



Housing Assistance Council

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January 31, 2019

Alfred M. Pollard, General Counsel
Attention: Comments/RIN 2590-AA83
Federal Housing Finance Agency
Eighth Floor
400 7th Street, SW
Washington DC 20219

Re: **Federal Home Loan Bank Housing Goals Amendment. RIN 2590-AA82**

Dear Mr. Pollard:

The Housing Assistance Council (HAC) appreciates the opportunity to comment on the Federal Housing Finance Agency's (FHFA's) proposed Rule on the Federal Home Loan Bank Housing Goals Amendment. The proposed amendments replace the existing four separate retrospective housing goals with a single prospective mortgage purchase housing goal. The proposed rule would also establish a separate small member participation housing goal and allow the Banks to request FHFA approval of alternative target levels for the proposed goals. FHFA is also proposing to eliminate the \$2.5 billion volume threshold so that all Banks have housing goals applied to them.

The Housing Assistance Council is a national nonprofit organization that helps build homes and communities across rural America. HAC has a longstanding relationship with the Federal Home Loan Bank system and is pleased that FHFA is placing attention on this important affordable housing resource nationwide.

HAC is in support of efforts to expand access to credit to low and very low income (LMI) borrowers through the Federal Home Loan Bank system. Small member participation housing goals need to be amended; for example, in 2017 only 27 percent of the loans small PFIs sold through AMA were to LMI borrowers.

HAC generally supports the proposed rule which would establish a benchmark goal of 50 percent of loans to LMI borrowers. Greater access, presence and activity in rural markets would be integral in helping increase the affordable housing goals.

HAC strongly supports the proposed Rule's inclusion of federally backed loans such as USDA RHS Section 502 Guarantees.

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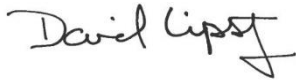
HAC is an equal opportunity lender.

To further rural activity within the affordable housing goals. HAC recommends that the affordable housing goals be expanded to allow the purchase of loans from certified U.S. Department of Treasury Community Development Financial Institutions (CDFI's).

The strength of the FHLB system has always been the autonomy of its eleven banks. Each bank has substantial rural territory and rural areas have undoubtedly been a lagging market for nearly all banks. Any effort to strengthen, enhance, or incentivizing more rural activity by the banks would almost assuredly help increase their affordable housing goal activity.

The Housing Assistance Council is pleased to have this opportunity to comment on the proposed rule for the Federal Home Loan Bank Housing Goals Amendments. We thank FHFA and the Banks and are willing to assist in any way that we can towards the implementation of this important effort. Please do not hesitate to contact me if you need additional information or clarification of our comments.

Sincerely,

A handwritten signature in black ink that reads "David Lipsetz". The signature is written in a cursive, slightly slanted style.

David Lipsetz
Chief Executive Officer