



August 18, 2025

The Honorable Jerome Powell
Chairman, Federal Reserve Board of Governors
20th and Constitution St. NW
Washington, DC 20551
RE: Docket No. R-1869; RIN 7100-AG95

The Honorable Jonathan Gould
Comptroller of the Currency
400 7th St. SW
Washington, DC 20219
RE: Docket ID OCC-2025-0005; RIN 1557-AF30

The Honorable Travis Hill
Acting Chairman, Federal Deposit Insurance Corporation
550 17th St. NW
Washington, DC 20429
RE: RIN 3064-AG13

RE: Notice of Proposed Rulemaking -- Community Reinvestment Act Regulations

Dear Chairman Powell, Comptroller Gould and Acting Chairman Hill:

Thank you for the opportunity to comment on the Notice of Proposed Rulemaking (NPRM) entitled “Community Reinvestment Act Regulations,” which was published jointly in the Federal Register on July 18, 2025 by the Board of Governors of the Federal Reserve System, the Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation (collectively, “the Agencies”). Please note that these comments have not been submitted to, or approved by, NeighborWorks America’s board and do not necessarily represent the views of its board members, either collectively or as individuals.

For over 45 years, the Neighborhood Reinvestment Corp. (doing business as NeighborWorks America®), a Congressionally-chartered, national, nonpartisan nonprofit, has worked with our network of nearly 250 nonprofits to create opportunities for people to improve their lives and strengthen their communities by providing access to homeownership and safe, affordable rental housing, increasing financial capability, and promoting community and economic development. The spirit of partnership and service that is at the heart of the Community Reinvestment Act underpins much of the work that NeighborWorks and our national network pursue, and it is with this alignment in mind that we offer our perspective on the NPRM. NeighborWorks encourages the Agencies to adopt the regulations as proposed.

NeighborWorks is committed to maintaining a CRA that provides us, our network, and our financial institution partners with the clarity and regulatory certainty necessary to pursue reinvestment work in urban, suburban, rural, and Native communities across America. In FY 2024, NeighborWorks organizations leveraged \$11.27 billion in reinvestment in their communities, creating 16,300 new homeowners, owning/managing 211,900 high-quality rental homes, providing homeownership education and counseling for over 105,000 families and individuals, and much more. The partnerships and investments that have made these accomplishments possible are strongly impacted by CRA.

While nearly fifty years have passed since the Community Reinvestment Act was signed into law, the statute remains vital today to ensure that banks meet the credit needs of the communities that they serve, particularly in low- and moderate-income neighborhoods. CRA is a critical framework for ensuring that the low- and moderate-income (LMI) people that NeighborWorks organizations serve have access to safe, sustainable banking and financial products and services, and that the neighborhoods in which they live are able to attract and retain capital for homeowners, small businesses, and others. CRA also provides incentives for banks to partner with NeighborWorks, network organizations, and other community-based organizations to increase their reach and enhance access to safe and responsible financial products and services.

NeighborWorks and the organizations that make up the NeighborWorks network have a vested interest in ensuring the stability and consistency of CRA regulations across the three regulatory agencies. We are grateful for the Agencies' unified rulemaking, which creates a level playing field for financial institutions. Unified adoption of the 1995 regulations will enhance community stakeholder organizations' ability to partner with all institutions to pursue community development projects and meet the credit and investment needs of families and communities.

To successfully implement the CRA regulations, examiners must be provided comprehensive, uniform training, a project which NeighborWorks would welcome the opportunity to further discuss. Effective, consistent, and predictable administration requires well-trained examiners with the necessary expertise in community development. The Federal Reserve, FDIC, and OCC should jointly develop comprehensive examiner training to ensure consistency and support well-informed judgements about topics such as performance context, innovation, and community needs. NeighborWorks, in its capacity as the leading provider of training for the community development field, would be pleased to offer our technical expertise and capacity to assist in developing and delivering a curriculum to train and support CRA examiners through our NeighborWorks Training Institutes or Group Learning offerings.

CRA regulations are one of the most powerful tools that the federal government has for incentivizing and rewarding bank behaviors that are responsive to the needs of their communities, like those served by NeighborWorks network organizations. We look forward to continuing our long tradition of collaboration with the Agencies and our financial institution partners through the Community Reinvestment Act.

Sincerely,



Marietta Rodriguez
President & CEO
NeighborWorks America