



THE
RESURRECTION
PROJECT

April 8, 2020

Comptroller Joseph M. Otting
Comptroller of the Currency
Comp 400 7th Street, SW
Washington, D.C. 20219

Chair Jelena McWilliams
Federal Deposit Insurance Corporation
550 17th Street, NW
Washington, DC 20429

Docket No. OCC-2018-0008

RE: Notice of Proposed Rulemaking, Community Reinvestment Act Regulations

Dear Comptroller Otting & Chair McWilliams:

The Resurrection Project (TRP) submits these comments in response to the OCC/FDIC's Notice of Proposed Rulemaking (the "Proposal") regarding the Community Reinvestment Act (CRA). TRP strongly opposes the Proposal and believes it would drastically lessen the public accountability of banks to their communities by enacting unclear performance measures on CRA exams that would not accurately measure a bank's responsiveness to local needs. Contrary to the agencies assertions that their proposed changes would increase clarity and CRA activity, the result will be *significantly fewer* loans, investments, and services to low- and moderate-income (LMI) communities.

TRP is a leading community development organization on Chicago's Southwest side. Through TRP, each year 10,000 predominantly Latino families increase their capacity to reach their goals and improve their socio-economic status. Since its founding in 1990, TRP has leveraged \$576.7M in neighborhood reinvestment, created 296,000 sq. ft. of commercial community space, developed 864 units of affordable housing, and created more than 1,700 homeowners. Since 2016, TRP Lending, the organization's Community Development Financial Institution (CDFI), has deployed \$1.5M in loan capital, creating 49 new homeowners.

By encouraging CRA investment and increased homeownership in historically under-served and under-resourced communities, TRP increases access to capital in neighborhoods that have been ignored by traditional and mission lenders. TRP reaches underserved families which, because of no credit history, immigration status, limited English skills, or few savings are shut out from traditional mortgage lending.

TRP's wealth building programs and its affiliated CDFI, build upon the organization's 29-year history in creating more stable and economically vibrant communities. These efforts are supported by CRA contributions, and without, TRP would be unable to support as many families in building wealth and achieving homeownership. Through TRP and CRA driven lending, families and individuals achieve homeownership, build household wealth, and increase the stability of neighborhoods.

Building Relationships. Creating Healthy Communities.

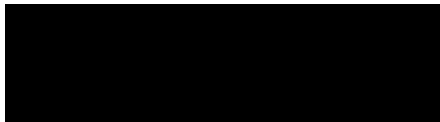
We believe a pass-fail test for evaluating banks' retail lending distribution would prompt many banks to do *just enough* to pass. Converting the CRA activities test into a dollar-based metric would encourage banks to cut down on many small, impactful loans and projects – which together may have higher transaction costs – and instead focus on fewer, high-dollar-value projects. As TRP plans its next affordable housing development for low-income Latino families, we believe the Proposal would leave banks less motivated to partner with us when they could receive CRA credit for spending millions to improve an athletic stadium in an LMI Opportunity Zone.

The CRA is the most significant tool we have to ensure banks meet the needs of our low- and moderate-income (LMI) families and communities. Modernization must preserve what works under the CRA, not dilute it to the point that it no longer serves the people and communities it was intended to benefit.

To protect the CRA ecosystem, we urge you to suspend the rulemaking process, work with the Federal Reserve, and release a proposal that augments the progress achieved by CRA instead of one that reverses it. This approach is in the best interests of the LMI communities, non-profits, banks, and the regulators -- in Chicago, and across the country.

Thank you for the opportunity to submit comments. Today more than ever, we know there is a lot more work to be done to create healthier communities. If you have any questions or would like to learn more about our organization, please contact Kristen Komara, our VP of Lending, at kkomara@resurrectionproject.org or 312.880.1143.

Sincerely,



Raul I. Raymundo
Chief Executive Officer