



# Native CDFI Network 2023 Policy Priorities



**Pete Upton (Ponca)**  
NCN Board Chair

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NCN Vice Chair

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 nine-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 to \$50M annually
- b. Establish a NMTC set aside for Native CDFI/CDEs.
- c. Adopt CDFI Fund Certification Requirements that Strengthen Not Disenfranchise NCDFIs
- d. Cooperative Agreement with CDFI Fund to Improve Census Mapping, Service County Designations, and Data Sovereignty through Data Interpretation

### **2. U.S. Department of Agriculture – USDA**

- a. Make Permanent & National, USDA 502 NCDFI Direct Lending Pilot Successful in South Dakota
- b. Support 2023 Farm Bill that Enhances Flow of Subsidies/Capital to Indian Country Farmers/Ranchers
- c. Cooperative Agreement with NCN to Increase Farm Service Agency/RMAP Programs in Tribal Areas

### **3. Housing & Urban Development – HUD**

- 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 and Congressional Report on Data in at least 20 States
- c. Streamline HUD 184 Mortgages and Pilot NCDFI Packaging Capacity
- d. Cooperative Agreement with HUD/Fannie/Freddie on Secondary Markets to Recapitalize NCDFIs

### **4. U.S. Department of Interior – DOI**

- a. Cooperative Agreement with NCN to Support Funding Flow of Existing BIA Business Programs and Delivery of Financial Literacy in BIA Schools.
- b. Streamline Lease Processing/Recordation on Mortgages and Security Instruments
- c. Implement Rezillience Fund in Partnership with DoI and Oweesta Corporation

### **5. Other Agencies, Government Sponsored Agencies and Regulators**

- a. Establish a White House Office on Non Profit Organizations
- b. 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
- c. Establish Office of Native Americans or Native Advisory Boards within CFPB and OCC
- d. Cooperative Agreement to Support CRA Regulations that Improve Services in Indian Country
- e. Cooperative Agreement with SBA to facilitate Navigators and SBA Program into Tribal Area

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

### **1. National Housing Intermediaries & Philanthropic Organizations**

- a. Execute Intermediary MOUs with Federally Funded Housing Intermediaries on NCDFIs
- b. Execute Philanthropic MOUs with Philanthropy to Promote Understanding of NCDFIs
- c. Execute NeighborWorks America MOU to Distribute NWA Scholarships to NCDFIs
- d. Improve Direct Funding to Native Missions, Governed, and Led Organizations over Non-Native Intermediaries to Serve Tribal Areas

### **2. National Tribal/Native Intermediaries – NCAI, NAIHC, Oweesta, NDN Collective, AFN, SCHHA**

- a. Engage with fellow Tribal/Native policy leaders to share 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

*2023 Policy Priorities are based on input from NCN Members, the NCN Policy Committee, and the NCN Board of Directors and are updated throughout the year.*



## **RECENT ADVOCACY ACTIONS**

NCN Survey Results on Impacts of Proposed CDFI Certification Changes  
(February 9, 2023)

NCN Comment Letter to CDFI Fund on Annual Certification and Data Collection Report Form and the abbreviated Transaction Level Report  
(January 27, 2023)

NCN and Co-Signatories Comment Letter on CDFI Certification Application  
(December 5, 2022)

NCN and Co-Signatories Comment Letter on Target Market Assessment Methodologies  
(December 19, 2022)

NCN Comment Letter to Interagency Community Investment Committee  
(December 21, 2022)

NCN Comment Letter on Minority Lending Institution Designation Criteria  
(November 25, 2022)

NCN Letter to CDFI Fund on Equitable Recovery Program Eligibility Guidelines  
(August 8, 2022)

NCN Comment Letter on the Community Reinvestment Act Regulations  
(August 5, 2022)