

**From:** [REDACTED]  
**To:** [Comments](#)  
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To Whom It May Concern:

I am a UCLA student in a combined MD/PhD program in anthropology and community medicine. My research focusing on the health impacts of displacement in Los Angeles, a topic that came out of working in the county hospitals where I encountered many patients who had been pushed out of the city and into the far edges of the the metro area. I have seen firsthand the impacts of community disinvestment, and the difference that sustainable investments in community can make. Having learned of the CRA I now know what a difference this has made for improving quality of life for low and middle income communities of color.

I oppose the changes to the Community Reinvestment Act (CRA) regulations proposed by the Office of the Comptroller of the Currency (OCC) and the Federal Deposit Insurance Corporation (FDIC).

I do this for many reasons:

The definition of affordable housing would be relaxed to include middle-income housing in high cost areas, The proposal would lessen the public accountability of banks by not accurately measuring its responsiveness to local needs., The system that gives credit to banks for having branches in LMI communities is weakened and will likely lead to massive branch loss in communities that are already underserved, The new scoring system would allow banks to completely ignore almost half of the markets where they have branches and still pass their exams

I know what a difference the CRA can make for low and middle income communities of color in the Los Angeles area that I work with and care for in the clinic. It can help those who still live in places like South LA continue to stay in their homes and neighborhoods that they have invested so much time, energy, money, and love into. For those who have already been displaced to the further reaches of Los Angeles, such as Lancaster/Palmdale or beyond, it can help them re-establish and re-build a meaningful life where they are now.

It is clear that the proposed rules would weaken CRA. The focus on LMI communities would be lost - the exact intent of CRA when it was signed in 1977. This backtracking would violate the agencies' obligation under the statute to ensure that banks are continually serving community needs. The FDIC and OCC need to discard the proposal, and instead work with the Federal Reserve Board to create an interagency rule that will augment the progress achieved under CRA instead of reversing it.

Maxwell Hellmann  
Los Angeles, CA  
MD/PhD Student [REDACTED]