



Greater Rochester  
**Habitat**  
for Humanity®

# every family

needs a foundation to build a future.

Building homes, communities, and hope in the Greater Rochester area.

To whom it may concern,

Greater Rochester Habitat for Humanity has worked with FHLB since 2018 and supports its efforts to expand affordable housing throughout our region. We have submitted AHP applications for both our Homebuyer and Critical Home Repair programs in the past, and have been awarded multiple times. Given this, we're very familiar with the application process and have several recommendations to improve it going forward.

### General Application Issues:

The AHP portal poses several challenges that create an unnecessary hassle for applicants:

- a. It requires that narrative responses be typed directly into the portal or copy/pasted over from another source. When copying and pasting our responses for this year's application, the portal would reject our responses due to an unknown formatting error, requiring us to spend time troubleshooting what was wrong.
- b. In the Hard Costs section, users are required to upload a Project Construction Form, which is only available as an Excel file. When completing and submitting the form, FHLB requires that it be approved and signed by an architect. However, the Hard Costs section does not allow for the signed, PDF-printed version of this form to be uploaded alongside the original Excel file. When mentioning this issue to FHLB support, we were told to upload the PDF anywhere else within the application that accepts PDFs.
- c. The portal requires that each individual section be "completed" before users can advance, making it difficult to look over and plan for the application when it initially becomes available. To avoid this issue we upload "placeholder" attachments, which requires us to go back through and upload the correct attachments once we are ready to finalize a given section.

Our overall recommendation would be to update the portal to a) allow for Word attachments that include narrative responses, rather than requiring users to input responses directly, b) ensure that users can upload any relevant file types for each given section, rather than requiring them to upload into a different spot, and c) allow for users to move between different sections of the application when it becomes available, rather than requiring that each section be complete before allowing the user to advance.

### Application Date Announcements:

In the past, there has been little advance notice of exactly when AHP applications would open and close. A lack of certainty about the application timeframe makes it extremely difficult for our agency to plan accordingly, particularly in the Spring when our Grants staff is working on several funding proposals at once. Our ability to coordinate our build schedule and select properties to include in our application is also negatively impacted by this uncertainty. It influences the documentation and proof we're able to provide for certain scoring categories (e.g. proof of committed funding, surveys and permit sets, third party cost verification). A lack of notice hinders our ability to compile these forms in a timely fashion





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and produces uncertainty around which funding sources we can anticipate securing commitment for. Ultimately, announcing the application window further in advance would allow us to better plan around AHP timelines, and prepare a more precise, thorough application.

#### Green Building Innovation Scoring Category:

This category awards full points for projects able to achieve either Passive House or Net Zero Energy standards, and zero points for those that aren't. While GRHFH building designs do not yet meet these criteria, we have improved our construction practices over the years to enhance energy efficiency, moving from gas furnaces and water heaters to all-electric heating and cooling, Insulated Concrete Forms, and Energy Star certification. With how this category is scored, there is no distinction made between projects like ours that embrace energy efficiency but still fall short of Passive House and Net Zero Energy, and those that disregard it entirely. This category also requires that *all* buildings on a given project meet these design standards in order to score points. Further, these criteria favor higher density projects that can meet these standards through an economy of scale over single-family residential projects where each site requires its own energy-efficient system and inspection. We recommend that FHLB rework this category to award partial points, based on intermediate energy-efficiency benchmarks (e.g. solar-ready, EV-ready, Energy Star certification, etc.). We also recommend allocating partial points based on the proportion of homes within a project that meet a given standard, rather than doing so on an all-or-nothing basis. Not only would this be fairer to agencies with limited capacity, but it would also incentivize developers who currently lack the capacity to achieve Passive or Net Zero to gradually build that capacity over time, rather than ignoring green building altogether.

#### Repair Program Application:

Having submitted AHP applications for both our Homebuilding and Repair programs, we've found the application caters to new construction proposals more so than owner-occupied repair proposals. For example, because we rarely know exact costs and types of repairs in advance of our proposal, it's challenging to give a line-by-line estimate of total project costs. Additionally, there are several forms that require 3<sup>rd</sup>-party review and sign-off that don't provide valuable information in the context of owner-occupied repair projects, where cost estimates are mostly speculative. We recommend that FHLB either waive the requirement to provide these forms for owner-occupied repair projects, or create forms that better fit this type of project. For example, other grant applications we've submitted for our Repair Program have allowed us to provide general cost estimates for the scopes of work that we commonly perform; or provide our applicant waitlist in the place of specific project sites.

Sincerely,

x   
Matthew J. Flanigan, CEO