

From: [Elliott Lee](#)
To: [Comments](#)
Subject: [EXTERNAL MESSAGE] CRA COMMENTS--RIN 3064-AF22
Date: Wednesday, April 08, 2020 11:57:55 AM
Importance: High

04/08/2020

To Whom It May Concern:

My name is Elliott Lee and I am the Executive Director of Housing and Neighborhood Development Services, Inc. (HANDS) in Orange, NJ. The mission of HANDS is to work with residents and stakeholders to create neighborhoods where families want to--and are able to--raise their families and run their businesses.

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 proposal would make it so banks no longer have an obligation to make mortgage loans in neighborhoods with low and moderate incomes., 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 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.

There is no doubt that the community that we serve, in particular its residents and small businesses, would be negatively impacted if any of these proposed changes were to be put into effect. Indeed, what improvements that HANDS has been able to facilitate in Orange and in neighboring municipalities over the last 34 years would be eroded and reversed in very short order.

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.

Elliott Lee | Executive Director

HANDS | 15 South Essex Avenue, Orange, NJ 07050

Office: (973) 678-3110 x 36 | Fax: (973) 678-0014

