

**From:** [Mary Delaney](#)  
**To:** [Comments](#)  
**Subject:** [EXTERNAL MESSAGE] Response to RIN 3064-AF22  
**Date:** Wednesday, January 29, 2020 10:45:05 AM  
**Attachments:** [image002.png](#)

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RE: Notice of Proposed Rulemaking, Community Reinvestment Act Regulations

To Whom it May Concern:

Community Matters Cincinnati opposes the proposed changes to the Community Reinvestment Act (CRA) regulations. The OCC and FDIC would 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 changes would increase clarity and CRA activity, the result will be significantly fewer loans, investments, and services to low- and moderate-communities (LMI).

In partnership with local banks utilizing their guidelines under CRA, we have made significant progress in advancing the local economy in Cincinnati, Ohio. CRA guidelines help to guide banks in making smart investments into our local communities and we should not weaken these rules and reverse decades of progress.

This deeply flawed proposal would result in less lending, investing and services for communities that were the focus of Congressional passage of CRA in 1977. This backtracking will violate the agencies' obligation under the statute to ensure that banks are continually serving community needs. The FDIC and OCC need to discard the NPRM, and instead work with the Federal Reserve Board and propose an interagency rule that will augment the progress achieved under CRA instead of reversing it.

Sincerely,

Mary Delaney



**COMMUNITY  
MATTERS**



**EDUCATION  
MATTERS**

**Mary Delaney**

**Executive Director**

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