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June 13, 2018

The Honorable Rodney Frelinghuysen  
Chairman  
Committee on Appropriations  
United States House of Representatives  
Washington, DC 20515

The Honorable Nita Lowey  
Ranking Democratic Member  
Committee on Appropriations  
United States House of Representatives  
Washington, DC 20515

The Honorable Tom Graves  
Chairman  
Subcommittee on Financial Services and  
General Government  
United States House of Representatives  
Washington, DC 20515

The Honorable Mike Quigley  
Ranking Democratic Member  
Subcommittee on Financial Services and  
General Government  
United States House of Representatives  
Washington, DC 20515

Dear Chairman Frelinghuysen, Ranking Member Lowey, Chairman Graves, and Ranking Member Quigley:

On behalf of America's credit unions, I am writing regarding the Financial Services and General Government Appropriations Act for Fiscal Year 2019, as reported by the Subcommittee. The Credit Union National Association (CUNA) represents America's credit unions and their more than 110 million members.

CUNA is concerned with the draft bill's \$191 million allocation to the Community Development Financial Institutions (CDFI) Fund. The CDFI Fund was fully funded at \$250 million in H.R. 1625, the Consolidated Appropriations Act for Fiscal Year 2018. The CDFI Fund was established in 1994 by the Riegle Community Development and Regulatory Improvement Act and is administered by the Treasury Department. It makes capital grants, equity investments and awards for technical assistance to community development financial institutions (CDFIs). Examples of CDFIs include community development banks, community development credit unions, community development loan and venture capital funds, and microenterprise loan funds. CDFIs are required to provide a 1:1 match for most of the awarded funds, which are offered on a competitive basis. CDFIs finance community development initiatives such as small businesses, community facilities, and low-income housing. The CDFI Fund also administers the New Markets Tax Credit program, which provides tax credits to Community Development Entities (CDEs) which in turn provide the tax credits to entities which invest in the CDEs. The CDFI Fund is an important investment in America and we urge the full Appropriations Committee to support this program and its full funding.

We strongly support the funding level of \$2 million for the Community Development Revolving Loan Fund (CDRLF) included in the Subcommittee draft. Created in 1979 and transferred to NCUA administration in 1986, the CDRLF assists credit unions serving low-income communities to: 1) provide financial services to their communities; 2) stimulate economic activities in their

communities, resulting in increased income and employment; and 3) operate more efficiently. CDRLF funds a revolving loan program and a technical assistance program. As an example, in 2015 the CDRLF extended a grant to assist in chartering the Finest Federal Credit Union in New York City. Finest FCU, which is headquartered in Manhattan, serves roughly 75,000 employees of federal, state, county and municipal agencies or departments engaged in police protection in the city of New York. Finest FCU received a low-income credit union designation to help it serve those who serve and protect us.

CUNA appreciates the Subcommittee's loan limit designations for the Small Business Administration, providing a loan limit of \$30 billion for the Section 7(a) loan program and a loan limit of \$7.5 billion for the Section 504 Loan Program.

In addition, we support the many regulatory relief provisions included in the Subcommittee draft that would benefit credit unions. It includes a two year delay to the effective date of the NCUA's risk-based capital rule, from January 1, 2019 to January 1, 2021. The bill also includes the Mortgage Choice Act, the Privacy Notification Technical Clarification Act, the Financial Institutions Examination Fairness and Reform Act, the TRID Improvement Act, and the Bureau of Consumer Financial Protection–Inspector General Reform Act.

On behalf of America's credit unions and their 110 million members, thank you for your leadership and support of legislation to assist America's community financial services providers.

Sincerely,



Jim Nussle  
President & CEO