

From: [Jasmin Anzo](#)
To: [Comments](#)
Subject: [EXTERNAL MESSAGE] RIN 3064-AF22
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To Whom It May Concern:

I am a case manager with the housing department for Brighton Park neighborhood council. Brighton Park Neighborhood Council is a community-based, nonprofit organization serving a working class neighborhood on Chicago's Southwest side. BPNC's mission is to create a safer community, improve the learning environment at public schools, preserve affordable housing, provide a voice for youth, protect immigrant rights, promote gender equality, and end all forms of violence.

We oppose the changes to the Community Reinvestment Act (CRA) regulations proposed by the Office of the Comptroller of the Currency (OCC) and the Federal Deposit Insurance Corporation (FDIC), for the following reasons:

The proposal would make it so banks no longer have an obligation to make mortgage loans in neighborhoods with low and moderate incomes., The new scoring system would allow banks to completely ignore almost half of the markets where they have branches and still pass their exams, The system that gives credit to banks for having branches in LMI communities is weakened and will likely lead to massive branch loss in communities that are already underserved, The proposal redefines community development to include large infrastructure projects like stadium improvements in LMI Opportunity Zones which further encourages banks to seek out larger deals over smaller loans to meet the ratio for the total dollar volume metric, The definition of affordable housing would be relaxed to include middle-income housing in high cost areas, The proposal would lessen the public accountability of banks by not accurately measuring its responsiveness to local needs.

I work with various families with the dreams of becoming homeowners. These are the same families who struggle to think they can become a property owner and this would just crush or just make it harder on them.

It is clear that the proposed rules would weaken CRA. The focus on LMI communities would be lost - the exact intent of CRA when it was signed in 1977. This backtracking would violate the agencies' obligation under the statute to ensure that banks are continually serving community needs. The FDIC and OCC need to discard the proposal, and instead work with the Federal Reserve Board to create an interagency rule that will augment the progress achieved under CRA instead of reversing it.

Jasmin Anzo

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Jasmin Anzo

Housing Case Manager

Brighton Park Neighborhood Council

[4477 S Archer Ave Chicago, IL 60632](#)

O: [\(773\)523-7110](tel:(773)523-7110)

F: [\(773\)523-7023](tel:(773)523-7023)