**Testimony of**
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**(NAHREP)**

**Subcommittee on Housing, Community Development and Insurance**
**Committee on Financial Services**
**U.S. House of Representatives**

**Hearing on:**
**"A Review of the State of and Barriers to Minority Homeownership"**
**Wednesday, May 8, 2019**

Good morning Chairman Clay, Ranking Member Duffy, and distinguished members of the Subcommittee on Housing, Community Development and Insurance. My name is Joseph Nery, and I am here representing the National Association of Hispanic Real Estate Professionals (NAHREP) as a past President of the organization, and as an 18-year veteran of the housing industry where I serve a predominantly Latino market as a real estate attorney. [1]

Thank you for the opportunity to testify before you today on the state of minority homeownership and to evaluate existing barriers that hinder homeownership growth among communities of color. As we consider our nation's demographic and economic trends, it is undeniable that the future of the U.S. economy will rest on the shoulders of traditionally underserved communities. We hope this hearing will serve to develop a shared understanding that the fate of the overall U.S housing market is contingent upon the ability of communities of color to access homeownership.

Homeownership has long been considered the gateway to the middle class and one of the primary conduits to wealth creation for American families. This rings particularly true for Latino families, when 39 percent of Hispanic wealth is derived from home equity.[2] Just as the future of the housing market is intrinsic to the success of minority populations, so too is the health of the overall economy tied to the housing market, which contributes close to 15 percent of the United States GDP.[3]

**I) NAHREP's Position in the Market**

Our organization is one of the largest Latino business organizations in the country, with over 30,000 members and more than 80 local chapters. The passion behind our growing membership revolves around one primary mission—advancing sustainable Hispanic homeownership—because we believe homeownership has a unique ability to uplift families, create strong communities, and stimulate a prosperous national economy for all Americans. Homeownership continues to be one of the best solutions to the persistent racial wealth gap between non-Hispanic White and Black and Latino families. Communities with higher homeownership rates report lower crime, lower poverty rates, higher civic engagement, and children of homeowners do better in school, experience fewer behavior problems, and are more likely to grow up to become homeowners themselves.[4]

In the wake of the 2008 housing crisis, the impact of subprime lending and an under-regulated mortgage market devastated the financial system as we knew it. While the impact of the housing crisis was felt throughout the nation, Hispanic families and other families of color were disproportionately impacted. Many fell victim to subprime lending, purchasing homes at the peak of the market that later went

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[1] The terms "Hispanic and Latino" are used interchangeably by the U.S. Census Bureau and throughout this document to refer to people of Mexican, Puerto Rican, Cuban, Central American, South American, Dominican, Spanish decent and decent from other Spanish-Speaking countries.
[2] The Federal Reserve. (2018, May). Report on the Economic Well-Being of the U.S. Households in 2017. Retrieved from https://www.federalreserve.gov/publications/report-economic-well-being-us-households.htm.
[3] Dietz, R. (2019, April 26). Housing Affordability Reducing Housing Share of GDP. Retrieved from https://eyeonhousing.org/2019/04/housing-affordability-reducing-housing-share-of-gdp/.
[4] Haurin, D., Parcel, T. L, and Haurin, R. J. (2001, October). The Impact of Homeownership on Child Outcomes. Retrieved from https://www.jchs.harvard.edu/sites/default/files/liho01-14.pdf

underwater. This, coupled with a lack of asset diversification in non-housing investment vehicles, caused many Latino families to lose their life's savings.[5]

In response to the Great Recession, NAHREP amended its mission for the first, and only, time in its history by adding the concept of "sustainable" to our mission of advancing Hispanic homeownership. The need for strong legislative and regulatory oversight within the mortgage industry is critical to avoid repeating the mistakes of the past. But some of today's regulatory structure excludes otherwise credit worthy families who do not fit neatly into today's underwriting criteria. We firmly believe every individual who desires to become a homeowner and can sustain a mortgage should be granted access to a piece of the American Dream. That is not the case today.

**II) The State of Minority Homeownership**

Annually, NAHREP produces the State of Hispanic Homeownership Report, a publication that tracks how Hispanics are faring with respect to homeownership attainment and other economic indicators. Hispanics have increased their rate of homeownership for the past four consecutive years.[6] In 2018, Hispanics achieved a net gain of 362,000 homeowners, the largest net gain for the population since 2005. And, over the past decade, Hispanics have accounted for 62.7 percent of the net U.S. homeownership growth in total.[7]

Despite this remarkable growth, homeownership rates among Latinos and other minority populations have yet to return to their pre-crisis levels and fall far below those of their non-Hispanic White counterparts. At the end of 2018, the Hispanic homeownership rate was 47.1 percent, compared to 73 percent for the non-Hispanic White population and 64.4 percent for the general population. Additionally, the 2018 Hispanic homeownership rate was over two and half percentage points lower than its peak in 2007.[8] While Hispanic homeownership trends are positive, they should be much higher.

Minority household wealth dropped precipitously because of lending practices preceding the last economic crisis, and, consequently, these households are similarly impacted by their wealth disparity relative to non-Hispanic White households. Today more than ever, broad access to affordable credit, low down payment mortgage products, and sufficient affordable housing stock will be imperative to closing the wealth gap and to making the American Dream a reality for all Americans.

Hispanics are projected to account for more than half of all new potential homeowners over the next several years and for 56 percent of all new homeowners by 2030.[9] Hispanics are also the fastest growing native-born U.S. population, accounting for more than half of the nation's population growth since the

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[5] Limón, N. (2019, April 10). 2019 State of Hispanic Wealth Report. Hispanic Wealth Project. Retrieved from http://hispanicwealthproject.org/downloads/2019-SHWR-Annual-Report.pdf

[6] Calderon, M. (2019, April 9). 2019 State of Hispanic Homeownership Report. NAHREP. Retrieved from https://nahrep.org/downloads/2018-state-of-hispanic-homeownership-report.pdf

[7] U.S. Census Bureau. (2019, February 28). Current Population Survey/Housing Vacancy Survey. Available from https://www.census.gov/housing/hvs/data/index.html

[8] U.S. Census Bureau. (2019, February 28). Current Population Survey/Housing Vacancy Survey. Available from https://www.census.gov/housing/hvs/data/index.html

[9] Goodman, L., Pendall, R., and Zhu, J. (2015, June). Headship and Homeownership: What does the Future Hold? Retrieved from https://www.urban.org/sites/default/files/2000257-headshipand-homeownership-what-does-the-future-hold.pdf

year 2000.[10] And, at a median age of 29, Hispanics are just entering their prime home buying years, further increasing homeownership potential for decades to come. These trends underscore an important reality: Hispanics are driving homeownership growth in America. If the mortgage market fails to support those potential new homeowners along their home buying journey, the nation will bear the adverse economic consequences. To put things into perspective, if population projections come to bear and homeownership rates across ethnic groups remain consistent with current rates, it would mean that the national homeownership rate would decline by nearly 10 percentage points over the next forty years to 55 percent.[11] The last time the U.S. homeownership rate was that low was in the years immediately following World War II.

## III) Structural Barriers to Minority Homeownership Growth: Unique Latino Challenges

Despite the Hispanic role in driving housing demand for decades to come, the current mortgage market is not set up to serve the unique characteristics of Latinos well. Many of today's potential Hispanic homeowners are credit worthy and have sufficient household income to support a mortgage. But, because they are more likely to be self-employed, earn non-W2 wages, utilize pooled resources within a multigenerational household, and pay for household expenses in cash rather than credit, they are more likely to be denied a mortgage loan. Today's mortgage structure and regulations rely too heavily upon easily documented W2 income and do not sufficiently recognize the entrepreneurial practices so prevalent in the Hispanic community. Because of this, lenders consistently fail to accurately assess the risk and repayment capacity of many otherwise credit worthy Hispanic borrowers.

### A) Prevalence of Non-W2 borrowers

People of color are more likely to be self-employed or work non-traditional, "non-W2" jobs than the general population. Of note, while the number of businesses in the U.S. declined in the years following the financial crisis, the number of Latino-owned businesses grew by nearly 50 percent.[12] Additionally, Hispanics and African Americans are more likely to participate in the gig economy, with 31 percent and 27 percent reporting nontraditional earnings, respectively.[13] However, mortgage underwriting rules

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[10] U.S. Census Bureau. (2001 - 2018). DP-1: Profile of General Demographic Characteristics: 2000 and PEPASR6H: Annual Estimates of the Resident Population by Sex, Age, Race, and Hispanic Origin for the United States and States: April 1, 2010 to July 1, 2017. Available from https://www.census.gov/data/datasets/2017/demo/popest/nation-detail.html

[11] Zandi, M. (2019, May 2). Moody's Analytics economist calculations using U.S. Census projections of population shares and Current Population Survey/Housing Vacancy Survey.

[12] Stanford Latino Entrepreneurship Initiative (2017). State of Latino Entrepreneurship. Stanford Graduate School of Business. Retrieved from https://www.gsb.stanford.edu/sites/gsb/files/publication-pdf/report-slei-state-latino-entrepreneurship-2017.pdf

[13] Edison Research. (2018, December). The Gig Economy. Marketplace-Edison Research Poll 2018. Retrieved from https://www.edisonresearch.com/americans-and-the-gig-economy/

remain notoriously challenging for those who don't earn their income through a traditional paycheck from a full-time employer.

### B) Multi-Generational Households and Non-Borrower Income Access

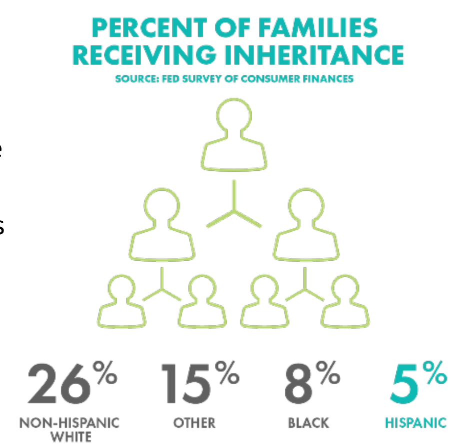
In 2016, 27 percent of the Hispanic population and 26 percent of the Black population lived in multi-generational households, compared to the general population at 20 percent and the non-Hispanic White population at 16 percent.[14] However, mortgage underwriting rules do not allow for any flexibility based on individual family circumstances or the overall financial contributions of members of the household.

### C) Lower Levels of Reliance on Credit

Hispanics, on average, rely more readily on cash than credit to pay for expenses, making their ability to demonstrate credit worthiness difficult by traditional credit scoring models. Millions of Hispanics pay rent, utilities, and cell phone bills with cash, in full and on time, but this pattern does not impact the factors contributing to the credit score. In 2015, the Consumer Financial Protection Bureau (CFPB) published a study finding that 26 million Americans are "credit invisible" and 19 million Americans have "unscoreable" credit files, including those who are deemed to have insufficient information and are deemed to have a "thin credit file."[15] Latinos are almost twice as likely to be "credit invisible" or have "unscoreable" files than their non-Hispanic White counterparts. Yet, mortgage underwriting relies heavily on traditional credit scoring models to assess future credit worthiness. Alternative credit scoring models are currently unavailable in the mortgage space, despite their wide acceptance in the credit card, personal loan, and automotive lending spaces.

### D) Challenges in Saving for a Down Payment

The challenges in saving for a down payment are a significant barrier to homeownership for Latino buyers. Several factors make saving difficult in today's economy: Hispanics are younger than the general population, are concentrated in high-cost metro areas and fall behind other demographics in the transfer of intergenerational wealth. According to the Survey of Consumer Finances, only 5 percent of Latinos reported receiving an inheritance, the lowest rate out of all demographics.[16]




The predominant form of wealth accumulation for Latino families is homeownership and much of the equity that would have been accrued in the last 20 years was wiped

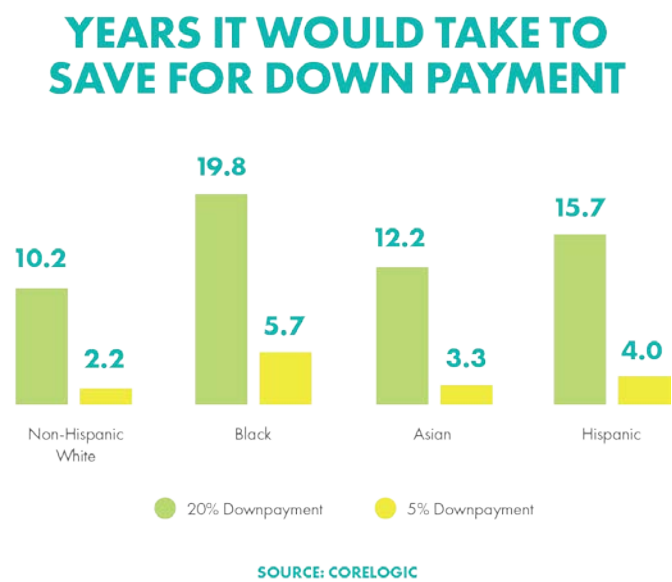
[14] Cohn, D. and Passel, J. (2018, April 5). A record 64 million Americans live in multigenerational households. Pew Research Center. Retrieved from https://www.pewresearch.org/fact-tank/2018/04/05/a-record-64-million-americans-live-in-multigenerational-households/

[15] The CFPB Office of Research. (2015, May). Data Point: Credit Invisibles. Consumer Financial Protection Bureau. Retrieved from https://files.consumerfinance.gov/f/201505_cfpb_data-point-credit-invisibles.pdf

[16] The Federal Reserve. (2017, October 31). Survey of Consumer Finances. Available from https://www.federalreserve.gov/econres/scfindex.htm

out by the Great Recession. The wealth gap between Latinos and non-Hispanic Whites is close to $150,400, coincidently also the value of a home in some geographic areas of the U.S.[17]

To add perspective to many conversations occurring today about low down payment loans, consider that it would take an average Hispanic homebuyer nearly 16 years to save for a 20 percent down payment, compared to just slightly over ten years for the typical non-Hispanic White homebuyer.[18] This is why low 3.5-5 percent down payment options are so important to Hispanic families. The time value of lost equity would stunt the economic growth of another generation unless we protect these low down payment options.




**IV) Actionable Legislative and Regulatory Policy Changes to Increase Minority Homeownership**

Federal policies, whether legislative or regulatory, must be clear, consistent, and coordinated to ensure sustainable homeownership for all credit worthy individuals. To that end, NAHREP offers these actionable federal policy solutions to remove barriers for prospective Latino homebuyers:

**A) Underwriting Guidelines Should Accommodate the Unique Needs of Hispanic Households: Extend the "QM patch" Until it is Replaced by an Alternative that Better Measures a Consumer's Repayment Capacity.**

A key feature of the *Wall Street Reform and Consumer Protection Act of* 2010 (Pub. L. 111-203) are provisions requiring the borrower's ability to repay the loan to be assessed prior to the loan consummation. Significantly, the implementing rules written by the CFPB created a legal safe harbor for lenders who followed traditional, safe, and known underwriting standards and products, known as the "Qualified Mortgage Rule." The brightline Qualified Mortgage (QM) designation is now the predominant

[17] The Federal Reserve. (2017, October 31). Survey of Consumer Finances. Available from https://www.federalreserve.gov/econres/scfindex.htm

[18] McLaughlin, R. (2019, February 21). CoreLogic economist calculations using CoreLogic House Price Index and U.S. Census Bureau Current Population Survey.

form of mortgage finance available. It includes a 43 percent debt-to-income ratio (DTI). During the transition to full implementation, each of the Government Sponsored Enterprises (GSEs), Federal Housing Administration (FHA), Veteran's Affairs (VA), and the U.S. Department of Agriculture (USDA) were granted temporary authority to designate loans that meet their underwriting requirements as bearing QM status. FHA, VA, and USDA finalized rules and no longer use the temporary authority. The GSEs still use their temporary authority to designate loans qualifying for their guarantee as bearing QM status, we call this the "GSE QM Patch." This authority will expire the sooner of the end of conservatorship or January 2021. Were the "GSE QM Patch" to expire without further address, Latino borrowers would be disproportionately impacted. Furthermore, current guidelines make it difficult for self-employed and gig economy workers to gain access to home loan financing.

The expiration of the "GSE QM Patch" would mean that FHA would be the only remaining QM option for working class Latinos, and QM is the only dependable source of lending in the market today. This is problematic because oftentimes FHA loans can be more expensive for borrowers. Furthermore, limiting consumer choices can create market distortions that disadvantage private capital and interfere with the competitive nature of the market for these loans. At least for the full period of conservatorship, access to conventional loans should not be made unavailable to credit worthy Latino borrowers based on the application of the 43 DTI ratio alone.

The Urban Institute, also providing testimony here today, calculates that in 2017, about one in five GSE-backed mortgages originated in 2017 had a DTI ratio over 43 percent, and approximately one in two FHA or VA mortgages had a DTI ratio over 43 percent.[19] Hispanics are 38 percent more likely to have a high DTI loan, the most likely of any demographic.[20]

Additionally, whether the "QM patch" expires or not, FHFA policy alone determines the ability of the GSEs to accept loans that exceed the 43 percent DTI threshold. Specifically, the May 2013 lender letter from the FHFA to the GSEs granting the DTI expansion could easily be revoked or significantly altered by other recommendations about risk-based pricing for this cohort of loans.[21] We urge Congress, FHFA, and the CFPB to coordinate on ensuring lending options for low-to-moderate wealth Latino borrowers when it comes to mortgage credit access in the conventional market.

Furthermore, we support the Ability-to-Repay provision, and we do not want to see a return to irresponsibly-loose underwriting standards. The difficulty today, however, is that the underwriting guidelines for the calculation and verification of a borrower's income and debt provided by the CFPB in "Appendix Q" of the rulemaking are essentially an outdated and—in some places—internally inconsistent version of prior-FHA policy. Income and debt of a borrower must be calculated per the relatively limited provisions and monthly debt payments, including the new house payment, and must

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[19] Kaul, K. and Goodman, L. (2018, August). What, If Anything, Should Replace the QM GSE Patch? Urban Institute. Retrieved from https://www.urban.org/sites/default/files/publication/98949/qualified_mortgage_rule_0.pdf

[20] Goodman, L. (2019, March 25). New Data Confirm the Urgency of Addressing the Expiration of the GSE Patch. Urban Institute. Retrieved from https://www.urban.org/urban-wire/new-data-confirm-urgency-addressing-expiration-gse-patch

[21] Federal Housing Finance Agency. (2013, May 6). FHFA Limiting Fannie Mae and Freddie Mac Loan Purchases to "Qualified Mortgages." Retrieved from https://www.fhfa.gov/Media/PublicAffairs/Pages/FHFA-Limiting-Fannie-Mae-and-Freddie-MacLoan-Purchases-to-Qualified-Mortgages.aspx

stay under 43 percent of the borrower's monthly income. Self-employed borrowers and gig economy workers who have multiple part-time jobs, struggle under these requirements.

The General QM category simply must become more robust, current, and sophisticated before it can support the weight of the mortgage market. As a Committee, we urge you to support efforts to better understand and to more clearly define QM standards in order to accomplish a more flexible view of how debt and income are determined and as only one of the significant factors in determining QM status.

One statutory or regulatory option is to eliminate the DTI calculation (not its evaluation) and rely instead upon the higher-cost mortgage rules for presumptive and rebuttable presumption compliance thresholds. Roughly stated, the APOR + 150 basis points would dictate the new QM status rather than the 43 percent DTI in a new risk-based pricing model.

A second alternative is for Congress to expressly delegate QM standard setting to an independent body charged with evaluating credit access and consumer protections regularly and make flexible adjustments that are clearly communicated to the market.

Either option is preferable to the constraining and strenuous regulatory ambiguities found in today's Appendix Q.

### B) Preserve and Protect Affordable Access to Low Down Payment Mortgages

Taxpayer support for mortgage lending should guarantee broad access to credit for all credit worthy borrowers, with a particular sensitivity toward the needs of first-time homebuyers and communities underserved by the private sector. Access to credit needs to be consistently available in all geographic areas and throughout the ebbs and flows of the economic cycle.

Hispanic families, not unlike other families of color and most first-time homebuyers, are heavily reliant on low down payment products as a means to achieve homeownership, whether provided through FHA guarantees or through private mortgage insurance.

### C) Support FHA Program Improvements

Hispanic borrowers are more than twice as likely (42.8 percent) to have an FHA loan than non-Hispanics (20.6 percent),[22] yet the agency is understaffed, underfunded, and operating within the constraints of outdated technology and computer systems. As a result, the housing market is doing a disservice to the changing face of America's homeowners. Congress must prioritize efforts to fund FHA's much needed modernization efforts and no federal housing finance policy should be devoid of a plan for how to do so.

NAHREP would support direct budget authority for the FHA, rather than through the U.S. Department of Housing and Urban Development (HUD), along with granting the FHA the ability to retain a portion of its insurance revenues in order to increase spending on staffing and modernization efforts. This would give the FHA more effective operational and risk management capabilities.

Additionally, we urge further clarification of FHA lender liability under the False Claims Act (FCA). There is still too much uncertainty about what types of lender errors can trigger liability, which can result in penalties several times the loan amount. As a result, many of the largest lenders have chosen to

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[22] Polygon Research. (2018, March). Hispanic Access to Mortgage Finance-Role of Gender and Ethnicity. Insights based 5-year analysis of 2013-2017 HMDA data.

abandon FHA lending altogether, further limiting credit options for communities of color with lower credit scores.

**D) Housing Finance Reform Must Ensure Access to Credit to Underserved Segments of the Population that the Private Market Fails to Serve in an Affordable and Sustainable Fashion**

Any conversations around housing finance reform should be done in a coordinated fashion across all Federal housing agencies. The expiration of the "QM Patch," the end of conservatorship for the GSEs and the ability for FHA to continue to serve low-to-moderate wealth and underserved borrowers are all interconnected.

Any housing finance reform proposal should have a clear commitment to serve low- to-moderate wealth borrowers, fully funding programs that serve underserved communities such as the Housing Trust Fund and the Capital Magnet Fund and sets clear goals and strategies for how to meet those commitments. The following are key principles that must guide any future GSE reform conversations to ensure the protection and expansion of access to credit for underserved communities:

**A clear commitment to serve low- to moderate-wealth borrowers:** Any new system must include a strong duty-to-serve mandate that incentivizes serving all segments of the population. We support fully funded programs that serve underserved communities, such as the Housing Trust Fund and the Capital Magnet Fund, and the establishment of clear goals and strategies for how to meet those commitments.

**Ensure broad credit access and encourage innovation:** Any new system that replaces the GSEs should broaden current levels of access for credit worthy borrowers and should encourage innovation around credit access.

**Enforceable mechanisms must exist to ensure affordable housing goals are met:** Any new system should include enforceable mechanisms by the Federal Housing Finance Agency (FHFA) tied to the government guarantee that ensure the enterprises or their replacement serve the entire market.

**Equitable secondary market access:** Any new system must secure a liquid, deep, and economic efficient secondary market that services the entire nation on roughly the same terms.

**Protects affordable mortgage financing:** Protects the 30-year fixed rate, fully pre-payable mortgage, and overall access to affordable, long term mortgage financing for a wide range of credit worthy borrowers.

**E) Secure Access to Government Sponsored Loans for DACA borrowers**

We saw an increased rate of denials last year for DACA recipients applying for FHA loans based on the Administration's interpretation of existing guidelines. This practice sets a dangerous precedent. FHA should not get ahead of the Judiciary to decide immigration law. Unilateral determinations on whether "legal residency" suffices to establish "legal status" verges on arbitrary delineations and are inconsistent with other policies for legal immigrants, even those with non-permanent visas. These practices appear to be unfairly targeting otherwise eligible applicants for political purposes, and it has no place in mortgage policy. NAHREP urges the Committee to ensure equitable treatment of DACA recipients in the financial sector by protecting their ability to secure government sponsored mortgages and thereby continue contributing to the U.S. economy.

**F) Promote diversity in the housing workforce**

NAHREP estimates that 40 percent of all real estate transactions utilize the Spanish language at some point in the transaction and that as much as 25 percent of transactions occur entirely in Spanish. Yet, current estimates indicate 13 percent of credit counselors and loan officers and 10.8 percent of real estate agents are Hispanic.[23] With Latinos accounting for most of the net gains in U.S. homeownership, the lack of a sufficient number of culturally competent professionals within the real estate and housing finance sectors makes an already complex transaction more complicated and exacerbates the mortgage underwriting challenges that exist today. NAHREP urges the House Financial Services Subcommittee on Diversity and Inclusion to take on the issue of diversifying the housing workforce. A diverse lending community stimulates increased homeownership rates for minority borrowers.

**G) Increase the housing inventory stock of affordable homes**

Finally, we would be remiss if we did not mention the need to increase the housing inventory stock of affordable, owner-occupied housing, quite possibly the biggest barrier to minority homeownership today. Even as Hispanics overcome access to credit issues, finding a home to purchase has never been more difficult. Today, the U.S. is experiencing record-level housing inventory shortages and, as a result, is driving up prices of existing homes for sale. In 2018, nationwide there were 10 percent fewer homes on the market than the prior year, and, in places where home values are appreciating the fastest, there were up to 40 percent fewer available homes to purchase.[24] The housing supply shortage is most acute in markets with high concentrations of Hispanics, exacerbating challenges in homeownership attainment. For one, foreclosed homes should go to first-time homebuyers, not investors. NAHREP commends the GSEs and HUD for piloting a program that offers a "first-look" to foreclosed homes to non-profits in order to increase the likelihood that these homes will go to first-time homebuyers or low- to moderate-income renters. Furthermore, any Congressional infrastructure bill should include stipulations incentivizing transit-based development to increase the supply of the much needed stock of affordable homes for sale.

**Conclusion**

The wealth gap between people of color and non-Hispanic White populations cannot be denied. Homeownership is one of the most important means of bridging the wealth gap, and it is our goal at NAHREP to ensure financial policies reflect the needs of all segments of the U.S. population.

While we are proud to see a resilient Latino population consistently increasing its rate of homeownership for the past four years, there is still more work to be done to ensure the long-term prosperity of underserved communities and the overall U.S. economy. A failure to address the issues

[23] Bureau of Labor Statistics from the Current Population Survey, Table 11. Employed persons by detailed occupation, sex, race, and Hispanic or Latino ethnicity (2018 version).
[24] Zillow. (2018, January 18). Inventory Shortage at Crisis Levels in Nation's Hottest Housing Markets. Retrieved from http://zillow.mediaroom.com/2018-01-18-Inventory-Shortage-at-Crisis-Levels-in-Nations-Hottest-Housing-Markets

raised today can result in a significant shrinking of the housing market and, as a result, the entire U.S. economy. Now is not the time to curtail access to the very products that have catapulted so many working class Americans into the middle class. We are at a crossroads to rethink our housing finance structure to ensure that it adequately serves the changing face of America's aspiring homeowner.