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Re: Proposed Changes to Interagency Q&A

OCC: Docket ID OCC-2013-0003

Federal Reserve: Docket No. OP- 1456

FDIC: Attention: Comments on CRA Interagency Q&A

To Whom It May Concern:

As an entrepreneur, involved community activist and supporter of the National Community Reinvestment Coalition (NCRC), I acknowledge that the proposed changes to the Interagency Question and Answer (Q&A) document would be modestly helpful. That being said, I believe that the proposed changes fall far short of the comprehensive revisions to the CRA regulation needed to keep pace with the changes in the banking industry. I believe that the agencies must implement bold and aggressive changes to the CRA regulation in order to increase responsible lending, investing, and services in low- and moderate-income communities.

It is my belief that the following changes would strengthen the CRA regulation:

- The agencies should designate additional assessment areas for counties and metropolitan areas in which a bank makes sizable numbers of loans but in which the bank does not have branches.
- The agencies must also refrain from altering examination weights in their proposed Q&A on community development lending. While it is desirable to affirm the importance of community development lending as the first part of the proposed Q&A does, the second part of the Q&A stating that strong performance in community development lending can compensate for weak performance in retail lending must be deleted. Better methods can be developed for elevating the importance of community development lending.
- A more rigorous service test which assesses data on bank deposits in addition to bank branches in low- and moderate-income communities is urgently needed. In addition, the existing Q&As regarding foreclosure prevention and loan modifications are not effectively stimulating large-scale foreclosure prevention activities. Reforms to the CRA regulation boosting the importance of foreclosure prevention and servicing must be undertaken.
- The Q&A needs to be strengthened by saying that CRA examiners will separately evaluate originations and purchases and will downgrade banks if the purchasing is conducted in a manner to inflate the CRA rating.

I urge prompt and comprehensive reform to the CRA regulations.

rely,


Marcella Roberts, Esq