Mortgage loan performance data and background: Supports view that low down payments were not the cause of the housing crisis.

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- Skin in the game
 - Average LTVs did not significantly change in the run-up to the crash
 - JCHS-Harvard study http://housingperspectives.blogspot.com/2013/04/how-much-did-ltvs-actually-rise-during.html
 - The <u>Survey of Consumer Finances</u> (SCF) from the last 20 years finds that there
 was actually relatively little change in the distribution of LTVs through the boom
 years.
 - Outstanding mortgage debt did increase substantially; it essentially kept pace with the rise in home prices.
 - The flood of underwater owners was thus less the result of a greater share of owners having little equity cushion and more the result of the tremendous collapse in housing prices.
 - Center for Responsible Lending.
 - Between 1990 and 2009, more than 27 million mortgages were made with low down payments.
 - These loans did NOT carry the risky features found in subprime loans.
 - Increasing down payment requirements would materially shrink the mortgage market with little increase in loan performance.
 - Based on average home prices, it would take 14 years for the typical American family to save enough money for a 20% down payment.
 - Homeownership remains a key driver of personal and national economic prosperity, and will be fostered by responsible low down payment loans.

Loan performance and loss rate stats

GSEs were 4 to 6 times less than commercial banks on average.

Avg loss rates	1971-2007	2008-2011
GSEs	4 bps	52 bps
Commercial Banks	15 bps	184 bps

(Ex: a loss of 1bp on a \$1B loan portfolio = \$100,000)

FHFA study

Study provided a comparison, on an apples-to-apples basis, GSEs loan originations with those for private label securitizations.

Segmented loans four ways:

1. ARMs-versus-fixed-rate

- 2. By vintage
- 3. By FICO score
- 4. By loan-to-value ratio

In almost every one of 1,800 different comparisons covering years 2001 through 2008, GSE loan performance was exponentially better.

On average:

- 1. GSE fixed-rate loans performed 4 times better
- 2. GSE ARMs performed 5 times better

The low down payment blame is a race to the bottom narrative:

- 1. Theory based on a series of false equivalencies
 - a. Low-income borrowers are considered no different from subprime borrowers
 - b. No different from those who took out two-year teaser rates or liar loans
- 2. Implies that GSE securitizations are the same as private label securitizations
 - a. As if concepts like, "nonrecourse," or "originate to distribute," versus "buy and hold," are not meaningful.

Risk retention

- 1. GSEs' retention of credit risk is diversified among huge portfolios of low risk loans booked before, during and after the bubble.
- 2. By way of contrast, a private label securitization is a single static portfolio in liquidation

HFA lending performance stats

- 1. State of New York Mortgage Agency (SONYMA)
 - a. September 30, 2012, just 3.7% of single-family borrowers 60 days or more delinquent
 - b. Compare with 10.9 percent of all borrowers in New York State (MBA).
 - c. Prior to the recent economic crisis, SONYMA's 60+ day default rate never exceeded 2%
- 2. North Dakota Housing Finance Agency
 - a. Delinquent mortgages consistently around 4 percent
 - b. Nearly identical to the MBA delinquency rates for all mortgage loans in North Dakota, despite NDHFA being focused on serving low- and moderate-income households
- 3. Pennsylvania Housing Finance Agency Q-3 2012 conventional loans
 - a. 90 plus-day delinquency rate 2.98%
 - b. Foreclosure rates of 0.99%
 - c. Far below the equivalent rates for all conventional loans in Pennsylvania

Relative to other affordable lending channels

- 1. Limited review of HFA loan data conducted by Fannie Mae in 2011
 - a. HFA-financed loans performed significantly better than other Fannie Mae affordable housing loans.

2. Limited study NCSHA 2011 of the relative performance of HFA-financed and non-HFA-financed loans insured by FHA found that, in a large majority of the states, HFA-financed loans had lower long-term delinquency and foreclosure rates than non-HFA loans.

Individual HFAs' loan performance records demonstrate the impact of their responsible underwriting standards and commitment to sustainable homeownership.

For example:

- 1. FHA-insured loans purchased by the Connecticut Housing Finance Agency have lower foreclosure rates than comparable FHA loans in the northeast.
- 2. Loans financed by the Delaware State Housing Authority and serviced by U.S. Bank have a 60 days or more delinquency rate of just over 2 percent, compared with a national 60 days or more rate of 8.3 percent.
- 3. Virginia Housing Development Authority loan foreclosure rates on FHA and conventional loans are both under 1 percent. This is 3.2 percentage points under the national FHA foreclosure rate and 2.5 percentage points lower than the national foreclosure rate for conventional loans.