



Federal Housing Finance Agency  
Division of Housing Mission & Goals  
400 7<sup>th</sup> Street SW, 9<sup>th</sup> Floor  
Washington, D.C., 20219  
Streamlining the Affordable Housing Program Application

As members of the [Partners for Rural Transformation](#) (PRT), we appreciate the opportunity to submit comment on the Federal Home Loan Bank's (FHLB) Affordable Housing Program (AHP) competitive application process.

PRT is a national coalition of organizations committed to serving rural communities in persistent poverty. We serve the vast majority of people living in persistently impoverished places, the majority of which are rural, with a significant presence in the Mississippi Delta, Appalachia, Indian Country, the Black Belt, and Colonias along the U.S. / Mexico Border. Together, we have records of accomplishment spanning decades. In the last ten years alone, we have deployed over \$2 billion, reaching millions of people who reside in persistent poverty communities. The Partners for Rural Transformation submits this comment letter in hopes of emphasizing the importance of consistency, transparency, and flexibility to meet the needs of communities who have been historically marginalized from resources.

The Partners for Rural Transformation has identified a few key areas in the application process that, if addressed, would increase accessibility for the persistently poor communities we serve:

- Consider Native and Rural communities for maximum impact
- Ensure a similar application experience across the nation, regardless of FHLB Region
- Consider streamlining other applications within the FHLB System
- Create more aligned scoring systems and resources for applicants

To make a true difference in the application process, rural and Native communities need to be at the forefront of the FHLB's mind. There are several barriers to accessing capital that steer AHP funding away from these persistently poor regions. AHP having a competitive program may be a deterrent from starting an application for the communities where the dollars

would have the most impact. Education and awareness of AHP funds may be a first level barrier to accessing critical capital needed to address rural and Native housing crises. A lot of the time, funding opportunities in rural regions are only shared through word of mouth or from trusted community sources. Even if rural communities are aware of the opportunity, many persistently poor counties are served by mission lenders, such as CDFIs like PRT Partners. Rural organizations operate with little to no operational or flexible funding. Staff are typically fulfilling multiple roles. This lack of capacity, combined with the daunting reality that other metropolitan organizations have whole departments dedicated to applying for federal dollars, generates disincentive to participate at all. This creates inequities across place, given that regions who are starving for capital to provide basic needs (such as shelter, food and water) are put in the same competition as major metropolitan municipalities.

In PRT's network across the nation, we have heard reports that all fall on different ends of the spectrum regarding their experience applying for the competitive AHP funds. Some say it's one of the easier funding pots to access, while others have to hire consultants just to have a chance to apply, despite already having lower capacity and higher burden.

Streamlining the FHLBank AHP competitive fund application is not sufficient to address this inequity to accessing AHP and other FHLB funds for rural places. It will take coordinated streamlining across *all* of the FHLBanks to have a uniform application and scoring system. This will ease burden across the board for rural applicants and on those reviewing submitted applications. Not only will it increase accessibility, it will leverage the impact of the AHP dollars, allowing the FHLB funds to go further.

The Partners for Rural Transformation applaud the Federal Home Loan Bank's efforts to improve competitive application processes for AHP. AHP is an essential program for many of the communities PRT serves, and provides necessary funding to address a [growing rural housing crisis](#). Increasing consistency in resources and scoring criteria across the nation would allow more communities to thrive. The burden of applying for this type of funding often falls on organizations or local leaders who are already going above and beyond their required job descriptions in rural communities, meaning that difficult application processes in some places bar these areas from accessing

capital. Similarly, addressing the specific challenges that face communities experiencing persistent poverty can open doors for these regions to overcome disinvestment and meet their potential. Whether addressing the current Area Median Income (AMI) mechanisms, which disproportionately disadvantage areas of concentrated poverty, or emphasizing rural and persistently poor counties in the scoring process, PRT believes that that improvements to the AHP competitive application process can act as a positive force for change for our communities. The Partners for Rural Transformation are thankful for your time and the opportunity to contribute to this request for information.

In partnership,



Sara Ball, VP of Operations  
Partners for Rural Transformation (PRT)

[sarab@pfrt.org](mailto:sarab@pfrt.org)



**PARTNERS FOR RURAL  
TRANSFORMATION**



**COMMUNITIES  
Unlimited**



Hope  
credit union  
enterprise cooperation  
policy institute



**RCAC**  
www.rcac.org