Welcome back to Inclusiv's advocacy roundup! On this platform, I will be sharing updates on some of Inclusiv's recent activities related to advocating on behalf of community development credit unions and the communities they serve. We also encourage you to get involved with these efforts and alert us to any opportunities for which Inclusiv's collective voice can help move the needle, so to speak.

**Advocacy at the National Level**

**Support for CFPB Structure**

Last month, Inclusiv joined our members HOPE CU and Self-Help FCU, along with the National Association of Latino Community Asset Builders, in signing an amici curiae brief filed by the Center for Responsible Lending in support of the Consumer Financial Protection Bureau (CFPB) before the Supreme Court. Our support for the bureau falls into four broad arguments:

- CFPB’s regulatory independence allows small financial institutions to thrive by providing a level regulatory playing field
- A CFPB director subject to at-will removal will undermine the Bureau’s accountability to the public, and harm small financial institutions
- The CFPB’s leadership structure is consistent with the historical design of financial regulation
- Should the Court find removal restrictions to be unconstitutional, the proper course is to sever that section of the act, not the act in full

Please [click here](#) to download a copy of the amici curiae brief submitted to the Supreme Court.

**Challenge to CRA proposed changes**

Inclusiv is seeking feedback from member credit unions on proposed changes by the Office of the Comptroller of the Currency (OCC) and the Federal Deposit Insurance Corporation (FDIC) to the Community Reinvestment Act (CRA). Passed and signed into law in response to “redlining” over 40 years ago, the CRA has been a critical tool for ensuring some level of accountability for lending, investments and financial service access in low- and moderate-income communities by banks. When working well, CRA facilitates the flow of capital into the communities Inclusiv members serve and compliments / supports the activities of community development credit unions. Unfortunately, the sweeping reforms proposed by the federal banking regulators threaten to reduce the overall flow of CRA resources in the following ways:

- Drastically changing the way CRA investments are measured, incentivizing larger, easier investments
- Expanding the list of qualifying CRA activities resulting in a reduction in resources for home and small business lending in economically distressed places
- Altering the manner in which CRA activity is assessed by geography, potentially creating a pathway for banks to pass over the most hard to serve communities

Notably, there are provisions included in the proposed rule that contemplate credit for investments into Community Development Financial Institutions (CDFIs). While the proposed rule acknowledges the important role of CDFIs
and CDCUs, the structural issues outlined above raise questions as to whether or not these types of investments will be motivated by CRA at meaningful levels in the future.

Inclusiv CEO, Cathie Mahon, participated in a webinar hosted by the national CDFI Coalition last month outlining our concerns, and a recording of the webinar may be viewed here.

We invite Inclusiv members to submit comments or to share feedback with Jules Epstein-Hebert, Membership Engagement Manager, by March 18th. Public comments to the FDIC and OCC regarding their proposal are due on April 8, 2020.

**Vigorous advocacy on behalf of CDCUs and MDIs**
Inclusiv has updated our Advocacy Platform reaffirming our commitment to CDFIs, strong consumer protections and easing the regulatory burden for LIDs and Minority-Designated credit unions. We continue to work with our partners in the House Finance Committee to ensure that CDCUs and MDIs are offered a regulatory environment in which their unique needs and strengths are recognized and they are able to flourish.

**Advocacy at the CDFI Fund**

*House proposes $304 million in funding for the CDFI Fund in FY2021*

Inclusiv continues to advocate for increased funding of the CDFI Fund with members of Congress. Along with our partners at the CDFI Coalition, Inclusiv urges Congress to continue its bipartisan support for CDFIs by providing at least $304 million for Fiscal Year 2021. Click here to download a copy of the CDFI Coalition’s Fiscal Year 2021 Appropriations Fact Sheet.

**Jodie Harris to speak at Inclusiv’s 9th Annual CDFI Update at the GAC**
Inclusiv will also be hosting our 9th annual CDFI Credit Union Update at the GAC next week featuring CDFI Fund Director Jodie Harris and providing new data regarding the strong impact CDFI credit unions have on the communities they serve. Secure your seats today!

**Contact us** to receive state-level CDFI profiles which are now available to all Inclusiv members and partners.

**Advocacy at the State-Level**

*Success in securing a proposal of $25 million in funding for CDFIs in New York State over the next five years*

New York State CDFI Funding
Inclusiv continues to work with our partners at the NYS Community Equity Agenda and NYS CDFI Coalition to engage with state legislators to ensure that Governor Cuomo’s proposal of $25 million in funding over five years for New York State’s CDFIs is included in the final draft of the state budget this spring. We are also working with the Governor’s office, and state agencies to ensure the structure of the program will benefit all of the states CDFIs equitably. Learn more here.

Additionally, Melissa Marquez, CEO of Inclusiv member Genesee Co-Op FCU, participated in a NYS Community Equity Agenda discussion this past Saturday during Caucus Weekend in Albany, NY. The discussion was hosted by Assemblymember Yuh-Line Niou and the topic was "Communities of Color: Ending Systemic Wealth Extraction and Building Community Wealth." Congratulations, Melissa!
Do you have advocacy issues you would like Inclusiv to be involved with? We’d love to hear from you! Please submit questions and ideas via email to jhebert@inclusiv.org.

In cooperation,

[Signature]

Jules Epstein-Hebert
Membership Engagement Officer

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**About Inclusiv**

At Inclusiv, we believe that true financial inclusion and empowerment is a fundamental right. We dedicate ourselves to closing the gaps and removing barriers to financial opportunities for people living in distressed and underserved communities. Inclusiv is a certified CDFI intermediary that transforms local progress into lasting national change. We provide capital, make connections, build capacity, develop innovative products and services and advocate for our member community development credit unions (CDCUs). Inclusiv members serve over ten million residents of low-income urban, rural and reservation-based communities across the US and hold over $112 billion in community-controlled assets. Founded in 1974, Inclusiv is headquartered in New York, NY, with offices in Madison, WI and Atlanta, GA. For more information about Inclusiv visit us at Inclusiv.org and connect with us on Facebook, LinkedIn and Twitter.

Inclusiv was instrumental in establishing the CDFI Fund in 1994, is a permanent member of the national CDFI Coalition and is the CDFI and community finance authority for the credit union industry. Our member CDCUs represent over 10 million members in low-income communities across the US, representing the majority of all CDFI-certified credit unions. Today, CDFI certification is an essential credential for credit unions with a focus on financial inclusion. Inclusiv is the credit union industry's best resource for learning more about certification and technical and financial assistance grants. For more information on our advocacy on behalf of CDFI credit unions, [click here](https://www.inclusiv.org).

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