The website will not let me choose a topic. Topic: Fair Lending Oversight Data System" (FHFA-27). Submit comments to FHFA, identified by "2022-N-6," using any one of the following methods.

Regression is the theme to this "system". It appears a "modern" way of redlining just as FHA created with district maps of "people of color and low income." This system is no better than what was once historical regulations set forth by FHA to disproportionately cause segregation and inequality; with defined areas of poverty and discrimination. Not once, in several years, have I been asked my nationality or gender. Perpetuating impertinent information in legally records documents for all to see and utilize "big data" to attempt to single out, stereotype or prejudices against is unconstitutional and against our civil rights. There is nothing, ABSOLUTELY NOTHING, written in a real estate appraisal or any other real estate document that I have ever seen in regards to gender, race or religion. To even begin to substantiate such unnecessary data may only further and unnecessarily exacerbate opinions of bias that may not be factually based.

As a US citizen, I am appalled that this bill has made it this far. Pure and simple, this is regression and not progression. I have nothing to hide, but it should be unnecessary to document religion, race and gender for any circumstance unless it has to do with medical issues. In my job, I don't know the religion, gender or race of any comparable I use because it's not public information and simple put, I wouldn't care anyway because it's irrelevant. We are all humans. Isn't that what our Bill of Rights and Constitution say?

I have compiled a list of research papers which states systematic bias in lending and FHA policies. I hope someone will read these; there are several research papers like it. They provide historical context for lending practices. Appraisers appear to get all the blame for issues arising with bias. Continuing to set more regulations on appraisers, without going back to the true root cause, will change nothing until the full scope of current matters is addressed.

https://www.nber.org/system/files/working_papers/w29244/w29244.pdf

https://repository.law.uic.edu/cgi/viewcontent.cgi?article=1584&context=lawreview

https://ncrc.org/wp-content/uploads/dlm_uploads/2018/02/NCRC-Research-HOLC-10.pdf

https://ncrc.org/wp-content/uploads/dlm_uploads/2018/02/NCRC-Research-HOLC-10.pdf

https://www.jstor.org/stable/20108708?read-now=1&refreqid=excelsior%3A8ba83cffa3dfc9bee464dfac9a0b3b69&seq=4

Additionally, there's a reason why the GSEs have started to limit appraisal waivers and it's

due to lender "gaming" with limited oversight of new practices. I hope, as an appraiser, when mortgage defaults are on the rise that we are solely not to blame. The AEI has been studying the effects of appraisal waivers and use of AVMs over with several well researched studies.

Appraisal waivers jumper almost double, as compared to traditional appraisals in the prior two years. Our industry fought against increased threshold for appraisal waivers and as projected, the lenders have taken advantage.

https://www.aei.org/wp-content/uploads/2022/05/GSE-Appraisal-Waiver-Infographic-March-2022-v6-002.pdf?x91208

https://structuredfinance.org/wp-content/uploads/2021/11/SFA-Research-Corner-Assessing-Appraisal-Waivers-and-AVMs.pdf

https://www.gao.gov/assets/720/717700.pdf

https://files.consumerfinance.gov/f/documents/cfpb_avm_outline-of-proposals_2022-02.pdf#page13

https://www.federalreserve.gov/SECRS/2019/April/20190405/R-1639/R-1639_020519_133471_492414709790_1.pdf

https://72nut3mk2z64bywh6c1thwjy-wpengine.netdna-ssl.com/wp-content/uploads/2021/03/USMI-Comment-Letter-on-Appraisal-RFI-vf.pdf