



Submitted electronically via www.regulations.gov

Frank Cassidy
Principal Deputy Assistant Secretary
Office of Housing—Federal Housing Administration
Department of Housing and Urban Development
451 7th Street SW, Room 9262-9280
Washington, DC 20410-0500

Re: Request for Information Regarding Buy Now Pay Later Unsecured Debt Docket No. FR-6547-N-01

Dear Mr. Cassidy:

The Housing Policy Council (“HPC”)¹ appreciates the opportunity to submit this comment letter in response to the Federal Housing Administration’s (“FHA”) Request for Information (RFI)² on the implications of Buy Now Pay Later (BNPL) lending on housing affordability and stability. HPC appreciates FHA’s proactive identification of an emerging financial product in the mortgage lending space, and its willingness to engage with stakeholders as to how this product should be incorporated into the mortgage underwriting process. This type of thought leadership and engagement is noteworthy and appreciated.

We believe it is both timely and prudent for FHA to explore the implications of Buy Now Pay Later products on the sustainability of mortgage lending. As noted in the RFI, and as validated by HPC members experience, there is insufficient data and insight regarding consumer use of these products and the impact on borrower performance.

As FHA is aware, BNPL lending is not regularly reported on borrower’s credit reports. While some BNPL companies are in the early stages of delivering data to the credit bureaus, this is not being done in a consistent manner and is not being provided to all of the credit bureaus. Until

¹ The Housing Policy Council is a trade association comprised of the leading national mortgage lenders and servicers; mortgage, hazard, and title insurers; and technology and data companies. Our interest is in the safety and soundness of the housing finance system, the equitable and consistent regulatory treatment of all market participants, and the promotion of lending practices that create sustainable homeownership opportunities in support of vibrant communities and long-term wealth building for families. For more information, visit www.housingpolicycouncil.org.

² See Federal Register [Notice](#), Vol. 90, No. 119, June 24, 2025.

there is uniformity in the delivery of BNPL data and therefore consistent credit reporting, reliable predictions of risks associated with BNPL are simply not feasible.

Therefore, in the absence of data and analysis that would provide a comprehensive understanding of BNPL usage patterns, motivations, and outcomes, we believe that FHA policy changes to address BNPL would be premature and could have unintended consequences. We appreciate FHA's responsibility to manage risk to the Mutual Mortgage Insurance Fund and fully support rigorous underwriting standards, but do not believe any changes to address BNPL risks are appropriate at this point in time.

HPC appreciates FHA's thoughtful approach to this emerging issue and looks forward to the agency's continued analysis of how evolving financial products impact the mortgage market.

Yours truly,

A handwritten signature in dark ink, reading "Edward J. DeMarco". The signature is written in a cursive, slightly slanted style.

Edward J. DeMarco
President
Housing Policy Council