

May 29, 2026

The Honorable William Pulte
Director
Federal Housing Finance Agency
400 7th St. SW,
Washington, DC 20219

RE: Implementing President Trump’s Executive Order “Promoting Access to Mortgage Credit”

Dear Director Pulte,

On behalf of the undersigned organizations, we write to express our support for the policy opportunities presented by President Trump’s March 13, 2026, Executive Order “Promoting Access to Mortgage Credit.”¹ Pursuit of the policy goals outlined in the Executive Order, by the Federal Housing Finance Agency (FHFA) and other agencies, has the potential “to improve the availability and affordability of mortgage credit.”

To that end, we request that FHFA work to fulfill the directive of Section 6(a) of the Executive Order, which states:

The Director of FHFA, along with other federal agencies, shall consider, as appropriate and consistent with applicable law:

- i. modernizing appraisal regulations and guidance to expand the use of alternative valuation models, desktop and hybrid appraisals, and artificial intelligence valuation tools;
- ii. simplifying appraiser qualification requirements; and
- iii. reducing appraisal requirements for low-risk transactions, including low loan-to-value refinancing and small-balance loans; and setting clear appraisal timelines.

Our organizations agree that President Trump’s EO presents an opportunity for appraisal modernization to improve the quality, efficiency, and integrity of residential property valuation. As a result of the dominant role that Fannie Mae and Freddie Mac (the GSEs) play in the mortgage marketplace, and the expanded use of alternative valuation methodologies that has occurred over the last few years, FHFA and the GSEs are in an optimal position to contribute to the transformation of appraisal policies, practices, and processes.

We believe that the marketplace and consumers would benefit from expanded use of “hybrid” valuation methodologies that leverage data and technology to complement and enhance the physical review of the property. Encouraging use of a continuum of valuation methodologies

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/>.

that vary depending on the risk of the transaction, in conjunction with clear and consistently applied standards, judicious oversight and transparency, has already improved the quality of property valuation and the efficiency of the process. As highlighted in the President's Executive Order, we recommend one change "to expand the use of alternative valuation models, desktop and hybrid appraisals," that would expedite alternative valuation methodologies: allow borrowers, real estate agents, and loan officers to photograph the interior and exterior of the property, in accordance with a set of specified authentication and validation requirements, and submit the photos using a secure portal to prevent tampering and fraud, with appropriate quality control in place. This protocol was successfully utilized during the COVID-19 pandemic and significantly improved the efficiency of the valuation process.

Our organizations also recommend expanded deployment of value acceptance (permitting waiver of the traditional appraisal requirement for eligible low-risk properties) by the GSEs. Experience demonstrates that waivers have provided significant cost savings to consumers with no deterioration in the safety and soundness of the valuation process. However, value acceptance is limited to properties with values at or below \$1 million, regardless of loan size. This cap has not increased since Fannie Mae first introduced the concept in 2016, when the high-cost area loan limits for GSE loans were just \$625,500. Today that loan limit is \$1,249,125. In other words, the value acceptance limit has not moved in tandem with increases in loan limits, creating misalignment between today's property values and waiver policy parameters. We propose raising the value acceptance limit proportionally to \$2 million properties and recommend reviewing the value acceptance limits annually, when the GSEs update loan limits.

Lastly, the GSEs should continue to find ways to improve the reliability of valuations. Our organizations believe that the more data and information that is available to appraisers, the more accurate and reliable the valuation process can be. Expanded data access could also improve the speed and cost of valuations. The most expansive set of property data (including rural markets) – accumulated from the submission of appraisal data to the GSE Uniform Collateral Data Portal – resides with the GSEs. To improve appraisal reliability, we recommend that the GSEs provide appraisers with special, limited access to the appraisal dataset, possibly using features from Collateral Underwriter (CU) and Loan Collateral Advisor (LCA) to the extent permissible under applicable law and governing contracts. The GSEs currently provide system access to mortgage lenders and appraisal management companies to enhance appraisal reliability, but neither the appraisal data nor the tools are available to appraisers. Circumscribed appraiser access to the market data within these systems could enhance appraisal quality, reduce appraisal turn times and cost, and improve borrower experience. We acknowledge that giving appraisers full access to CU and LCA could be problematic, as it includes analytics and property ratings that could unduly influence the appraiser's assessment of value. However, a limited release of market information to appraisers would increase appraisal reliability and reduce friction in the appraisal process without influencing the appraiser's judgment.

Our organizations believe that the GSEs could serve a critical role in establishing standards that modernize the valuation process across the entire housing finance ecosystem. We

look forward to working with FHFA to improve the efficiency and quality of the valuation process. Thank you for your consideration.

Sincerely,

American Bankers Association
America's Credit Unions
Broker Action Coalition
Community Home Lenders of America
Housing Policy Council
Independent Community Bankers of America
Mortgage Bankers Association
National Association of Mortgage Brokers