



November 28, 2022

**Submitted Electronically**

Comment Intake  
Mortgage Refinances and Forbearances RFI  
Consumer Financial Protection Bureau  
1700 G Street NW,  
Washington, DC 20552

**Re: Request for Information Regarding Mortgage Refinances and Forbearances; CFPB–2022–0059**

Dear Ladies and Gentlemen,

The Wisconsin Bankers Association (WBA) is the largest financial trade association in Wisconsin, representing nearly 200 state and nationally chartered banks, savings and loan associations, and savings banks. WBA appreciates the opportunity to comment on the Consumer Financial Protection Bureau's (CFPB) request for information regarding mortgage refinances and forbearances (RFI).

CFPB issued the RFI seeking comment about ways to facilitate mortgage refinances for consumers who would benefit from refinancing, especially consumers with smaller loan balances, and ways to reduce risks for consumers who experience disruptions in their financial situation that could interfere with their ability to remain current on their mortgage payments. WBA supports CFPB's overall goal of ensuring that consumers have access to the financial opportunities presented by the housing finance system. However, within the RFI CFPB states concerns over the availability of refinance opportunities for consumers with smaller loan balances, and barriers preventing consumers from accessing falling interest rates. WBA has not identified any barriers to consumer access to falling interest rate, or availability of refinancing opportunities, regardless of loan amount, in Wisconsin.

As CFPB identified in its 2021 Mortgage Market Activity and Trends Data Point article, The refinance boom dominated mortgage market activities in 2019 and 2020 and peaked in March 2021. This was true in Wisconsin, where banks worked to provide opportunities to their communities to take advantage of lower rates as they continued to drop, regardless of loan amount. Given that the COVID-19 pandemic also affected borrowers during this time, banks worked to provide workouts, accommodations, and assist borrowers in taking advantage of CARES Act provisions and other government assistance. This was a busy time that saw Wisconsin banks doing what they do best: working with their communities to provide financial services including refinance and modification opportunities, as well as working with borrowers to address the needs of their unique situations. WBA is not aware that loan amount affected availability of any assistance.

In its RFI, CFPB also raises concerns over refinancing programs which might present risks to borrowers, through additional costs or reduction in equity. WBA would emphasize that

Wisconsin banks provide opportunities to assist borrowers, and in evaluating their options, are well aware of potential risks, and ensure that such risks are well known and understood by their customers. Wisconsin banks are not creating overly complex products, or confusing alternatives. Rather, banks are providing what their customers need, and are adequately tailoring those products to their customer base and local area.

### **Conclusion**

WBA supports CFPB's efforts to gather information and further its understanding of the mortgage refinancing market. However, WBA does not believe that any further action from CFPB is necessary in this area. Wisconsin banks are already well aware of the concerns CFPB raises regarding the refinancing market and have worked for many years to create products and build relationships with their customers and communities to best serve their needs. While it is important that CFPB understand the refinancing market, WBA is concerned that any further agency action would only negatively impact an area that Wisconsin banks are already fully familiar with and working effectively to meet the needs of their borrowers.

WBA appreciates the opportunity to comment on CFPB's proposed rulemaking.

Thank you,

A handwritten signature in cursive script that reads "Rose Oswald Poels".

Rose Oswald Poels  
President/CEO