



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,

A handwritten signature in blue ink, appearing to read "Dom Mjartan", with a horizontal line extending to the right.

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	OH
Cinnaire Lending (Formerly- Capital Fund Services, Inc.)	Lansing	MI
Citizen Potawatomi Community Development Corporation	Shawnee	OK
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	CO
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	OH
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	CT
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 Development 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 Research, Inc.)	Georgetown	DE
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

Nonprofit Finance Fund	New York	NY
North Carolina Community Development Initiative	Raleigh	NC
Northwest Native Development Fund	Carlie Dam	WA
Ohio Capital Finance Corporation	Columbus	OH
Oportun Financial Corporation	Redwood City	CA
Opportunity Finance Network	Washington	DC
Opportunity Fund	San Jose	CA
Opportunity Resource Fund	Lansing	MI
PACE Finance Corp.	Los Angeles	CA
Pacific Coast Regional Small Business Development	Los Angeles	CA
Pacoima Development Federal Credit Union	Van Nuys	CA
PathStone Enterprise Center	Rochester	NY
Pathway Lending (Formerly SE Comm. Capital Corp.)	Nashville	TN
Pennsylvania Assistive Technology Foundation	King of Prussia	PA
Primary Care Development Corporation (PCDC)	New York	NY
Quattrucci & Co.	South Freeport	ME
Reinvestment Fund, Inc.	Philadelphia	PA
Rosenthal, Clifford	Brooklyn	NY
Rural Community Assistance Corporation	West Sacramento	CA
SC Community Loan Fund	Charleston	SC
Scalia and Company, Inc.	Portland	ME
Self-Help	Durham	NC
South Carolina Community Bank	Columbia	SC
Southern Bancorp	Little Rock	AR
Steps Coalition	Gulfport	MS
TELACU Community Capital	Los Angeles	CA
The Carsey School of Public Policy, University of New Hampshire	Durham	NH
The Disability Opportunity Fund, Inc.	Rockville	NY
The Genesis Fund	Brunswick	ME
Three Roots Capital	Knoxville	TN
Venture South	Columbiana	AL
West Central Development Corporation DBA Anchor Financial Services	Lima	OH
West Philadelphia Services Institution	Philadelphia	PA
Woodstock Institute	Chicago	IL