



December 5, 2022

Ms. Marcea Barringer
Supervisory Policy Analyst
Attention: Duty to Serve 2022 RFI
Federal Housing Finance Agency
Eighth Floor, 400 Seventh Street, S.W.
Washington, D.C. 20219

Submitted via Federal eRulemaking Portal:

<https://www.fhfa.gov/PolicyProgramsResearch/Programs/Pages/Duty-to-Serve.aspx>

Re: Support for Fannie Mae Duty to Serve Plan Modifications to Explore Feasibility of Equity Investments in Native CDFIs

Dear Ms. Barringer:

We are writing on behalf of the South Dakota Native Homeownership Coalition's Policy Committee to respond to the request for comments from the Federal Housing Finance Agency on Fannie Mae's Duty to Serve Plan Modification.

Created in 2013, the Coalition is a diverse group of agencies, institutions, and organizations with a mission to increase homeownership opportunities for South Dakota's Native people to build strong and healthy communities. Our members include representatives of South Dakota's tribes, federal and state agencies, tribally designated housing entities (TDHEs), nonprofit organizations, housing developers, lenders, and Native community development financial institutions (CDFIs).

We are writing to express our strong support for Fannie Mae's proposed Duty to Serve plan modification under Housing for High-Needs Rural Populations – Objective #4. This modification would allow Fannie Mae to explore the feasibility of equity investments in Native CDFIs to create access to affordable capital.

c/o Lakota Funds, P.O. Box 340, Kyle, South Dakota 57752 • (605) 455-2500

CREATING A CLEAR PATH TO HOMEOWNERSHIP

Native CDFIs are critical to the deployment of affordable mortgage capital in Native communities in South Dakota. The three Native CDFI housing lenders in our state include Masaska Owecaso Otipi Financial and Lakota Federal Credit Union on the Pine Ridge Reservation and Four Bands Community Fund on the Cheyenne River Reservation. The possibility of these lending institutions accessing equity investments from Fannie Mae would open up opportunities for the Native CDFISs to explore the creation of new down payment assistance and/or second mortgage programs.

We urge you to approve Fannie Mae’s request for this plan modification to explore the feasibility of equity investments in Native CDFIs and the recommended activities that result from this exploration.

We appreciate the opportunity to provide these comments and look forward to working with the Federal Housing Finance Agency to improve financing opportunities inspired by the Duty to Serve regulations to ensure that Native people continue to have access to homeownership financing no matter where they live, including on tribal land.

Thank you for your consideration.

Sincerely,



James “JC” Crawford
Principal
CBJ Producers

Policy Committee Co-Chair
SD Native Homeownership Coalition



Sharon Vogel
Executive Director
Cheyenne River Housing Authority

Policy Committee Co-Chair
SD Native Homeownership Coalition