

Federal Reserve Bank of Chicago

Rethinking U.S. Housing Finance



Patrick J. Lawler

Associate Director and Chief Economist

Federal Housing Finance Agency

May 6, 2010

Chicago, IL



The views expressed are mine and not those of the Federal Housing Finance Agency.

Overview of Remarks



- Selected housing finance problems and some possible approaches
- Private market option or new GSEs ?
- An example of a low-risk GSE

Selected Housing Finance Problems



- Underwriting
- Loan terms
- Servicing Model
- Cross subsidies
- Implicit guarantees



- High LTVs: Is 90%, with mortgage insurance, high enough?
- Documentation
- Teasers
- Borrower credit quality

Where and how should these be addressed?



- Availability of subordinate liens—right of refusal for first lien?
- Availability of refinance loans—prepayment fees?
 - Net economic costs
 - Net increase in financial risk

Reconsider tax deductibility?



- Timing of servicing payments poorly aligned with timing of costs
- Overreliance on reps and warranties



- Low risk loans subsidize high risk loans at the Enterprises
- Loans from small lenders subsidize loans from big lenders

Implicit Guarantees—Private Market Option



Can we simply eliminate implicit guarantees without adding more explicit guarantees?

- Is FHA/GNMA enough to address low-income housing and first time (low FICO, high LTV) home buyers?
- Any reason to aid other borrowers?
 - Market efficiency vs. economic growth
- Market stability—Have investors learned enough lessons to avoid new housing bubbles for a long time?
- If they haven't, can the government price credit risk without subjecting itself to sizeable losses?
- Would the absence of government guarantees promote less risk-taking?
- Is multifamily housing an exception?
- Government role in standardization?

Selected Issues in GSE Design



- TBTF and systemic risk
- Concerns about cooperatives
- Government insurance funds and risk pricing
- Countercyclical capital requirements

Can We Design Inherently Safe GSEs?

- Less interest rate risk if asset portfolios are minimal
- Less credit risk if government takes the catastrophic portion and charges for it
- Even less credit risk if most of the rest of it is distributed to private investors

Possible Securitization Model (Example)



- All single-family MBS use senior/sub structure per Davidson
- Government guarantees senior piece, corresponding to cat risk, for a fee
- GSEs initially retain sub tranches (~2% of UPB?)
- Once a month or so, GSEs required to sell mega Subs without any guarantee
 - Aggregation by originator would facilitate market discipline
 - Aggregation by LTV/FICO could reduce cross subsidies
 - Broad aggregation would maximize liquidity

Other Possible GSE Features



- Market sales used to calibrate g-fee and cat risk pricing
- GSEs required to retain a small but significant portion (10%?) of sub tranches to help align GSE incentives with government
- Sub tranches must be capitalized at 100%
- GSEs retain total control of loss mitigation (including loan modification)
- Multifamily could remain closer to current model but more focused on securitization



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