March 21, 2025

The Honorable Scott Bessent Secretary of the Treasury U.S. Department of the Treasury 1500 Pennsylvania Avenue, NW Washington, DC 20220

Dear Secretary Bessent,

On behalf of Opportunity Finance Network (OFN) and the undersigned members, we write to express our concern about President Trump's Executive Order (EO) entitled "Continuing the Reduction of the Federal Bureaucracy" released on March 14, 2025.

OFN is the nation's leading network and intermediary focused on community development investment, managing over \$1 billion in total assets and membership of more than 470 community development financial institutions (CDFIs). Our network of CDFIs ensures communities overlooked by mainstream finance, often urban, rural, and Native communities, have access to affordable, responsible financial products and services. OFN is a trusted investment partner to the public, private, and philanthropic sectors, and, for 40 years, has helped partners invest in communities to catalyze change and create economic opportunities for all.

The EO includes language that could jeopardize CDFIs' work to support small businesses, build affordable housing, and create economic opportunity for all Americans. We want to make clear that all CDFI Fund programs are undertaken pursuant to statutory authorities and thus are not subject to the Executive Order. We also thank you for your recent statement affirming that CDFIs are "a key component of President Trump's commitment to supporting Main Street America in the pursuit of job growth, wealth creation, and prosperity."

There is a clear statutory basis for the programs of the CDFI Fund. The "applicable law" establishing the CDFI Fund is the Riegle Community Development and Regulatory Improvement Act of 1994. On March 14, 2025, President Trump signed the Full-Year Continuing Appropriations and Extensions Act of 2025, a law directing a continuation of the fiscal year (FY) 2024 level of \$324 million in appropriations for the CDFI Fund and \$500 million in CDFI Bond Guarantee Authority for FY 2025 (first authorized by the Small Business Jobs Act of 2010). Capital Magnet Fund (CMF) was authorized in the Housing and Economic Recovery Act of 2008 (HERA), which added section 1339 to the Federal Housing Enterprises Financial Safety and Soundness Act of 1992. The New Markets Tax Credit, which is also administered by the CDFI Fund, was reauthorized through 2025 on December 27, 2020, when President Trump signed the Consolidated Appropriations Act of 2021 into law.

Interfering with the CDFI Fund's programs and its capacity to administer them would threaten the economic opportunity of hardworking Americans nationwide. Over 1,400 CDFIs serve as the backbone of our local economies, delivering over \$300 billion in financial services each year to urban and rural communities





stretching across every state and Congressional district. Millions of small businesses, from farms to restaurants to childcare centers, rely on critical investments from the CDFI Fund. CDFIs, through CDFI Fund programs, drive billions in private investment to essential infrastructure projects in local communities.

Throughout its 30-year history, the CDFI Fund and CDFIs have maintained bipartisan support from Congress. On March 15, Senators Crapo (R-ID) and Warner (D-VA), issued a <u>statement</u> in support of the CDFI Fund on behalf of the 28-member bipartisan Community Development Finance Caucus.

Many hardworking Americans who are already struggling in the current strained economic environment rely on the work of CDFIs for their communities to function, and interruptions to the CDFI Fund would only further stress communities nationwide.

We urge Treasury to work with the industry to affirm and strengthen the CDFI Fund's programs.

Sincerely,

Opportunity Finance Network and the undersigned OFN members listed by state headquarters:

<u>Alabama</u>

Bronze Valley Corp Neighborhood Concepts OPAL Community Capital Sabre Finance

<u>Alaska</u>

Alaska Growth Capital BIDCO, Inc. Cook Inlet Lending Center, Inc. Haa Yakaawu Financial Corporation Spruce Root, Inc.

<u>Arizona</u>

Border Financial Resources Inc Growth Partners Arizona PPEP Microbusiness and Housing Development Corporation Prestamos CDFI, LLC Raza Development Fund Salt River Financial Services Institution

<u>Arkansas</u>



Arkansas Capital Corporation Communities Unlimited, Inc. FORGE Community Loan Fund People Trust Southern Bancorp Southern Bancorp Community Partners

California

Access Plus Capital Accessity Accion Opportunity Fund AmPac Business Capital Bankers Small Business CDC California Capital Small Business Financial Development Corporation California Coastal Rural Development Corporation California Community Reinvestment Corporation California FarmLink Century Housing Corporation Civic Community Partners, Inc. Clearinghouse CDFI Community First Lending Community Vision Capital and Consulting **Economic Justice Fund** El Pajaro Community Development Corporation Feed the Hunger Fund First Community Capital, Inc. Fondo Adelante Founders First Capital Partners Fresno Area Hispanic Foundation Genesis LA Housing Trust Fund Ventura County Housing Trust Silicon Valley ICA Fund Inclusive Action for the City IRC's Center for Economic Opportunity Lendistry Low Income Investment Fund (LIIF) Main Street Launch Neighborhood Housing Services of Orange County, Inc. Neighborhood Partnership Housing Services, Inc. NHS Neighborhood Lending Services (LA) North Edge (formerly AEDC) Opening Doors, Inc. PACE Finance Corporation



Pacific Community Fund (fka National Asian American Coalition) Pacific Community Ventures RE-volv Rural Community Assistance Corporation San Luis Obispo County Housing Trust Fund The San Francisco Housing Accelerator Fund TMC Community Capital Ventura County Community Development Corporation Vermont Slauson Economic Development Corporation Westwater Financial, Inc. Women's Economic Ventures Working Solutions CDFI Yurok Alliance for Northern California Housing

Colorado

B:Side Fund Colorado Enterprise Fund, Inc. Community Enterprise Development Services GRID Alternatives Impact Development Fund Mercy Community Capital Native American Bank, N.A. Oweesta Corporation Rocky Mountain MicroFinance Institute Southern Colorado Community Lending LLC Triple Bottom Line Foundation (TBL Fund)

Connecticut

Capital for Change Hartford Community Loan Fund, Inc. Housing Development Fund, Inc. Inclusive Prosperity Capital Inc.

District of Columbia

Building Hope CBA Fund City First Broadway Bank City First Enterprises Hogar Hispano, Inc. Housing Assistance Council Institute for Community Economics, Inc. Latino Economic Development Corporation (LEDC) (DC) National Housing Trust Community Development Fund

NCRC Community Development Fund Partners for the Common Good, Inc. Washington Area Community Investment Fund

<u>Delaware</u>

NeighborGood Partners, Inc. True Access Capital Corporation

<u>Florida</u>

BAC Funding Consortium, Inc Black Business Investment Fund (BBIF) Central County Community Development Corporation Community Fund of North Miami Dade Enterprising Latinas, Inc. Florida Community Loan Fund Miami Bayside Foundation Inc. Neighborhood Lending Partners, Inc. Solar and Energy Loan Fund (SELF) Solita's House Inc. VyStar Credit Union

<u>Georgia</u>

Access to Capital for Entrepreneurs (ACE) ACT! Albany Community Together, Inc. Atlanta Neighborhood Development Partnership Catalyst Development Corporation Community Housing Capital, Inc. Community Housing Services Agency, Inc. (CHSA) Habitat Capital Habitat for Humanity International NeighborWorks Columbus NewTown Loans LLC Small Business Assistance Corporation Southwest Georgia United Empowerment Zone, Inc. Thrive Community Lending

<u>Hawaii</u>

Council for Native Hawaiian Advancement Hawaii Community Lending Inc Hawaiian Lending & Investments

<u>Idaho</u>



NewWest Community Capital Nimiipuu Community Development Fund Pocatello Neighborhood Housing Services, Inc.

<u>Illinois</u>

Allies for Community Business Bridge Investment Community Development Corporation C3 Fund Charter School Finance & Development (CSFD) Chicago Community Loan Fund Community Investment Corporation Greenwood Archer Capital IFF National Community Investment Fund Neighborhood Lending Services, Inc. Park Manor Christian Church Credit Union

<u>Indiana</u>

Bankable Build Fund, LLC Community Investment Fund of Indiana, Inc. Edge Fund, LLC Indianapolis Neighborhood Housing Partnership, Inc. Bankable Build Fund, LLC Community Investment Fund of Indiana, Inc. Edge Fund, LLC Indianapolis Neighborhood Housing Partnership, Inc.

<u>Iowa</u>

Habitat for Humanity of Iowa Iowa Center Loan Fund Iowa Community Capital Neighborhood Finance Corporation

<u>Kentucky</u>

Community Ventures Corporation Fahe Frontier Housing, Inc. Kentucky Habitat for Humanity Kentucky Highlands Investment Corporation LHOME CDFI Mountain Association Redbud Financial Alternatives, Inc.

Southeast Kentucky Economic Development Corporation The Catalytic Fund

<u>Louisiana</u>

AMCREF Community Fund, Inc. NewCorp, Inc. Southern Mutual Financial Services, Inc.

<u>Maine</u>

CEI Capital Management, LLC CEI Ventures Coastal Enterprises (CEI) Four Directions Development Corporation MaineStream Finance The Genesis Fund

<u>Maryland</u>

Baltimore Community Lending Charter Schools Development Corporation Enterprise Community Loan Fund, Inc. FSC First Healthy Neighborhoods Inc Maryland Capital Enterprises, Inc. Montgomery County Green Bank Neighborhood Impact Investment Fund NeighborWorks Capital NHS of Baltimore

Massachusetts

BDC Community Capital Corporation BlueHub Loan Fund, Inc. BlueHub SUN Boston Impact Initiative (BII) Children's Investment Fund Common Capital, Inc. Community Health Center Capital Fund Cooperative Fund of the Northeast Dorchester Bay Neighborhood Loan Fund Housing Partnership Network, Inc. Local Enterprise Assistance Fund Massachusetts Housing Investment Corporation



Nectar Community Investments New Hope Community Capital, Inc. North Central Massachusetts Development Corporation (NCMDC) Quaboag Valley Business Assistance Corporation The Fund for Jobs Worth Owning, Inc. Worcester Community Housing Resources, Inc.

<u>Michigan</u>

Chi Ishobak, Inc. Cinnaire Lending Corporation Detroit Development Fund Grow Invest Detroit Lake Superior Community Development Corp Magnet Lending Corporation Michigan Women Forward Northern Initiatives One Detroit Credit Union Opportunity Resource Fund ProsperUS Detroit Micro Lending Rende Progress Capital Venture North Funding & Development

<u>Minnesota</u>

African Development Center African Economic Development Solutions (AEDS) Community Reinvestment Fund, Inc. Cooperative Loan Fund Entrepreneur Fund, Inc. Exodus Lending First Children's Finance Greater Minnesota Housing Fund Habitat for Humanity of Minnesota, Inc. HAP Economic & Community Development Corporation Indian Land Capital Company **Initiative Foundation** Latino Economic Development Center (MN) MEDA Metropolitan Consortium of Community Developers Midwest Minnesota Community Development Corporation Neighborhood Development Center **NeighborWorks Home Partners** Northland Foundation



One Roof Housing Propel Nonprofits Shared Capital Cooperative TCHFH Lending, Inc. The Sunlight Loan Fund, LLC White Earth Investment Initiative WomenVenture

<u>Mississippi</u>

Culleywood Capital Hope Credit Union Hope Enterprise Corporation Magnolia Federal Credit Union Renaissance Community Loan Fund, Inc.

<u>Missouri</u>

AltCap Great Rivers Community Capital International Institute Community Development Corporation justine PETERSEN Legacy Bank and Trust New Growth Capital Southeast Economic Development Fund, Inc St. Louis Community Credit Union Urban Strategies, Inc. (USI)

<u>Montana</u>

Great Falls Development Authority, Inc. Great Northern Development Corporation MoFi NACDC Financial Services, Inc. Native American Development Corporation NeighborWorks Montana

<u>Nebraska</u>

Center for Rural Affairs Community Capital Community Development Resources Economic Empowerment Center (dba Lending Link) Habitat Omaha Affordable Mortgage Solutions, Inc Midwest Housing Development Fund, Inc.



Native360 Loan Fund, Inc. Nebraska Enterprise Fund Omaha 100, Inc. Spark CDI

North Carolina

Business Expansion Funding Corp. (BEFCOR) CAHEC Capital, Inc. Carolina Community Impact Carolina Small Business Development Fund Institute Capital Invest Appalachia Latino Community Credit Union Local Government Federal Credit Union Mountain BizWorks NC Rural Center **Piedmont Business Capital** SAVES Green Community Fund Scale Link (fka EBA Fund) Self-Help Credit Union Self-Help Federal Credit Union Self-Help Ventures Fund SJF Ventures

North Dakota

CommunityWorks North Dakota

<u>Nevada</u>

Access Community Capital Rural Nevada Development Corporation

New Hampshire

New Hampshire Community Loan Fund, Inc. ROC USA Capital

New Jersey

1st Bergen Federal Credit Union Cooperative Business Assistance Corporation Elizabeth Development Company Of New Jersey Greater Newark Enterprises Corporation (GNEC) New Jersey Community Capital Union County Economic Development Corporation

New Mexico

DreamSpring Homewise, Inc. The Housing Trust Tiwa Lending Services Ventana Fund

New York

AAFE Community Development Fund, Inc. Accompany Capital Adirondack Economic Development Corporation Alternatives Federal Credit Union Ascendus **BOC Capital Corp** Brooklyn Alliance Capital, Inc. **Business Consortium Fund** CDCLI Funding Corporation Inc. Community Capital New York Community Impact Loan Fund Community Loan Fund of the Capital Region, Inc. Community Preservation Corporation Corporation for Supportive Housing (CSH) Equitable Facilities Fund **Everest Federal Credit Union** Grameen America Greater Jamaica Local Development Company Grow America Fund, Inc. Habitat for Humanity NYC and Westchester County Harlem Entrepreneurial Fund, LLC Home HeadQuarters La Fuerza Community Development Corporation Leviticus Fund Local Initiatives Support Corporation (LISC) Lower East Side People's Federal Credit Union Neighborhood Housing Services of Rochester, Inc. New Economy Loan Fund, LLC New York University Federal Credit Union Nonprofit Finance Fund NYCEEC (New York City Energy Efficiency Corporation) PathStone Enterprise Center





Ponce Bank Primary Care Development Corporation Pursuit Renaissance Economic Development Corporation Seed Commons Sustainable Neighborhoods LLC The Disability Opportunity Fund The Urban Empowerment Fund TruFund Financial Services, Inc. Upper Manhattan Empowerment Zone Development Corporation (UMEZ) Vital Healthcare Capital

<u>Ohio</u>

Affordable Housing Trust for Columbus and Franklin County Apex Fund for Economic Opportunities Appalachian Growth Capital LLC CHN Housing Capital Cincinnati Development Fund, Inc. Cleveland Development Advisors Community Reinvestment Fund Economic and Community Development Institute (ECDI) Finance Fund Capital Corporation Freedom Equity, Inc Growth Opportunity Partners Ohio Capital Finance Corporation Valley Partners Village Capital Corporation Western Reserve Community Fund

<u>Oklahoma</u>

Citizen Potawatomi Community Development Corporation MetaFund Corporation Oklahoma Assistive Technology Foundation Tulsa Economic Development Corporation

<u>Oregon</u>

Affiliated Tribes of Northwest Indians Financial Services (ATNI-EDC) CASA of Oregon Community LendingWorks Craft3 Habitat for Humanity of Oregon Micro Enterprise Services of Oregon Network for Oregon Affordable Housing



Portland Housing Center

Pennsylvania

ASSETS Beech Capital Venture Corporation Bridgeway Capital **Economic Opportunities Fund** Enterprise Development Fund of Erie County Entrepreneur Works Finanta Finanta Credit Union Impact Loan Fund, Inc. Invest PGH Inc. JARI Growth Fund, Inc. Landmarks Community Capital Corporation Neighborhood Community Development Fund Pennsylvania Assistive Technology Foundation (PATF) Philadelphia Accelerator Fund PIDC Community Capital **Reinvestment Fund** Rising Tide Community Loan Fund The Enterprise Center Capital Corporation

Puerto Rico

Lendreams (COFECC)

Rhode Island

Capital Good Fund Providence Revolving Fund

South Carolina

Beaufort County Black Chamber of Commerce CLIMB Fund CommunityWorks Midlands Housing Trust Fund South Carolina Community Loan Fund

South Dakota

Akiptan Dakota Resources Four Bands Community Fund



GROW South Dakota Lakota Federal Credit Union Lakota Funds NDN Fund, Inc. Neighborhood Lending Services, LLC (SD) Northeast South Dakota Economic Corporation (NESDEC) Rural Electric Economic Development, Inc.

<u>Tennessee</u>

Appalachian Community Federal Credit Union BrightBridge, Inc Pathway Lending River City Capital Investment Corp. Tennessee Rural Development Fund LLC The Housing Fund

<u>Texas</u>

Affordable Homes of South Texas, Inc. BCL of Texas Borderplex Community Capital Brazos Valley CDC, Inc. Businesses Invest in Growth, Inc. Capital Plus Financial El Paso Collaborative Entre Capital, LLC Five Points Community Capital, LLC Greater Texas Capital Corporation Just Community LiftFund McLennan Community Investment Fund (McCIF) National Association for Latino Community Asset Builders (NALCAB) Neighborhood Housing Services of San Antonio NeighborWorks Laredo On The Road Lending PeopleFund Private Leverage Rio Grande Valley Multibank Corporation Texas Mezzanine Fund TREC Community Investors

<u>Utah</u>

Community Development Corporation of Utah Rocky Mountain Community Reinvestment Corporation



Suazo Business Center Utah Microloan Fund

<u>Virginia</u>

Appalachian Community Capital Corporation Community Business Partnership Community Investment Collaborative Foodshed Capital Locus (fka VCC Social Enterprises) Locus Bank (fka VCC Bank) Locus Impact Fund (fka Virginia Community Capital) Mobility Credit Acceptance LLC Momentus Capital People, Inc. Financial Services Piedmont Housing Alliance Rochdale Capital Corporation Virginia Community Development Fund (VCDF) WPC Community Impact Fund LLC

<u>Vermont</u>

Community Capital of Vermont, Inc. NeighborWorks of Western Vermont Opportunities Credit Union Vermont Community Loan Fund, Inc. VSJF Flexible Capital Fund

Washington

Business Impact Northwest Chehalis Tribal Loan Fund Evergreen Business Capital Impact Capital Northwest Access Fund Northwest Native Development Fund (NNDF) Pacific Northwest Tribal Lending (fka Lummi CDFI) Rainier Valley Community Development Fund SNAP Financial Access

Wisconsin

Community Assets for People First American Capital Corporation First Nations Community Financial Forward Community Investments



Habitat for Humanity of Dane County, Inc.
Hmong Wisconsin Chamber of Commerce, Inc.
Impact Seven, Inc.
Legacy Redevelopment Corporation
Northwest Side Community Development Corporation
Wisconsin Native Loan Fund, Inc.
Wisconsin Women's Business Initiative Corporation (WWBIC)
Woodland Financial Partners (formerly Niijii Capital Partners)

West Virginia

Partner Community Capital (Formerly Natural Capital Investment Fund) Woodlands Community Lenders

Wyoming

Wind River Development Fund

CC: The Honorable Russell Vought Michael Faulkender Alexandria Smith Pravina Raghavan