



Federal Deposit Insurance Corporation

550 17th Street NW, Washington, D.C. 20429-9990

MEMORANDUM

DOCKET: Federal Register Citation: 12 CFR Part 345
Docket No.: RIN 3064–AF81

DATE OF EX PARTE COMMUNICATION: July 22, 2022

SUBJECT: Virtual meeting with the National Bankers Association to discuss the Community Reinvestment Act (CRA)

PARTICIPANTS: Nicole Elam, President and CEO
Michael Williams, The Williams Group

CFPB Staff: Tricia Kerney-Willis, Assistant Director, Office of Financial Institutions and Business Liaison
Charles Johanek, Advisor Office of Financial Institutions and Business Liaison
Diane Standaert, Senior Fellow, Consumer Education

MEMO PREPARED BY: Diane Standaert, Senior Fellow, Consumer Education, CFPB

On July 22, 2022, CFPB staff identified above met with the National Bankers Association (NBA), representing minority depository institutions (MDIs) and women-owned and operated depository institutions. Of NBA’s 152 member banks, 93% are also Community Development Financial Institutions (CDFIs). Issues raised included considerations in crediting CRA-motivated investments into MDIs and CDFIs; CRA credit for MDI investments in technology; CRA reporting requirements for MDIs that are also CDFIs; the interaction between CRA and other federal funds such as the Emergency Capital Investment Program (ECIP); and changes to the small bank designation. NBA will be submitting a public comment on these and other issues related to the CRA.