



OF GRAYS HARBOR COUNTY

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Building Our Communities One House at a Time

Serving All of Grays Harbor County

Submitted on 4-8-2020

Comment regarding "Reforming the Community Reinvestment Act Regulatory Framework" RE:
Docket ID OCC-2018-0008

Dear Reviewers for the Community Reinvestment Act Proposed Rule:

NeighborWorks of Grays Harbor County would like to offer comments on the Office of the Comptroller of the Currency's (OCC) Advance Notice of Proposed Rulemaking (ANPR) regarding the Community Reinvestment Act (CRA).

NeighborWorks of Grays Harbor County is a 39 year-old, 501(c)3 nonprofit organization and a NeighborWorks® America Chartered Member. Our mission is to create safe and affordable housing opportunities by partnering with governments, businesses and residents. Sustainable homeownership is our goal. This is accomplished through home buyer education and full-on HUD counseling as well as a revolving loan program and private and public partnerships. Our loan committee is comprised mostly of our board member bankers who bring the benefit of their lending skills to our clients. The CRA credit for all of our activities benefits their lending institutions. Lender members have served on our board and committees since our inception, creating a shared trust and partnership that serves all the rural communities in our service area. With a staff of seven, this "Exemplary" rated NeighborWorks organization leverages nearly \$7 million dollars a year of homeownership, owner-occupied rehabilitation, housing counseling and Fee for Service Construction Management. We could not provide this menu of services without our lender partner support.

The proposed changes to CRA will likely impact the rural areas of this state and organizations like this one that are focused on sustainable housing for lower wage earners which was and should continue to be in support of the original intent of the Act. I strongly urge your reconsideration all of the latest proposed changes and to refocus your efforts on the needs of the American people instead of the unchecked banks.

Thank you for the opportunity to support CRA as it was originally envisioned.

Respectfully,


David S Murnen
Executive Director

NeighborWorks of Grays Harbor County