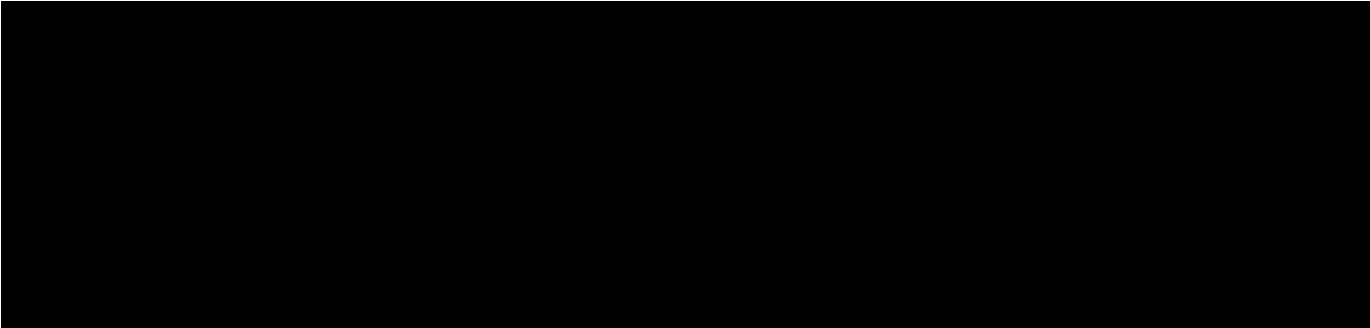


From: [Kelly Read](#)
To: [Comments](#)
Subject: [EXTERNAL MESSAGE] Comment letter submission: RIN 3064-ZA39
Date: Thursday, October 23, 2025 9:00:26 AM



Hello,

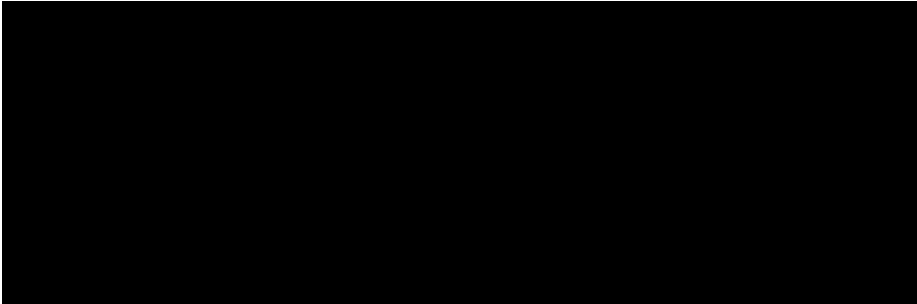
Attached please find Housing Partnership Network's comment in response to:

Regulatory Publication and Review Under the Economic Growth and Regulatory
Paperwork Reduction Act of 1996
RIN 3064-ZA39

We also submitted through the Federal Register portal.

Please let me know if you have any questions.

Best,
Kelly Read





October 22, 2025

The Honorable Jerome Powell
Chairman, Federal Reserve Board of Governors
20th and Constitution St. NW
Washington, DC 20551

The Honorable Jonathan Gould
Comptroller of the Currency
400 7th St. SW
Washington, DC 20219

The Honorable Travis Hill
Acting Chairman, Federal Deposit Insurance Corporation
550 17th St. NW
Washington, DC 20429

Dear Chair Powell, Comptroller Gould, and Acting Chairman Hill:

I am writing to provide comments on behalf of the Housing Partnership Network (HPN) in response to the agencies' review of Community Reinvestment Act (CRA) regulations under the process established by the Economic Growth and Regulatory Paperwork Reduction Act (EGRPRA).

Housing Partnership Network (HPN) is an award-winning collaborative of 120+ of the nation's largest and most impactful affordable housing and community development organizations. HPN members are engaged in the rental and for-sale markets and they work in every region of the country, collectively managing more than \$70 billion in assets and providing close to 500,000 low-wealth families with housing stability and wealth building opportunities.

Congress passed the Community Reinvestment Act (CRA) in 1977 as a response to the redlining. It requires regulators to assess a bank's record of meeting the credit needs of its entire community, including low- and moderate-income (LMI) neighborhoods, consistent with the bank's safe and sound operation. Public CRA ratings provide banks with an incentive to achieve certain goals described in the framework and criteria established by the agencies. For decades, the CRA has opened access to credit and services for LMI people, small businesses, farms and community development projects that would not be served by regulated banks in the absence of the incentives the law creates.

CRA is essential for our nation's affordable housing finance system. Through the syndication of Low Income Housing Tax Credits (LIHTC) and by providing other resources, CRA-motivated banks make available billions of dollars each year to support the production and preservation of affordable housing. Simply put, we cannot address our nation's current housing cost crisis without the CRA.

In the agencies' approach to the CRA, we encourage maintaining primary focus on its statutory purpose and role that CRA plays in our affordable housing system. Those should be the lenses through which to consider the reduction of burden for covered banking entities. We encourage the agencies to continue their efforts to provide even greater clarity and certainty about the eligibility of activities for which there is little question of benefit to low- and moderate- income households and communities. We believe that the agencies could leverage technology to help validate that such activities are highly likely benefit low- and moderate- income households and communities. A key measure of the success of providing such flexibility and leveraging technology would include a meaningful reduction in the staff time needed to review and validate the eligibility of a significant portion of the activities claimed by regulated institutions. This could allow the agencies to focus more staff resources on examining activities that may have less clear impact or that require deeper understanding because they are particularly innovative.

We encourage the agencies to consider creating a mechanism through which banks and mission-driven organizations can jointly obtain pre-approval for innovative activities that are likely to benefit low- and moderate-income people. In addition, we encourage the agencies to provide flexibility to regulated institutions to make impactful or innovative investments in CRA deserts (areas with very little CRA activity), especially for banks that have internet banking platforms that effectively expand the geographic reach of the communities they serve.

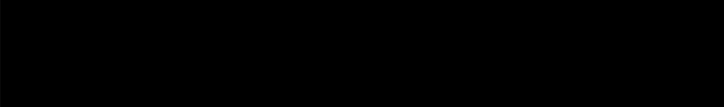
We also encourage the agencies to continue their efforts to strengthen and deepen examiner training. Specifically, a portion of examiner training should include engagement with practitioners that utilize CRA resources to produce benefits for low- and moderate-income people. HPN would be pleased to support such efforts.

Given the significant expansion of the LIHTC, we encourage regulators to consider how to align CRA incentives to support regulated banking entities to support greater demand for credits and other capital necessary to finance a larger pipeline of LIHTC.

We encourage regulators to continue their efforts to develop a method for approving investments in "naturally-occurring affordable housing" that serves low- and moderate- income people, but does not include a government subsidy. We strongly encourage a first step in this direction to include the requirement eligible NOAH investment be made for housing that is purchased developed, financed, rehabilitated, improved or preserved by a non-profit organization with a stated mission of affordable housing.

Finally, we strongly encourage the agencies to maintain a consistent approach to the implementation of CRA.

Respectfully submitted,


Noel Andres Poyo, Executive Vice President