

Home Mortgage Disclosure Act Public Hearing, August 5, 2010
Panel Two: Alexis Iswanisiw

Alexis Iswanisiw:

Good morning. My name is Alexis Iwanisiw, and I'm a Project Associate for NEDAP. Thank you for holding this hearing and for giving us the opportunity to discuss home improvement, Regulation C, and to the data provided under HMDA.

For the past 15 years, NEDAP, the organization where I work, has used HMDA data effectively in a wide variety of activities, and it really has been a vital component of our work. And as such, we really appreciate the strengths of the data and especially the loan-level data sets, but it's always been confronted by weaknesses in the past; specifically, the lack of underwriting criteria.

We've used this data in a variety of ways to help community-based organizations with CRA challenges, to help legal services organizations identify possible discriminatory lending practices, and statewide campaigns for improving policy on responsible lending, and also in our foreclosure prevention, education, and outreach work.

So there are three main recommendations that I'd like to make today. The first is that the Dodd-Frank Act revisions to HMDA are a huge step in the right direction, but they do lack some important criteria; specifically, things people have been talking about all day -- debt-to-income ratio, combined loan-to-value ratios, and escrow status. In addition, the lack of specificity about how the data should be provided is also a great opportunity to shape the data set and ensure that all the data will be available at the loan level.

And as Keith said, I'm really looking forward to the later discussion on how we can actually implement that and protect borrower privacy while still maintaining low-level data.

Second, we recommend that the scope of HMDA be increased to include more information on multifamily housing. It's really important in New York City. It's a huge sort of housing stock for us. And we'd like both construction and permanent loans reported, and also to have banks report outside their CRA assessment areas as well. We also recommend that all types of home-secured loans be reported, as people have talked about, and home equity lines of credit. We second people have been saying about that all morning.

Third, we'd like to prioritize HMDA enforcement and make sure that banks are reporting data in an accurate and timely manner. And the recent settlement with Citi Financial has shown that hasn't always been the case, and we've asked the Board to take a leadership position in making sure all the regulations are enforced.

Finally, I'd also like to second the recommendations that people are making this morning about adding loan-modification data, especially HAMP-modification data, as a HMDA-reportable transaction. The HAMP modification has been one of the primary policies for addressing the foreclosure crisis and we right now have very limited data to assess whether or not our policy responses have been effective in helping the people who have been hardest hit -- borrowers in

communities, borrowers in communities of color. And so, it's vital that we have that information on an ongoing basis to make sure that our policy response is appropriate and doing what we hope it will do.

So I'd like to thank you again for the opportunity to speak today, and I look forward to our discussion later.