



To: Rulemaking File

From: Barry Wides, Deputy Comptroller for Community Affairs

Date: February 4, 2020

Subject: Summary of Meeting with Consumer Bankers Association CRA Committee

On February 3, 2020, representatives from the FDIC and OCC attended a meeting in Washington, D.C. with the Consumer Bankers Association's CRA Committee.

The meeting attendees indicated the following aspects of the OCC/FDIC CRA NPR for which there was consensus support:

- moving CRA modernization efforts to forefront after 10 years
- use of metrics associated with a presumptive CRA rating
- CRA rating for which there is transparency and consistency
- having a list of CRA qualifying activities
- greater incentives for an outstanding CRA rating with a 5-year examination period
- clear market and demographic benchmarks for retail loan distribution tests
- multiplier to incentivize certain activities
- retaining consideration of performance context

The attendees indicated that the CRA Committee had concerns with the following aspects of the proposed rule:

- potential for different sets of rules from prudential regulators
- balance sheet-based instead of origination-based metrics
- deposit-based assessment areas
- mandatory inclusion of consumer lending
- twenty five percent weighting for retail loans held on the balance sheet for less than 90 days
- increased data collection

OCC Attendees:

Grovetta Gardineer, Senior Deputy Comptroller for Bank Supervision Policy
Brian Hubbard, Deputy Comptroller for Public Affairs
Barry Wides, Deputy Comptroller, Community Affairs

FDIC Attendee:

Leonard Chanin, Deputy to the Chairman

Consumer Bankers Association Attendees:

Yvonne Blumenthal, US Bank

Lloyd Brown, Citigroup
Nathalia Artus, Atlantic Union Bank
Jan Bergeson, Ally
Norm Bliss, Bank of the West
Melissa Borino, BMO Harris
Christina Cudney, United Bank
Jon Davies, Regions
Brad Dossinger, M&T Bank
Staci Glenn Short, Huntington
Emmanuel Glover, TCF
Seth Goodall, Santander
Joseph Hernandez, TIAA
Alicia Vela, Bank of America
Peter Sullivan, PNC
Sharon Jeffries-Jones, Truist
Christine Lloyd, HSBC
Jim Matthews, Capital One
Chris McGillis, BBVA Compass
Beverly Meek, Flagstar
Donna Normandin, Frost Bank
Julius Robinson, MUFG Union Bank, N.A.
Kathleen Robinson, TD Bank
Bobbie Salgado, MUFG Union Bank, N.A.
Beth Trotter, IBERIABANK
Doug Schaeffer, Woodforest Bank
Richard Hunt, Consumer Bankers Association
Stephen Congdon, Consumer Bankers Association
Maren Colon, Consumer Bankers Association
Warren Traiger, Buckley LLP
Caroline Eisner, Buckely, LLP