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August 1, 2022

ATTN: OCC Docket ID OCC–2022–0002; FDIC RIN 3064-AF81; Federal Reserve Docket No. R-1769 and RIN 7100-AG29

Re: Interagency Proposal to Strengthen and Modernize Regulations Implementing the Community Reinvestment Act (CRA)

Local Progress,[1] alongside 40 members of our network of local elected officials, write in response to the Notice of Proposed Rulemaking (NPR) to Strengthen and Modernize Regulations Implementing the Community Reinvestment Act (CRA). We appreciate the opportunity to offer these comments on the NPR given the importance of this law to the communities across the country that are represented by our network. While we appreciate several strong components of the proposal, significant changes are necessary to realize the intent of the law and its full potential in an evolving world of persistent inequity.

CRA data and exams are an important part of numerous Responsible Banking Ordinances[2] enacted across the country that enable municipalities to evaluate the institutions in which they place public deposits. Responsible Banking Ordinances require banks that seek to receive municipal deposits to demonstrate that they are serving low-income neighborhoods and communities of color.

The CRA is one of the major civil rights laws passed in response to the discriminatory policies and practices that initially locked people of color out of banking, credit, housing, employment, and education. It is one of the most important laws we have that holds banks accountable to their obligations to serve and invest in local communities. It has led to trillions of dollars reinvested nationwide for affordable housing, small business support, daycare, schools, economic development, local businesses and community services. The CRA has also fostered affordable mortgages, small business loans and supports, bank branches, and commitments to responsible multifamily lending. The CRA is fundamental to the improvement of health outcomes in low- and moderate-income communities via development and initiatives that address the social determinants of health and create healthier communities.

However, for all its benefits, inequities persist and the CRA has not kept up with significant changes in the banking industry. Too many low-income families, immigrants, and people of color still lack sufficient access to loans to purchase homes, improve their homes, and start and maintain businesses. Smaller nonprofits struggle to access grants and loans to build and preserve

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[1] Local Progress is a movement of more than 1,300 local elected officials representing over 600 jurisdictions in 48 states committed to racial and economic justice. The network includes local leaders at all positions of local governance—mayors, district attorneys, county commissioners, city councilmembers, and school board members—representing major cities, growing suburbs, and rural communities.

[2] LOCAL PROGRESS, RESPONSIBLE BANKING AND ACCESS TO CREDIT (Jan. 2019), https://localprogress.org/wp-content/uploads/2019/01/Responsible-Banking-and-Access-to-Credit.pdf

much-needed deep and permanent affordable housing and to support community development. Lending to speculators and unscrupulous landlords contributes to harassment and displacement, especially for low-income tenants and tenants of color. As the economic fallout resulting from COVID-19 continues, the hardest hit communities are the ones that were already the nation's most underserved. It has been 40 years since the CRA was passed and the racial wealth gap is wider than ever. The average Black and Latinx households earn about half as much as the average White household and only have about 15% to 20% as much net wealth.[3] Additionally, persistent countrywide racial disparities in banking and lending result in fewer residential and small business loans, branches, resources, and more harassment and displacement for Black, Indigenous, and people of color (BIPOC).

The NPR's proposed changes to the asset limits will allow some banks to reduce their investment in the communities and businesses that will need the most assistance rebuilding. Our nation cannot rebuild and reopen if banks are not committed to an equitable recovery from the pandemic.

As the first major update of the CRA in over 25 years, this rulemaking presents a historic opportunity for the CRA to finally meet its intended purpose to address redlining and racial disparities and increase access to banking and capital in low- and moderate- income (LMI) and BIPOC communities. In light of the disastrous proposals of the previous administration, we appreciate that federal regulators are working together to offer several positive steps forward; for example: more rigorous data-driven lending tests; a focus on smaller businesses; more data disclosure and analysis of bank deposits and products at the largest institutions; lending-based assessment areas; anti-displacement criteria in some community development categories; and expanded discrimination downgrades to include non-credit consumer violations. However, absent significant revisions, the NPR presents a missed opportunity to ensure that the CRA meets its intended purpose to address redlining and other racial disparities in our financial systems.

Federal Regulations Should Affirmatively Aim to Close the Racial Wealth Gap

Systemic racism, discrimination, and the inequities they perpetuate cannot be adequately addressed with "color-blind" policies; we know that income is not an adequate proxy for race.[4] The CRA requires banks to serve all communities and is intended to remedy racial exclusion, which provides room for federal bank regulators to incorporate race in CRA exams to a greater extent than they do presently. Despite acknowledging that the CRA originated as an anti-redlining law, the proposal fails to live up to the CRA's intended purpose. The only aspect of the current proposal that provides any assessment on the basis of race is the requirement of disclosure of already-public Home Mortgage Disclosure Act (HMDA) data to produce exam tables describing lending by race—and this disclosure will have no impact on the final rating.

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[3] *See* Aditya Aladangady and Akila Forde, *Wealth Inequality and the Racial Wealth Gap*, FED NOTES, Oct. 22, 2021, *available at* https://www.federalreserve.gov/econres/notes/feds-notes/wealth-inequality-and-the-racial-wealth-gap-20211022.htm.

[4] *See* Laurie Goodman et al., *Should the Community Reinvestment Act Consider Race?*, URBAN INST., Jan. 2022, *available at* https://www.urban.org/sites/default/files/2022-04/should-the-community-reinvestment-act-consider-race_1.pdf.

More must be achieved in this area to address the systemic racism that undergirds and pervades our banking systems. Regulators should create affirmative obligations to serve and benefit BIPOC people and communities and incentivize activities that close the racial wealth gap. Regulators should benchmark and disclose all available data by race: home loans (HMDA), small business loans (1071 data), grants to BIPOC-led organizations, and branch & community development locations.[5] Increasing racial disparities should lead to downgrades and trigger fair lending investigations. Regulators should extend place-based anti-displacement criteria to all community development categories: no credit should be awarded for displacement or detrimental effects on LMI or underserved populations. And finally, regulators should expand discrimination downgrades to include incidents of displacement or harm ("detrimental effects") on BIPOC people and communities, such as specific branch closures, harmful landlord practices, or higher cost products that disproportionately impact communities of color.[6]

<u>Higher Asset Level Thresholds and Exemptions for "Smaller" Large Banks Create Loopholes That Will Significantly Reduce Community Development Finance Funding</u>

The current proposal may create loopholes that could exclude banks from analysis in many areas. For example, higher asset level thresholds encourage banks to reduce their level of community development financing and customer services. Moreover, federal regulators should make sure that all large banks are held to the same standards and close the loopholes that exempt "smaller" large banks with $2B to $10B in assets. The current proposal exempts these "smaller" large banks from data disclosure, auto lending tests, and scrutiny as to from where they take deposits and the types of bank accounts they offer. This proposal compounds the harms of reducing obligations for 20% of banks by raising asset size thresholds that reclassify hundreds of banks into the less rigorous intermediate and small bank test categories. Over $1 billion of community development finance will be lost under this proposal.[7] The agencies' proposal to change the CRA regulations should at the very least expect the same range of reinvestment activity as CRA currently does for all banks. In this respect, the proposal goes backwards with no justification about how any reduction in burden for these banks would somehow offset the loss of reinvestment activity from a public benefits perspective. The banks impacted have been engaging in community development or service provision for several years without any apparent deleterious impacts.

To close these loopholes, the proposal to allow a bank to pass its exam even if it fails up to 40% of its assessment areas must be seriously reconsidered. No bank should be permitted to pass an assessment area where it fails component tests, especially in cases of displacement-financing or branch closures in already underserved LMI and BIPOC communities. No bank classification or "major product line" threshold should exclude lines of business; depending on the size of loans and comparative volume such exclusions could preclude banks making thousands of loans from analysis. Limited purpose consumer banks must be evaluated on that limited purpose, and all

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[5] Under the current proposal, data on deposit and automobile lending will not be made publicly available, which limits the extent to which the public can hold banks accountable for reaching underserved communities. We ask the agencies to reconsider this decision.

[6] In addition, we urge the regulators to add the Americans with Disabilities Act to those laws included in a fair lending review.

[7] *See* Josh Silver, *Initial Analysis Of The CRA Notice Of Proposed Rulemaking*, NAT'L CMTTY. REINV. COAL., June 1, 2022, *available at* https://ncrc.org/initial-analysis-of-the-cra-notice-of-proposed-rulemaking/.

consumer loans should be evaluated for distribution and impact. Any line of business that results in 50 loans or more than 15% of lent dollars, whichever is lower, should be evaluated as a major product line. Regulators should require all affiliate lenders to be evaluated and factor in performance by non-bank lenders with which banks have a formal relationship, especially to offer a product the bank no longer offers.

<u>Federal Regulations Need to Future Clarify Processes for Community Engagement and Accountability</u>

The communities most impacted by our inequitable financial system, and their input, must be central to the CRA process. Although we agree with the proposal's goal of "clarif[ying] the agencies' treatment of public comments in connection with CRA examinations," the proposal nonetheless provides little clarity or guidance as to how the comments factor into the component analysis or final ratings. Too few details were provided regarding how proposals by the regulators regarding advance notice of exams, sharing comments with banks on community needs and their performance, requiring comments on banks be made public, and establishing new ways for the public to provide input on needs and bank performance will improve these processes, nor how they factor into the examination process any more than they do today. In fact, the only section of the examination process that explicitly referenced public comments is the retail lending test, and benchmarks remain the driving factor with public comments as merely one of several additional factors regulators are considering adding.

Regulators should establish a proactive process to solicit local input on needs and bank performance from a wide range of stakeholders, with an emphasis on BIPOC-led and serving organizations. This could include letters, hearings, and listening sessions. Regulators should consider utilizing community advisory boards within local communities to facilitate this engagement process. Regulators should evaluate how well banks solicit and incorporate feedback from similar stakeholders and provide clarity on how comments factor into ratings—ideally based on how banks meet local needs with products and practices. Community Benefits Agreements and community-informed CRA plans should be encouraged, and then monitored and enforced through conditional approvals on mergers and review for CRA exams. Finally, banks must respond in meaningful ways to specific issues raised in community comments, with the option for regulators to require specific actions should they fail to respond adequately. Too often, regulators are silent when the banks have ignored feedback from local organizations, leaving community residents to fend for themselves in an inequitable financial system and discouraging community members from future engagement.

<u>Federal Regulators Must Address Barriers to Homeownership</u>

Homeownership remains an important path to wealth creation and developing intergenerational wealth. Yet, too often BIPOC communities are locked out of homeownership opportunities, targeted with predatory products, and face limited opportunities to accumulate wealth due to lower appraisal values. Affordable, accessible residential mortgages are critical forms of credit needed to achieve homeownership and stay in their homes, yet consumers are forced to also rely upon other forms of credit, such as auto loans, credit cards, credit builder loans, and small dollar loans. The current proposal offers a more comprehensive, data-driven approach to the CRA lending test that will derive ratings based on how bank mortgage lending compares to a set of market and community benchmarks. We appreciate this proposed data-driven framework and acknowledge that it could combat grade inflation but have concerns about its overall impact without significant changes.

Regulators must prioritize owner-occupied homes over investor-owned properties and focus on originations, as opposed to loans that banks have purchased from other lenders. Any evaluation of investor properties must focus on their impact on communities, ensuring they build wealth for BIPOC communities without fueling displacement or other harms. Similarly, regulators should evaluate who receives loans in LMI/BIPOC communities to ensure they are benefiting—and not displacing—LMI and BIPOC people. To address the lack of access to traditional financing for manufactured homes, regulators should define standards for qualified safe and affordable personal property (chattel) loans eligible for inclusion on the list of CRA-eligible activities, while maintaining downgrades for predatory chattel loans.

Regulators must incorporate an analysis of loan pricing and consumer product terms to ensure that products are meeting local needs—instead of extracting wealth. Likewise, regulators should evaluate how well loan products match local needs. The Home Mortgage Disclosure Act ("HMDA") now collects and discloses details on loan pricing and terms, including closing costs, points and fees, reverse mortgages, interest-only mortgages, interest rates, and more. But the proposal fails to incorporate any of these factors. The retail services and products test gives credit for responsive products, such as affordable mortgages, but does not evaluate usage of said products, nor does either test lower a rating for failing to offer such products or for offering high-cost, extractive products.

Federal Regulators Must Prioritize Loans to Underserved Small, Micro-, BIPOC-owned, and Immigrant-Owned Businesses

Although small business loans were incorporated into the CRA over 25 years ago, very small and micro- businesses, as well as BIPOC-owned and immigrant-owned businesses of all sizes still lack access to the capital they need to open and sustain their businesses. The CRA must do more to direct capital to them.

We support the proposed analysis of loans to businesses under $250,000 in revenue and suggest adding a category for businesses under $100,000 in revenue as well. However, we are concerned that the new definition of "small business" will give credit for lending to businesses with up to $5 million in revenue. The CRA must focus on unmet credit needs which fall among BIPOC-owned businesses and businesses under $1 million in revenue, with a focus on businesses that have revenues that fall under even smaller tranches. The distribution test will give credit for any of the small business loans in LMI tracts, but with no analysis of whether the business is BIPOC-owned or as to business size, loans could skew towards larger and/or white-owned businesses and less so to persistently underserved small, micro-, BIPOC-owned, and immigrant-owned businesses. As such, regulators must focus on small and BIPOC-owned businesses in LMI/BIPOC communities, to ensure they are benefiting—and not displacing—these marginalized business owners. Regulators must also include analysis of loan pricing and terms to ensure products are meeting local needs and not extracting wealth, as could be the case with high-interest credit cards or other higher-cost products.

Federal Regulations Should Facilitate Responsible Multifamily Lending

The CRA should incentivize responsible multifamily lending and downgrade banks for financing landlords that harm and displace LMI and BIPOC tenants. Responsible lending is critical to maintaining affordable housing, whereas unsustainable loans and loans to landlords that harass and displace tenants or keep buildings in poor condition, threaten this important stock of housing. Although we appreciate the proposal's intent to ensure unsubsidized ("NOAH") housing remains affordable even post-renovation, it barely moves the needle on what is needed to deter displacement and preserve safe, stable, affordable housing.

Regulators should conduct a comprehensive evaluation of multifamily mortgage lending for distribution, affordable units, building conditions, and underwriting. They should give credit for adopting and adhering to anti-displacement best practices like the Association for Neighborhood and Housing Developers (ANHD)'s Multifamily Best Practices and NY State's Department of Financial Services guidance and downgrade ratings for incidents of harm to and displacement of LMI and BIPOC tenants.

Federal Regulators Should Weight Access to Bank Branches and Affordable, Accessible Financial Products More Heavily

Access to bank branches and affordable, accessible financial products is critical to building wealth credit and ensuring that undeserved, un(der)banked BIPOC, LMI, and immigrant populations are able to join and remain in the financial system. Yet, banks continue to expand and grow as branches close and lower-income and BIPOC communities are consistently left behind. The tide of branch closures has accelerated rapidly since the onset of the COVID-19 pandemic.

In the current proposal, analysis of bank branches, bank products, and access to banking are just one piece of an already small section of the CRA exam, made smaller in the proposal. Branches must remain a core component of the retail services test. There must be stronger consequences for closing branches in underbanked LMI and BIPOC communities, including downgrades, especially when communities provide comments about the impact of the branch closure and/or lack of branches. However the weighting is finalized, no bank should pass its exam if it fails to serve communities with branches and affordable and accessible products

We appreciate several positive aspects of the current proposal including the benchmarking of branches in LMI communities, incentives to open branches in unbanked areas, and a more rigorous analysis of where the largest banks take deposits and the types of accounts they offer. However, we also have significant concerns about the impact of this new approach. Branches and access to banking now fall under the "retail services and products test" which covers more areas but counts for less of the final rating (just 15%). Furthermore, the analysis of consumer and deposit bank products appear to only have the potential to raise the score, with no accompanying product usage analysis. Few details exist on how branch openings and closings factor into rating. Although one closure could have a significant impact on a local community, for a bank with a large branch network such a closure would barely impact the overall exam rating.

Regulators should require banks to demonstrate specific steps taken to avoid closure through improved services and outreach, as well as actions taken to mitigate harm should a branch close. Regulators should evaluate all banks (not just those with over $10 billion in assets) on where they take deposits, the quality of their banking products, and usage of affordable products. Finally, in the retail lending test and services tests, all consumer loans must be evaluated for equitable distribution, and quality, with incentives for impactful activities and downgrades for wealth extraction and harm.

<u>Federal Regulators Should Enhance the Rigor of the Community Development Finance Test</u>

Community organizations, nonprofit developers, and community development financial institutions depend upon bank financing leveraged through the CRA to support their missions. We appreciate the attention to volume, the impact review incentives for deeper affordability and grants, and new categories specific to broadband access and climate resiliency. Climate change, in particular, has compounded CRA challenges and highlighted its shortcomings. It has increased credit needs in climate-vulnerable areas while simultaneously straining the abilities of banks to provide access to credit. New York's Department of Financial Services has developed a framework under the New York CRA for climate mitigation credit that is worthy of emulation. Still, more can be done to ensure that any activity that obtains credit benefits local communities, and that banks are deterred from activities that cause harm.

The proposed community development financing (CDF) test does not match the rigor of the lending test, and the quantitative and impact review components of the CDF subtest should further be developed. Although the qualitative review is needed, it can also be abused and result in inflating a rating if the review is not carefully designed. In particular, the regulators should reconsider assigning each community development loan or investment an impact score on a point scale as contemplated in the Federal Reserve's Advance Notice of Proposed Rulemaking. In so doing, regulators should evaluate loans and investments separately within the community development finance test to ensure banks do not cease making investments. We are most concerned about the possible impact on Low Income Housing Tax Credit (LIHTC) investments, which are a critical source of equity for affordable housing. The investment test also incentivizes other forms of investments, such as EQ2 investments and grants. Furthermore, while we appreciate that adding credit for prior-period loans may incentivize longer-term patient capital, the change should not allow banks to substantially reduce originations of impactful loans, nor give additional credit for less impactful activities. Since this credit would further supplement the credit that banks would already receive for renewing or refinancing the loan, regulators should assess if the prior term credit is for activities that would not have been done without such incentive. For example, the duration of the majority of commercial multifamily mortgages to private landlords is already longer than a CRA cycle and thus banks do not need further incentives. Worse, without stronger anti-displacement criteria in the affordable housing category, a bank could conceivably receive credit over multiple exam cycles for a loan to a landlord that maintains a building in poor condition, harasses, and/or displaces tenants.

Regulators should expand the impact review to include activities that close the racial wealth gap, finance long-term/permanent affordable housing, support mission-driven nonprofit developers, and support activities that explicitly connect to locally-identified needs. Regulators should also ensure that banks do not receive credit—and certainly not "extra credit"—for housing in lower-income communities that is identified as too expensive for the local community. Regulators should ensure that banks do not receive credit for activities that do not explicitly benefit LMI or BIPOC communities. Along these lines, we ask the regulators to reconsider their proposal to expand CRA consideration for financial literacy with no income limits and ensure scarce counseling resources are targeted to LMI and other underserved populations. Finally, regulators must extend the stronger anti-displacement criteria to all community development categories (not just place-based categories) and allow downgrades for activities discounted by that criteria or otherwise found to contribute to displacement or harm.

Federal Regulators Should Create Deposit-Based Assessment Areas and Ensure Equitable Service Between Online and Branch-Based Assessment Areas

We are pleased that the current proposal keeps branch/ATM-based assessment areas to evaluate how banks perform where they have a physical presence. We are also excited to see new lending-based assessment areas to evaluate the equitable distribution of 1-4 family mortgages and small business loans outside of where banks have branches. In addition, regulators should also add assessment areas based on where banks take deposits and open accounts and assess lending and banking in all assessment areas.

Regulators should also create deposit-based assessment areas for all large banks based on where they take deposits and open accounts. Failure to do so undermines the original intent of the law to ensure banks lend where they take deposits and fails to incorporate new models of banking. Under the system as proposed, online banks have no obligation to equitably serve any local communities, including unbanked areas of a large city like New York. Regulators should also ensure banks are lending and providing access to banking equitably within all new online assessment areas. Banks should also provide community development finance in the areas they serve and do so in a way that "expands the pie" and does not lead to a reduction in service to areas they serve with branches. In order to ensure that banks serve smaller metropolitan areas and rural counties, regulators proposed requiring that banks with ten or more assessment areas must receive at least a Low Satisfactory rating in 60% of the assessment areas in order to pass overall. This proposal, however, may not be an adequate solution since the smaller areas could represent a minority of areas, allowing a bank to pass the 60% threshold by focusing on the larger areas. One possible fix is to require banks to achieve at least a Low Satisfactory rating of 60% in each of its large metropolitan, small metropolitan and rural assessment areas. Finally, regulators should ensure that banks are serving communities equitably within branch-based and online assessment areas.

Merger Review

Under the current proposal, the regulators have maintained the same process for reviewing merger applications, arguing that improvement of the CRA exams themselves will suffice. Such a position, however, fails to contend with potential changes in CRA performance subsequent to a bank's most recent exam. Regulators should improve upon implementation of the convenience and needs standard and secure concrete plans—including via community benefits agreements—regarding increased lending, investment, and services in LMI and BIPOC communities. In addition, public hearings, as was the case with the U.S. Bank and MUFG/Union merger, should be the standard. An outstanding CRA rating should not be considered evidence that merging banks have satisfied the public benefits legal requirement.

Conclusion

We are grateful for the opportunity to comment on the CRA proposal. The CRA is one of the key tools we have to hold banks accountable to the needs of our local communities. For all of the many benefits that the CRA has brought, it still has a long way to go to live up to its original charge of fighting and eliminating redlining. The proposal should be lauded for the increased rigor and accuracy of the large bank retail lending test. These changes will reveal distinctions in performance and critically improve data collected on retail lending, community development financing, deposits and basic banking services with the added benefit of making exams more objective and transparent. Although the NPR promises to make certain parts of CRA exams more rigorous, we urge the agencies not to weaken certain reinvestment requirements and to extend the rigor of the large bank lending test to the other tests by adding objective quantitative and qualitative measures and more instructions to examiners regarding how to weigh various components of the tests to prevent another round of CRA ratings inflation. Now is the time to create a strong, race-conscious CRA that requires and incentivizes positive activities, downgrades ratings appropriately for harm and displacement, keeps community input central to the process, expands public reporting of data collection, bolsters assessment areas, and maintains and strengthens local obligations. A rule that delivers public accountability can help reduce inequalities, disinvestment and other disadvantages in America's overlooked communities.

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