

**From:** [Anita Garrett](#)  
**To:** [Comments](#)  
**Subject:** [EXTERNAL MESSAGE] July 25th, 2025 - Regulatory Publication and Review Under the Economic Growth and Regulatory Paperwork Reduction Act of 1996; Comment Request (RIN 3064-ZA39)  
**Date:** Friday, August 15, 2025 4:24:52 PM  
**Attachments:** [image001.png](#)

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**To Whom It May Concern:**

I am writing in response to the agencies' fourth notice under the Economic Growth and Regulatory Paperwork Reduction Act of 1996 (EGRPRA), published July 25, 2025, requesting comment on regulations in the Banking Operations, Capital, and Community Reinvestment Act (CRA) categories. I appreciate the opportunity to provide input on outdated, unnecessary, or unduly burdensome requirements and respectfully request relief from the CRA Public File requirement.

In my over 30 years of experience in regulatory compliance, I have encountered only one request for a CRA Public File. Despite the effort required to maintain and update this file, its utility has proven minimal. Much of the information mandated for inclusion—such as performance evaluations, branch locations and services, CRA Disclosure Statements and HMDA data—is already available through other sources, including agency websites and public databases. The duplication of effort not only consumes valuable resources but also adds to the compliance burden without a corresponding public benefit.

The Public File requirement is a prime example of a regulation that has outlived its practical relevance. In today's digital environment, transparency and accessibility are better achieved through centralized, agency-maintained platforms. Eliminating this requirement would reduce unnecessary paperwork and allow institutions to focus more effectively on meaningful community engagement and reinvestment activities.

I urge the agencies to consider removing the CRA Public File requirement as part of this EGRPRA review. Doing so would be a thoughtful step toward modernizing CRA compliance and reducing regulatory burden for insured depository institutions.

Thank you for your consideration.

Sincerely,

**Anita Garrett CRCM** • *Chief Compliance & Risk Officer*



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