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To Whom It May Concern:

The Community Reinvestment Act was passed in 1977 **to end discrimination known as redlining**. It required banks to meet the credit needs of the communities where they do business.

Geography must remain the focus of CRA exams for all banks. We want banks to be graded based on every geography where they lend or receive a significant percentage of their deposits. We can't eliminate geographic assessment areas. We can't allow banks to cherry-pick where they lend – and where they don't lend at all. We can't allow banks to ignore the credit needs of distressed and vulnerable communities. We can't allow a reboot of redlining.

We also need new language that explicitly states the law's obligation to fairly serve all races and ethnicities. In 2017, the Office of the Comptroller of the Currency (OCC) watered down the penalties for discrimination. We can't allow regulators to allow banks to pass CRA exams if they discriminate.

We want the Community Reinvestment Act applied to all lenders, the same way it's applied to traditional banks. The financial landscape has changed. Mortgage companies, credit unions, fintechs and other "nonbank" lenders now make the majority of the home loans in America.

We want a clearly-defined grading system that emphasizes lending, branches, fair lending performance, and responsible loan products for working class families. We want each of these important aspects to get their due weight in analyzing a bank's CRA performance. We do not support one ratio that lumps all of a bank's activity together.

Lastly, we need regulators unafraid to stand up to financial institutions. If a bank fails its CRA exam, or wishes to acquire a bank with a better CRA grade, agencies should recognize and encourage community benefit agreements. This spring, the OCC weakened its CRA enforcement by allowing banks with failed CRA ratings to merge, acquire, and grow their business. We cannot allow regulators to adopt this policy.

Thank you

Tina Aranda