



August 18, 2025

VIA E-MAIL ONLY

Chief Counsel's Office
Attention: Comment Processing
Office of the Comptroller of the Currency
400 7th Street SW, Suite 3E-218
Washington, DC 20219

Ann E. Misback
Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue NW
Washington, DC 20551

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

Re: Community Reinvestment Act; Rescission of 2023 CRA Rule and Reinstatement of 1995 CRA Framework RIN 3064-AG13

The Wisconsin Bankers Association (WBA) is the largest financial trade association in Wisconsin, representing nearly 180 state and nationally chartered banks, savings and loan associations, and savings banks. WBA appreciates the opportunity to comment on the Agencies' notice of proposed rulemaking to rescind the 2023 Community Reinvestment Act (CRA) final rule and reinstate the CRA regulations as they were in effect prior to March 29, 2024, with certain technical and conforming amendments (NPR).

The CRA rulemaking process has been long and involved, with multiple proposals and extensive stakeholder input over the past several years. WBA filed comments in 2022 in support of modernization goals such as improving clarity, consistency, and keeping CRA relevant to how consumers access financial services. WBA emphasized the importance of tailoring requirements to bank size, reflecting local market realities, and minimizing reporting burdens. In consideration of these principles, WBA supports the rescission of the 2023 CRA Rule and the reinstatement of the pre-2024 framework, which better achieves these objectives by providing a practical, predictable, and flexible foundation for CRA compliance that continues to meet community needs.

WBA's prior comments emphasized several key principles that remain relevant today. First, WBA commends the joint efforts of the OCC, FRB, and FDIC to maintain consistency across agencies, which is essential for a fair and uniform examination process. Flexibility in delineating assessment areas is also critical, particularly for banks operating in rural and border regions, where local market realities must be considered. Although the NPR does not propose changes to Small Bank or Intermediate Bank thresholds, WBA continues to support periodic updates to these thresholds to ensure CRA requirements remain aligned with current banking conditions and capacities. Regardless of the regulatory framework in place, data collection and

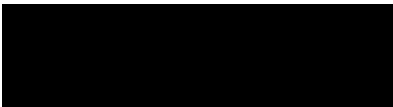


recordkeeping requirements should be designed to minimize the diversion of resources away from community development efforts. Finally, WBA maintains that clear and consistent criteria, along with appropriate incentives for affordable housing activities, are vital to supporting meaningful community investment.

WBA recognizes that the NPR's rescission is intended to realign CRA regulations with the statutory framework and address concerns raised over the past few years. While WBA supports the NPR, it also reminds the Agencies that frequent and sweeping regulatory changes can disrupt planning and community investment. The past few years of CRA regulatory uncertainty have stressed and strained Wisconsin banks, which have had to repeatedly reevaluate their organizational structures, invest in staff training, consider new hires, and coordinate with vendors amid shifting regulatory expectations. While WBA acknowledges that future improvements to CRA supervision may be beneficial, we urge the Agencies to pursue such enhancements mindfully and without initiating further rulemaking. Improvements in areas such as examination consistency, documentation clarity, and examiner training can meaningfully strengthen CRA implementation without altering the regulatory framework. These aspects remain important even if they are outside the NPR's scope.

WBA appreciates the Agencies' efforts to ensure CRA continues to effectively serve community credit needs. If rescission proceeds, we urge pairing this action with a plan for regulatory stability and clear guidance for future modernization efforts. Consistency, clarity, and predictability are essential to the success of CRA efforts for banks, regulators, and the communities they serve.

Sincerely,



Rose Oswald Poels
President/CEO