



THE HOUSING PARTNERSHIP

April 7, 2020

RE: Notice of Proposed Rulemaking, Community Reinvestment Act Regulations

To Whom It May Concern:

The Housing Partnership, is a broad-based, private, non-profit housing development and financial corporation organized to expand affordable and well-maintained housing within stable neighborhoods for low and moderate-income families in the City of Charlotte and Mecklenburg County. We are in opposition to the proposed FDIC and OCC changes to the Community Reinvestment Act (CRA) as it would reduce the accountability of banks to their communities by not holding them accountable to the performance measurements as defined by the current matrix. As a member of the NeighborWorks® America Network of Excellence, we have counseled over 28,000 families, created over 4,100 homeowners, completed 3,013 rental homes and invested a cumulative of \$638 million in affordable housing.

Currently, the City of Charlotte ranks 50/50 on the mobility scale. The City of Charlotte relies on our partnership to help with moving the bar to help better the quality of life among citizens in our city. Our corporation offers financial literacy and homebuyer education trainings, down payment assistance, and foreclosure prevention and eviction prevention programs which are critical towards helping with upward mobility. In addition to these programs, building quality affordable housing in an environment where the need outweighs the demand is a necessity. Most of this work could not have been accomplished without partnerships with local and regional bank CRA investments. We see strong value in these institutions who have a strong interest in the community and the proposed changes would make it difficult to assess whether a bank has invested in the community. A matrix holds banks accountable for getting a "pass" on giving back to the community within their customer base.

Thank you for the opportunity to provide comments on the CRA proposed rules. I would ask that you take into consideration the current climate of our nation and not make changes to the CRA until the administration has an opportunity to level the pandemic concerns and allow the CRA to have proper attention.

Thank you for your time and consideration.

Best regards,



Erin Barbee
Senior Vice President, The Housing Partnership

