

**From:** [Darlene Sample](#)  
**To:** [Comments](#)  
**Subject:** [EXTERNAL MESSAGE] RIN 3064-AF22  
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**Attachments:** [image004.png](#)

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April 8, 2020

RE: Notice of Proposed Rulemaking, Community Reinvestment Act Regulations

To Whom It May Concern:

Interfaith Community Housing of Delaware, Inc. opposes the proposed changes to the Community Reinvestment Act (CRA) regulations as deeply misconstrued. What the OCC and FDIC is proposing would reduce the public accountability of banks to their communities by enacting ambiguous performance measures on CRA exams that would not accurately measure a bank's responsiveness to local needs. The proposed changes would result in significantly fewer loans, investments and services to low-and-moderate income communities that are contrary to what the agencies are claiming. Our organization knows first-hand the importance of not allowing these unclear changes to be implemented as we have staff and board members who reside in these communities. Our offices are also located in these communities and we have witnessed the benefits as we have seen a rotation of clients moving from current situation to an improved situation of empowerment as a result of the programs afforded by the terms of the current CRA. The banks specific, deliberate regulations ensure that this often forgotten population continues to be supported in their quest for self-development.

The proposed changes would allow the agencies to dramatically lessen CRA's focus on LMI communities which is contradictory to the intent of the law to address redlining. Relaxing the definition of affordable housing would include middle-income housing in high cost areas and the Notice of Proposed Rulemaking (NPRM) would count rental housing as affordable if lower-income people could afford to pay the rent without verifying that lower-income people would be tenants.

In addition, collected interpretations of the proposed changes would add financing to large infrastructures, propose an inflate ratings provision, lessen responsiveness of local banks, alter the ratio measure which would allow easily allow banks to shift their focus from local needs, relax bank requirements in the areas served, as well as change necessary parameters needed to accurately value effectiveness through retail testing that would serve to lessen what the CRA was designed to accomplish.

Rather than weakening CRA, the agencies should implement clear concise reforms that would increase bank activity in underserved neighborhoods. The agencies should address persistent racial disparities in lending by strengthening the fair lending reviews on CRA exams or adding an examination of bank activity to communities of color in CRA exams.

Ultimately this deeply flawed proposal would result in less lending, investing and services for communities that were the focus of Congressional passage of CRA in 1977 which is viewed as "backtracking". This backtracking clearly violates the agencies' obligation under the statute to ensure that banks are continually serving community needs. It is our intent to encourage the FDIC and OCC need to discard the NPRM, and instead work with the Federal Reserve Board and propose an interagency rule that will strengthen the progress achieved under CRA instead of reversing it.

***Take Precautions & Stay Safe!***

***Warmest Regards***

***Darlene Sample, MBA***

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