

June 12, 2018

Alfred M. Pollard General Counsel, Attention: Comments/RIN 2590–AA83, Federal Housing Finance Agency, Eighth Floor, 400 Seventh Street SW, Washington, DC 20219.

And by email to RegComments@fhfa.gov

Dear Mr. Pollard,

RE: Request for comments on FHFA Affordable Housing Program Amendments, RIN 2590-AA83, Federal Register 19188, Vol. 83, No. 85, Wednesday, May 2, 2017

The CDFI Coalition is pleased to have the opportunity to comment on the Federal Housing Finance Agency (FHFA) Affordable Housing Program (AHP) amendments. The CDFI Coalition ("Coalition") is the national voice for CDFIs of every type. The Coalition supports CDFIs nationwide to help them better provide credit, capital, development services, and financial services to underserved people and communities. The Coalition provides an opportunity for CDFIs and their many partners, including the full spectrum of community development finance funders and researchers, to have a unified voice in support of the role of CDFIs as an integral segment of the nation's financial services industry.

CDFIs have a strong interest in the proposed changes offered by the FHFA, as a large percentage of the nation's 1000+ certified CDFIs access the program directly. CDFIs may participate in the AHP program as members of their respective banks, as project sponsors, and as grantees. This experience, while substantial, is quite diverse across the CDFI industry.

Some CDFIs in the Coalition's membership are focused solely on using AHP for multi-family rental projects, while others prioritize homeownership activities, and generally support maintaining the homeownership retention requirements. Other CDFIs are focused on obtaining greater access to

the program's revolving loan fund provisions. The Coalition is particularly interested in working with FHFA and banks on expanding the use and impact of revolving loan funds.

Creating a regulatory structure that works for all AHP stakeholders and balances multiple competing priorities is difficult to develop and administer. The CDFI Coalition supports a regulatory framework that outlines clear priorities, but allows maximum flexibility and reduced complexity for FHLBs, their members, and project sponsors.

We encourage the FHFA to read with care the more specific recommendations submitted by individual CDFIs and their trade associations. (A list of the CDFI Coalition's members are attached.)

Sincerely,

Dominik Mjartan

CDFI Coalition Board Chair On behalf of the CDFI Coalition



CDFI Coalition Membership, June 2018

Access to Capital for Entrepreneurs	Cleveland	GA
ACCION U.S. Network	Brooklyn	NY
Alaska Benteh Capital	Wasilla	AK
Alaska Growth Capital	Anchorage	AK
Association for Enterprise Opportunity	Washington	DC
BankPlus	Ridgeland	MS
Beneficial State Foundation	Oakland	CA
BBIF Florida	Orlando	FL
Boston Commmunity Capital	Boston	MA
Bridge Investment Community Development Corporation	Rock Island	IL
BrightBridge Inc.	Chattanooga	TN
Capital Impact Partners	Oakland	CA
Capital Plus Financial	Bedford	TX
Carolina Small Business Development Fund	Raleigh	NC
CEI	Brunswick	ME
Center for Rural Affairs	Lyons	NE
Chicago Community Loan Fund	Chicago	IL
Chicanos Por La Causa/Prestamos CDFI. LLC	Phoenix	AZ
Cincinnati Development Fund	Cincinnati	ОН
Cinnaire Lending (Formerly- Capital Fund Services, Inc.)	Lansing	MI
Citizen Potawatomi Community Development Corporation	Shawnee	ОК
Common Capital, Inc.	Holyoke	MA
Community Action Financial Institute	Washington	DC
Community Development Bankers Association	Washington	DC
Community Development Venture Capital Alliance	New York	NY
Colorado Enterprise Fund	Denver	СО
Community Reinvestment Fund	Minneapolis	MN
Community Ventures Corp.	Lexington	KY
Cooperative Fund of New England, Inc.	Wilmington	NC
CRAFT3	Ilwaco	WA
Credit Builders Alliance	Washington	DC
CU Strategic Planning	Tacoma	WA
Cumberland Empowerment Zone Corporation	Millville	NJ
Dakota Resources	Renner	SD
Diamond Lakes Federal Credit Union	Malvern	AR
Economic Opportunities Fund	Philadelphia	PA
Enterprise Community Loan Fund, Inc.	Columbia	MD
Fahe	Berea	KY
Finance Fund	Columbus	ОН
Four Directions Development Corporation	Orono	ME



CDFI Coalition Membership, June 2018

Fresno Community Development Financial Institution	Fresno	CA
Fund Consulting, LLC	Chicago	IL
GECU	El Paso	TX
Greensboro Community Development Fund	Greensboro	NC
Gulf Coast Renaissance Corporation	Gulfport	MS
Homes Are Possible	Aberdeen	SD
Housing Development Fund	Stamford	СТ
Housing Partnership Network	Washington	DC
Idaho-Nevada CDFI, Inc.	Boise	ID
IFF	Chicago	IL
Impact Seven, Inc.	Almena	WI
Invest Detroit Foundation	Detroit	MI
Kentucky Highlands Investment Corporation	London	KY
Launch, NY, Inc.	Buffalo	NY
LiftFund	San Antonio	TX
Lendify Financial LLC	San Francisco	CA
LISC	Washington	DC
Los Angeles LDC	Los Angeles	CA
Low Income Investment Fund	Washington	DC
Lummi Community Development Financial Institution	Ferndale	WA
MDK Consulting Group	San Antonio	TX
MetaFund Corporation	Oklahoma City	OK
Metropolitan Economic Development Assoc. (Meda)	Minneapolis	MN
MGIC	Milwaukee	WI
MoFi (Formerly, Montana and Idaho Community Devlopment Corporation)	Missoula	MT
National Association for Latino Community Asset Builders (NALCAB)	Washington	DC
National Community Investment Fund	Chicago	IL
National Community Reinvestment Coalition	Washington	DC
National Community Stabilization Trust	Washington	DC
National Cooperative Bank	Washington	DC
National Council on Agricultural Life and Labor Research Fund, Inc. (NCALL	Georgetown	DE
Research, Inc.)		
National Development Council	New York	NY
National Federation of Community Development Credit Unions	New York	NY
Native American Development Corporation	Billings	MT
Native CDFI Network	Rapid City	SD
Natural Capital Investment Fund, Inc.	Shepherdstown	WV
NeighborWorks Capital	Silver Spring	MD
New Jersey Community Capital	New Brunswick	NJ
Nonprofits Assistance Fund	Minneapolis	MN



CDFI Coalition Membership, June 2018

North Carolina Community Development Initiative Northwest Native Development Fund Carlie Dam WA Ohio Capital Finance Corporation Oportun Financial Corporation Redwood City CA Opportunity Finance Network Washington DC Opportunity Fund San Jose CA Opportunity Resource Fund PACE Finance Corp. Los Angeles CA Pacific Coast Regional Small Business Development Los Angeles CA Pacoima Development Federal Credit Union Pathway Lending (Formerly SE Comm. Capital Corp.) Pathway Lending (Formerly SE Comm. Capital Corp.) Pennsylvania Assistive Technology Foundation Primary Care Development Corporation (PCDC) New York Reinvestment Fund, Inc. Reinvestment Fund, Inc. Reinvestment Fund, Inc. Rochaster SC Community Assistance Corporation SC Community Loan Fund SC Community Loan Fund Self-Help South Carolina Community Bank Columbia SC Catlai and Company, Inc. Self-Help South Carolina Community Bank Columbia SC Southern Bancorp Little Rock AR Steps Coalition Title Carolina Community Capital The Carsey School of Public Policy, University of New Hampshire The Disability Opportunity Fund, Inc. Rockville NY The Genesis Fund Nevest Challedphia Services NY The Genesis Fund Nevest Chiladelphia Services Institution Philadelphia PA Woodstock Institute Philadelphia PA Woodstock Institute Philadelphia PA Woodstock Institute	Nonprofit Finance Fund	New York	NY
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