



December 16, 2025

**DEPARTMENT OF AGRICULTURE**

**Rural Housing Service**

**7 CFR Part 3555**

**[Docket Number RHS–21–SFH–0017]**

**RIN 0575–AD08**

**Single Family Housing Guaranteed Loan Program**

**AGENCY: Rural Housing Service | Department of Agriculture  
(USDA)**

**ACTION: Proposed rule**

RE: Support for Proposed Delegated Underwriting Rule; Expression of Interest in Pilo

The Community Home Lenders of America (CHLA)<sup>1</sup> writes to provide a list of small independent mortgage banks that currently utilize USDA-Rural Development’s (RD) 502 Single Family Housing Loan Guarantee Program (SFHLGP) and request to participate in a delegated underwriting pilot program referenced in a proposed rule published on August 4, 2024 in the *Federal Register*

These firms are small, community based lenders that primarily service rural communities. CHLA staff and these members appreciate USDA-RD’s consideration of its strong interest in participating and to that end would welcome the opportunity to further discuss their interest.

In addition, while the comment period has closed, CHLA strongly supports the proposed rule, which implements Section 201 of the Housing Opportunity Through Modernization Act of 2016. Allowing lenders to have delegated underwriting authority aligns the program with the FHA and the VA as the proposed rule indicated. Such authority will better serve the interests of prospective borrowers and lenders by safely and soundly expediting the underwriting approval process. CHLAs members are familiar with such authority as they already have such authority under the FHA and VA programs.

Sincerely,

COMMUNITY HOME LENDERS OF AMERICA

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<sup>1</sup> CHLA is the only national trade association focused exclusively on small and mid-sized independent mortgage banks (IMBs).