

From: Brian Evjen <bevjen@norstarus.com>
Sent: Tuesday, June 12, 2018 6:23:02 PM
To: Marisa Button
Subject: 2018/2019 RFA Public Comments

Marisa,

Please see the below comments regarding the 2018/2019 RFA process

1. Remove titles from Principal Disclosure requirements. FHFC's objective in creating the current principal disclosure process was to identify principals down to the natural person level, and this can be achieved by simply listing principals by name with no titles. The requirement to include principals' titles has been the subject of recent litigation and can prove problematic when titles are not available options within FHFC's drop-down menus. Removing the requirement to include titles would eliminate this as a basis for litigation, while still achieving the original goal of the disclosure process.
2. We support including LGAO funding in the 9% geo Medium and Small County RFA. This is a way for FHFC to enable local governments to support developments that address the most critical affordable housing needs in their communities, both financially and by making their applications more competitive with the LGAO points. We look forward to this discussion during the upcoming workshop.
3. In lieu of applying extra points for applications receiving LGAO in Medium and Small Counties (like in Large Counties), consider automatically placing LGAO applicants into the "A Group" for leveraging in addition to establishing a goal to fund 2-3 LGAO applications.

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