

**Federal Home Loan Bank Affordable Housing Program (AHP)  
Proposed Rule (83 Federal Register 11344 (March 14, 2018))  
Conference Call of the Federal Housing Finance Agency (FHFA) and Jamboree Housing  
May 24, 2018**

**Attendees (by telephone):**

FHFA: Marcea Barringer, Eric Howard, Tiffani Moore

Jamboree Housing: Laura Archuleta, Michael Massie

**Summary:** On May 24, 2018, FHFA staff held a conference call with representatives of Jamboree Housing about the above-referenced proposed rule. The following is a summary of the attendees' discussions and reflects solely the statements of the attendees, as captured by FHFA staff.

**Need for Subsidy Analysis**

Jamboree Housing staff stated that the word "supportive" in "supportive services," as used in the proposed rule's provisions on the "need for subsidy" analysis, implies extensive, comprehensive services for special needs populations. Jamboree Housing staff indicated that it uses the phrase "resident services" or "community services" to describe more limited services whereby a coordinator working in a non-special needs project connects households to outside assistance.

Jamboree Housing staff also stated that the proposed rule addresses projects where housing and government-funded supportive services in a project may not be readily bifurcated in separate operating and supportive services pro formas, respectively, but does not address projects that receive housing and supportive services funding from non-governmental community foundations that cannot be readily bifurcated. Jamboree Housing staff recommended that, in lieu of requiring separate operating and supportive services pro formas, as proposed, FHFA require AHP project sponsors to complete a cost certification, similar to the Form 8609 for Low-Income Housing Tax Credit projects, to demonstrate that the AHP funds were used solely for AHP-eligible expenses, such as construction or acquisition costs.