

April 7, 2020

Chief Counsel's Office  
Attention: Comment Processing  
Office of the Comptroller of the Currency  
400 7th Street, SW  
Suite 3E-218  
Washington, D.C. 20219

Robert E. Feldman  
Executive Secretary  
Attention: Comments  
Federal Deposit Insurance Corporation  
550 17th Street NW  
Washington, D.C. 20429

**Re: Docket ID OCC-2018-0008/RIN 3064-AF22 (Proposed Community Reinvestment Act Regulations)**

To Whom It May Concern:

Thank you for the opportunity to provide comments on the proposed rule changes to the Community Reinvestment Act (CRA). Michigan's nonprofit and foundation community, which our two organizations represent, has a long history of productive partnerships with our banking institutions on CRA activity benefitting low- and moderate-income communities throughout Michigan.

We realize the comment period closes on April 8 on the OCC-FDIC Notice of Proposed Rulemaking related to the CRA. However, we strongly urge you to extend the comment period until 90 days following the end of the national emergency declaration concerning COVID-19.

The data received from our members since mid-March confirms that the economic impact of this pandemic on low- and moderate-income families, who our members serve, is exceeding the capacities of our members to respond to critical needs. The uncertainty of proposed changes to the CRA, which we believe will result in less CRA activity and reduced accountability to these communities is not helpful as we all work together to overcome the effects of this outbreak.

New and renewed partnerships are going to be necessary between business, government and nonprofits, as we collectively assemble the resources needed to protect the health, safety and economic resiliency of all our American communities. A rushed rulemaking process will contribute to the fear and uncertainty on the part of our nonprofits, foundations, banks and other CRA stakeholders in tackling both immediate and long-term needs for our most vulnerable neighborhoods and communities.

Thank you for considering our request to extend the comment period to allow for all CRA stakeholders to offer their perspectives once this crisis has passed.

Sincerely,



Kyle Caldwell  
President & CEO  
Council of Michigan Foundations

Donna Murray Brown  
President & CEO  
Michigan Nonprofit Association

cc:

Senator Debbie Stabenow

Congressman Dan Kildee