



THE HOUSING PARTNERSHIP

April 7, 2020

RE: Notice of Proposed Rulemaking, Community Reinvestment Act Regulations

To Whom It May Concern:

Charlotte Mecklenburg Housing Partnership, Inc. (The Housing Partnership) opposes the proposed changes to the Community Reinvestment Act (CRA) regulations. The FDIC and OCC would reduce the accountability of banks to their communities by enacting unclear performance measures on CRA exams that would not accurately measure a bank's responsiveness to local needs.

The Housing Partnership, is a broad-based, private, non-profit housing development and financial corporation organized to expand affordable and well-maintained housing within stable neighborhoods for low and moderate-income families in the City of Charlotte and Mecklenburg County. For over thirty years, we have counseled over 28,000 families, created over 4,100 homeowners, completed 3,013 rental homes and invested a cumulative of \$638 million in affordable housing. Our programs include financial literacy and homebuyer education trainings, down payment assistance, assistance with foreclosure prevention and eviction prevention. As a member of the NeighborWorks® America Network of Excellence, we pride ourselves in helping families in low and moderate income communities. Changes to this Act would significantly impact The Housing Partnerships' ability to provide the following courses:

Financial Literacy Training

The Homeownership Center of Charlotte offers financial literacy workshops designed to provide the customer with the knowledge to take control of their finances. The workshop addresses three key areas: Managing Your Money, Saving to Build Wealth and Understanding Credit.

Homebuyer Education Training

The Homebuyer Education Class is designed to educate potential homebuyers on the homeownership process from start to finish. This comprehensive 8-hour class is facilitated by nationally-certified instructors. Topics discussed include obtaining a mortgage loan, shopping for a home, budgeting and on-going home maintenance. Upon completion the customer will receive a certificate that satisfies homebuyer education requirements for most lenders.

Down payment Assistance

The City of Charlotte and The Housing Partnership have joined forces to administer the HouseCharlotte Program. This program offers a 10-year, deferred, forgivable loan to qualified buyers. This down payment assistance is targeted to impact families with incomes that are 110% or less of the median income. Through this program The Housing Partnership successfully served over 300 families in 2019.

Foreclosure Prevention

Individual advising sessions are available to homeowners who are facing mortgagee default and/or foreclosure. During these sessions, the advisor will assist the customer with formulating an action plan to avoid foreclosure.



Eviction Prevention

This program provides services to assist with options for individuals in a situation where eviction may occur due to a reduction or loss of income in the home.

All of the above mentioned courses are key components to place or keep low to moderate families in a homeownership position. We rely on partnerships with those financial institutions who serve the low-to-moderate income communities and “pass” the current matrix criteria to help build capacity in LMI communities. Combining dollar volume of lending and community development in order to reach a rating largely based on dividing CRA activity by deposits will encourage banks to seek out largest deals and discourage smaller dollar loans and investments. That, coupled with the reduction and perhaps an elimination of CDBG and Housing Trust funds, would make capacity building a challenge for our corporation.

Please reconsider making changes to the CRA until after the current climate of our nation has leveled out. The current administration is focusing on the pandemic and the CRA deserves to have the proper attention before changes are made to impact those who currently benefit from the CRA.

Thank you for your time and consideration.

Best regards,



Julie Porter
President, The Housing Partnership