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On behalf of the Burton Blatt Institute at Syracuse University and the National Disability Institute in Washington, DC, we welcome the opportunity to comment on issues regarding the Community Development Financial Institutions (CDFI) Fund. Individuals with disabilities are three times more likely than their nondisabled peers to be living in poverty, fifty percent less likely to be homeowners and/or have access to affordable housing and are frequent targets of predatory lenders.

1. Community Development Advisory Board

The Advisory Board should include, at a minimum, a private citizen leader from the disability community as part of a commitment to diversity. Public agency representation should be expanded to include the Office on Disability at the US Department of Health and Human Services and the Office on Disability Employment Policy at the US Department of Labor to provide needed advice on opportunities for collaboration with multiple federal agencies invested in advancing the economic self sufficiency of persons with disabilities.

2. Definitions

The definition of low income should explicitly include persons with disabilities who lack adequate access to loans or equity investments. All CDFI Awards across program authorities should require applicants to “identify activities that will market and outreach to low income individuals with disabilities, increase access to capital to this target population, and provide effective and meaningful participation in loan or investment products.” Such a change to the definition of targeted population should be added consistently across all IDFI Fund programs.

3. Certification

CDFIs should be recertified on a regular basis at least every two years and be required to document their activities and results related to low income persons with disabilities. Social performance reporting annually should document number of loans and investments

in the disability community, nature, size, terms and conditions of such investments, and current status as well as type and results of technical assistance activities.

4. Financial Assistance

CDFIs should create a category of eligible entities that serve a national market or are the intermediaries. Such entities might focus on persons with disabilities, women, Native Americans, or other minorities. Fifteen percent of the appropriation should be allocated for such applicants. Match requirements should not be reduced for any applicant as part of the public-private leveraging of resources.

5. CDFI Training

CDFI should expand its training and technical assistance activities to increase the capacity of all CDFI funded entities to understand the needs of and market and outreach to persons with disabilities and related organizations.

We welcome the opportunity to discuss these comments and strengthen the capacity of CDFIs to respond to the underserved community of persons with disabilities.

Sincerely,

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