

**From:** [Jasmine Lilly](#)  
**To:** [cra.reg@occ.treas.gov](mailto:cra.reg@occ.treas.gov); [Comments](#)  
**Cc:** [Rashmi Rangan](#)  
**Subject:** [EXTERNAL MESSAGE] Docket ID OCC-2018-0008 for FDIC RIN 3064-AF22  
**Date:** Wednesday, April 08, 2020 12:07:24 PM  
**Attachments:** [image001.png](#)

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April 8, 2020

Joseph M. Otting

Comptroller of the Currency

400 7th Street SW, Suite 3E-218

Washington, DC 20219

Docket ID OCC-2018-0008

RIN 1557-AE34

Via email: [cra.reg@occ.treas.gov](mailto:cra.reg@occ.treas.gov)

Jelena McWilliams, Chair

Board of Governors

Federal Deposit Insurance Corporation

550 17th Street NW

Washington, DC 20429

RIN 3064-AF22

Via email: [Comments@fdic.gov](mailto:Comments@fdic.gov)

RE: Notice of Proposed Rulemaking, Community Reinvestment Act Regulations

Dear Comptroller Otting and Chair McWilliams:

I, Jasmine Lilly, oppose the proposed changes to the Community Reinvestment Act (CRA) regulations on the following grounds:

1. Federal Reserve does not support this proposal. Please discard this proposal and work with the Federal Reserve Board to write and propose a rule that will augment the progress achieved under CRA instead of reversing it.
2. Activities that were never at risk of redlining are CRA eligible under this proposal. Under this proposal, infrastructure, stadiums, and housing projects benefitting middle-income families in high cost areas count as CRA activities. Just to be clear, these activities were never at risk of redlining.
3. Assessment areas include geographies that were never at risk of redlining. Wealthier customers create deposit-based assessment areas in geographies that are not at risk of redlining.
4. The Presumptive CRA Ratings will allow a bank to reduce their commitment in the very communities that CRA must serve. Under these rules banks could issue as little as 5% of their retail loans to LMI borrowers or communities and still “pass” their CRA exams with Satisfactory ratings.
5. Even if at some time in the future call reports capture relevant data, the very fact that a bank needs to do less than they do today to achieve presumptive CRA ratings calls into question the motives for this NPRM.

Fairness to moderate- and low-income communities dies in opacity of call reports that do not shed light on borrowers, neighborhoods, or communities. They tell us only one thing—that a bank need not do anything more, in fact, much less to meet its CRA obligations.

There are too many concerns with this proposal. Thank you for the opportunity to comment and your consideration of these comments.

Sincerely,

Jasmine Lilly

Jasmine Lilly  
**She/Her/Hers**  
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