STATE OF MICHIGAN
RICK SNYDER
GOVERNOR
MICHIGAN STATE HOUSING DEVELOPMENT AUTHORITY
LANSING
SCOTT WOOSLEY, CFA
EXECUTIVE DIRECTOR

July 10, 2013

RECEIVED
JUL 15 2013
LARRY S. ROYSTER
SUPREME COURT CLERK

Larry Royster, Chief of Staff
Michigan Supreme Court
Post Office Box 30052
Lansing, Michigan 48909

Re: ADM File No. 2012-04 - Proposed Amendment of Rule 3.218 of the Michigan Court Rules

Dear Mr. Royster:

This letter is written in response to the Supreme Court's proposal to amend Rule 3.218 of the Michigan Court Rules and requests for comment on the same.

The Michigan State Housing Development Authority (the "Authority" or "MSHDA") strongly supports the proposed rule amendments. Specifically, the Authority supports aspects of the proposed rule that will make Friend of the Court Records available to Authority at the request of a person who can show that the information is necessary to allow the person to receive services from that government agency.

MSHDA administers a number of federal housing assistance programs that require the Authority to determine a household's income level in order to both determine whether or not the household qualifies for federal assistance and to determine the appropriate level of such assistance. Support payments provided pursuant to court order can be a significant source of income for certain households and the Authority's ability to verify the amount of support can be a critical factor in making a determination as to eligibility and assistance level.

We believe that the proposed court rule would address this issue, clear up any inconsistency in current practice, and better allow the Authority to complete its important work in this regard.

The Authority staff is working with the Michigan Department of Human Services to adjust the data sharing arrangements between the parties to handle this additional information when applicable and allow for an appropriate sharing of this data. These changes will be most effective if the proposed court rule is adopted.

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Equal Housing Employer/Lender

It is our understanding that a court rule considered under the proposed timeline would be adopted by the court in the fall and implemented by the court effective January 1, 2014. The Authority would request that the effective date be accelerated to October 1, 2013 given the need for immediate implementation of the change and the necessity that we gain access to the applicable data on as expedited a timeline as possible.

Thank you for your consideration of our recommendations and requests.

Sincerely,

Scott Woosley
Executive Director

Christopher L. LaGrand
Chief Housing Investment Officer

cc: Kelly Rose
Lisa Dove
MSHDA Rental Assistance and Homeless Solutions Division

Donna McMillan
MSHDA Asset Management Division

Sherri Davio
Cassandra Brown
MSHDA Rental Development Division