



MORTGAGE BANKERS ASSOCIATION

March 15, 2026

The Honorable Mike Johnson
Speaker
U.S. House of Representatives
The Capitol
Washington, D.C. 20515

The Honorable Hakeem Jeffries
Minority Leader
U.S. House of Representatives
The Capitol
Washington, D.C. 20515

The Honorable French Hill
Chairman
Committee on Financial Services
U.S. House of Representatives
2129 Rayburn House Office Building
Washington, D.C. 20515

The Honorable Maxine Waters
Ranking Member
Committee on Financial Services
U.S. House of Representatives
2221 Rayburn House Office Building
Washington, D.C. 20515

Dear Speaker Johnson, Leader Jeffries, Chairman Hill, and Ranking Member Waters:

On behalf of the Mortgage Bankers Association (MBA)¹, I write to you regarding the *21st Century ROAD to Housing Act*, as passed by the full Senate just last week. The legislation represents a positive effort to help boost housing supply, expand affordable homeownership, reduce unnecessary regulatory burdens, and embrace modern manufactured and modular housing.

MBA strongly *supported* both individual proposals (S. 2651 and H.R. 6644, respectively) that led to the formation of the current bill (H.R. 6644, as amended) that passed the full Senate. As you consider next steps regarding this comprehensive housing package, MBA looks forward to collaborating with you and your respective staff members, your Senate counterparts, and key officials within the administration to further refine and improve this significant proposal. MBA also asks that you consider our views regarding specific sections of the legislation and act to amend and improve the bill, as suggested:

Section 213 – FHA Multifamily Loan Limits

MBA strongly *supported* this section during its prior consideration by both the House and Senate. Just last month, the full House voted to update the *statutory* loan limits for Federal Housing Administration (FHA) mortgage insurance for residential multifamily construction for the first time since 2003 to better reflect current costs, while also providing for the use of a superior inflation adjustment formula/index for setting those limits going forward. The Senate Banking Committee's original version of S. 2651 required FHA to *study* the outdated current multifamily loan limits and

¹ The Mortgage Bankers Association (MBA) is the national association representing the real estate finance industry, an industry that employs more than 390,000 people in virtually every community in the country. Headquartered in Washington, D.C., the association works to ensure the continued strength of the nation's residential and commercial real estate markets, to expand homeownership, and to extend access to affordable housing to all Americans. MBA promotes fair and ethical lending practices and fosters professional excellence among real estate finance employees through a wide range of educational programs and a variety of publications. Its membership of more than 2,000 companies includes all elements of real estate finance: independent mortgage banks, mortgage brokers, commercial banks, thrifts, REITs, Wall Street conduits, life insurance companies, credit unions, and others in the mortgage lending field. For additional information, visit MBA's website: www.mba.org.

report to Congress on both their appropriateness and the adoption of a new inflation adjustment index. It also granted FHA rulemaking authority to adjust those loan limits to better match housing market conditions and costs and enhance affordability pending the results of the study.

Unfortunately, the language for this section within the current Senate bill contains drafting errors that would oblige FHA to actually **decrease** the loan limits to levels **below** those calculated by HUD staff under current law authorities, thereby negating the underlying purpose of the section as introduced – and as negotiated by the respective House and Senate authorizing committees this year and last. **MBA urges you to fulfill the provision’s true intent by amending Section 213 with the language of H.R. 6132, as offered by Reps. Monica de la Cruz and Ritchie Torres (and included last month as Section 106 of the original House-passed H.R. 6644).**

Section 901 – Institutional Investor Ban to Purchase of Single-Family Housing

MBA is concerned about the unintended consequences of policies contained within this section of the current Senate bill, specifically pertaining to long-term investment in the rental housing market. Section 901 would preclude firms owning more than 350 units from purchasing any additional units. Although there are carve-outs for certain types of build-to-rent transactions, they come with a requirement to dispose of those holdings after seven years – with *existing previously* built-to-rent properties not explicitly excepted. Moreover, the definition of “single-family home” could be read to include rental townhome communities and other attached units. MBA believes the language of the section would constrain capital for rental housing – especially for build-for-and built-to-rent housing communities. **MBA (along with other major housing industry groups) urges the following changes to Section 901:**

On page 288, insert before line 1:

“(L) Purchased as a community of five or more contiguous rental units.”

“(M) Purchased with support from the programs described in Section 42 of the Internal Revenue Code, or another affordable housing program in which rents are restricted.”

On page 293, line 18, strike the following:

“(A), (B), or”

On page 294, lines 5–6, strike the following:

“(A), (B),”

Additional Concerns

MBA continues to have reservations about **Section 602** (the prior “VALID” Act) of the current Senate bill, which amends FHA’s Informed Consumer Choice Disclosure (designed to provide a price comparison between FHA and GSE products) to also include a comparison on VA Home Loan program pricing. While MBA supports this section’s intent, the prescribed steps, if enacted, will be costly to implement and are unlikely to result in any additional VA loan issuance given the processes lenders already have in place to inform consumers of their choices well before reading Uniform Residential Loan Application (URLA) documents.

MBA also has significant concerns with **Section 101** of the current Senate bill which would require servicers on all government-backed loans (FHA, VA, RHS and PIH Section 184) to offer “foreclosure mitigation” counseling to all borrowers that become 30-days delinquent. The provision further requires the FHA Mutual Mortgage Insurance Fund (MMIF) to cover the costs of this counseling – not only for FHA, but for the other agencies as well.² By way of contrast, MBA has traditionally supported reasonable funding levels for housing counseling through the congressional appropriations process. Expenditures from the MMIF are limited by law to activities necessary to conduct the FHA single-family insurance program. Using the MMIF to pay for counseling for other agency programs does not appear to be permissible or wise.

Conclusion

MBA urges you to establish a process – either through a formal conference committee or otherwise – for the House to continue working with the Senate and the administration to refine and improve this important proposal (as suggested above). We look forward to the opportunity to collaborate further with you and other key stakeholders to improve this important package before it reaches President Trump’s desk for signature.

Thank you in advance for the consideration of the detailed views expressed within this letter.

Sincerely,



Bill Killmer
Senior Vice President
Legislative and Political Affairs

cc: The Honorable Steve Scalise, Majority Leader
The Honorable Katherine Clark, Minority Whip
The Honorable Tom Emmer, Majority Whip
The Honorable Pete Aguilar, Democratic Caucus Chairman
The Honorable Mike Flood, Chairman, Housing & Insurance Subcommittee
The Honorable Emanuel Cleaver, Ranking Member, Housing & Insurance Subcommittee
The Honorable Monica de la Cruz
The Honorable Ritchie Torres

² The provision conflicts with Section 202 of the *National Housing Act* that establishes the MMIF and limits expenditures from the fund to paying insurance claims and loss mitigation and property disposition expenses *related only to FHA-insured loans*.