



February 26, 2021

Alfred M. Pollard, General Counsel
Attention: Comments/RIN-2590-AB12
Federal Housing Finance Agency
Eighth Floor, 400 Seventh Street SW
Washington, DC 20219

Re: Advance Notice of Proposed Rulemaking on Enterprise Housing Goals/85 FR 82965/ RIN-2590-AB12

Dear Mr. Pollard:

On behalf of the 2.2 million credit union members we represent, the Heartland Credit Union Association (HCUA) appreciates the opportunity to comment on the Federal Housing Finance Agency's (FHFA) Advance Notice of Proposed Rulemaking (ANPR) on Enterprise Housing Goals.

The safety and soundness of the enterprises is very important to credit unions and should remain the top priority of the FHFA. That said, the FHFA must balance safety and soundness with credit availability for consumers. HCUA believes the FHFA should not exclude particular categories of loans from receiving housing goals credit, absent thorough evidence that shows the performance of certain loan products to be unsustainable and therefore not helpful in promoting home ownership.

We believe that the FHFA should continue to monitor and analyze trends regarding whether the low-income areas home purchase subgoal has resulted in the displacement of residents from certain communities, as mentioned in the ANPR. Further analysis of census tracking data over the next five years could provide the information necessary to determine if certain classes of residents have been displaced from their communities.

We believe that providing low-income and very-low income borrowers the opportunity to purchase homes using community lending loan products in Opportunity Zones would benefit these borrowers by allowing them to purchase homes in areas that are in a renewal phase and developing economically. In addition, promoting homeownership in these areas would help in the renewal and economic development of the areas. HCUA strongly supports loans made to low-income and very-low income borrowers and communities and believes such loans should receive priority in housing goals credit.

As always, we appreciate the opportunity to review this issue. We will be happy to respond to any questions regarding these comments.

Sincerely,

A handwritten signature in black ink that reads "Bradley D. Douglas". The signature is written in a cursive, flowing style.

Brad Douglas
President/CEO