

From: Dorothy K Dean <info@disabilityjustice.net>
Sent: Wednesday, April 08, 2020 9:29 PM
To: Comments
Subject: [EXTERNAL MESSAGE] [SUSPECTED SPAM] RIN 3064-AF22
Attachments: Disability Justice re CRA 04082020.pdf

FDIC

Dear Friends,

My focus is on the way one polio survivor, my friend Sue Blom, living at a low income supported herself economically. She also prepared for her future. What she did is not what everyone can do. It worked for her. CRA regulations could help more people build economic stability. People with disabilities must be factored into any CRA regulations. People with disabilities are a sizable part of the population. Sadly, 60% of disabled adults are low to moderate income. Good CRA regulations can help address that.

Please see the attached letter addressed to the Comptroller of the Currency.

Thank you

--

Dorothy K Dean, Founder & CEO

Disability Justice

US Constitution -> ADA -> Inclusion -> Democracy

414-204-9080

office: M-W & F 9am - 5pm

<https://DisabilityJustice.net>

Disability Justice
A Disability Civil Rights Nonprofit
609 College Ave
South Milwaukee WI 53172
414-204-9080

April 8, 2020

To: Office of the Comptroller of the Currency

RE: Notice of Proposed Rule making, Community Reinvestment Act Regulations (CRA)

The Notice of Proposed Rule making (NPR) to reform the Community Reinvestment Act (CRA) ignores the importance of including low- and moderate- income people with disabilities in community development activities. As a result, Disability Justice strongly opposes the proposed rule making in its current form and recommends that the NPR be revised to address the financial and economic needs of low- and moderate- income people with disabilities.

Sue Blom, a polio survivor, secured her future by working and saving. She was always low income but she supported herself. She knew that the time would come when she could no longer work. The aftereffects of polio keep taking her strength.

She did the American thing by saving and buying a duplex -- the Milwaukee way for many families over many decades to gain economic stability. The owner lives in the lower unit and a tenant lives in the upper. Sue's income from the renter was enough to cover the cost of the mortgage, utilities, and maintenance. She never used public assistance.

Sue lived in a low-income part of Milwaukee. The CRA helped make the area more stable and encouraged home ownership. Sue banked in the area and shopped in the area. She wanted to do her business where she could go with her scooter. Like so many residents of the area, she depended on walking (scootering) and public transit.

People with disabilities must be included in the consideration of rules for the CRA. 60% of adults with disabilities are low to moderate income (LMI). We are concerned about the lack of attention paid to people with disabilities.

We are particularly concerned about the following four omissions from the proposed rules:

- Qualified Activities, as defined in the NPR, contain no examples of LMI people with disabilities benefiting from investments, lending and/or service activities.
- The qualifying CRA activities list has eliminated the possibility for banks to receive CRA credit for investment in economic and workforce development activities including apprenticeships, internships, on-the-job skills training and skill

certifications that are vitally important to many LMI populations, including those with disabilities.

- The NPR does not require banks to dis-aggregate reporting data by gender/race/ethnicity or disability, thereby failing to compel banks to address the historical lack of access and equitable treatment of sub-populations of the LMI community.
- The NPR discusses the applicability of seven other relevant laws that address discrimination, but fails to include the Americans with Disabilities Act (ADA). Since the passage of the ADA, financial institutions have in multiple court cases been found in violation of the ADA for lack of website accessibility and discriminating practices regarding access to credit.

Vibrant, healthy communities are best supported when economic opportunities are inclusive of LMI populations, including people with disabilities. Unless the challenges of LMI people with disabilities are intentionally addressed, people with disabilities will be unintentionally excluded from the financial system and overlooked as a target of community development activities.

The regulatory agencies need to revise the NPR in its current form and offer a set of rules that maintains the intent of the CRA and includes low- and moderate-income people, including those with disabilities.

Thank you for your attention to and support of our comments.

Sincerely,

Dorothy K Dean
Founder & CEO