



A Latino coalition building organization serving Philadelphia

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Robert E. Feldman,
Executive Secretary,
Federal Deposit Insurance Corporation
550 17th Street NW,
Washington, DC 20429

March 6, 2020

Re: RIN 3064-AF22

Dear Mr. Feldman.

Please accept this comment expressing Ceiba's opposition to 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)

As a community based organization with over 30 years of experience working to help low-income families become first-time homeowners and build their asset base, we have seen how CRA has encouraged financial institutions to engage in a productive way in our neighborhoods.

We believe that the proposed regulations are averse to helping working families. The proposed regulations divert the focus of CRA to serve low-income families and the neighborhoods they live in. It encourages banks to help large development projects like stadiums and other megastructures rather than assisting the average working person to realize the American Dream of homeownership or to help low-income men and women be more productive workers by helping them to secure affordable housing.

The focus of the proposed regulations on big business instead of small business is another reason why they are detrimental to low-income neighborhoods. This focus is shortsighted as neighborhood small businesses are one of the most powerful engines of development for the communities in which they are located.

The proposed regulations also discourage banks from assuming their role as anchor institutions in our neighborhoods. Instead of promoting the presence of banks in the communities where their services are most impactful, the proposed regulations seek to weaken requirements for financial institutions to develop roots in low-income communities.

Finally the proposed regulations limit the ability of banks to gauge how they meet the needs of the low-income consumers in their market. A chain is only so strong as its weakest link. Helping low-income consumers is not charity. It is a way to open new business opportunities for financial institutions; nurture the development of small businesses into bigger business; and transform renters into mortgage holders.

We respectfully urge the OCC and the FDIC to keep CRA strong. Please do not weaken it at a time when we need CRA the most. Please work with the Federal Reserve Board to develop an interagency approach to improve CRA's reach into low-income neighborhoods.

Respectfully,



Will Gonzalez, Esq., Executive Director