



NATIONAL  
ASSOCIATION FOR  
LATINO  
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BUILDERS

January 31, 2022

To Whom it May Concern:

I write in response to the invitation to submit a short brief on our priorities for the implementation of the Infrastructure Investment and Jobs Act (PL -117-58). Thank you for this opportunity to uplift the needs of Latino communities and small businesses.

[NALCAB](#), the National Association of Latino Community Asset Builders, is a US Treasury-certified Community Development Financial Institution (CDFI) that represents and serves 160 diverse nonprofit community development and asset-building organizations across the country. Over half of our members are lenders, and more than 50 of which are certified CDFIs. These organizations uplift Latino communities by strengthening access to quality affordable housing, safe financial products and services and the ability to start and grow successful businesses. Many of the people served by the NALCAB Network are low- to moderate-income individuals who are first- or second-generation immigrants. During the COVID-19 pandemic, NALCAB mobilized over \$17.6 million in grants and low-interest loans, supporting over 120 nonprofits and 600 small businesses.

First, we would like to commend President Biden for Executive Order 14052, Implementation of the Infrastructure, and Investment Act, that acknowledges the need for equity and to make investments in communities, “that have been too often left behind”. Latino communities are often left out from access to government investments, we saw this with pandemic relief efforts during first round of PPP and even later in COVID 19 vaccine efforts. Our public policies must consider the unique experiences and needs of Latinos. The Infrastructure Investment and Jobs Act is an investment in our Nation’s infrastructure and competitiveness. In addition to helping rebuild America’s roads, bridges, and rails; it will help expand access to broadband to underserved communities, strengthen minority small business, and invest in communities that have often been left behind. In implementing the Act, we ask that the federal agencies prioritize the following:

- a) Seeking measurable outcomes in advancing equity: As you know, Section 1071 of the Dodd Frank Wall Street Reform and Consumer Protection Act requires that financial institutions collect and report certain data regarding the applications of traditionally underserved businesses. The purpose is to facilitate the enforcement of fair lending laws and to enable the identification and validation of business and community development needs and opportunities for women-owned, minority-owned, and small businesses. While Executive Order 14052 directs agencies to focus on measurable outcomes for the American people and we echo this need we also want to highlight the importance of collecting measurable outcomes for traditionally under invested communities. Data is key to advancing equity and making data publicly available helps identify and validate needs and areas of improvement.
- b) Increasing the competitiveness of minority businesses, including swiftly implementing the Minority Business Development Agency business development grants which would increase the capacity of nonprofits that provide services to minority businesses through education, grants or loans and technical assistance. Minority and immigrant entrepreneurs are more likely start and maintain successful businesses with the assistance of these organizations that provide the services to match their unique needs. Engaging in conversations and efforts to solicit the input of community based and national nonprofits that have a track record of success in connecting to the needs of minority business will be key in implementing the Minority Business Development Agency programs including the Minority Business Development Grant program and the Minority Business Development Center Program.



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- c) Investing public dollars equitably by considering direct community benefit in disinvested communities. Proposals, in particular, for the Digital Equity Competitive Grant Program, should require authentic community engagement and detail how disinvested communities will benefit or be directly served.
- d) Infrastructure Implementation Task Force: We appreciated that the president established within the Executive Office of the President an Infrastructure Implementation Task Force to coordinate implementation of the Infrastructure Investment and Jobs Act and other related significant infrastructure programs within the executive branch. Collaboration and coordination among the federal agencies are important it is also important that the task force be in touch with and connected directly to the needs and experiences of the American people, particularly communities of color and low-income communities. The task force should hold regular roundtable discussions and/or opportunities for traditionally underserved communities to weigh in on policies that impact them.
- e) Ensure stakeholder input throughout the implementation process: Stakeholder input can promote the advancement of equity and investment in traditionally underserved communities. Agencies should consistently provide notice and an opportunity for public comment when moving forward on program implementation and notice periods should be at least 60 days in order to allow stakeholders to prepare meaningful responses.
- f) Ease the Administrative Burden: The process and requirements that individuals and organizations face when accessing public resources can exacerbate inequity. The administrative burden – which can include accessing to web portals, compiling documentation, and verifying eligibility, is not equal for people with different resources, backgrounds, cultures, language proficiency and geography. We ask that the federal agencies assess processes for broad inclusion with a focus on traditionally marginalized people which include but is not limited to those without access to the internet, people living in rural areas, and people with Limited English Proficiency (LEP).

Thank you again and I look forward to working with you on behalf of Latino communities nationwide. Should you have any questions or wish to discuss further please do not hesitate to reach out to me or Director of Public Policy, Clarinda Landeros at [clanderos@nalcab.org](mailto:clanderos@nalcab.org)

Sincerely,

Marla Bilonick  
President and CEO