PM
To: OHRP RFI <OHRP_RFI@fhfa.gov>
Subject: Request for Input-Credit Scoring

Having been deeply immersed in the lending, real estate, and non-profit world, for 30+ years, I have come up with a much more innovated and sustainable risk model than the archaic "FICO" model.

I have seen first-hand thousands of inaccurate credit profiles and credit invisibles that are the basis to deny access to affordable credit. Risk based lending, which incorporates scaled vesting models, is far more effective as a sustainable and affordable lending model.
With Fannie Mae's most recent announcement of shared credit risks the opportunity is now for each of us to be less reliant on antiquated FICO scoring systems and place more reliance geared towards risk tolerance lending programs that no longer penalize rural property
borrowers, eliminates facially neutral loan programs that increase the costs to the persons borrowing under 100k, and balances loan costs for all amounts. With the Duty to Serve Rule, and Chattel property lending considerations, there has never been a better
time to create vesting loan products that increase savings, build wealth, and are not appreciation reliant for equity factoring.

Credit Scoring should still be included in lending considerations but only as a basis for determining the borrower vesting periods. Low to moderate income earners will never truly be able to leave a legacy of wealth so long as we:

1) penalize them for borrowing under 100k,
2) have them pay higher interest rates based on a less than perfect credit scoring process that increases loan costs, and interest rates, for borrowers who have not yet established credit,
3) have credit score layering instead of simply increasing the risk based matrices and modeling,
4) offer reverse mortgage products that deprive heirs from being the beneficiary of the legacy of wealth transfers-(these loans are not a wealthy persons method for aging in place).

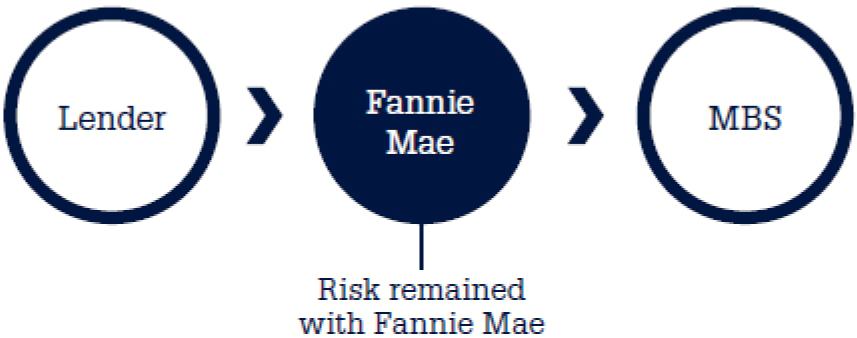
If we rethink the way loans are made, priced, underwritten, serviced, and we alter the Mortgage Insurance features to a vested lending model – we will see people who have never saved, become savers albeit from a vesting model that is no more punitive
then the early withdrawal form a retirement account.

The Duty to Serve Rule could be expanded to all forms of personal property lending and would create an entirely new loan product for Fannie Mae to purchase. Scalability, is not as complex as
one might think. The Escrow account adds a line item for the financial denture vesting program I have designed. The traditional default, whereby a borrower's credit is decimated with one missed payment, becomes a thing of the past. Allowing a borrower
time to reach liquidity, without first destroying their credit, only serves to minimize fire sales of distressed assets and predatory deed thievery.

I would be more than happy to speak at length, share some of the scaling and models I have created, for investor presentation and pilot program implementation.

Credit Risk Transfer — What is it?

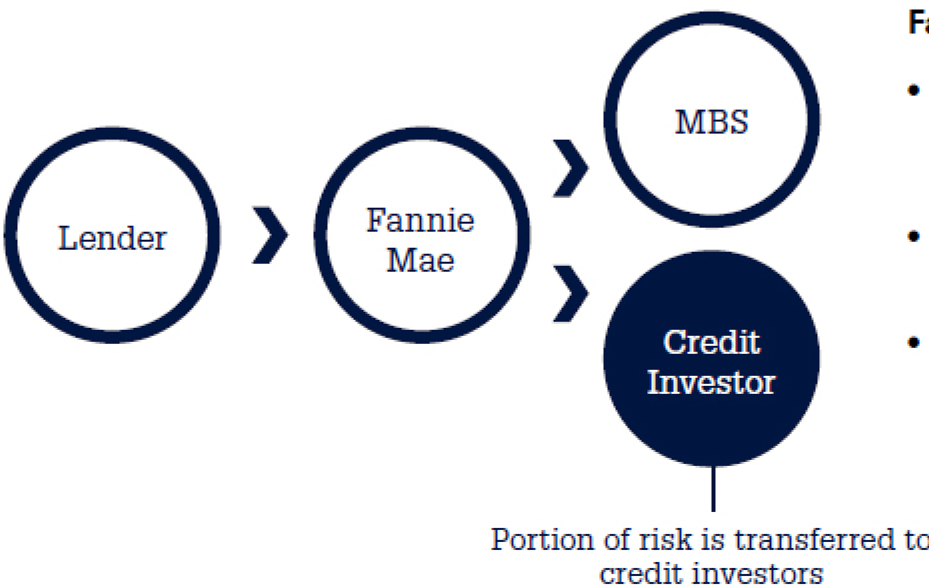
Old Model



Fannie Mae:

- Guaranteed timely payment of principal and interest to MBS investor
- Kept all credit risk associated with loan acquisitions
- Managed credit risk through underwriting and eligibility guidelines, lender oversight, quality control practices, servicing policies, and credit portfolio management

New Model



Fannie Mae:

- Guarantees timely payment of principal and interest to MBS investor
- Sells a portion of credit risk to investors
- Applies its credit risk management expertise on behalf of investors to protect the value of their investment

Respectfully,

Randall Lowell | Executive Director
Greenfield Institute**,** a nonprofit 501(c)(3) organization
2101 Fourth Avenue | Suite 820 | Seattle, WA 98121
Business 206.387.4333 | Cell 206.200.2517
rlowell@greenfieldinstitute.org or randy@gfins.org

Greenfield Institute offers alternative means for accessing our services and materials for those seeking assistance that have any mobility impairments, visual or hearing impairments, or other disabilities. We will do our best to accommodate your particular needs.

How to access our services through alternative means:
1) Greenfield Institute currently has Housing Counselors who speak the following languages: Korean, Spanish, Polish, Chinese, Arabic, and English. If your particular language is not listed we have contracted with a third party vendor to assist you in receiving our services.

2) If we cannot accommodate your specific request, or do not offer the type of services requested, we may be able to refer you to another agency or organization to meet your needs.