



February 24, 2016

Mr. Grady B. Hedgespeth  
Director, Office of Economic Opportunity  
U.S. Small Business Administration  
409 Third Street SW.  
Washington, DC 20416

Re: *Notice Of Extension Of And Changes To Community Advantage Pilot Program And Request For Comments*, SBA docket number SBA-2015-0013

Dear Mr. Hedgespeth:

The National Association of Government Guaranteed Lenders (NAGGL) appreciates the opportunity to provide formal comments on behalf of the association's members regarding the Community Advantage Pilot Program.

Historically, NAGGL has strongly supported the efforts of the U.S. Small Business Administration (SBA) to increase access to capital for small businesses in underserved markets. We believe that the Community Advantage Pilot Program has the potential to assist in meeting that objective and applaud the actions that SBA has taken to expand this pilot and to extend it to March 31, 2020.

We believe that this extension of time will be beneficial to the program in several ways. First, we think that the extended date will make current program participants and potentially eligible entities more willing to devote the resources necessary to successfully participate in the pilot. In addition, we believe that the longer term will give greater opportunity to demonstrate the merits of this type of initiative. Finally, and most importantly, we believe that the extension will allow the Agency sufficient time to appropriately evaluate both the efficacy of the program and its risks in order to ascertain whether the pilot is achieving its objectives and whether its performance warrants extending the pilot or making it a permanent program. In this regard, we believe that the Agency has laid out an appropriate framework for evaluating the pilot by its new sunset date, and we strongly support the Agency's intention to thoroughly assess the program, including analyzing its success in meeting its stated objectives, as well as its potential risks.



SBA specifically requested comments regarding whether the program should be made permanent. NAGGL strongly believes that it would be premature to make the Community Advantage Pilot Program permanent at this time. That opinion is based on the short history of the pilot and the fact that the Agency has not had the time necessary to fully evaluate all aspects of it, especially the impact of the recent changes.

Thank you again for providing this opportunity to make the views of NAGGL's members known to SBA.

Sincerely,

A handwritten signature in black ink that reads "Anthony R. Wilkinson". The signature is written in a cursive style with a prominent initial "A" and "W".

Anthony R. Wilkinson  
President and Chief Executive Officer

cc: Ann Marie Mehlum, AA/CA