



July 19, 2016

The Honorable Melvin L. Watt
Director
Federal Housing Finance Agency
Constitution Center
400 7th Street, SW
Washington, D.C. 20219

Re: Proposed Language Preference Question and the Uniform Residential Loan Application (URLA).

Dear Director Watt:

The Texas Bankers Association has been informed that there is a language preference question being considered by the FHFA and the CFPB for inclusion in the URLA. I am writing to strongly urge the FHFA not to include the language preference question in the form.

Texas has been a majority-minority state for over a decade, and many of our communities speak languages other than English and Spanish. In fact, the seventh largest school district in the country, the Houston Independent School District, educates students that speak over 100 different languages. The inclusion of a language preference question in the form will most likely lead to confusion in customers and potential liability for lenders.

The proposed inclusion of the question raises a number of concerns for us. For example, how will the data generated be stored? Who will have access to the data? Will this information, possibly indicating only preferences rather than proficiencies, be used in fair lending examinations?

If the goal of including this question is to collect data on language preferences, we believe that the FHFA has alternatives such as census data and the surveys conducted by the Federal Reserve and the FHFA.

Thank you for the opportunity to let us share our views.

Sincerely,

J. Eric T. Sandberg, Jr.
President and CEO
Texas Bankers Association