



2013 Community Lending Plan

Approved December 14, 2012

Executive Summary

The Federal Home Loan Bank of Pittsburgh (Bank) is pleased to provide its Year 2013 Community Lending Plan (hereinafter "Plan"). The Plan provides an outline of the Bank's proposed activities for 2013 that will assist its members in reaching their housing and community development goals for the communities they serve.

The Federal Housing Finance Agency's (FHFA) Community Investment Cash Advance (CICA) regulation requires each Federal Home Loan Bank to complete an assessment of the credit needs and market opportunities for community lending in its district. The regulation also requires each FHLBank to develop an annual Plan on or before January 31 of each year. The Plan must be approved by the Bank's Board of Directors and submitted to the FHFA. While encouraging the Bank to develop new programs and initiatives, the regulation ultimately promotes renewed participation of members in the housing and community development of their communities.

Within this Plan, the Bank provides a summary of the credit needs and market opportunities identified by the Bank for its district, which includes Delaware, Pennsylvania and West Virginia (hereinafter "district"). These findings were derived from a variety of sources, including meetings with members and community stakeholders, research from various state and federal agencies, and information gathered in conjunction with the preparation of the Bank's 2013-17 Strategic Plan.

The research conducted and findings identified in the Plan represent the various challenges facing affordable housing and community development in the district and the nation. High unemployment, weak economic conditions and unstable real estate values have created a climate of uncertainty for lenders while at the very same time driving the demand for affordable housing and community investment higher. Those same conditions have also made it difficult for small businesses to obtain credit which have curtailed local economic development initiatives.

In 2013, the Federal Home Loan Bank of Pittsburgh will continue efforts to assist our members and other stakeholders in the district to address the increasing challenges for affordable housing and community development.

I. Market Assessment

The Bank annually conducts research of pertinent data sources that helps to identify challenges and opportunities related to housing and community development in the market areas served by its members. That research includes both primary and secondary sources of information.

Primary sources include information gathered from member banks serving various market areas, housing and community development advocates, public officials and other community stakeholders. Several different methodologies have been used to gather primary research information including facilitated small-group discussions, surveys and ongoing contacts with customers and other stakeholders.

Secondary sources of information included reviews of third party housing and community development research and analysis.

Primary Research

Learning Forums/Housing Roundtables

In 2011, the Bank conducted two Learning Forums and four Housing Roundtables which provided its primary constituencies (i.e. Board directors, members of the Bank's Affordable Housing Advisory Council (Council), member financial institutions and community leaders) with the opportunity to share information and observations about critical local market opportunities and challenges.

The forums/roundtables provided:

- A first-hand discussion of the affordable housing and community development needs in underserved geographies within Bank's district
- An opportunity to learn more about the capacity and appetite of member banks for community lending and investing
- Identification of action-oriented solutions that could be considered during future product/policy discussions

- Enhanced relationships between member banks, Board and Council members, and other community stakeholders

The following represent common themes resulting from discussions during the Learning Forums and Housing Roundtables:

- A growing number of residents are experiencing housing cost burdens
- Aging populations are creating housing issues
- There is pressure on local rental housing markets as a result of foreclosures, declining home buyer market, job loss, need for housing for seniors and special needs populations and the impact of Marcellus Shale workers seeking housing
- Developers and planners are experiencing difficulty in obtaining good market information for local housing markets to use to assess market need and demand or for planning purposes
- Capacity issues exist for nonprofit housing organizations
- Aging housing stock has created a need for preservation, rehabilitation and/or demolition programs
- Need for better coordination of funding sources to maximize their impact
- Focus on financial literacy is needed
- There is a need for capital and support for entrepreneurs and small businesses

Affordable Housing Advisory Council

The Council has 15 members who represent a cross-section of housing and community development professionals from the Bank's district. The Council's purpose is to advise the Bank's Board and staff on housing and community development matters in the district. Council members also assist the Bank in developing an ongoing understanding of specific needs and help build relationships with the community investment stakeholders.

In 2012, the Council made specific recommendations for the 2013 Affordable Housing Program Implementation Plan (AHP Plan). The AHP Plan is designed to align regulatory requirements with affordable housing needs as identified by the Council and the Bank. Those recommendations included a re-launch of the Bank's first time homebuyer product and changes to the AHP competitive scoring criteria and feasibility guidelines. The Council also provided valuable insight, based on their

professional experience, on specific needs (i.e. special populations, rural areas, first-time homebuyers, etc.) throughout the district and how those needs could be better served. The AHP Plan is available on the Bank's website.

Housing and Economic Development Conferences

In 2012, Bank staff attended several major housing and community development conferences including the: Housing Alliance of Pennsylvania's Homes Within Reach Conference, Pennsylvania Association of Housing and Redevelopment Agencies annual conference, Delaware Governor's Housing Conference, Federal Reserve Bank of Philadelphia's Housing and Community Development Summit, West Virginia Housing Conference hosted by CommunityWorks, and the West Virginia Annual Community Action Continuing Education Conference. These conferences present current program information and as well as best practices in the field of housing and community development, which helped shape the Bank's goals and strategies.

Secondary Research

State Consolidated Plans

The Consolidated Plans for Delaware, Pennsylvania and West Virginia were reviewed and analyzed. The Consolidated Plans are required by the Department of Housing and Urban Development and are intended to address the critical housing and community development needs faced by each state, provide housing market analysis and summarize the State's methods of distributing funds to local governments and organizations.

A consistent measure of affordability and relative need across all three state plans is the concept of housing cost burden. Households that are housing cost "burdened" are spending greater than 30 percent of their income on housing. "Severely burdened" households are defined as households spending greater than 50 percent of their income on housing.

The table below shows the change in severe cost burden from 2009 to 2010 for extremely low income renters. Extremely low-income households earn less than 30 percent of the Area Median Income (AMI). Households at this income level are considered the hardest to house, are most likely to be

vulnerable to homelessness and, as such, are good relative indicators of the need for affordable housing. Although the number of severely cost burdened households declined in West Virginia between 2009 and 2010, high levels of severe rental housing cost burden among extremely low-income households exists in all three states.

Severely Housing Cost Burdened Extremely Low-Income Renter Households

	2010	2009	% Change	Percent of all extremely low income renters who are severely cost burdened
Delaware	13,200	11,015	19.84%	77.34
Pennsylvania	237,618	219,835	8.09%	73.58
West Virginia	32,547	37,281	-12.70%	64.67
United States	6,215,080	5,886,293	5.59%	75.04

Housing Wage

The National Housing Coalition annually expresses housing needs for various jurisdictions in terms of the wages needed by a family to afford the average cost of rent and utilities for a two-bedroom apartment in that jurisdiction. Certainly there are local market differences, but the data indicates that rental housing is still out of reach for most lower-income families in Pennsylvania, Delaware and West Virginia earning average or minimum wages.

State	Housing Wage to Afford 2-BR Unit	Average Hourly Wage	Difference
Delaware	\$18.65	\$14.37	-\$4.28
Pennsylvania	\$16.06	\$12.86	-\$3.20
West Virginia	\$11.50	\$ 9.88	-\$1.62

The housing ratio analysis for Pennsylvania, Delaware and West Virginia are outlined below.

Pennsylvania

In Pennsylvania, the Fair Market Rent (FMR) for a two-bedroom apartment is \$835. In order to afford this level of rent and utilities, without paying more than 30 percent of income on housing, a household must earn \$2,790 monthly or \$33,404 annually. Assuming a 40-hour work week over 52 weeks per year, this level of income translates into a Housing Wage of \$16.06.

In Pennsylvania, a minimum wage worker earns an hourly wage of \$7.25. In order to afford the FMR for a two-bedroom apartment, a minimum wage earner must work 89 hours per week, 52 weeks per year, or alternatively a household must include 2.2 minimum wage earner(s) working 40 hours per week year-round in order to make the two-bedroom FMR affordable.

In Pennsylvania, the estimated mean (average) wage for a renter is \$12.86 an hour. In order to afford the FMR for a two-bedroom apartment at this wage, a renter must work 50 hours per week, 52 weeks per year, or alternatively, working 40 hours per week year-round, a household must include 1.2 worker(s) earning the mean renter wage in order to make the two-bedroom FMR affordable.

Delaware

In Delaware, the FMR for a two-bedroom apartment is \$970. In order to afford this level of rent and utilities, without paying more than 30 percent of income on housing, a household must earn \$3,232 monthly or \$38,784 annually. Assuming a 40-hour work week over 52 weeks per year, this level of income translates into a Housing Wage of \$18.65.

In Delaware, a minimum wage worker earns an hourly wage of \$7.25. In order to afford the FMR for a two-bedroom apartment, a minimum wage earner must work 103 hours per week, 52 weeks per year, or alternatively a household must include 2.6 minimum wage earner(s) working 40 hours per week year-round in order to make the two bedroom FMR affordable.

In Delaware, the estimated mean (average) wage for a renter is \$14.37 an hour. In order to afford the FMR for a two-bedroom apartment at this wage, a renter must work 52 hours per week, 52 weeks per year, or alternatively, working 40 hours per week year-round, a household must include 1.3 worker(s) earning the mean renter wage in order to make the two-bedroom FMR affordable.

West Virginia

In West Virginia, the FMR for a two-bedroom apartment is \$598. In order to afford this level of rent and utilities, without paying more than 30 percent of income on housing, a household must earn \$1,993 monthly or \$23,917 annually. Assuming a 40-hour work week, 52 weeks per year, this level of income translates into a Housing Wage of \$11.50.

In West Virginia, a minimum wage worker earns an hourly wage of \$7.25. In order to afford the FMR for a two-bedroom apartment, a minimum wage earner must work 63 hours per week, 52 weeks per year, or alternatively a household must include 1.6 minimum wage earner(s) working 40 hours per week year-round in order to make the two bedroom FMR affordable.

In West Virginia, the estimated mean (average) wage for a renter is \$9.88 an hour. In order to afford the FMR for a two-bedroom apartment at this wage, a renter must work 47 hours per week, 52 weeks per year, or alternatively, working 40 hours per week year-round, a household must include 1.2 worker(s) earning the mean renter wage in order to make the two-bedroom FMR affordable.

2011 Pennsylvania Rental Housing Survey

The Pennsylvania Housing Finance Agency (PHFA) commissioned Bowen National Research to conduct a rental housing survey for Pennsylvania in 2011. Bowen surveyed 1,498 rental projects comprised of 147,520 units in the state. The major findings of the study focused on occupancy and vacancy rates for market-rate, tax-credit and subsidized properties. With occupancy rates at 94.9 percent, 98.5 percent and 99.3 percent respectively, the conclusion is that the rental market in Pennsylvania, particularly for units typically considered affordable, is very tight, arguing for a need to expand the rental housing supply generally and the affordable rental housing supply specifically.

Delaware State Housing Authority (DSHA) Statewide Housing Needs Assessment

The DSHA has prepared a Statewide Housing Needs Assessment to examine current needs for housing among low-income households and the major findings of that study include:

- Over 34,000 Delaware residents currently face worst-case housing needs, based on their either paying more than 50 percent of their income for rent or living in substandard housing
- More than 59 percent (8,058) of the current inventory of assisted rental housing in Delaware is over 20 years old
- It is estimated that 50 percent to 70 percent of the units over 20 years of age may be in need of substantial rehabilitation

State of West Virginia Consolidated Annual Performance and Evaluation Report

The State of West Virginia's 2012 Consolidated Action Plan identifies 140,296 households with unmet housing needs. Those considered as having the most serious unmet need and the highest priority for action include large families in need of rental housing with incomes at or below 30 percent of the AMI, and households that are owner-occupants in that same income category. The number of households in these two priority categories totals over 33,000.

2013-17 FHLBank Pittsburgh Strategic Plan

Data included in the Bank's strategic plan cited the following challenges coming out of the recent economic recession:

- 2012 has been another transition year for the U.S. economy. Indications remain mixed and many continue to question the strength of the domestic and global economy
- Real GDP growth is expected to be near two percent for the year as job growth remains anemic and the threat of European and Asian economic slowdowns continue to plague the domestic economy. Current GDP forecasts project modest growth between 1.0 – 2.5 percent for 2013
- A number of policy changes set to take place in January 2013 could drastically impact economic growth during the year. A host of significant tax reduction provisions are set to expire, which would curb consumer spending, further weakening an already precarious recovery
- High unemployment with weak job growth has been a concern for the past few years and is expected to carry through into 2013
- Housing has been a drag on the economy for several years, but 2012 brought signs of bottoming out and recent data provides hope of a modest recovery as in 2013. Housing starts and new home sales have been trending higher off of historical lows while existing home sales continue on a choppy path. Housing outlooks for 2013 suggest moderate price appreciation but are likely to be muted by weak job growth and high unemployment despite record low mortgage rates

Opportunities

Based on the data resulting from research of both primary and secondary sources as outlined above, the following continue to be areas of primary focus as far as future policy/product development:

- Address the most critical housing needs in the district – including housing issues for seniors, persons with special needs, homeless individuals and families, households in rural areas and those who are severely cost burdened
- Focus on education – explore opportunities to support financial literacy initiatives, especially for young adults
- Prioritize rehabilitation and preservation – including owner-occupied housing, home modifications for seniors and persons with disabilities, small scale rental 1-4 units (mod-rehab program) and preservation of existing subsidized units
- Support comprehensive community development - rewarding community and affordable housing projects that are consistent with sound local planning and that have the potential for the greatest impact on the community where they are to be located
- Coordinate efforts to support innovative approaches – coordinating investment of limited resources among funders, developing banking partnerships and convening stakeholders to share best practices and ideas to address significant issues
- Support economic development – by encouraging mixed-use development, focusing support for manufacturing and providing capital available for entrepreneurs and small businesses
- Align messages on policy-related issues – including GSE reform and support for important programs

Recap of 2012 Key Initiatives and Goals

The information below summarizes the Bank's 2012 Community Lending Plan performance through October 31, 2012 and projects the year-end results where appropriate:

1. Expand the use of the Bank's existing community lending products and services through the following:

1(A). Community Lending Program (CLP) – commitment to specific projects

2012 Goal: The Bank will commit CLP funds to 20 specific projects.

Results: The Bank has committed CLP funds to 12 specific projects through October 31, 2012. An additional two projects are anticipated by year-end for a total of 14 projects.

The Bank approved a total of 57 CLP applications through October 31st (12 specific projects and 45 portfolio applications). Portfolio loans are qualified loans made by a member prior to requesting CLP funds. To qualify, portfolio loans must have been originated within 90 days of the CLP funding. The total dollar amount requested was \$128 million (\$16 million for specific projects and \$112 million for portfolio loans).

1(B). Technical Assistance

2012 Goal: Continue to expand relationships with the Bank's partners and provide technical training to members.

Results: The Bank conducted various product related technical assistance and training sessions throughout the district in 2012.

In support of the 2012 Affordable Housing Program (AHP) funding round, the Bank conducted one webinar with 50 attendees and four in-person workshops with a total 102 attending. In addition to the webinar and workshops, the Community Investment Department staff conducted 55 project-specific technical assistance consultations related to the AHP funding round.

Bank staff also conducted a product information webinar for the Banking On Business (BOB) product for 51 attendees prior to the opening of the initial funding round. In addition, four in-person workshops were conducted throughout the year to bring more detailed product information directly to members in underserved market areas.

1(C). Banking On Business Program

2012 Goal: Commit all available funds (\$2.2 million) to eligible small businesses and increase the number of members enrolled to use BOB by 8 members.

Result: The Bank has committed the entire \$2.2 million BOB allocation and 11 new members enrolled in the BOB product as of October 31, 2012.

A total of 21 businesses were approved through October 31, 2012 (with 11 located in Northeastern Pennsylvania, two in Southeastern Pennsylvania, two in Southwestern Pennsylvania, one in Northwestern Pennsylvania, four in West Virginia and one in Delaware).

1(D). Member Education Initiative

2012 Goal: Develop and conduct quarterly member educational seminars that provide member banks with the opportunity to increase their lending and investing in affordable housing and/or community development.

Results: As part of its ongoing member education series, the Bank has completed two of three educational offerings planned for 2012. The last topic “Organizing a Loan Consortium to Support Affordable Housing and Community Development” was presented at three in-person workshops and a webinar is scheduled for November 30. The other topics covered in 2012 as part of the member education series were “Housing and Community Development ABCs” and “Chesapeake Bay Watershed Environmental Requirements/Local Compliance.”

As of October 31, 2012, representatives from 68 different members attended at least one of the Bank’s seminars offered in 2012.

1(E). Increase the number of members that submit an application, enroll in, or participate in a community investment product or initiative in 2012

2012 Goal: Increase the number of members participating in the Bank's Community Investment products to 100 members.

Members must complete one or more of the following requirements in 2012 to count toward the achievement of the goal:

- 1) Submit an eligible business under the Banking On Business (BOB) program, enroll to use BOB for the first time, or update their enrollment in BOB if they have been inactive since 2007
- 2) Submit a qualified AHP, CLP or Letter of Credit application
- 3) Participate in member education training or Bank initiatives (Blueprint Communities or other new initiatives).

Results: Through October 31, 2012, 97 members have used or participated in at least one of the Bank's community investment products or initiatives. By year-end, the Bank expects the number of participating members to increase to 105.

2. Support cooperation and partnerships and align the Bank's program priorities to meet housing and economic development needs.

2(A). Increase Capacity in Underserved Areas

The Bank pursued opportunities to enhance the capacity of existing Community Based Organizations (CBOs) and developers to undertake affordable housing and economic development projects.

2012 Goal: The Bank will support the development of capacity of CBO's and developers by sponsoring/supporting educational workshops and conferences.

Results: The Bank sponsored and participated in several housing and community development conferences in 2012:

- In Pennsylvania, the Bank was a major sponsor for both the Pennsylvania Association of Housing and Redevelopment Authorities' Conference and the Housing Alliance's Homes Within Reach Conference. These two conferences were attended by over 700 housing and community development stakeholders from across the Commonwealth
- In Delaware, the Bank sponsored the Governor's Housing Conference with over 400 attendees
- In West Virginia, the Bank sponsored several conferences including the West Virginia Housing Conference hosted by CommunityWorks and the West Virginia Annual Community Action Continuing Education Conference

2(B). Blueprint Communities (BC)

2012 Goal: Cooperate with local partners and community stakeholders to support the efforts of the 28 recertified and two new Blueprint Communities in Pennsylvania, West Virginia and Delaware with the implementation of their community plans.

Result: In 2012, the Bank continued its work with eight community teams in West Virginia, 14 in Pennsylvania and six in Delaware who had previously recertified their Blueprint Communities (BCs) designation.

In Delaware, two communities were designated as Blueprint Communities in late 2011. In 2012, these communities completed leadership and capacity building training provided by the University of Delaware's Center for Community Research and Service and are receiving coaching/technical assistance with the development of revitalization plans. The Bank is considering \$5,000 seed grant proposals from both communities.

The Bank also awarded \$10,000 mini-grants to two recertified Delaware communities to support community development activities as part of a competitive proposal process.

In Pennsylvania, Blueprint Community team's Tamaqua and Uniontown hosted Learning Exchanges, sponsored by the Bank and the Local Initiatives Support Corporation, where they showcased best practices in community development.

In West Virginia, the Bank and the Benedum Foundation partnered with the Community Development Hub to begin the process for selecting new communities in the state, five to seven communities are expected to be designated Blueprint Communities by December 2012 and a kick-off event is being planned for early 2013.

2(C). Expand Access of Intermediary Lenders

2012 Goal: Enhance relationships with intermediaries, explore membership opportunities with Community Development Financial Institutions (CDFI), and continue to partner with various intermediary lenders serving the Bank's district.

Results: During 2012, the Bank participated in or supported the following activities sponsored by other financial intermediaries:

- Small Business Administration (SBA) Lenders Conference in Western Pennsylvania
- West Virginia SBA webinar for Small Business Development Center staff
- Central Pennsylvania Small Business Development Center workshop
- Product presentation to representatives of U.S. Department of Agriculture's West Virginia Rural Community Development Initiative
- Federal Reserve Bank of Philadelphia's Small Business Roundtable

2(D). Facilitate the creation of partnerships with member banks, funding sources and other stakeholders to address critical affordable housing and community development needs.

2012 Goal: The Bank will seek opportunities to support housing and community development events and meetings to address issues such as the effect of Marcellus Shale on housing markets and financial literacy.

Results: As noted under goal 1.D. Member Education, the Bank offered member educational meetings on three topics, which involved a variety of funding partners, regulators and other stakeholders.

The Bank also recognized the significant contributions of its members to community investment, presenting its Pillars of the Community and Council awards. The Pillars winners were Penn Security Bank and Trust (for using the AHP, CLP and BOB programs) and WSFS Bank (for using the AHP and BOB programs). The Council's Award recipient was Karen Whitehill of the KNBT Division of National Penn Bank.

2(E). Align the Bank's program priorities to meet the critical affordable housing and community development needs.

2012 Goal: The Bank will continue to refine its programs in order to best meet the needs within the district. Specifically, the Bank will explore enhancements that: (1) address housing issues for seniors, persons with special needs and those severely cost burdened, and (2) focus on rehabilitation and preservation.

Results: The Bank received applications in the 2012 AHP funding round that support a variety of underserved needs in the district. Of the 59 AHP applications (2171 units) in the 2012 AHP funding round, the following summarizes the projects the addressed the district's housing needs:

- Senior housing – 31 projects
- Households with special needs - 43 applications (334 units)
- Extremely low-income households - 37 applications (443 units)
- Rehabilitation/presentation - 33 applications (1489 units)

2013 Key Initiatives and Goals

The information below summarizes the Bank's Community Lending Plan performance goals for 2013:

1. Expand the use of the Bank's existing community lending products and services through the following:

1(A). Community Lending Program – commitment to specific projects

The Bank has created a loan product that incorporates the broader eligibility criteria permitted in the CICA regulation. The loan product, called the Community Lending Program (CLP), is priced at the Bank's cost of funds.

The Bank will continue to emphasize using CLP for specific project financing, whereby members match-fund loans to specific qualified projects.

2013 Goal: The Bank will commit funds to 20 specific projects.

1(B). Technical Assistance

The Bank's Community Investment Department staff meets with members and partners, providing technical assistance to these groups on the use of our housing and community investment products. This practice will continue to be provided as a component of the Bank's 2013 Plan.

2013 Goal: Continue to expand relationships with the Bank's partners and provide technical training/assistance to members and other product users.

1(C). Banking On Business Program

The Banking on Business (BOB) program is designed to assist member-financed small business start-ups and expansion. The Bank will continue to emphasize technical assistance and promote usage to members in Blueprint Communities and underserved markets in 2013.

2013 Goal: Commit all available funds (\$2.7 million) to eligible small businesses and increase the number of members enrolled to use BOB by 10 members.

1(D). Member Education Initiative

In 2013, the Bank will continue to offer the member education initiative it started in 2009, which focuses on providing members with the latest information on programs and/or activities related to housing, community and economic development. The educational sessions strive to present relevant information that may lead to potential business opportunities for our members.

2013 Goal: Develop and conduct at least one member educational seminar that will provide member banks with the opportunity to increase their lending and investing in affordable housing and/or community development.

1(E). Increase the number of members that either enroll in or submit an application for a community investment product

2013 Goal: Increase the members participating in the AHP, BOB, CLP or First Front Door (FFD). The goal is to achieve at least 95 member touch points (product participation) in 2013.

2. Support cooperation and partnerships and align the Bank's program priorities to meet housing and economic development needs:

2(A). Increase Capacity in Underserved Areas

The Bank will pursue opportunities to enhance the capacity of existing Community Based Organizations (CBOs) and developers to undertake affordable housing and economic development projects. The Bank recognizes that effective CBOs are a key element in encouraging members to participate in non-traditional partnerships for affordable housing and community development.

2013 Goal: The Bank will seek to support a variety of training/educational workshops or seminars conducted by other organizations that focus on issues related to either affordable housing or community development.

2(B). Blueprint Communities (BC)

2013 Goal: Continue to support the efforts of the existing Blueprint Communities in Pennsylvania, West Virginia and Delaware with the implementation of their community plans. In addition, the Bank will work with partners to designate new Blueprint Communities in West Virginia.

2(C). Expand Access of Intermediary Lenders

For some economic development activities, other organizations may offer the best opportunity to meet credit needs in underserved markets. For example, CDFIs, SBA 504 Corporations, Community Development Entities under the New Market Tax Credits (NMTTC), or local economic development intermediaries may be able to finance projects that contain a higher degree of risk or that require a higher level of technical assistance. The Bank will explore opportunities for our members to partner with these entities.

2013 Goal: Enhance relationships with intermediaries, explore Bank membership opportunities with CDFIs, and continue to partner with various intermediary lenders and organizations serving the Bank's district.

2(D). Facilitate the creation of partnerships with member banks, funding sources and other stakeholders to address critical affordable housing and community development needs.

2013 Goal: Seek opportunities to support housing and community development events and meetings to address issues that are pertinent to communities and members in the district.

2(E). Align the Bank's program priorities to meet the critical affordable housing and community development needs.

The Bank will work with the Council and the Board of Directors to enhance, as needed, the policies, priorities and guidelines to address the critical affordable housing and community development needs.

2013 Goal: Re-launch the First Front Door product. In addition, the Bank will complete a housing needs assessment. The scoring priorities in the competitive AHP program and set-aside(s) of AHP funds will be aligned to address the housing needs identified in the assessment.