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The Honorable Patty Murray Chairwoman Senate Appropriations Committee Washington, DC 20510

The Honorable Chris Van Hollen Chairman Senate Appropriations Committee Subcommittee on Financial Services and General Government Washington, DC 20510 The Honorable Susan Collins Vice Chair Senate Appropriations Committee Washington, DC 20510

The Honorable Bill Hagerty Ranking Member Senate Appropriations Committee Subcommittee on Financial Services and General Government Washington, DC 20510

Dear Chairwoman Murray, Ranking Member Collins, Chairman Van Hollen and Ranking Member Hagerty:

On behalf of the Credit Union National Association (CUNA), I am writing regarding the Subcommittee's consideration of the Financial Services and General Government Appropriations Act for Fiscal Year 2024. CUNA represents America's credit unions and their more than 135 million members.

This legislation includes funding for critical programs that provide underserved communities with access to mainstream financial services and alternatives to predatory lenders. We urge the Subcommittee to increase funding in certain key areas. First, we continue to recommend that the Community Development Financial Institutions (CDFI) Fund receive an appropriation of \$500 million in Fiscal Year 2024. In addition, we request that the Community Development Revolving Loan Fund (CDRLF) funding be increased to \$6 million. Finally, CUNA requests more funding for the Financial Crimes Enforcement Network (FinCEN) within the U.S. Department of the Treasury.

The Community Development Financial Institutions (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.

CDFIs such as Community Development Credit Unions (CDCUs) are charged with supplying lowincome, distressed communities with traditional banking services such as savings accounts and personal loans, and offering individuals the tools needed to become self-sufficient stakeholders in their own future. The CDFI Fund uses small amounts of federal dollars to leverage significant amounts of private and non-federal dollars, and has added a tremendous boost to the CDFI industry (which relies heavily upon private sector funds from corporations, individuals, religious institutions, and private foundations).

Created in 1979 and transferred to the National Credit Union Administration (NCUA) in 1986, the Community Development Revolving Loan Fund (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. No Congressionally-appropriated funds are used to fund the CDRLF's administrative or overhead costs. These costs are paid by credit unions insured by the NCUA. Therefore, every dollar appropriated by Congress to the CDRLF is passed on directly to underserved communities and the credit unions that serve them.

Some of these CDRLF technical assistance grants have been used to help credit unions expand their digital services, such as mobile or home banking or electronic bill payment. Other grants have been used to help small credit unions fight fraud and embed EMV chips in their credit and debit cards. In addition, some grants have been used to open new branches in underserved areas or move from home-based locations to non-residential spaces. Also, some grants allow credit unions to offer services like free income tax preparation and financial literacy classes. Finally, these grants enable small credit unions to offer a new product or service, such a new ATM or an asset liability management model. In an age of rapid consolidation in the credit union and small bank sector, it is vital to allow these small credit unions to compete and not have to close shop or merge with a larger financial institution that may not know the needs of the members of these small credit unions.

The Financial Crimes Enforcement Network (FinCEN), a division of the U.S. Department of the Treasury, is our nation's "Financial Intelligence Unit." FinCEN plays a critical role in combatting money laundering and other illicit uses of the financial system that fuel international terrorism, cybercrime, corruption, human rights abuses, and the illegal trafficking of persons, drugs, weapons, wildlife, and more. Crucially, FinCEN is also a key player in detecting any attempts to evade sanctions or US-imposed import restrictions related to the Russian Federation.

In conclusion, these three funding requests are good investments and are fiscally prudent. Credit unions are often the exact types of community lenders that are perfectly suited to help someone make that mortgage payment or receive that small loan to pay their one or two employees. Credit unions, not predatory lenders, should be where these Americans turn for financial assistance. On behalf of America's credit unions and their 135 million members, I urge you to fully fund these three important programs. Thank you for your consideration.

Sincerely. in Ville

Jim Nussle President and CEO