

**From:** [Alexandra Schmidt](#)  
**To:** [Comments](#)  
**Subject:** [EXTERNAL MESSAGE] CRA Comments Regarding: RIN 3064-AF22  
**Date:** Wednesday, April 08, 2020 10:54:16 AM

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April 8, 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: Community Reinvestment Act Regulations, Notice of Proposed Rulemaking [OCC Docket ID OCC-2018-0008, FDIC Docket ID RIN 3064-AF22]

Dear Comptroller Otting and Chair McWilliams:

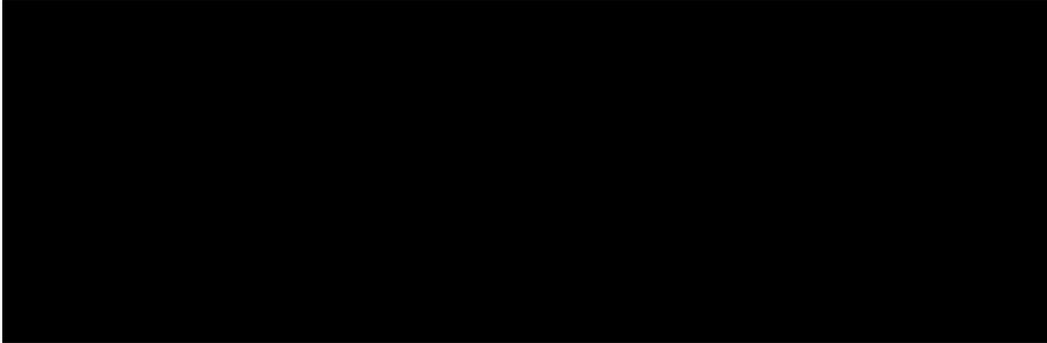
Thank you for the opportunity to comment on the Notice of Proposed Rulemaking (NPRM) entitled “Community Reinvestment Act Regulations.” This is a critical rulemaking, and Beyond Housing has serious concerns about the proposed changes to the regulations governing examinations under the Community Reinvestment Act. Beyond Housing opposes the proposed changes as they would result in significantly fewer loans, investments and services to low- and moderate-communities. This proposal would permit banks to avoid investment in low-income and minority neighborhoods, therefore making them far less accountable to the communities they are responsible to serve.

Beyond Housing (BH) is a nationally recognized, place-based community development organization that exists to help communities become better places to live. Our comprehensive, holistic approach brings civic leaders, targeted non-profits, corporations, and residents together to provide the infrastructure, support, and resources to improve lives, strengthen families, and create meaningful and lasting impact for communities and the greater St. Louis region for generations to come. To do this work, we rely on our local banks as partners in our mission. Bank investment, including charitable contributions, is a critical driver of our success in St. Louis. Many of the changes that are being proposed would impact not only our work at BH, but the communities that we work so very hard to serve.

This proposal threatens to undermine more than 40 years of access to sustainable mortgage credit, small business loans, community development, and partnerships between financial institutions and the communities they serve. It weakens communities’ input and expands the activities for which banks receive CRA credit to include tasks banks are completing in normal

course of business. Underserved communities need more access to mortgage credit, meaningful investments, and safe banking services, not less. We urge you to rescind this proposed rule and to develop a new proposal that reflects evidence, community input, and Congressional intent.

Respectfully submitted,



Chris Krehmeyer

President/CEO

Beyond Housing