

January 28, 2019

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

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

RE: *Community Reinvestment Act Regulations*  
Docket ID OCC-2018-0008  
RIN 3064-AF22

Dear Comptroller Otting & Chair McWilliams:

Chicago Lawyers' Committee for Civil Rights submits these comments in response to the OCC/FDIC's Notice of Proposed Rulemaking (the "Proposal") regarding the Community Reinvestment Act (CRA). This comment is being submitted today to enable the House Financial Services Committee to know our concerns in advance of the hearing on January 29, 2020, titled "The Community Reinvestment Act: Is the OCC Undermining the Law's Purpose and Intent?" We will be submitting a more detailed comment on March 9, 2020.

The CRA is an important regulatory system that address historic inequities in the financial industry and investment practices and can help repair the harm of those practices. The Proposal would weaken one of the major policy tools we have to address those systemic issues. For this reason, we are deeply concerned by any proposed changes that would weaken the CRA and the requirements it places on the industry.

### **About Chicago Lawyers' Committee for Civil Rights**

Chicago Lawyers' Committee for Civil Rights is a nonpartisan, nonprofit organization of civil rights lawyers and advocates working to secure racial equity and economic opportunity for all since 1969. We provide legal representation through partnerships with the private bar, and we collaborate with grassroots organizations and other advocacy groups to implement community-based solutions that advance civil rights.

Sincerely,

Clifford Helm  
Program Counsel  
Chicago Lawyers' Committee for Civil Rights  
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