

August 18, 2025

Jennifer M. Jones
Deputy Executive Secretary
Federal Deposit Insurance Corporation 550
17th Street NW
Washington, DC 20429 RIN
3064-AG13

Re: Community Reinvestment Act Regulation

To Whom It May Concern:

OneLocal Bank is an FDIC-regulated community bank headquartered in Massachusetts, proudly serving our customers and communities since our founding in 1889. As of June 30, 2025, our asset size was \$1,019,423. We operate under a traditional community banking model that emphasizes relationship-based service, prudent lending, and local decision-making.

We are fully committed to the goals of the Community Reinvestment Act (CRA) and to meeting the credit and financial services needs of our customers and communities. OneLocal Bank's priority is to remain at the forefront of new CRA opportunities and to embrace innovation in serving our markets. For example, we partner with local agencies such as senior centers to help prevent fraud and financial abuse of older adults, and we have expanded our commitment to youth financial literacy through our partnership with *My First Nest Egg*. This application, developed with input from educators and subject-matter experts, provides a proprietary curriculum designed to give elementary-aged children the tools and knowledge needed to manage money successfully.

We have consistently supported efforts to modernize the CRA framework, with a particular focus on making expectations clearer and ensuring that examiners apply the rules consistently. When the rules are transparent and predictable, banks can dedicate more time and resources to serving underserved communities and less time shifting regulatory standards.

For these reasons, OneLocal Bank is in full support of rescinding the 2023 CRA Regulations. We believe the 2023 Rule is deeply flawed for the following reasons:

- The Rule's assessment area framework (RLAAs and ORLAs) extends beyond what the CRA statute allows.
- The Rule does not provide banks with fair notice regarding which geographic areas and products will be assessed, or what benchmarks must be met to achieve a Satisfactory or Outstanding rating. In many cases, banks would not know expectations until after the evaluation period concludes.

- The introduction of comparative testing is unreasonable and could prove economically untenable, particularly for smaller community banks.
- The Rule risks creating disincentives to serving certain communities, potentially worsening lending disparities and exacerbating CRA “hot spots.”
- At over 1,500 pages, the Rule is unnecessarily complex, difficult to interpret, and costly to implement—imposing steep compliance burdens without corresponding community benefit.

As a Massachusetts-based community bank with branches located within 22 to 48 miles of the Rhode Island border, we are especially concerned about the proposed reform prohibiting the inclusion of towns in a bank’s assessment area if they fall within a multi-state MSA. This restriction does not reflect the realities of community banking in our region. Currently, our assessment area appropriately includes towns in Bristol County, Massachusetts, which are part of the Providence, Rhode Island MSA. These communities share longstanding economic, social, and banking ties with our service area, and our customers routinely cross county and state lines in their daily lives. Under the proposed rule, we would be forced to exclude these towns and limit our assessment area to counties within the Cambridge–Newton MSA—an approach that would not accurately represent how we serve our market.

In addition, OneLocal Bank strongly supports the recodification of the 1995 CRA framework. This framework provided a consistent and reliable structure that enabled banks to focus on fulfilling the spirit and purpose of the Act. It struck a careful balance between regulatory oversight and flexibility, while aligning with Congressional intent to apply CRA obligations in a fair, predictable, and transparent manner. Reinstating this framework would provide institutions with the certainty needed to continue meeting community needs while upholding the original objectives envisioned by Congress.

The CRA modernization effort was originally intended to make the rules clearer and more practical for banks and communities. Unfortunately, the 2023 Rule evolved into a wholesale overhaul that went far beyond this goal. Rather than simplifying the framework, it added new layers of complexity while leaving many long-standing concerns unresolved. In particular, we recommend that regulators consider the following adjustments as they chart the path forward:

- Ensure transparency in examiner practices. For example, some examiners have cited online internal “bulletin board” discussions that have not been made public. If such resources influence CRA exams, they should be made public and included in official agency guidance.
- Develop and publish the illustrative list of qualifying CRA activities contemplated in the 2023 Rule, so banks can plan proactively.
- Establish a process for banks to request advance confirmation that a community development activity will receive CRA credit, providing clarity and avoiding uncertainty during examinations.

We respectfully urge regulators to take into account our perspective as a community bank dedicated to serving our customers and communities. A clear, predictable, and practical CRA framework is essential for ensuring that banks like OneLocal can continue to meet the credit needs of our communities while carrying forward the Act’s original mission.

On behalf of OneLocal Bank, we thank you for the opportunity to provide our comments on this important matter. As a community bank with deep roots in Massachusetts, we are uniquely positioned to see firsthand how CRA policies shape access to credit and financial services in the communities

we serve. We stand ready to work collaboratively with regulators to strengthen the CRA in a way that both honors Congressional intent and meets the evolving needs of our customers. We urge the agencies to rescind the 2023 Rule, recodify the 1995 framework, and pursue future modernization efforts that are clear, balanced, and practical. Doing so will allow banks like ours to remain focused on what matters most supporting the individuals, families, and small businesses that form the backbone of our local economies.

Sincerely yours,

A solid black rectangular box used to redact the signature of Tracey A. Robbins.

Tracey A. Robbins
Senior Vice President
Retail, Business, and Institutional Banking
CRA Officer