

Creating opportunities for Native communities

2022 Policy & Advocacy Report



The Native CDFI Network's mission is to be a national voice and advocate that strengthens and promotes Native community development financial institutions (CDFIs), creating access to capital and resources for Native peoples.

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Native CDFI Network is a 501(c)(3) nonprofit organization.



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NATIVE CDFIs BY THE NUMBERS

64

Number of certified Native CDFIs serving American Indian, Alaska Native and Native Hawaiian communities in the United States

86%

Percentage of Native communities that lack a single financial institution within their borders

\$166M

Demand for capital by NCN members

\$21.3M

Amount of funding appropriated by Congress for the Treasury's Native American CDFI Assistance (NACA) program in 2022

30%

Increase in annual funding for Native CDFIs through the NACA program in 2022

21

Number of member webinars hosted by Native CDFI Network in 2022

\$8

Amount of private sector investments that are typically created by each \$1 invested in a CDFI, according to Treasury Secretary Janet Yellen



NCN Interim CEO Pete Upton

To our members, supporters and collaborators,

hroughout the last year, whenever Native CDFI Network has profiled its members in the new "Difference Makers" series, we've always saved a tough question for last: What do you need to recognize the full potential of your Native CDFI?

In the series and in other conversations with executive directors across the country, Native CDFI leaders have told us clearly they need more resources to be able to fully begin to address the needs in their communities, and they need those resources to be tailored to work in Indian Country.

As an industry, Native CDFIs and NCN have done a good job of talking about our needs, but we now need to take the next step to better define for our stakeholders how they can help us identify solutions.

Case in point: We regularly talk about the need for capital in Indian Country, but

going forward, we need to focus on the types of funding required to move the needle. Most often, that means patient capital: long-term, low-interest money that we can redeploy in our communities to make a difference.

The need for patient capital will help Indian Country as policy leaders and funders begin to shift their attention to holistic opportunities for economic development within Indigenous communities.

Successful communities require comprehensive thinking around good jobs, stable housing and reliable transportation. Only then will small businesses in our communities have reliable workforces. Only then can people find pathways to prosperity and wealth generation.

As we work to have a seat at the table as part of that discussion, it's important to take note of the progress we've made to

MILESTONES

November

NCN joins the Senate

Committee on Indian

Affairs roundtable to

highlight challenges

and opportunities

facing Native CDFIs.



December 2021

NCN efforts help secure a 30-percent increase in the CDFI Fund's NACA program to \$21.5 million, up from \$16.5 million.

2022 NCN hosts tribal leaders, Native CDF

January

2022

NCN invited to

participate in Native

Homeownership

Subcommittee

Project REACh

with Office of the

Comptroller of

Currency.

leaders, Native CDFIs, and the U.S. Treasury in the first of several roundtable discussions on leveraging the State Small Business Credit Initiatives (SSBCI) in Indian Country.

February

February 2022

RUCN convenes its first Mid-Winter Policy Roundtable event with members of Congress, federal policymakers and funders in Washington, D.C.

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get to this point. Some significant wins for NCN this year include:

- helping secure a 30-percent increase in the CDFI Fund's NACA program to \$21.5 million, up from \$16.5 million;
- starting a conversation with Treasury to establish a 10-percent Native setaside within the New Markets Tax Credit program, and establishing an internal NCN working group to develop a set of deployment goals;
- signing an MOU with Enterprise Community Partners to form a Native American Advisory Board so we can work together to help move the needle on the critical need for housing in Indian Country;
- providing a Native American economic development perspective in the rewrite of the Community Reinvestment Act regulations to better address the realities of investing in Indian Country and to improve the flow of capital from this program;

- advocating for the establishment of the Native American Programs office within Treasury to have a critical advocate within the department who understands the complexities of working within Indigenous communities;
- submitting comments to the CDFI Fund regarding the updated Certification Application process to ensure Native American CDFI Assistance Program (NACA Program) changes would not impact Native CDFIs with unintended consequences.

We've done that through strategic outreach to policymakers, certainly, but we also have more friends and a growing alumni network of former Native CDFI executives and allies to tap into. As evidenced by partnerships with the likes of NeighborWorks and Enterprise Community Partners, NCN also has deepened its ties to national nonprofits that we can partner with to address our challenges and needs.

To continue the momentum, NCN has added staff and beefed up our

August

NCN submits

comments to rewrite

the Community

Reinvestment Act

(CRA) to increase

access to capital in Indian Country. communications with members. As an organization and a membership, we're telling our own stories and showing the profound effects we're having in our communities.

More than ever before, Native CDFI Network's voice is being heard because we're part of the discussions, whether that's within various federal agencies, the halls of Congress, state houses around the country and boardrooms.

As we continue to lay the foundation for improving the financial wellbeing of our communities, NCN and its members must continue to use that voice to effect change, to inform the discussion, and to speak for ourselves, rather than have others speak for us.

Now that we're at the table, we have the opportunity and the responsibility to use our voices as a force for positive change and growth.

Weblaho (thank you to all of you),

Pete Upton Interim CEO

March 2022

NCN participates in 2022 Clinton Global Initiative Planning Retreat in New York City.

June 2022

NCN launches Summer Training Series for Native CDFI Executives.



NCN participates in the Department of Treasury's Office of Strategic Planning and Performance.

October 2022

NCN participates in White House working session with Economic Opportunity Coalition and Treasury's Freedman Bank Forum.



NCN hosts its Annual Policy and Capacity-Building Summit in Washington, D.C.

Native CDFI Network Membership program 2022

ith more than 64 Native community development financial institutions and supporters, the Native CDFI Network (NCN) is the leading industry organization supporting Native CDFIs across Indian Country. NCN strives to ensure that Native peoples are represented in the national policy dialogue and to spread the innovative solutions created by CDFIs throughout our Native communities. Most importantly, it provides an extended community where Native financial professionals can share proven models and ideas to restore native economies and foster thriving communities.

As a member of the Native CDFI Network you will be part of a collective voice advocating for expanded access to capital and promoting

the role of Native CDFIs as vital providers of financial products and services in Native communities. Your participation will help build support for our advocacy and leadership on legislative and policy matters at the federal level, particularly within the CDFI Fund and the Department of the Treasury.

You should become an NCN member if you are:

- a Native CDFI that wants to be actively involved in policy advocacy to increase resources for and advance the role of Native CDFIs in supporting thriving Native economies.
- an organization working in related fields that supports the work of Native CDFIs.

an individual who is working with or is supportive of the mission of Native CDFIs.

Membership Structure & Eligibility

NCN offers annual membership plans for Native CDFIs, individuals, forprofit and non-profit organizations. Each membership level plays a unique and vital role in growing the Network, strengthening the Native CDFI industry, and informing policy that is supportive Native economic development of strategies. For more information, visit the website or use the QR code below.



	NCN MEMBERS		NCDFI SUPPORTERS		
BENEFITS	Local / Regional Native CDFIs	National Native CDFI / Intermediary	Individual	Local / Regional Non-Profit Organization & For-Profit Organization (<\$1M) ¹	National Non-Profit Organization
Vote for NCN Board Members	0	Ø	\otimes	\otimes	\otimes
Networking Opportunities with Native CDFIs & Partners Across the Country	0	0	0	0	0
Access to 'Members Only' Events / Webinars	0	0	0	0	0
'Members Only' White Papers by Policy / TA Experts	0	0	0	0	0
Weekly NCN Email Broadcast with Latest News	0	0	0	0	0
Acknowledgment in NCN's Annual Report	0	0	0	0	0
1 Registration to NCN's Annual Policy Summit	8	\otimes	0	8	8
2 Registrations to NCN's Annual Policy Summit					

\$500

\$600

\$75

\$750

\$750 1 For-profit organizations with annual revenues less than \$1 million.

Making A Difference With Member Programs

eginning in the early days of COVID-19, the Native CDFI Network responded to member calls for help by rapidly transforming the scope of member programs it offered. Amid the uncertainty of the pandemic, NCN ramped up a series of virtual events that allowed members to learn, connect and, in many ways, cope with the rapidly changing environment.

The transformation has continued – some would say accelerated – in 2022 with a robust schedule of member-driven virtual and in-person programs and events.

"Our programming is based on member input," said Kristen Wagner, Native CDFI Network's Program Director. "We get input directly from members based on what's happening in the field and at their own Native CDFI. They're telling us what they need, and our job is to be responsive with programs that offer information, skill-building and opportunities for our members to connect with each other."

Webinar Series

Building on the success of its webinar series during the pandemic, NCN accelerated its pace of online programming in 2022. In the first 10 months of the year, NCN hosted 21 webinars for its members, including multiple sessions on the State Small Business Credit Initiative (SSBCI) and the United States Department of Agriculture's Single Family Housing Direct Home Loans program, also known as the Section 502 Direct Loan Program.

The webinars offer education and help build awareness of important policy initiatives that affect Native CDFIs, while also highlighting member best practices and innovation. Year-to-date,



Member input drives Native CDFI Network programming, according to Kristen Wagner, national programs director. "They're telling us what they need, and our job is to be responsive with programs that offer information, skill-building and opportunities for our members to connect with each other."

the webinars have drawn more than 800 attendees, according to Wagner, and there are several webinars still on the docket for the remainder of 2022.

Looking ahead, members can expect more growth in programming in 2023, Wagner said. That includes webinars on new and emerging topics, as well as more ways to access the content live or after the fact via the NCN website or social media pages.

Training Series

NCN hosted two multi-part training sessions for members and their staff in 2022. In January, NCN kicked off a three-part training series focused on the Native American CDFI Assistance (NACA) program. Facilitated by consultant and program expert Caleb Selby, the series detailed strategies, tips and tricks, resources and pitfalls to avoid when applying for NACA funding.

In June, the organization kicked off its first-ever NCN Institute Summer Training Series with three skill-building sessions for 20 Native CDFI Network members and their staff. The cohort-style training institute covered the topics of small business underwriting, advanced cash flow analysis and loan product price pointing during two-hour classroom sessions, followed by one-on-one coaching with series presenter Jack Northrup of New England Market Research. Native CDFIs who completed the cohort requirements also received a \$4,000 grant to upgrade their business technology - an \$80,000 investment in Native CDFIs.

NCN PROGRAMMING

Through its webinar series, training institutes and events, Native CDFI Network has welcomed dozens of difference makers as guest speakers in 2022 including policymakers, experts, innovators and leaders including:

U.S. Rep. Sharice Davids (D-KS)

U.S. Senator Lisa Murkowski (R-AK)

U.S. Senator Tina Smith (D-MN)

Carol Wayman | Office of U.S. Senator Catherine Cortez Masto (D-NV)

Jodi Harris, CDFI Fund | U.S. Department of the Treasury

Janis Bowdler | U.S. Department of the Treasury

Xochitl Torres Small | U.S. Department of Agriculture

Courtney Haynes | Department of Energy

Onna LeBeau | Office of Indian Economic Development Department of Interior

Michael J. Hsu | Office of the Comptroller of the Currency

Rohit Chopra | Consumer Financial Protection Bureau

Adair Morse | SSBCI Program

Casey Lozar | Center for Indian Country Development

Michou Kokodoko | Federal Reserve Bank of Minneapolis

Megan Cruz | Federal Reserve Bank of St. Louis

Candace Herring | Board of Governors of the Federal Reserve System

Chad Marchand | Federal Reserve Bank of San Francisco

Steven Shepelwich | Federal Reserve Bank of Kansas City

Chrystel Cornelius | Oweesta Corp.

Nick Tilsen | NDN Collective

Robert J. Miller | Arizona State University

Benjamin Navarro | Fannie Mae

Joshua Stallings | Federal Home Loan Bank

Gary Cunningham | Prosperity Now

Pilar Thomas | Quarles and Brady

Jesse Van Tol | National Community Reinvestment Coalition

Ronald Milsap, Letticia Flores Poole, Vachon Harper Young | BMO Harris Bank

Beverly Meeks | Flagstar Bank

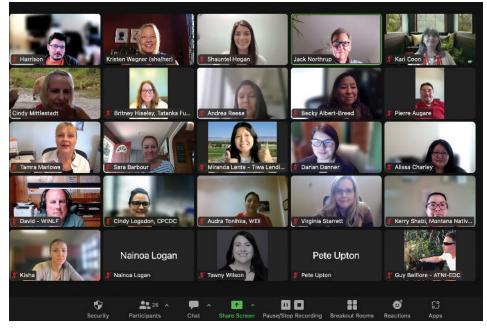
Tim Rios | Wells Fargo

Marietta Rodriguez | NeighborWorks

Mel Willie | NeighborWorks

Erica Kruzsel | Clinton Foundation

Jeffrey Moore | Independent Sector



NCN has hosted nearly two dozen webinars already in 2022, drawing more than 800 attendees with a mix of education, best practices, policy discussions and virtual networking.

Events

With the pandemic mostly behind us, Native CDFI Network leaned back into in-person gatherings where people could connect, inspire and learn from each other. As well, the live events gave NCN members the opportunity to meet with and hear first-hand from policymakers, federal officials and experts who can help advance the strength of Native CDFIs serving Indian Country.

In February, NCN hosted its firstever **Mid-Winter Policy Roundtable**, a two-day working session to review NCN's policy priorities and form action plans on issues brought forth from members. The first in-person event after Covid also welcomed guests from the U.S. Senate, including Senator Lisa Murkowski (R-AK) and the legislative aide to Senator Catherine Cortez Masto (D-NV), as well as senior officials from the USDA, Treasury, Department of Energy, the Office of Domestic Finance and the Consumer Financial Protection Bureau.

Also in attendance at the roundtable event were special guests from the Northwest Area Foundation, Neighbor-Works America, Catholic Campaign for Human Development, Clinton Global Initiative, National American Indian Housing Council, and others.

Native CDFI Network staff also expects a strong turnout of Native CDFI practitioners, funders, policymakers, and other industry partners at the **2022 NCN Policy and Capacity Build-ing Summit** in Washington, D.C.

This year's theme – Sowing the Seeds for Economic Justice Across Indian Country – reflects the important work of Native CDFIs when it comes to cultivating relationships and enriching economic conditions in their local communities.

The theme is also a call to action for attendees and others to invest in systems that grow Native economies, according to Wagner, who notes that there is a high level of receptiveness among invited guests in 2022.

"What's so exciting about the Summit is that when we have asked government officials, funders and policymakers to join us ... no one has turned us down," Wagner said. "They are excited to meet our members because they want to better understand Indian Country and the valuable work Native CDFIs are doing."



Native CDFls: Difference Makers for Indian Country

NCN developed the "Difference Makers" interview series to cast a spotlight on the innumerable benefits that Native CDFIs create for tribal communities. Each week, series author Ian Record speaks with a Native CDFI leader about his or her organization and how it's helping transform the community where they live and work. The following pages include highlights and insights from the interviews, as well as several inspiring stories of client success.

From your perspective, why did Native communities feel it necessary to create CDFIs, and what fundamental role do they play?



"It's the common thread of access to capital. There's a lack of that access across rural communities, tribal communities in particular. Tribal communities are standing up and we're figuring out ways to be creative to get those products to the members that need them. We're learning how to band together and have our voices heard and fight for those dollars to come into our communities and have them serve our members in a meaningful way. It's not a cookie-cutter solution that works the same for everyone. Those that work in Indian Country understand you have to be creative and think outside of the box. By having your own Native CDFI, you're able to create those packages that are not so cut and dry. It's not black and white. We are creating different solutions that work for different people that traditional banks wouldn't even touch. It's really amazing what Native CDFIs can do for the communities that they work in." **Sara Barbour | The Alliance CDFI**

Klamath, CA



"Often banks don't understand our communities and so the dollars just aren't getting injected into our tribal economies. We were established to enhance the tribal economy, and that's exactly what we've done. It's a win-win whenever we can make a loan—even to the tribal enterprises—because those dollars stay within the economy. How many times can we turn that dollar we've got within the community, instead of that dollar going to the big bank down the street? So our role is about access to capital, contributing to our tribal economies, education, and those things that an individual maybe isn't receiving at home: good financial decision making and goal setting and those sort of things. If they don't have a mentor in their life, maybe we can be a resource in some way." Cindy Logsdon | Citizen Potawatomi Community Development Corporation Shawnee, OK



"Many Native communities are pretty remote and rural, and just don't have access to appropriate banking and financing mechanisms. Also, there are a lot of issues with Native people being able to obtain traditional credit and being credit worthy. Also, as Native folks, we're very relational and trust based, right? So we want to be able to work with somebody that we know, that knows who we are, knows who our family is, (and) knows who our kids are. There's just not a lot of banking institutions that offer that kind of relationship. The CDFI model, which is a community-based model, really makes sense for tribal communities and economies."

Amber Schulz-Oliver | ATNI Economic Development Corporation Portland, OR



"You have to be part of the community to understand the needs and come up with creative solutions. You must have people embedded in the community. If you don't, you're guessing. If you've been on one reservation, you've been on only one reservation. We (all) have different needs, but we also have more in common than we have differences. As we work our way through that in a respectful fashion, how do we come up with a creative solution and marry the funding sources one to another? How do we address the radical differences in the cost of construction of a home? How do we attract partners to work on trust land? How do we work with somebody who's working on fee land within the boundaries of a nation? These are issues that require a 24-7 commitment to come up with creative solutions." Rollin Wood | Native Partnership for Housing Gallup, NM



"We're the only certified Native CDFI in Idaho. It's an expression of sovereignty. It's doing for your own, and taking that risk to express how you will create your own economy. It's also the importance of accessing credit for individuals, for businesses, (and) for homeowners to get a loan on trust land. If you think about federal policy historically, our wealth was taken from us. Tribes are wanting to take that back, and a financial institution is part of the solution. Another important point is that our industry works together. We provide one another a helping hand." Jonelle Yearout | The Nimiipuu Fund Lapwai, ID

What do Native CDFIs like yours need to realize their full potential? What support do they need to achieve their missions and maximize their impact?













"We need bigger NACA [Native American CDFI Assistance] awards from the Department of Treasury. Our loan volume is growing. Our Native CDFIs are growing. It's time we have a grant that meets those needs. I also want to see a Native setaside on the bond program because there are a group of us more mature Native CDFIs and even some that are emerging that want to partner to apply for a bond. We're there. We're ready. The lack of loan capital always holds us back. I shouldn't have to stop everything I'm doing and start shaking trees for more money because I don't have access to investment or the types of loan capital I need for lending. It shouldn't be that way. We need steady, consistent, low-cost access to capital." Tawney Brunsch | Lakota Funds

Kyle, SD

"Strong partnerships and networks. Your network is worth its weight in gold. Any time we've really been struggling, we reach out to other CDFIs, and we've learned and gained so much by having those connections. The other Native and non-Native CDFIs in Alaska have been such a huge resource for us. Making the time to have those relationships with one another can really pay dividends when you need it. Also, Native CDFIs have lofty missions, and there's no way we can achieve them alone."

Alana Peterson | Spruce Root Juneau, AK

"Money is an easy answer. But more specifically, (we need) technical assistance, including models and templates to quickly build critical expertise in terms of policy, lending, and other areas. That helps springboard these programs, getting them up and running much faster than they otherwise could. So technical assistance is a big part of it. Assistance with getting to scale through grant dollars for both operational support as well as loan capital, hopefully without too many compliance requirements. And then the freedom to carry out the work as the communities want and need it—not as someone far away thinks it should be done." Julia Nelmark | White Earth Investment Initiative

Ogema, MN

"We just need people to believe in us as much as we believe in our producers. We need policy change to have more access to different funding sources and different programs. We need foundations to treat us like thought partners when they're looking at investing or granting to us. There needs to be more trust-based philanthropy because we're out there in the trenches. We know exactly what our community needs. Since colonization, Indian Country has been prescribed solutions because we are perceived as broken and someone from the government will come in and say, 'Oh, you're broken or you're poor. Let me give you these commodity boxes or let me give you this housing program.' We're just prescribed these solutions without any input from our side. We have the right to self-determine our solutions." **Skya Ducheneaux | Akiptan, Inc.**

Eagle Butte, SD

"Realizing our full potential is tied to access to more non-recourse funding and more specifically funding for capacity building. It's not necessarily that difficult to attract funding in the form of recourse money from funders and investors. It's that non-recourse money in amounts that matter that it took a pandemic for the government to actually start providing. It shouldn't take that. The other thing is considering more patient performance goals and measurements, especially in a time like now. Lastly, operational capacity support for us is always a significant pursuit. Organizations like ours have smaller structures where folks have to wear many different hats. That's difficult for Native CDFIs, specifically their chief executives, to sustain."

Jeff Tickle | Cook Inlet Lending Center

Anchorage, AK

"At this stage in our growth, I need advice. I need somebody to help me look at our balance sheet and talk about better ways to move money, because idle money sitting in our savings accounts is wasted money. There are ways to keep moving money, and I need that higher-level sophistication of running a successful business so interest can be returned to Four Bands to make it more sustainable. We're exploring more revenue-generation models like becoming a mortgage broker and possibly creating a realty division and then making fees off that. I am looking for more internal revenue-generation models that also contribute to the mission because we're creating services our community still needs that don't exist." Lakota Vogel | Four Bands Community Fund Eagle Butte, SD









From top to bottom: CNEDTA clients Suzanne Sullivan (mother) and Callie Prier (daughter), coowners of Morning Sky Boutique and Evening Shade Mercantile. (Courtesy: Cherokee Nation Economic Development Trust Authority)

BHCLF client Tosa Two Heart, who participated in the Loan Fund's matched savings account program, poses with a Black Hills Federal Credit Union staff member as she purchases her first home. (Courtesy: Black Hills Community Loan Fund)

Sequoyah Fund client John McCoy (Courtesy: The Sequoyah Fund)

Nixyaawii client Melinda Broncheau, owner of Ruby's Indian Crafts & Supplies. (Courtesy: Nixyaawii Community Financial Services)

Is there an individual client success story that really inspires you?

"We had entrepreneurs – a mother and her daughter – who wanted to buy a building downtown to start a boutique. At that point, Vian had been shuttered. The buildings on Main Street were closing. But Suzanne Sullivan and her daughter Callie Prier just had it in their hearts that they were going to start this business and make it work. They came to us and we helped them with small business lending and technical assistance. They started a world-class boutique called Morning Sky that would have been perfect in the heart of the finest shopping centers in Dallas or New York City. When the COVID-19 pandemic impacted in-person sales, they pivoted to online sales. Later, we helped them buy the building next door to put in a home accessories store called Evening Shade Mercantile that has a little coffee shop in it. They have brought back to life the downtown area of a community that had it not been for them likely would have continued to sit vacant."

Stephen Highers | Cherokee Nation Economic Development Trust Authority Tahlequah, OK

"Tosa Two Heart is one of our matched savings program participants. She just bought her first home in June, and it was through the 4-to-1 match that she was able to do that. If we weren't able to provide her that assistance, she wouldn't have been successful in her quest to become a homeowner. She was so thankful, as are all of those we have helped in the past. Knowing her and the effort she made was really heartwarming, because it takes dedication from the clientele as well. They have to have enough passion to say, 'Okay, I'm going to do this. I'm going to have the dedication to raise this money myself.""

Barbara Schmitt | Black Hills Community Loan Fund Rapid City, SD

"I'd love to tell you about John McCoy. John has a fish hatchery up on a mountainside with stair-stepped fish runs. The cost of food for those trout was getting high. John had this great idea. He invented a feeding system – a solar array that powered a series of bug catchers mounted above the fish runs. He went to USDA for help, and USDA said it could provide part of the funds, but it couldn't cover the whole thing. We jumped in and used that USDA grant as the equity for his loan and got him a huge solar array. On a timer, every now and then you hear a beep, and those fish feeders open and dump the dead bug carcasses into the water. The fish love it. So John was able to grow his business by cutting his cost of food to basically zero, and the excess solar electricity powers about 50 percent of his electrical needs for his residence." **Russ Seagle | The Sequoyah Fund, Inc.**

Cherokee, NC

"Our next-door neighbor here is Umatilla tribal member Melinda Broncheau. She worked in IT and was a top professional in that field. Her mother and other family members gave her all of these skills – beading, tanning hides, and arts and crafts skills. She always had this dream of starting her own little store. She got her stuff together and opened in January 2020 in what was a former yoga studio. It was a big open space. It was kind of sparse when it first opened, and you go in there now and the place is jampacked full of materials she's produced. She just hung in there through the pandemic, taking another full-time job to keep up. When you see that kind of perseverance, it's inspiring to me and others in the community. She's one of our shining stars." Dave Tovey | Nixyáawii Community Financial Services Pendleton, OR



Representation Matters: A Seat at the Table

hose most impacted by public policy almost always have the best solutions. For too many years, the needs of Indian Country in the CDFI field went unheard, invisible, as a subset to the priorities of non-Natives.

That dynamic has begun to change in the last few years, thanks to the work of Native CDFI Network and other Native-led advocacy groups. Leaders in the Native CDFI movement have gained greater direct access to decision-makers in Congress, federal agencies, philanthropic organizations and corporate funders. NCN staff and members have earned seats on boards at organizations like the Federal Reserve, the Center for Indian Country Development, funding intermediaries, national nonprofit boards and local organizations.

"The number of Native leaders who have been elevated to sit at the table is so important, because if we're not there, nobody hears us or hears about our needs," NCN Interim CEO Pete Upton said. "We need to be at the table and make sure that Native Americans are advocating for Native Americans."

What's encouraging, Upton said, is that non-Native leaders at the table are inquisitive and interested in Indian Country.

"Some of them have never stepped foot on an Indian reservation or anywhere in Indian Country. So if we're not at the table telling the story, they'll never understand what it's like walking in our shoes."

How are Native CDFIs making a difference in Indian Country?



"Native communities face unique barriers to economic growth, including greater difficulty accessing financial services, credit, and capital. Through a combination of education and lending programs, Native CDFIs ensure Indian Country has equal opportunity to thrive and grow. I'm proud to support their mission of creating an economic infrastructure that is built to last."

- U.S. Rep. Sharice Davids (D-KS) (Ho-Chunk Nation)

"Native CDFIs understand what prosperity really means. Yes, it's about money, but it's about much more than that. It's about the need to change systems that lock Native communities out of opportunity—so they can determine their own future, on their own terms, for multiple generations. Native CDFIs are successful across Indian Country because they move financial capital in ways that build human capital. It's an approach with people, place, culture and community at its heart."

- Kevin Walker CEO, Northwest Area Foundation





"Native CDFIs are crucial to provide the financing, investment and literacy services to improve economic and social conditions in Native communities where inadequate or non-existent mainstream financial services are commonplace. We are seeing the positive impacts of Native CDFIs across Alaska and Indian country through increased homeownership, profitable Native-owned small businesses and community improvement projects. Supporting Native CDFIs will build stronger, more resilient communities and better the economy for the nation."

- U.S. Senator Lisa Murkowski (R-AK)

"I believe every tribal nation has the drive to be self-sustainable and hold their own power within their sovereign nation. To be self-sustainable includes building the capacity of the tribal community's assets to include human capital. The financial education, technical assistance and access to capital provided through Native CDFI's is delivered in a manner relatable to each community, as the NCDFI teams hold the Indigenous culture of each community and their members close to their hearts. As the Native CDFI's witness each success of their community members they are witnessing first-hand the improvements to quality of life and an increase in economic opportunities, both major stepping-stones towards strengthening self-determined communities. "



- Onna LeBeau (Omaha Tribe)

Director, Office of Indian Economic Development | Office of the Assistant Secretary for Indian Affairs



"The U.S. Commission on Civil Rights' Broken Promises report stated that the federal government has a trust and treaty responsibility to support economic development across Indian Country, but limited access to capital has undermined self-determination and development for decades. Native CDFIs play a crucial role in helping to close this gap and to further tribal sovereignty. I am glad to be a longtime supporter of Native CDFIs, and to be introducing the Honoring Promises to Native Nations Act to fund these critical institutions."

- U.S. Senator Elizabeth Warren (D-MA)

Q&A: Robin Puanani Danner

Sovereign Council of Hawaiian Homestead Associations | Chairwoman Chair, Native CDFI Network Policy Committee

rom its founding in 2009, the Native CDFI Network has always been a policy-driven organization.

Over the past two years, though, the organization has shifted its policy work into high gear with the creation of a formal policy committee that includes representatives from nine different regions of the country. The regional structure of the committee makes sure that Native CDFI members from every corner of Indian Country have a "seat at the table," according to Robin Puanani Danner (Native Hawaiian), the chief executive officer of Homestead Community Development Corp. and chairperson of the NCN Policy Committee. "It assures that everyone has a voice in our national policy dialogue and national policy debate."

In 2022, the group worked to advance nearly two dozen policy priorities aimed at making sure Native CDFI Network member voices were heard by Congress, federal agencies — including Treasury, HUD, USDA, SBA, among others — and other government-sponsored agencies, regulators, thought leaders and Native intermediaries.

Danner discusses the strategy and approach of the NCN Policy Committee below, as well as some of its accomplishments over the past year. *This interview* has been edited for length and clarity.

Why was it important for the policy committee to shift to more of a regional approach?

It gave the committee more definition and made sure that no region was forgotten. It made sure that the expertise and knowledge each of us brings from our respective tribal areas — on or off reservations — never gets lost at NCN and that there is a seat at the table for all nine regions. It assures that everyone has a voice in our national policy dialogue and national policy debate. Once we adopt our policy priorities, no one gets left behind.

Do you feel NCN has accomplished that?

Yes. It's a lot of work. Taking individual organizations and bringing them together in unity is one of life's great challenges, whether it's a family or a national organization like NCN. But yes, I think that NCN was a great idea in 2009, and it's an even better idea in 2022, given the modern challenges facing individual Native CDFIs and tribal organizations. That's why it's so important that we connect, share our stories, share our challenges and share our solutions. Because more often than not, the solutions that work in one region can be applicable in other regions.

There has to be a variety of priorities and viewpoints across the nine regions that make up your policy committee. What do you all agree on?

A lot. What's on that NCN policy priorities list reflects that. We try to be disciplined about the work that we agree on and work collectively on. For example, we agree that the NACA fund should be somewhere on the order of \$30 (million) to \$50 million annually because we can clearly document that the need is there.

We also agree on policy work related to the Community Reinvestment Act, which is another 40-year-old act where we were completely invisible and there was a complete indifference to Native Americans and Native communities. And we all accept on the need to end redlining and establish a 10 percent set-aside at HUD for its Section 4 program. In total, there's a list of 15-20 priorities that the entire committee agreed we should work on at NCN.

And we can all agree on the fact that we have a successful industry, we



"NCN was a great idea in 2009, and it's an even better idea in 2022, given the modern challenges facing individual Native CDFIs and tribal organizations."

have successful CDFI vehicles that are Native-governed, Native-led, Native knowledgeable ... and that we're successfully deploying this miniscule level of CDFI funding. If we can capitalize at far greater levels, everybody benefits! Because every time you bring capital into a community, it bounces around. You might make a loan to a business, and that business may be employing a tribal member who is paying a babysitter and paying their utility bill and buying groceries.

For sure, we all agree that the lack of capital is a huge missed opportunity. This is not a 'woe is me' agreement that NACA should be at \$30 to \$50 million, or that other funders should provide more capital to Native CDFIs. What we're saying is that this is a huge missed opportunity because we can be a part of the economic recovery on the regional, state and federal levels.

So I asked what the NCN policy committee members can agree on. What do they disagree on?

Strategy? (Laughs) The conversations aren't really disagreements, they're Contined on page 14

Contined from page 13

always building on each other on someone else's idea or building on someone else's strategy, which is why it's so thrilling. When you get smart, committed Native leaders in a room, we don't battle each other. We understand who we are in this country. I can't recall in the years that I've been involved with NCN where there was true disagreement. We're all living the same challenges as Indigenous people - American Indians, Alaska Natives, Native Hawaiians - and how can you disagree on very much when you live through the same indifference and the same invisibility that really has caused real suffering in our communities?

So there's no debates or friction then?

Do we have debates about strategy? Sure. I mean, it's awesome. It's fantastic because in policymaking and in policy advocacy, you want to have the closed room where you're having the great debates. Because what comes out of that? Fantastic strategy and fantastic unity and fantastic ideas that everybody can get around. And we have done that this year.

You must have a lot of unity because as I look through NCN's policy priorities, it looks like you've accomplished a lot of your policy goals this year. Is that true? Yes, absolutely. We made a lot of

progress toward our policy goals and priorities in 2022.

So your work is done, right?

Never! Being Native is forever in this country. There's always something more. That's what I love about policy. Policy is just another word for solutions, right? That's what having the annual Summit is about ... to figure out what we accomplished and what the next things are we need to face and the problems we need to fix for our communities. Because we have 500 years of [stuff] to fix.

About the Native CDFI Network Policy Committee

Created in 2021 by the Native CDFI Network Board of Directors, the Policy Committee works with NCN regions to ensure a continued national perspective for Native CDFI policy discussions. The board selected each of the nine Policy Committee Delegates to represent their respective regions.

The NCN Policy Committee serves the following purposes:

- It ensures an inclusive national voice by representing all regions in a priority setting
- It strengthens local advocacy by coordinating local response to regional issues
- It increases regional capacity building by facilitating local training and meetings
- It supports fundraising on a local level by coordinating local fundraising initiates with regional philanthropists, social impact investors, and banks



Policy Committee Members

Robin Danner Policy Chair Homestead Community Development Corporation

Mary Miner Region 1 | Alaska Alaska Growth Capital

Russ Seagle *Region 2* | *Eastern* Sequoyah Fund

Tawney Brunsch Region 3 | Great Plains Lakota Funds **Rob Aitken** *Region 4 | Midwest* Leech Lake Financial Services

Jonelle Yearout Region 5 | Northwest Nimiipuu Fund, Executive Director

Rolina Faagai Region 6 | Pacific Homestead Community Development Corporation Stephen Highers

Region 8 | Southern Plains Cherokee Nation Economic Development Trust Authority

Dave Castillo Region 9 | Southwest Native Community Capital

Native CDFI Network 2022 Policy Priorities

The Native CDFI Network, founded in 2009, is the only national member coalition of Native CDFIs in the country.

The NCN mission is to grow and strengthen Native CDFIs through policy advocacy, capacity building and access to capital to support the economic prosperity of American Indian, Alaska Native and Native Hawaiian communities.

NCN is governed by a 9-member national board of directors elected by NCN member CDFIs. Priorities are identified in the categories of Federal and Capacity Priorities and are subject to revision year-round.

A. Federal Priorities in Service to Native Peoples, Lands, & Communities

1. U.S. Treasury

- a. Increase NACA Program Appropriations to at least \$30M \$50M annually
- b. Establish a NMTC set-aside for NCDFIs at 10% of annual NMTC allocation
- c. Engage NCN Working Group to set NMTC deployment goals and strategies to build NCDFI capacity
- d. Establish Office of Native American Programs within Agency
- e. Strengthen NACA Eligibility Criteria (Native mission & governance) & restructure PG&M to facilitate capital access to the full impact of the CDFI Fund program in Indian Country.

2. Housing & Urban Development – HUD and USDA

- a. Establish 10% set-aside of HUD Section 4 sole sourced funding for investment in Tribal areas
- b. End redlining in home loan origination, servicing and loan loss mitigations with HUD/CFPB
- c. Make permanent & national, USDA 502 NCDFI Direct Lending Pilot successful in South Dakota
- d. Engage NCN Working Group at USDA to facilitate agriculture programs to Tribal areas (FSA, etc.)

3. Small Business Administration – SBA

a. Engage NCN Working Group at SBA to facilitate new Navigators Program & strategies to facilitate SBA programming to Tribal Areas

4. U.S. Department of Interior - DOI

- a. Engage an NCN Working Group to support Tribal areas & funding flow of existing BIA programs
- b. Implement partnership with NCDFIs to deliver financial literacy in BIA Schools
- c. Implement Partnership with NCDFIs to support IEED mission and goals at BIA
- d. Streamline lease processing/recordation on mortgages & security instruments
- 5. Other Agencies, Government Sponsored Agencies and Regulators
 - a. Establish a White House office on nonprofit organizations
 - Establish NCDFI & Tribal specific programming at Fannie Mae, Freddie Mac – Duty to Serve to create secondary markets for NCDFIs to recapitalize loan capital
 - c. Create a Federal Home Loan Bank program for economic prosperity similar to the Affordable Housing Program it successfully operates, with designated seats for NCDFIs on FHLB advisory boards
 - d. Waive match requirements on Build Back Better initiatives for Native areas and programs
 - e. Establish Office of Native Americans or Native Advisory Boards within CFPB & OCC
 - f. Advance CRA regulations to improve services in Indian Country
 - g. Improve federal agency outreach to engage NCN and NCDFIs in Rule Making processes

B. Capacity Priorities in Service to Native Peoples, Lands & Communities

1. Regional and National Thought Leaders and Capital Flow

- a. Engage public, private and philanthropic sectors to raise awareness of investment opportunities in Indian Country in the NCDFI sector and identify strategies to improve limited investments of the past
- b. Produce research and data reports on deployed capital, on conventional measurements of redlining, and meaningful engagement with Tribal and Native leaders.

2. Sole Source Federally Funded National Housing Intermediaries

- a. Execute Intermediary-to-Native Intermediary MOUs with NCN around best practices and principals to engage Native/Tribal leaders and convene annually on solutions
- b. Establish Native Advisory Councils with seats designated to NCN for NCDFI executives
- c. Increase Native Governed and Missioned Affiliates/ Grantees in NCN regions at Intermediaries, including training sessions on application and vetting process by intermediaries to be approved
- d. Issue Annual Training Scholarships to NCN for distribution to NCDFI members

3. National Tribal/Native Intermediaries – NCAI, NAIHC, Oweesta, NDN Collective, AFN, SCHHA

- a. Engage with fellow Tribal/Native policy leaders to share relevant data/research and federal budget and policy priorities relevant to NCDFI industry.
- b. Engage in partnerships on training and capacity building on NCDFI industry issues where relevant
- c. Coordinate joint policy dialogue and advocacy regionally and nationally on NCDFI industry issues
- d. Advance partnerships between sovereign tribal governments and NCDFIs serving Indian Country

2022 Policy Priorities are based on input by NCN Members, the NCN Policy Committee

POLICY PROGRESS & HIGHLIGHTS

Native CDFI Network made substantial progress on all of its policy initiatives this year, thanks to the ongoing work of the organization's staff, Board of Directors, and Policy Committee. The list below highlights a few of the key policy wins that Native CDFI Network helped earn for its members and Native communities.

State Small Business Credit Initiative

The SSBCI program was reauthorized and expanded as part of the American Rescue Plan Act of 2021. Originally established in 2010, the revamped SSBCI provides a combined \$10 billion to state, city, and tribal governments to expand access to capital, build entrepreneurial ecosystems, and create high-quality jobs.

In March 2021, Congress amended SSBCI in two key ways that benefit Indian Country. First, it added tribes to the definition of "State," effectively including tribal governments in the SSBCI Act. Second, it increased funding opportunities for Indian Country with a tribal government set-aside of \$500 million and another \$3.5 billion in funding for socially and economically disadvantaged individuals (SEDI) and small businesses.

Why it matters: The SSBCI program brings a huge amount of available capital to Indian Country. It's an important tool in growing private sector economies across tribal communities. By working with tribes to grow the number and size of Native-owned businesses, Native CDFIs can play a critical role in accessing SSBCI capital for Indian Country.

How NCN led on the issue: NCN worked closely with senior Treasury officials to bring Native CDFIs and Tribal officials together for a series of roundtable discussions, issued a white paper authored by legal expert Pilar Thomas, and hosted a series of webinars on how Indian Country could implement and benefit from the SSBCI program.

CDFI Equitable Recovery Program

Congress appropriated \$1.75 billion to the CDFI Fund to help community development financial institutions — including Native CD-FIs — respond to the economic impacts of COVID-19 with grant funding for expanded lending, grant making, and investment activ-

ity, as well as to enable CDFIs to build organizational capacity and acquire necessary technology, staff, and other tools. The funding awards are made through the CDFI Equitable Recovery Program (CDFI ERP).

When the CDFI ERP program was originally released, it included an omission that would have limited eligibility for Native CDFIs.

Why it matters: The way the CDFI ERP program was written was problematic because it failed to include an important component in how it defined Native lands. The omission of federally recognized service counties was huge for Native CDFIs because the majority of them would have been ineligible to apply for the program.

How NCN led on the issue: NCN worked to get the language changed quickly, submitting a formal service request to ask that service counties be included in the definition and that the eligibility criteria be revamped so Native CDFIs could participate in the program. During the process, NCN worked with the Treasury's Office of Native Affairs to help provide background information and context to agency officials.

Native American CDFI Assistance Program

The Native American CDFI Assistance (NACA) Program provides financial assistance awards to Native CDFIs in the form of loans, grants, equity investments, deposits, and credit union shares. NACA also provides technical assistance grants to certified Native CDFIs, emerging Native CDFIs, and sponsoring entities to help increase capacity to serve their communities or become certified CDFIs.

Over the past half-decade, the amount of annual NACA funding available to Native CDFIs had essentially flatlined at about \$16 million per year. In 2021, the amount allocated to Native CDFIs through NACA increased 30 percent to \$21.5 million.

Why it matters: The annual funding available through NACA helps Native CDFIs build capacity and fulfill their mission to help create jobs, spur the development of housing and community facilities, and enhance financial security for Native communities and their citizens.

How NCN led on the issue: Native CDFI Network advocated for increased NACA funding through a mix of formal requests and ongoing education and awareness activities. NCN also leaned into its relationships with Congressional members to solidify support for increased funding for Native CDFIs.

New Markets Tax Credit

The New Markets Tax Credit (NMTC) program incentivizes community development and economic growth through the use of tax credits that attract private investment to distressed communities. As of the end of fiscal year 2020, the NMTC program financed more than 9,500 businesses and created more than 368 million square feet of manufacturing, office, and retail space.

While the NMTC program has allocated nearly \$20 billion nationally over the past half-decade, Native-led applicants received a tiny fraction — less than 0.004% — in NMTC allocations during that time period. The overall lack of NMTC allocations to Native-led applicants highlighted the dire need for program improvements to support Native communities across Indian Country.

Why it matters: Large economic development projects often require significant amounts of capital to help fund infrastructure such as roads, bridges, and upgrades to electrical grids, as well as complementary projects such as housing, schools, and healthcare facilities. Tax credits are an important tool for luring investors and capital to large development projects that are needed in Indian Country.

How NCN led on the issue: NCN has taken a multifaceted approach, including working with Congress and directly with Treasury, to increase awareness of the fact that Indian Country has essentially been ignored by the NMTC program. As a result, the CDFI Fund has contracted with a consulting firm to provide technical assistance to Native organizations and to conduct research regarding the needs for New Markets Tax Credits in Indian Country.

Community Reinvestment Act

Enacted in 1977, the Community Reinvestment Act (CRA) requires federal banking regulators to incentivize financial institutions to help meet the credit needs of the communities in which they do business, specifically low- and moderate-income neighborhoods.

Earlier this year, banking regulators launched a "once in a generation" rewrite of CRA to strengthen and modernize its regulations and correct racial discrimination issues such as redlining that were the impetus for the original law. Why it matters: Native communities have been unbanked at a rate three times higher than the rate for all U.S. households. The lack of banking access can be attributed in part to low access to bank branches, which is one of the issues that CRA addresses. The new rewrite of the regulations provides banks greater incentives to do business in and with Indian Country, which will mean more money to fund tribal economic and community development projects as well as Native-owned small businesses. The proposed regulations also feature - for the first time - a stand-alone section specifically on "Native Land Areas."

How NCN led on the issue: NCN has been actively working on CRA since 2019, when it traveled to New Mexico to join then-U.S. Rep. Deb Haaland (Laguna Pueblo), banks, community leaders, and banking regulators to deepen their understanding of how Native communities have been left out of CRA to date. When the rewrite was announced, NCN held listening sessions with its members, provided formal comments to the Office of the Comptroller of the Currency, Federal Deposit Insurance Company, and the Federal Reserve, and worked with members to encourage changes and comments on the rules.

Section 502

The USDA's Section 502 Direct Loan Program helps low-income applicants obtain housing in rural eligible areas by providing payment assistance to increase their ability to repay mortgage loans. The American Rescue Plan Act appropriated additional funds for Section 502 for refinancing loans.

Why it Matters: The 502 loan program brings in the kind of capital that's hard to get in Indian Country: low-cost, longterm capital for housing that fits the needs of Native people living on and off reservations in rural areas.

How NCN led on the issue: NCN worked with several of its members and the South Dakota Homeownership Coalition to raise awareness and organize an event to bring Congressional leaders together. A webinar on the topic drew 90 participants, including Congressional staff, and highlighted the best practices of the South Dakota Native Homeownership Coalition and the successes that happen when Native-led organizations administer federal dollars in the ways that work best for their communities.

Market Study: Native CDFI Capital Needs

Native CDFIs require both financial capital and human capital to fully realize their potential when it comes to making a difference in Indian Country.

o one doubts that Native CDFIs need more affordable capital to deploy in Indian Country. Unfortunately, there is little data to answer the main questions — how much, what kind and what for that go along with that need.

In an effort to quantify the need, in the fall of 2022, the Native CDFI Network engaged New England Market Research Inc. to conduct a market study that included asking members about their needs for long-term low-cost loan capital, as well as their organizational capacity needs. The market study, which is part of NCN's effort to become a CDFI intermediary, found that:

- There is strong demand for low-interest, long-term loan capital among Native CDFIs.
- Some Native CDFIs have excess cash that they are struggling to deploy because of technology, staff and capacity issues, which are common challenges NCDFIs face in serving their communities.
- There is an appetite and need among Native CDFIs for coupling loans with operating grants to help them build capacity.
- Demand for CDFI capital increases by 28% when modest operating grants are provided with loan capital.
- By and large, for every \$1 of operating grants provided, small business demand/deployment increases by \$3.80.
- Small business lending is where the greatest demand is, followed by first mortgages for housing, ag

loans and consumer loans. To provide more context, small business loan capital demand is 4 times greater than the second-ranked category (first mortgage loans.)

- There is limited demand for energy, credit repair, housing improvement and other loan capital.
- There is substantial interest in new intermediary models such as loan participation and loan guarantees.
- To a lesser degree, there is some interest in low-cost capital that would allow Native CDFIs to refinance their existing corporate debt.

Overall, the study found an estimated \$166 million in incremental demand over the next three years among NCN members — and that number is conservative, says study author Jack Northrup. "That \$166 million is in addition to existing lending activities and doesn't reflect loan capital demand if we were to provide capacity-building operating grants."

In conducting this study, New England Market Research and NCN were quite aware that predicting Native CDFI loan-capital demand for more than one year is a bit of a risky endeavor. Many Native CDFIs experience fluctuating demand in their markets, intermittent funding and product-specific funding opportunities each year.

The study, which was funded by two awards from the U.S. Dept. of Treasury CDFI Fund, is a significant step toward determining demand for intermediary loan products and services among NCN's members and Native CDFIs across the country. "The work we're doing is helping clearly define the amounts and types of capital Native CDFIs require to make loans in their communities and build their own organizational capacity. That is good news for Indian Country."

> – Pete Upton Interim CEO, Native CDFI Network

NCN and New England Market Research are also working with the Center for Indian Country Development at the Federal Reserve Bank of Minnesota to expand data and research on the demand for capital in Indian Country. That effort will further support NCN's market study, according to Interim CEO Pete Upton, who applauds the work of CICD and others seeking to quantify the need.

"The work we're doing is helping clearly define the amounts and types of capital Native CDFIs require to make loans in their communities and build their own organizational capacity," Upton said.

"That is good news for Indian Country."

Market Study: How much? What Kind? What Impact?

"The market study by New England Market Research, Inc. helped quantify the demand for loan capital among Native CDFI Network members, as well as their interest in different types of loan products and the impact staff funding has on their ability to make loans."

Loan Dollars Demand 2023-25 by Loan Category





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Board of Directors



Pete Upton (Ponca) Chairperson

Pete is interim CEO of Native CDFI Network and executive director of Native360 Loan Fund, which serves Native communities in three states. He's been involved with NCN since it was a grassroots movement and is known nationally as a powerful advocate for equal access to capital.



Cora Mae Haskell Board Member

A teacher for more than two decades, Cora has worked for more than 20 years in the Native CDFI sector, where she is nationally recognized for her efforts in the areas of financial literacy and entrepreneur education.



Fern Orie (Oneida) Vice Chairperson

Fern is an executive vice president at Oweesta Corporation, the oldest and largest Native CDFI intermediary in the country. Prior to joining Oweesta, she was founding CEO of Wisconsin Native Loan Fund and spent 20 years in Native housing and a decade in the Indian gaming sector.



Dave Tovey (Utamilla) Board Member

Dave is executive director of Nixyáawii Community Financial Services, a developing Native CDFI. Dave has extensive experience as both a tribal executive and corporate executive, as well as expertise in economic development.



Cindy Mittlestadt Secretary

Cindy served as fund manager at Bristol Bay Development Fund, serving Alaska Native communities. She has a long history of working with Native CDFIs, nonprofit entities and the corporate banking community on social and economic development in Indian Country.



Russ Seagle Board Member

Russ is the executive director of The Sequoyah Fund, a North Carolina based Native CDFI that specializes in working with Native businesses and entrepreneurs.



Cindy Logsdon Treasurer

Cindy is CEO of Citizen Potawatomi Community Development Corporation, one of Indian Country's largest Native CDFIs. Over two decades, Cindy has created innovative and muchneed financial products and made nearly \$50 million in loans to Native entrepreneurs.



Robin Danner (Native Hawaiian) Board Member

Robin is CEO and co-founder of Homestead Community Development Corporation and chairwoman of Sovereign Council of Hawaiian Homestead Associations. Robin is nationally known for her public policy work as well as her leadership in the banking, housing and Native CDFI industries.

NCN Staff



Pete Upton (Ponca) Interim CEO



Kristen Wagner National Programs Director



Shauntel Hogan (Ponca) National Communications Director

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Thank You

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Administration for Native Americans Bank of America Catholic Campaign for Human Development Flagstar Bank Native American Agriculture Fund NeighborWorks America Northwest Area Foundation U.S. Small Business Administration Wells Fargo



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