



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:

Please accept this letter which is in opposition to the proposed CRA Amendments. I have dedicated the past 17 years of my life to community and economic development in Baltimore City. The vast majority of my tenure was in a community-based setting where our nonprofit worked to revitalize a northeast Baltimore neighborhood through homeownership education, small business development, scattered site acquisition and rehabilitation, marketing homes for sale, and through community organizing. Our work saw low- and moderate-income families move into their first home. It saw families get out of debt and remain that way. Small business owners opening their first business in the community and neighbors coordinating joint beautification projects on their blocks and in shared spaces within the community.

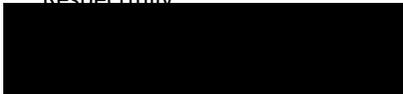
Today, as I now work for a nonprofit with regional reach, our goal is accomplishing much of the same thing – homeownership and lending opportunities for low and moderate income families, repairs to homes for seniors, place making through large economic development projects as well as block level projects, and acquisition and rehabilitation of homes that otherwise would sit dilapidated. Our work helps to holistically build a neighborhood in every aspect of the word.

At each step in my journey, I have had financial institution partner's support through grant making, board service, and event volunteerism. CRA guidelines rewarded these actions from our bank partners as it elevated their scores and ratings during CRA exam periods. Moreover, I have personally been able to support a bank partner by offering testimony and support letters, as they sought to expand their footprint. An action I gladly performed based on the tremendous high-level assistance provided to my nonprofit over the years.

Building the connections with the local teams and representatives at various institutions and having these professionals dream big dreams for our community alongside us and our neighbors is where the banks really shows its true commitment. Now, I fear that will be threatened.

The new proposed amendments will allow banks to pass their CRA exams while failing in half of their assessment areas. It will allow them to get credit for activities done anywhere. It changes the definitions of CRA activity to include things like stadiums in Low-to-Moderate Income communities. These three changes alone, threaten the community-based relationships from banks as it is conceivable that they will drastically cut back their CRA activities in many of their assessment areas. There is no incentive for them to do the small things that have huge benefits for communities across the nation. I urge you to reconsider these amendments.

Respectfully



Johnette A. Richardson, Deputy Director

