



STATE OF MICHIGAN

RICK SNYDER
GOVERNOR

MICHIGAN STATE HOUSING DEVELOPMENT AUTHORITY
LANSING

EARL J. POLESKI
EXECUTIVE DIRECTOR

June 12, 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**

Mr. Pollard,

On behalf of Michigan State Housing Development Authority (MSHDA), regarding the proposed rulemaking of the Federal Home Loan Banks' Affordable Housing Program (AHP) I am pleased to provide this comment letter. I serve as Low Income Housing Tax Credit (LIHTC) Allocations Manager of MSHDA, which is a state agency headquartered in Lansing, MI. We have direct knowledge of the value of AHP as gap financing for affordable housing projects through the FHLBank Indianapolis (FHLBI).

In our role as the Housing Finance Agency (HFA) for the state of Michigan we are responsible for administering the LIHTC Program, which is an extremely valuable resource in the creation and preservation of affordable rental housing. In recent years, we have enjoyed a productive, cooperative, and collaborative relationship with the FHLBI where we have made efforts to align the LIHTC program with the AHP program in order to allow them to work together for the goal of benefiting Michigan residents who are in need of quality affordable housing.

In developing the Qualified Allocation Plan (QAP), which governs the LIHTC program, we definitely understand how stakeholder input is important to the process and we appreciate the opportunity to provide comments to you. In our experience developing the QAP, we have recognized the significant benefits of adopting a process that creates a level of certainty and transparency for applicants and stakeholders, which creates an attractive program that developers, investors, lenders, and other stakeholders desire to utilize because it is predictable and fits well within the typical development process. We would encourage you to keep these key principals in mind as you continue developing the proposed rule.

We look forward to our continued collaboration with the FHLBI as we work together to continue to address the affordable needs of the residents of the state of Michigan. On behalf of MSHDA, the opportunity to comment on the value of AHP funding and this proposed rule is appreciated. If you have any questions, please feel free to contact me at (517) 373-3433.

Sincerely,

A handwritten signature in black ink, appearing to read 'CB', with a long horizontal line extending to the right.

Chad Benson
Allocations Manager
Low Income Housing Tax Credit Program