



October 21, 2025

Chief Counsel's Office
Attn: Community Processing
Office of the Comptroller of the Currency
400 7th Street, SW, Suite 3E-218
Washington, DC 20219
Docket ID OCC-2023-0016

Ann E. Misback
Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue, NW
Washington, DC 20551
Docket No. OP-1828

Jennifer M. Jones
Deputy Executive Secretary
Attn: Comments – EGRPRA
Federal Deposit Insurance Corporation
550 17th Street, NW
Washington DC 20429

RE: Economic Growth and Regulatory Paperwork Reduction Act of 1996 (EGRPRA), Docket ID OCC-2023-0016 and Docket No. OP-1828

Woodstock Institute is a 52-year old research and policy non-profit based in Chicago whose mission is to advance economic justice and racial equity within the financial industry through research and advocacy at the local, state, and national levels. Thank you for the opportunity to provide our thoughts regarding EGRPRA's requirement for agencies "to identify outdated or otherwise unnecessary regulatory requirements on insured depository institutions." This comment focuses exclusively on the implementing regulation of the Community Reinvestment Act (CRA).

Other written comments and public testimony regarding EGRPRA, the CRA, and the requirement for agencies to identify and eliminate unnecessary regulations will highlight the quantitative and qualitative positive impact of the CRA on low- and moderate-income communities throughout the country. Woodstock Institute lends its voice to this broad chorus of supporters, but would like to provide an additional perspective and request to make of the agencies. Specific to the CRA, numerous interviews with advocacy organizations and covered entities alike have found that there is nothing so substantively broken or redundant in the CRA regulation to warrant any action under EGRPRA. Those same conversations identified a more systemic concern regarding regulatory reform efforts currently underway – across the board, stakeholders are longing for stability.

In addition to "war-torn" Chicago being the home of deep dish pizza and a fanatical fixation on banning ketchup from hot dogs, it is also a sports town. Indulge us as we use a sports metaphor to describe the current state of our nation's consumer financial protection infrastructure.

Imagine the Federal Financial Institutions Examination Council (FFIEC) as a team. When the team performs well, communities, consumers, small businesses and small farms win through the protection the agencies provide by enforcing a suite of consumer financial protection and anti-discrimination laws. Those laws exist due to past and present harms based on recurring lapses in ethical behavior by various segments of the financial industry in pursuit of profit over the financial well being of the country.

Currently, the team has a new owner. The guiding regulatory principle of the new ownership seems to vary from a Mr. Burns-esque tactic to "release the hounds" to the Silicon Valley commandment to break things fast. If it weren't for the fact that low- and moderate-income communities will bear the brunt of these



questionable principles and that taxpayers will foot the bill when the eventual bailout occurs, this would make excellent theater. Over 70% of American families live paycheck-to-paycheck, so they cannot afford to withstand the “hounds” of predatory financial products or have their consumer financial protections “broken.”

As with most ownership changes, coaches are moving around, leaving, being fired or are new to the team. Such is the case in each agency that comprises the FFIEC. Some are given so many jobs that it's likely they'll do poorly in each. Some are under attack even though they have a winning record. Many are fired without replacements. Their relationship with the new owner varies headline-by-headline, and the principles of the new owner often conflict with the laws their agencies are meant to enforce, creating a choice between pleasing ownership or complying with the law.

Then you have the players on the field who have been decimated to the point where they know they can't compete. Specialists are gone, veterans fled for the relative comfort of retirement, and in many cases, the players that remain are being directed to stop playing the game they've trained for and instead take a backhoe to the field to destroy it.

In the best of times, consumers and communities come a distant third as it relates to their relative importance to the financial industry. At the top, shareholder profit expectations rule the day. A close second are regulators since nobody wants to end up in jail when they go too far in pursuit of profit. Trailing in the rear are consumers whose livelihoods and futures depend on accessing responsible and affordable financial products and services.

As of this moment, consumers and communities got bumped down to fourth. Now at the top is the Federal Administration's mandate that the financial industry perform their function within a narrow band of acceptable political behavior. It's unclear whether the financial regulatory agencies are even supposed to continue their basic oversight functions, and they're stumbling over their statutory duties in the confusion. The uncertainty that this environment has created for the financial industry will manifest itself in greater wealth disparities as financial predators are emboldened in this new deregulatory regime, new products are released into the economic ecosystem without safeguards, and bank compliance officers struggle to keep up with constantly shifting regulatory changes.

In this environment, our request is to respectfully ask the agencies to stop changing things. Prioritizing stability is the only sensible path forward right now. Recently enacted regulatory changes have hindered the industry's ability to support small businesses, build affordable housing or to assist those who have been historically excluded. At this rate, the harm done will take a generation to undo. While much of the consumer advocacy industry could be thanking you for ensuring our prolonged existence by giving us so much to fix, I am certain that we would celebrate the day when we are no longer needed because consumer financial protection works, discrimination in lending is a thing of the past, and communities come first.

Sincerely,



Horacio F. Méndez
President and Chief Executive Officer
Woodstock Institute

