

From: [Katharine S. Barry](#)
To: [Comments](#)
Subject: [EXTERNAL MESSAGE] CRA - Proposed Changes
Date: Tuesday, January 28, 2020 2:15:15 PM

To Whom It Concerns @ FDIC -

Re: *Proposed Changes to Community Reinvestment Act (CRA)*

H.O.M.E.S. is a community and economic development non-profit which has been operating in Broward County, FL (a metropolitan South Florida community of almost 2,000,000 residents) since 1998.

We are dismayed that powerful lobbies are pushing for a watered-down CRA in light of the current climate of widening economic disparities between rich and poor, a crisis-level lack of affordable housing in cities across the U.S., high unemployment in low-income neighborhoods (despite almost full employment overall), and a shrinking pool of both government funds and bank grants for housing and/or neighborhood revitalization work done by non-profits.

We are even more dismayed that these powerful lobbies are likely to be successful. For the past 5 or 6 years, banks have already been giving little more than "lip service" to CRA requirements, and less and less real investment in low-income neighborhoods, and certainly dramatically less actual help to non-profits in the trenches of community work. Make-believe CRA activities seem to be all that is required anymore – such as:

- A bank's annual community meeting to which all the local non-profit housing & community development groups are invited, and the bank brags about some program or project they have supported in some way (usually with very little money); or the bank asks us what issues we face and our suggestions on how they can help (but they don't act on this information, year after year).
- "Technical Assistance" webinars available to non-profits (generally useless).
- Very small grants, which make no real positive impact on the problems that non-profits are working on (really – what help is a grant of \$1,500 towards an affordable housing project??).
- Letting a non-profit group hold a meeting in a bank's space.
- Showing up at a meeting or presentation to potential new homebuyers, and participating in a way that steers potential new customers to the bank.

The above are some examples of what passes for CRA compliance these days. The real bank investments are going to giant for-profit companies doing tax-credit projects, etc..

The federal government should be tightening up CRA regs, not loosening them. I hope someone at the FDIC actually cares about what is happening out here in the real world!

THANK YOU FOR YOUR CONSIDERATION of the issues involved -



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