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# United States Senate

WASHINGTON, DC 20510

July 25, 2012

Mr. Thomas J. Curry  
Comptroller of the Currency  
Administrator of National Banks  
Washington, D.C. 20219

Dear Mr. Curry:

I write today to express my considerable concern regarding the Independent Foreclosure Review (IFR) process.

I am writing you because the IFR process prohibits homeowners from appealing the outcome of IFR decisions. This lack of an opportunity to appeal the decisions made by the independent consultants fails to provide aggrieved homeowners with recourse and review in the event that their claims are mistakenly rejected.

As mentioned by the OCC, the purpose for the IFR is to give homeowners an opportunity to seek redress from servicers for any errors, misrepresentations, or any other discrepancies in the foreclosure process that led to an unwarranted foreclosure filing. Absent an appeals process, homeowners must rely on the assumption that the independent consultants did not make any errors in their review. Additionally, since the independent consultants are retained by the servicers, homeowners have no guarantee that their IFR was conducted in an unbiased manner. The result is that homeowners who have lost their homes – in part due to servicers' errors – are being asked to trust a process that lacks any review mechanism.

I recognize and appreciate that the OCC has taken steps to make the IFR process fair, thorough, detailed, and transparent, but in order to fully verify that all aggrieved homeowners are properly remedied an appeals process must be made available.

I urge you to establish an appeals process for IFRs. Thank you for considering my views on this important matter.

Sincerely,



Sherrod Brown  
United States Senator