#### NATIONAL FAIR HOUSING ALLIANCE

# FHFA Listening Session FHLBank System at 100: Focusing on the Future Initiative

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# Fair & Affordable Housing

NELA

The FHLBanks need to do substantially more to support fair and affordable housing.

The FHLBanks should exceed the statutory threshold for affordable housing and include investments in climate resiliency.

The FHLBanks must fulfill their obligation under the Fair Housing Act to Affirmatively Further Fair Housing.

# Credit Access Program

The FHLBanks should educate their members on promoting access to credit for underserved markets.

- Special Purpose Credit Programs
- First Generation Down Payment Programs
- Small Dollar Mortgage Programs
- Language Access Initiatives.



# Source of Income

FHLBanks should condition multi-family rental housing advances on source of income protections.

- Require acceptance of all lawful sources of income as rental payment.
- Protect against eviction on the basis of source of income.



## Membership Conditions

- FHLB membership should be conditioned on the fair housing and fair lending record.
- Membership for CDFIs with assets greater than \$1B should be conditioned on the existence of a community benefits agreement.



## Board of Directors

FHLBanks should add more public interest independent directors, including those with experience in fair housing and fair lending.



### **Analysis & Transparency**



#### **\*** To enhance transparency, FHFA should:

- Publish a detailed analysis for each FHLBank of the public support and private benefits received as compared to the public benefits delivered.
- Annually publish a detailed report for each FHLBank describing the activities related to fair housing, fair lending, Affirmatively Furthering Fair Housing, and affordable housing.
- Require the FHLBanks to annually publish Equitable Housing Finance Plans.



#### ABOUT THE NATIONAL FAIR HOUSING ALLIANCE

The National Fair Housing Alliance® leads the fair housing movement. NFHA works to eliminate housing discrimination and ensure equitable housing opportunities for all people and communities.

- Education and outreach
- Member services
- Public policy & advocacy
- Housing and community development
- Tech equity
- Enforcement
- Consulting and compliance programs

