May 13, 2020

The Honorable Jovita Carranza  
Administrator  
US Small Business Administration  
409 3rd St, SW  
Washington DC 20416

The Honorable Steven T. Mnuchin  
Secretary of the Treasury  
US Department of the Treasury  
1500 Pennsylvania Avenue NW  
Washington, DC 20220

Dear Administrator Carranza and Secretary Mnuchin:

On behalf of the Native CDFI Network (NCN), the National Congress of American Indians (NCAI), and the Native American Finance Officers Association (NAFOA), which collectively serve Native community development financial institutions, (CDFIs), and all federally-recognized American Indian and Alaska Native tribal nations, we write on matter of great and timely importance. We urge you to ensure state and tribally-chartered nonprofit CDFIs are eligible to receive forgivable loans under the Paycheck Protection Program (PPP). We are concerned that any other decision would be a misinterpretation of the CARES Act and Congressional intent to support all nonprofits. This issue must be addressed before the “safe harbor” return deadline of May 18.

Native CDFIs are working hard to support underbanked businesses and individuals in their home communities, many of which have been severely harmed by the Covid-19 pandemic. A March 23 NCN survey found that more than a month ago, most Native CDFIs had already been contacted by their clients about restructuring loans. As many clients have been forced to restructure loans due to the economic downturn, many Native CDFIs have been forced to stretch resources. Ensuring that all nonprofit CDFIs have access to the PPP will help these CDFIs and their clients through this challenging time.

We want to particularly ensure that tribally-chartered nonprofit CDFIs are included as eligible loan recipients. The CARES Act clearly states that both “tribal business concerns” and nonprofits are eligible – any determination denying tribally-chartered nonprofit CDFIs access to the PPP is incorrect.

By removing barriers for Native CDFIs to participate in the Paycheck Protection Program, Native CDFIs can better serve our customers. The Native CDFI Network urges you to act quickly to avoid further confusion and implement the CARES Act intent that all nonprofits be eligible for the PPP. Please reach out to NCN for any follow up at jbrossy@nativecdfi.net or 650-387-5899.

Best regards,

Jackson S. Brossy  
Executive Director  
Native CDFI Network

Kevin J. Allis,  
Chief Executive Officer  
National Congress of American Indians

Dante Desiderio  
Executive Director  
Native American Finance Officers Association

Enclosure: white paper

cc. Senate Committee on Indian Affairs, House Native American Caucus