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Sent: Wednesday, April 08, 2020 8:17 PM
To: Comments
Subject: [EXTERNAL MESSAGE] RIN 3064-AF22

To whom it may concern:

On behalf of the NeighborWorks Collaborative of Ohio and its 10 member organizations operating across the state of Ohio, we appreciate the opportunity to provide comments on the OCC and FDIC proposed changes to the CRA Regulations.

The NeighborWorks Collaborative of Ohio represents the 10 non-profit organizations in Ohio that are affiliates of NeighborWorks America. These organizations develop affordable rental housing, lead in community and economic development efforts in their regions, help families through the home buying process with homebuyer education, credit counseling, and financial coaching, assist families who are in danger of losing their home through foreclosure prevention counseling and rental assistance, and revitalize neighborhoods with strategic investments and programs that build home ownership opportunities.

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 new scoring system would allow banks to completely ignore almost half of the markets where they have branches and still pass their exams. Letting banks pass their CRA exams while failing in half of their assessment areas, as well as letting banks get credit for activities done anywhere, could lead banks to dramatically cut back CRA activity in many of their assessment areas. We believe this could have the effect of incentivizing banks to support easier to develop, higher-dollar activities in select areas instead of encouraging participation in complex, high-touch, capital intensive, longer-term, smaller, or not maximally-profitable activities. It could also weaken the system that gives credit to banks for having branches in LMI communities and will likely lead to massive branch loss in communities that are already underserved.

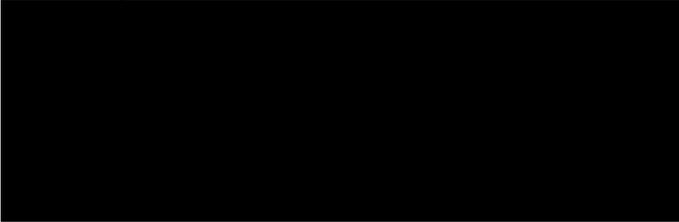
In addition, we oppose proposed rule changes that redefine community development to include large infrastructure projects like stadium improvements in LMI Opportunity Zones, which further encourages banks to seek out larger deals over smaller loans to meet the ratio for the total dollar volume metric.

We firmly feel that CRA should be strengthened, not weakened. CRA must continue to ensure that banks meet the unique needs of the communities in which they operate. CRA is critical to the work our 10 organizations do everyday across the state of Ohio. Without CRA, critical capital for affordable housing development, community development lending and financial programs would not be available to support the work our organizations do at community and neighborhood-level scale. Banks of all sizes have been great partners to our efforts and CRA has been the impetus for the foundation of these productive and impactful projects and programs.

Thank you for the opportunity to offer comment on proposed changes to the Community Reinvestment Act. CRA has been a critical tool for ensuring that banks serve the needs of low- and moderate-income

communities and we are supportive of making improvements that serve that mission. We would encourage the OCC and the FDIC to stop the adoption of these new regulations and work with the Federal Reserve Board to create an interagency rule that will build upon the progress achieved under since the adoption of CRA, rather than reversing its important and impactful legacy.

Sincerely,



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