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October 12, 2023

Michael Regan, Administrator  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Room 3426 WJC North  
Washington, DC 20460

Re: LIDAC Engagement and Accountability Letter of Support—Inclusiv

Dear Administrator Regan:

The Credit Union National Association (CUNA) is the nation's largest trade association representing America's credit unions, which serve more than 135 million members. CUNA is proud to provide this letter of support for Inclusiv's application to the Environmental Protection Agency's (EPA) Greenhouse Gas Reduction Fund (GGRF). For almost 50 years, Inclusiv has supported a national network of community lenders called Community Development Credit Unions (CDCUs). CDCUs share a mission to serve low-income and disadvantaged communities (LIDAC), including, but not limited to rural communities, Tribal communities, communities with environmental justice concerns, energy communities, and persistent poverty counties. CDCUs specialize in and have a long track record of serving populations with limited access to safe and affordable financial services. And, over the past three years, Inclusiv has been a leader in mobilizing and training CDCUs to create clean energy and energy efficiency loan products, particularly for LIDAC regions, across the United States.

CUNA is confident that Inclusiv, through close collaboration with its network of 481 CDCUs, will be able to effectively reach and engage LIDAC areas in the implementation and ongoing operations of its GGRF program. CDCUs are member-owned and member-governed financial cooperatives that are, by design, constantly engaging with and deeply accountable to the communities they serve. Many CDCUs hold designations, like Community Development Financial Institution (CDFI) or Minority Depository Institutions (MDI), that require demonstrated accountability to low-income people and communities and/or to Black, Native, Hispanic, and Asian American and Pacific Islander people and communities. Collectively, Inclusiv's network of CDCUs serves more than 19 million members who are primarily located in LIDAC areas across all 50 states, Washington DC, Puerto Rico, and the U.S. Virgin Islands.

With almost 50 years of experience working with CDCUs, Inclusiv understands how to advance financial inclusion in the LIDAC areas that will be served by the GGRF program. Through continuous engagement with Inclusiv's network of member CDCUs, and those CDCUs' deep engagement with their own members, Inclusiv will maintain accountability to the GGRF

implementation priorities identified by residents, small businesses, and community institutions in LIDAC areas. This ongoing dialogue will ensure that each community is able to access affordable capital to deploy clean technology projects in their homes, small businesses, and community institutions.

CUNA's credit union members are financial cooperatives chartered under federal or state law, which means they are non-profit, tax-exempt depository institutions, unique in both their legal structure and in their approach to serving their members. Credit unions grew out of the Great Depression to address the difficulty Americans were having in obtaining credit to start a business, buy a home, or meet every day financial needs. State legislation establishing credit union charters began in Massachusetts in 1909 and grew substantially during the Great Depression, with more than 38 states adopting parallel legislation between 1921 and 1935. At the Federal level, Congress passed *The Federal Credit Union Act* (FCU Act) in 1934, which authorized the creation of federally-chartered credit unions "for the purpose of promoting thrift among [their] members and creating a source of credit for provident or productive purposes."<sup>1</sup> This non-profit approach and cooperative structure creates strong incentives for credit unions to ensure their members are well-served.

Because of this innate commitment to the financial well-being of members, it is not surprising that CDCUs represent more than one-third of all CDFI certified institutions and conduct 76.3% of all CDFI portfolio activity according to the most recent data.<sup>2</sup> CUNA is an industry partner of Inclusiv and has worked closely with it to support CDCUs so they can continue this important work. Together, CUNA and Inclusiv have advocated for increased funding to support these activities and provided outreach and education to support CDCUs' and MDIs' abilities to serve their membership and provide necessary financial services to those who are underserved.

Founded in 1974, Inclusiv is a national nonprofit and certified CDFI intermediary that helps low- and moderate-income people and communities achieve financial independence through credit unions. Inclusiv serves community development credit unions by providing capital, making connections, building capacity, developing innovative products and services and advocating for its membership network. Inclusiv's national network includes 481 community development credit unions that are managing more than \$274 billion in community-owned assets for more than 19 million Americans in predominantly LIDAC areas, across all 10 EPA regions.

Inclusiv launched its Center for Resiliency and Clean Energy in October 2019 with the goal of growing local markets for clean energy technologies that reduce greenhouse gas emissions across the nation. To date, Inclusiv has trained 500 lenders from more than 200 community-based financial institutions in how to develop affordable financing solutions for green projects, focusing on rural, Tribal, environmental justice, and energy communities.

We are pleased to support Inclusiv's application to the EPA's Greenhouse Gas Reduction Fund and believe CDCUs will play a critical role in ensuring the program reaches and effectively serves individuals, homeowners, small business owners, and community institutions in LIDAC areas.

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<sup>1</sup> 12 U.S.C. 1752(1).

<sup>2</sup> CDFI Annual Certification and Data Collection Report: FY 2020 Snapshot (Oct. 2021) available at [https://www.cdfifund.gov/sites/cdfi/files/2021-10/ACR\\_Public\\_Report\\_Final\\_10062021\\_508Compliant\\_v2.pdf](https://www.cdfifund.gov/sites/cdfi/files/2021-10/ACR_Public_Report_Final_10062021_508Compliant_v2.pdf).

Thank you for the opportunity to express our support. If you have questions, or require additional information, please do not hesitate to contact me at (202) 503-7184 or [esullivan@cuna.coop](mailto:esullivan@cuna.coop).

Sincerely,

A handwritten signature in black ink that reads "E. Sullivan". The signature is written in a cursive style with a large, prominent initial "E".

Elizabeth M. Sullivan  
Senior Director of Advocacy & Counsel