

June 11, 2018

Alfred M. Pollard, General Counsel  
Attention: Comments/RIN 2590-AA83  
Federal Housing Finance Agency  
400 Seventh Street, SW, Eighth Floor  
Washington, D.C. 20219

**Re: Notice of Proposed Rulemaking and Request for Comments –  
RIN 2590-AA83 – Affordable Housing Program Amendments**

Dear Mr. Pollard:

Thank you for the opportunity to comment on the Federal Housing Finance Agency’s proposed rulemaking regarding the Affordable Housing Program (“AHP”) administered by the Federal Home Loan Banks.

Housing Works RI at Roger Williams University (RWU) serves as a clearinghouse for information about housing in Rhode Island. We conduct research and analyze data to educate stakeholders on the importance of housing affordability to the state’s economic future. In a fiscal environment as challenging as the one we are currently in, a strong and successful AHP program is absolutely critical to creating the affordable homes that our communities need.

We commend the Federal Housing Finance Agency for working to update the AHP regulation. However, we have real concerns about some elements of the proposed amendments, especially the required outcomes framework and the application re-ranking it necessitates. It appears that the new outcomes concept being proposed requires the Banks to allocate 55% of their funding to two out of three regulatory priorities – and in so doing, overriding the discretion that the Banks have proven adept at utilizing in meeting their local area needs. We recommend that this approach not be adopted.

Of even greater concern, however, is the re-ranking of AHP applications that would be necessitated by the imposition of the proposed outcomes framework. AHP applicants in Rhode Island value the transparency and predictability of the program, and make decisions about their potential developments and applications based on that transparency. As acknowledged by FHFA in the proposed rule, Banks would no longer be simply ranking applications according to their score but rather adding a second, outcomes-based, test that could result in the highest scoring projects being rejected and lower scoring projects being funded through a re-ranking process.

We also think that the proposal that requires sponsors to evaluate all members of the project development team prior to the application could be burdensome and in many cases impractical because the team might not have been assembled yet. We urge you to reconsider this requirement.

Thank you for the opportunity to share our viewpoints on this very important program. If you have any questions, please feel free to contact me at [bclement@rwu.edu](mailto:bclement@rwu.edu).

Sincerely,

Brenda Clement  
Director