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April 7, 2020

Joseph M. Otting,
Comptroller of the Currency

Robert E. Feldman,
Executive Secretary, Federal Deposit Insurance Corporation

Re: OCC Proposed CRA Rulemaking Docket ID OCC-2018-0008 FDIC RIN 3064-AF22

Memphis Medical District Collaborative (MMDC) is opposed to the changes to the Community Reinvestment Act (CRA) as written. These changes could result in fewer loans, investments and services to low- and moderate-income communities. The proposal has the potential effect of making redlining possible again, permitting banks to avoid investment in low-income and minority neighborhoods. Further, it stands to make banks less accountable to the communities they have a responsibility to serve.

MMDC is a community development organization working with partners to strengthen the communities in the Memphis Medical District so that they are more vibrant, prosperous and equitable. Our organization's priorities are focused around strengthening commercial corridors, increasing the housing supply and improving the public space for the more than 30,000 employees, students and residents in the Memphis Medical District.

The CRA prioritizes resources to individuals and businesses in communities that otherwise could not access them. Switching to a "non-exhaustive list" of eligible activities to include infrastructure, transportation and sports stadiums, could undermine this. The proposed rule also institutes a single ratio to assess how banks serve communities disregarding whether the community development and financial needs of the community are being served. Further, the rule proposes that banks must meet investment benchmarks in a "significant portion" of its assessment areas. A "significant portion" is defined as more than 50 percent. In effect this would legalize redlining, potentially leaving communities like the ones we serve further left behind.

CRA was enacted to end redlining and to increase access to resources for those living and working in distressed communities. The first goal of CRA modernization should be to prioritize the problems CRA was intended to fix and at minimum ensure its original intent is preserved. Our concern is that this proposal eases compliance for financial institutions and undermines the original intent of the CRA.

Sincerely,



Thomas A. Pacello
President, Memphis Medical District Collaborative

cc: National Alliance of Community Economic Development Associations (NACEDA)
National Community Reinvestment Coalition (NCRC), The Honorable Steve Cohen, U.S.
House of Representatives, The Honorable Lamar Alexander, U.S. Senate, The Honorable
Marsha Blackburn, U.S. Senate