



November 10, 2014

Alfred M. Pollard, General Counsel
Attention: Comments/RIN 2590-AA39
Federal Housing Finance Agency - Fourth Floor
1700 G Street, N.W.
Washington, D.C. 20552

Re: Notice of Proposed Rulemaking and Request for Comments - Members of Federal Home Loan Banks (RIN 2590-AA39)

Dear Mr. Pollard:

I am the President and CEO of Vista Maria, a nonprofit agency in Michigan that provides care, treatment and education to abused, neglected and traumatized girls. Our organization also offers an array of community-based prevention, low-cost housing and treatment services for vulnerable teenage boys and girls from our community. Thank you for the opportunity to submit comments on the Notice of Proposed Rulemaking (NPR) regarding Federal Home Loan Bank (FHLB) membership.

In conducting research on this issue, I learned that since 1989, Congress has reviewed Federal Home Loan Bank membership access on three occasions. In each instance, it has expanded access to membership. The proposed NPR changes regarding FHLB membership will reduce the number of members, and therefore, diminish significant sponsorship opportunities for nonprofits like Vista Maria. These members have helped Vista Maria receive \$1.15 million toward our affordable housing and treatment program projects, which clearly reach the area's most impoverished youth and aid their transition to become self sustaining.

Over the past five years, Vista Maria has worked to realize a vision that enables vulnerable girls, as well as at-risk youth and families, to break the intergenerational cycle of abuse, neglect and poverty by providing treatment, education, daily living skills and supportive social connections critical to their sustained success. Our achievements include the successful launch of a low-cost transitional living program for homeless young women and those who age out of the foster care system without family or support systems. We also were able to expand and build a new therapeutic treatment housing program for victims of human trafficking. Our partner in caring

for these and other housing initiatives at Vista Maria is the Federal Home Loan Bank of Indianapolis (FHLBI) and member partner Amerisure. We are grateful to the FHLBI and their members for providing the capital to support Vista Maria's affordable housing initiatives.


It is my opinion that the proposed rule will reduce the System's income and funding for the Affordable Housing Program (AHP). The AHP is funded annually with 10 percent of the Federal Home Loan Bank System's income. This in turn limits the number of members who can partner with Vista Maria on AHP grant applications. In our case, hundreds of youth would be adversely affected by this loss in income. Today, more than 450 children receive daily support, care and guidance at Vista Maria.

The tremendous support of the FHLBI to help our children has yielded significant outcomes. Vista Maria successfully launched the Shepherd Hall Transitional Living Program. This 12 to 24 month, low-cost transitional housing and living program provides programming and housing for 20 tenants, and all of these young women possess education and employment plans so they can live successfully in the community when they leave Vista Maria. The Shepherd Hall Transitional Living Program was made possible through a \$750,000 grant award from the FHLBI which was brought to our attention and sponsored by Amerisure. Our organization was also the recipient of a grant award of \$500,000, again sponsored by Amerisure, for program expansion to serve more girl victims of human trafficking. The state-of-the-art treatment housing for victims of sex and labor trafficking is one of a handful of unique programs within the U.S. solely focused on specialized treatment and community reintegration of victims of these heinous crimes.

The great work of the Federal Home Loan Bank of Indianapolis and their members to engage the community by providing the capital to fund affordable housing for our most at-risk population illustrates that reducing the number of members will only reduce the amount of funding to child caring facilities like Vista Maria. For the reasons discussed above, I respectfully request that the proposed rulemaking regarding membership eligibility in Federal Home Loan Banks be withdrawn from consideration.

Please feel free to contact me if you have any questions.

Sincerely,


Angela Aufdemberge
President and CEO
Vista Maria