Bankers Trust
453 7th Street
Des Moines, IA 50309

April 8, 2020

Robert E. Feldman, Executive Secretary
Attention: Comments
Federal Deposit Insurance Corporation
550 17th Street NW
Washington, DC 20429

Re: Community Reinvestment Act Notice of Proposed Rule Making
RIN 3064-AF22

Bankers Trust is Iowa's largest privately-owned bank with $5 billion in assets serving the needs of communities it serves in the states of Iowa and Arizona. The bank was established in 1917 and is currently supervised by the FDIC and the Iowa Division of Banking.

Since the year 2000 Bankers Trust has continuously received CRA performance ratings of "outstanding" by both the FDIC and the OCC.

We appreciate the initiative and proposal to update and improve the existing CRA regulatory framework. As part of this effort we suggest that Congress expands the applicability and coverage of the CRA to the credit union industry.

Without this change the CRA will not have its intended effect of serving local communities, as credit unions have dramatically increased in size, presence and complexity, without regard for or accountability of serving LMI communities from where deposits are taken.

Expanding coverage to credit unions is also a matter of fairness and balance. While banks invest billions every year in community investments, special loan programs, community partnerships and CRA compliance infrastructure, credit unions can expand, merge and operate without supervision of CRA compliance. In Iowa we have even seen credit unions acquire banks, taking active CRA institutions out of play.

Support Towards Increased Clarity and Transparency

Bankers Trust supports the OCC's and FDIC's efforts to clarify and expand what qualifies for CRA credit, expanding where CRA activities count, suggesting a more objective method to measure CRA activity, and efforts to revise data collection, recordkeeping and reporting.

We support the ideas and the intent to establish specific, quantifiable performance metrics. Removing subjectivity from the examination process is long overdue and beneficial for all stakeholders.

Bankers Trust – comments to ANPR to reform the Community Reinvestment Act

Areas of Concern

The regulatory burden of the proposed new data collection and reporting requirements is

significant. The financial costs of the combined proposed rules in the NPR outweigh any perceived benefits to enhance clarity, transparency and accountability.

We encourage the agencies to issue final rules that will improve the CRA regulatory framework without added compliance costs. This could be attainable through improved quantified and transparent benchmarks, within the existing requirements of data collection and reporting.

We also encourage the agencies to maintain the current definition of a mortgage loan consistent with the definition set forth in Regulation C, and not replace it with requirements of certain segments of the Call Report, as proposed.

Another way to control costs of CRA compliance is to maintain annual data submissions, rather than increase the frequency of submissions to quarterly. The current reporting frequency is sufficient to evaluate compliance performance as no stakeholder (including regulatory agencies) will use such data to evaluate CRA performance on a quarterly basis.

We believe institutions will be better encouraged to direct more resources toward community partnerships and investments to enhance the quality of life within LMI communities when a new, more efficient regulatory framework is implemented without additional compliance burden.

Sincerely,

[redacted]

Alejandro Orozco
Vice President, Fair Banking Officer