



NORTH DAKOTA  
**Bankers**  
ASSOCIATION

February 27, 2023

The Honorable Sandra Thompson  
Director  
Federal Housing Finance Agency  
Constitution Center  
400 7th Street SW  
Washington, D.C. 20219

Via Email to [FHLBankSystem100@fhfa.gov](mailto:FHLBankSystem100@fhfa.gov)

RE: FHFA Review of the Federal Home Loan Bank System

Dear Director Thompson,

On behalf of the North Dakota Bankers Association (NDBA), thank you for the opportunity to comment on the FHFA review of the Federal Home Loan Bank (FHLB) system.

NDBA is a state trade association organized in 1889 to serve as a voice for North Dakota banks. NDBA's 62 members are commercial banks and savings institutions which operate and serve consumers, farmers and commercial customers in North Dakota. Our banks care about the vibrancy and vitality of their communities and appreciate the role the FHLB of Des Moines plays in serving their bank customers.

By far, the majority of NDBA member banks qualify under any definition as community banks and most are also small banks. North Dakota banks work hard to provide the full range of modern banking services to North Dakotans. As the backbone of main street businesses, community banks must have access to the full range of tools critical to the operation of a safe, sound and profitable institution in today's complex banking environment. FHLB liquidity services have become one of those critical bank management tools for banks in North Dakota, especially given the cyclical nature of the state's agricultural economy.

In addition, the FHLB of Des Moines has been an important partner for banks in serving the housing needs throughout the state by providing liquidity to support housing finance in all economic cycles and operating environments. Affordable housing, especially in rural North Dakota, continues to be a critical challenge. The FHLBank's mortgage programs and down payment assistance programs allow banks to meet the needs of their customers by filling the financing gaps.

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NDBA appreciates the opportunity to comment on the FHFA review of the FHLB system. We are confident you will find the FHLB system plays a critical role in U.S. financial system as a reliable and stable source of funding for community banks serving their communities.

Thank you for the consideration of our comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "Rick Clayburgh", with a long horizontal flourish extending to the right.

Rick Clayburgh  
President and CEO