



Neighborhood Housing Services of Baltimore, Inc.

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April 1, 2020

The Honorable Joseph Otting, Comptroller
Office of the Comptroller of the Currency
400 7th Street SW, Suite 3E-218
Washington, DC 20219

The Honorable Jelena McWilliams, Chair
Federal Deposit Insurance Corporation
550 17th Street, NW
Washington, DC 20429-0002

RE: Docket ID OCC-2018-0008; RIN 1557-AE-34, 3064-AF22; - Reform of the Community Reinvestment Act

Dear Comptroller Otting and Chair McWilliams:

As Homeownership Center Director of Neighborhood Housing Services of Baltimore, Inc. I submit these comments in response to the notice of the proposed Community Reinvestment Act (CRA) amendments. I oppose the proposal shifting the effectiveness of CRA by designing new examination procedures that will not hold banks accountable for meeting credits needs of local communities.

As a chartered member of NeighborWorks America. Our mission is to spark renewed vitality in neighborhoods by engaging community partners, increasing sustainable homeownership and advancing innovative capital solutions. We do this by helping to improve the physical appearance of neighborhoods, stabilizing local real estate markets, and engaging community residents.

NHSB, Inc. has been working in neighborhoods in Baltimore for the past 46 years. Our model is to provide education to potential home buyers to stimulate growth in targeted areas as well as provide low cost loans. Through the years CRA has been the most significant tool we have to ensure that banks meet the needs of our low- and moderate-income clients and communities.

The new CRA proposal would encourage banks to cut down on many small loans and projects. Such as, our Walbrook multifamily rental housing for low- and moderate-income individuals and instead focus on high dollar projects like spending millions on athletic stadiums in LMI areas. I urge you to re-consider this proposal as it will reduce bank investments and services in communities and hurt out LMI clients.

Thanks,



Director of Homeownership Center

