**Question 1 Are there particular components of the FHLBanks’ AHP application processes that could be made more effective or efficient, and if so, how? Are any of the FHLBanks’ specific documentation requirements for AHP applications unnecessary for verifying that the applicant meets the AHP eligibility requirements and scoring criteria? Are there ways to streamline the application process while maintaining the FHLBanks’ ability to verify applicants’ compliance with the AHP eligibility requirements and scoring criteria?**

No Feedback

**Question 2 How do the FHLBanks’ AHP application processes compare to those of other providers of gap funding with respect to scope, complexity, and documentation requirements?**

Having requested funding from the HOME Consortium, CDBG, SHOP, HCRI (Wisconsin State program), and Congressional Appropriations Requests, I would say the AHP program had the greatest complexity and documentation requirements. I do think that the financial feasibility calculation is essential but I could see how people would easily incorrectly complete that or also have a lot of conditions behind certain numbers.

**Question 3 Do the FHLBanks’ AHP application processes leverage other funders’ applications/requirements? Are the AHP application processes duplicative or complementary of other funders’ underwriting requirements and processes? Do the AHP application processes create the need for additional information and documentation?**

General similarities for sure but I would say the requirements for AHP are more comprehensive.

**Question 4 Should the AHP regulation allow the FHLBanks to differentiate their AHP application requirements for projects requesting subsidy that constitutes a small percentage of the total funding in the project? If yes, why? Do other gap funders differentiate their application requirements for smaller projects?**

I would create a subcategory of applications for under a certain funding threshold and set aside that pool of funds, say $5 million set aside for awardees of $250k and below. Make it simpler and more accessible to smaller nonprofits by decreasing the number of scoring criteria. You could also restrict who the funding goes to by making it only available to organizations with a specific operating budget.

**Question 5 What role do consultants provide in applying for AHP funds? What are the reasons that an AHP applicant may use a consultant? To the extent that applicants are using the services of consultants to apply for AHP subsidy, how does the practice compare to the use of consultants for other sources of gap funding?**

We did not use a consultant but I could see how they might be helpful. As a point of contention I think if you’re application requires a consultant to be successful you are making it more difficult for smaller nonprofits to submit an application and be competitive.

**Question 6 Are there effective practices the FHLBanks could implement to coordinate the underwriting review process across multiple funding sources in a project?**

I cannot speak intelligently about this.

**Question 7 What is the single most important change you would recommend for improving the AHP application process?**

Create a nonprofit specific application process that recognizes the limited scope of operations and capacity of those smaller nonprofits trying to make a difference.

**Question 8 What concrete steps would you recommend for simplifying the AHP application process and why?**

Discovery – Interview nonprofits that have and have not applied for AHP and determine how they secure funding and manage expenses of housing projects

Design – Recognize the common and evaluable criteria of those organizations and design a scoring system that recognizes organizations that are fiscally and operationally managing their project the best

Development – Place the application process into a more user friendly platform

Implement – Run it as a pilot program with a limited pool of funds available to 501c3’s only

Refinement – Solicit feedback about the efficacy of the funding, its requirements, reporting, and impact.