From: [redacted]
To: Comments
Subject: [EXTERNAL MESSAGE] RE: Notice of Proposed Rulemaking, Community Reinvestment Act Regulations
Date: Monday, February 17, 2020 6:45:28 PM

To Whom it May Concern:

Ruth Berger opposes the proposed changes to the Community Reinvestment Act (CRA) regulations as deeply misconceived. 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).

I live in a neighborhood that I'm super proud to be part of, one of several blocks that have people from different economic status and a perfect mix where no one ethnicity has a large majority. The businesses are varied and cater to the different communities who are in their radius. I want to keep it that way. A return to redlining would be devastating and the wrong direction to go. If an area is accessibility to a multiplicity of people, it will thrive and grow.

Instead of weakening CRA, the agencies must enact reforms that would increase bank activity in underserved neighborhoods. The agencies do not address persistent racial disparities in lending by strengthening the fair lending reviews on CRA exams or adding an examination of bank activity to communities of color in CRA exams. At the very least, the agencies could add a category on CRA exams of underserved census tracts, which would likely include a high number of communities of color. The agencies also require banks to collect more data on consumer lending and community development activities but do not require banks to publicly release this data on a county or census tract level. Finally, the agencies do not require mandatory inclusion on exams of bank mortgage company affiliates, many of whom engaged in abusive lending during the financial crisis.

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.

Thank you for taking the time to read this letter and do the right thing.
Sincerely,
Ruth Berger