

Rural Business Cooperative Service  
USDA Rural Development, Room 5045-S  
Mail Stop 3201  
1400 Independence Avenue SW  
Washington, DC 20250-3201

May 30, 2014

Opportunity Finance Network appreciates the opportunity to comment on RBS-14-BUSINESS-0018, the 2014 Farm Bill Implementation Listening Session—Healthy Food Financing Initiative, published in the Federal Register on May 6, 2014.

Opportunity Finance Network (OFN) is the leading national network of community development financial institutions (CDFIs) investing in opportunities that benefit low-income, low-wealth, and other disadvantaged communities across America. OFN Members are performance-oriented, responsible investors that finance community businesses, spark job growth in the areas that need it most and deliver both sound financial returns and real changes for people and communities. We partner across the public and private sector—with foundations, banks, corporations, and government agencies—to provide innovative solutions and to scale capital into larger investments.

Over the past 30 years, our network has provided more than \$33 billion in financing in markets that conventional finance would not otherwise reach. Healthy food financing is a growing sector of the opportunity finance industry, and CDFIs are emerging as critical partners in financing food systems.

The interagency Healthy Food Financing Initiative (HFFI) between the Departments of Agriculture, Health and Human Services, and Treasury, has already provided millions of dollars in capital to support healthy foods projects in low-access areas across the country. CDFIs, with their unique ability to provide financing that is flexible and responsive to the needs of the markets they serve, are an important delivery channel for that capital.

CDFIs ensure prudent use of limited public resources, leveraging fund many times over with private capital and multiplying the impact of those public dollars. CDFIs are also able to bring together key stakeholders including traditional lenders, foundations, community organizations, and public sector partners to finance complex transactions needed to support healthy foods projects.

The availability of federal funding through the Healthy Food Financing Initiative can further stimulate CDFI lending activities that increase access to healthy foods in underserved communities across the country. OFN encourages the USDA to continue to work with CDFIs to increase access to healthy foods in low-income communities.



OFN also encourages the USDA to provide financing to CDFIs for healthy food projects that impact aspects of the food system beyond retail outlets. Although retail is a very important component of bringing healthy food options into low income communities, CDFIS are often involved in the other aspects of the food system such as food production, processing, distribution, and financing food hubs for value-added producers. These types of projects, like supermarkets, can also increase access to healthy foods, and can create jobs and spur other economic development activity in communities.

Opportunity Finance Network and the CDFIs it represents share with the USDA the goals of ensuring that consumers have healthy food options and that food producers have access to the capital they need for successful enterprises. We look forward to coordinated efforts to reach those goals and would welcome to opportunity to discuss CDFIs' role in healthy food finance with you.

Please do not hesitate to contact me at 215.320.4309 or [mpinsky@ofn.org](mailto:mpinsky@ofn.org) for additional information on CDFIs and this aspect of their work. Thank you for your consideration of these comments.

Sincerely,

Mark Pinsky  
President and CEO