**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?

**Response:** Development process for affordable housing (before ground-breaking) can up 2+ years, which understandably adds to costs. While the AHP funding amount is finite, the application windows (June – August) can be counter-productive to a project’s time-line. Is there a possibility of having an “open-window” on the AHP application, perhaps with a caveat that ground breaking must occur within 2 years of approval? There could be a “final submission” that updates the project costs, proformas etc. once all approvals are in hand and the project is ready to move forward. I believe this could help shaving off time and possibly costs for bring a project to fruition.

The scoring methodology – consistent and predictable – is very helpful and a plus. I’ve been involved with a few projects that didn’t score well so the developer could start to look for other sources or re-examine their assumptions.

**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?

**Response:** As a banker, we aren’t too involved with the application processes with other funding sources. However, the raising of standards, e.g. energy efficiency, are a cost burden, and with the acute housing shortage we face today, I question if we’re seeking “perfection vs good”

Q**uestion 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?

**Response**: More flexibility on the income levels would be helpful. Again, with the current housing shortage, speeding up the availability of affordable housing (up to 80% AMI) will bring in a lot more projects – and in time, lift all boats.

**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?

**Response**: As a banker, I am not knowledgeable enough to speak to this issue.

**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?

**Response:** In the few instances where a consultant was hired, it was because the developer was not adequately staffed; also with turnover/retirements of experienced developers at some of our Non-profits, I can foresee the need for consultants grow, at least for a short while. Could FHLBB nominate a couple of non-profits in each state to be the “technical assistance” providers – following the example Maine Housing’s appointment of The Genesis Fund as a statewide TA provider?

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

**Response:** Having consistency in the application process between the key funders in each state, eg. State Housing Depts., Rural Development and FHLBB would be helpful.

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

**Response:** An “open window” for applications; and more flexibility with the tenant income levels at least for the next 5 years as communities rebuild the housing stock.

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

**Response:** See #7.