

June 12, 2018

To Whom It May Concern:

An associate with the Federal Home Loan Bank of Des Moines Advisory Council asked me to review the drafted changes to the Affordable Housing Program regulations. We are very interested in the possible changes being considered as it relates to how AHP funds will help communities in the future.

For over 35 years, Better Family Life, Inc. has been a St. Louis, MO based 501(c)3 Community Development Corporation dedicated to promoting stability among low and moderate income families. We offer support in housing, youth, employment, outreach and cultural arts. We also have a relationship with several local lenders, a few of which are members of FHLB of Des Moines. Banks like, Midwest Bank Centre, Carrolton Bank, and St. Louis Community Credit Union have been good banking partners that offers FHLB home ownership subsidies to qualified low to moderate-income buyers.

As a prior recipient selected to distribute funds to families in need, BFL believes that it is even more important now than in times past that help reaches populations with the most need. The proposed amendments to current policy may offer some benefits, but we believe it will also pose a number of challenges for developers and housing providers.

In our estimation, your proposed changes to the current guidelines for administering AHP funds increases the complexity of the program which ultimately limits the Federal Home Loan Banks' ability to respond to local affordable housing needs. In essence, practitioners/developers face a Catch 22 as it relates to earning profit and balancing targeted rental income. It also appears that priorities could shift too soon for builders to adjust projects and could leave many with gaps in financing; or challenged to address a criterion that was not initially a priority.

In addition, Missouri has faced several housing related challenges. Specifically, Missouri recently lost its State low-income housing tax credit (LIHTC), program. This creates a major threat to the development of low-mod income housing opportunities. Your proposed change to the AHP program deals another blow to the development of affordable housing in Missouri and across the nation.

With that in mind, we appreciate the challenges that funders face. It must be difficult to balance impact with equity in fund access. However, I urge you to retain the current guidelines for Federal Home Loan Banks. Keep the reporting criteria simple, and allow regional members to determine the needs of their constituents and member communities. Thank you.

Sincerely,



Malik Ahmed, CEO
Better Family Life, Inc.

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