October 29, 2026

The Honorable Joseph M. Gormley
Acting Assistant Secretary for Housing-Federal Housing Commissioner
Department of Housing and Urban Development
451 7th Street SW, Room 9007
Washington, DC 20410

RE: Modernizing and Strengthening Minimum Property Requirements

Dear Acting Assistant Secretary Gormley,

The undersigned organizations appreciate the opportunity to comment on the Federal Housing Administration's (FHA) "Draft Policy Update: Modernizing and Strengthening Minimum Property Requirements (MPR)." If finalized in a substantially similar form, this proposal could be one of the most meaningful updates to FHA valuation policy and the overall FHA financing process in years. We believe it would make FHA loans more efficient to originate, reducing the costs for lenders and consumers alike. We would welcome this positive impact on housing affordability, so we encourage you to expeditiously implement this transformative policy.

The proposed policy also advances the goals outlined in President Trump's March 13, 2026, Executive Order, "Promoting Access to Mortgage Credit."[1] By aligning FHA property valuation policies with those of Fannie Mae and Freddie Mac, the proposal will reduce operational, staffing, and compliance costs for lenders and appraisers, while extending to consumers the protections associated with the market's most widely used financing programs. This change would significantly reduce the regulatory burden of the FHA program, expanding access for creditworthy borrowers to safe housing with affordable financing.

Our organizations view FHA as the nation's flagship program for first-time homebuyers. Aligning property valuation standards used for FHA loans more closely with those applied for conventional financing makes the FHA program more effective and appealing to lenders and home buyers. We look forward to future engagement as you continue to strengthen the FHA home loan program and would welcome the opportunity to discuss input on some technical aspects of the policy, which our individual organizations will submit through FHA's Drafting Table process.

[1] Promoting Access to Mortgage Credit, White House Executive Order, Mar. 13, 2026, https://www.whitehouse.gov/presidential-actions/2026/03/promoting-access-to-mortgage-credit/.

Sincerely,

American Bankers Association
America's Credit Unions
Broker Action Coalition
Center for Responsible Lending
Collateral Risk Network
Community Home Lenders of America
Defense Credit Union Council
Housing Policy Council
Independent Community Bankers of America
Mortgage Bankers Association
National Association of REALTORS
National Association of Mortgage Brokers
National Housing Conference
Real Estate Valuation Advocacy Association