



April 7, 2020

RE: Docket ID OCC-2018-0008 Proposed CRA changes

To whom it may concern:

Thank you for allowing me to express my opposition towards the proposed changes to the Community Reinvestment Act (CRA). CRA encourages banks to invest in affordable housing and community development. By requiring banks to invest in LMI communities, CRA has secured over \$1 trillion in mortgages, small business loans, and economic development for under-served neighborhoods.

UNHS HomeOwnershipCenter's mission to Revitalize and Grow Neighborhoods would be weakened without CRA investments. We have been serving low and moderate income communities and residents since 1979. As a chartered member of the Neighborworks America Network as well as a HUD-certified Housing Counseling Agency, we provide homebuyer education, one-on-one financial coaching as well as foreclosure prevention and intervention services. Without CRA, homeownership would not be a possibility for many of our customers.

The proposed changes irresponsibly expand what would be considered eligible activities for CRA credit and the single ratio disregards whether or not the development and financial needs of the communities are being served by financial institutions. The new scoring system would basically give banks the ability to completely ignore select markets where they have branches and still pass their exams.

Expanding the CRA definition of community development investment to include the funding of luxury condominiums and athletic stadiums located on LMI tracts and allowing banks to fund LMI communities anywhere disregards public needs, which will lead to an increased lack of housing.

CRA's original intent when signed in 1977 was to end redlining! The proposed changes do not put families and communities first and essentially give banks the ability to return to the practice of redlining.



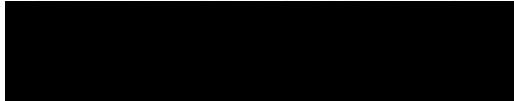
*HomeOwnershipCenter*

INVEST. RENEW. GROW.

---

We ask that the FDIC and OCC discard the proposal, and instead work with the Federal Reserve Board to create an interagency rule that will increase the progress achieved under CRA instead of reversing it.

Respectfully,



Danielle Smith  
Chief Executive Officer  
UNHS Neighborworks HomeOwnershipCenter  
1661 Genesee Street  
Utica, NY 13501  
dsmith@unhs.org  
315-724-4197