

**From:** [Austin Justice Coalition](#)  
**To:** [Comments](#)  
**Cc:** [Chas Moore](#)  
**Subject:** [EXTERNAL MESSAGE] Community Reinvestment Act Regulations - (RIN 3064-AF22)  
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To Whom It May Concern:

Austin Justice Coalition is a Racial Justice Group that educates and builds community power for people of color who live in Austin, Texas that need support, community, and liberation during a time of systemic injustice in America.

We oppose the changes to the Community Reinvestment Act (CRA) regulations proposed by the Office of the Comptroller of the Currency (OCC) and the Federal Deposit Insurance Corporation (FDIC), for the following reasons:

The new scoring system would allow banks to completely ignore almost half of the markets where they have branches and still pass their exams, The proposed changes will encourage banks to seek out large dollar community development deals to quickly get to a single total dollar volume metric and discourage loans to people with low- and moderate-incomes LMI and small businesses because the loans are much smaller, The system that gives credit to banks for having branches in LMI communities is weakened and will likely lead to massive branch loss in communities that are already underserved, The proposal redefines community development to include large infrastructure projects like stadium improvements in LMI Opportunity Zones which further encourages banks to seek out larger deals over smaller loans to meet the ratio for the total dollar volume metric, The definition of affordable housing would be relaxed to include middle-income housing in high cost areas, The proposal would redefine small businesses and family farms with higher revenues again encouraging banks to focus on larger loans to bigger businesses instead of smaller community-style loans., The proposal would lessen the public accountability of banks by not accurately measuring its responsiveness to local needs.

We must remember The Community Reinvestment Act was created to combat systemic, disparities that existed within the banking industry. While many of us experienced firsthand, redlining at its worst, and while redlining is now illegal, many of the broader disparities it was meant to address remain the same or have worsened since then. While we still believe the Act provides a strong framework for change, we also firmly agree it is capable of doing more. The Act has helped to increase minorities access to affordable housing and financing options but may be too lofty to state it has improved lives across the board.

It is clear that the proposed rules would weaken CRA. The focus on LMI communities

would be lost - the exact intent of CRA when it was signed in 1977. This backtracking would violate the agencies' obligation under the statute to ensure that banks are continually serving community needs. The FDIC and OCC need to discard the proposal, and instead work with the Federal Reserve Board to create an interagency rule that will augment the progress achieved under CRA instead of reversing it.

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