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To: [Comments](#)
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To Whom It May Concern:

The Housing Alliance is a statewide coalition working to provide leadership and a common voice for policies, practices and resources to ensure that all Pennsylvanians, especially those with low incomes, have access to safe, decent and affordable homes. We promote common-sense solutions to balance Pennsylvania's housing market and increase the supply of safe, decent homes for low-income people.

We oppose the changes to the Community Reinvestment Act (CRA) regulations proposed by the Office of the Comptroller of the Currency (OCC) and the Federal Deposit Insurance Corporation (FDIC), for the following reasons:

The new scoring system would allow banks to completely ignore almost half of the markets where they have branches and still pass their exams, The proposed changes will encourage banks to seek out large dollar community development deals to quickly get to a single total dollar volume metric and discourage loans to people with low- and moderate-incomes LMI and small businesses because the loans are much smaller, The system that gives credit to banks for having branches in LMI communities is weakened and will likely lead to massive branch loss in communities that are already underserved, The definition of affordable housing would be relaxed to include middle-income housing in high cost areas

We work with banks all around the state to reduce blight. Hundreds of thousands of blighted or abandoned buildings are spread across Pennsylvania, impeding community and economic development programs and conveying images of old, worn out communities.

At the Housing Alliance, we see these properties in our communities not as the eyesores they are today, but as untapped assets that provide land for redevelopment. Abandoned land, when transformed into productive re-use, is a critical opportunity for our older communities to modernize, revitalize, and grow, and to improve the quality of life for neighbors who are already there. That is why it is so important that banks continue to do work and invest in all communities where they have branches.

It is clear that the proposed rules would weaken CRA. The focus on LMI communities would be lost - the exact intent of CRA when it was signed in 1977. This backtracking would violate the agencies' obligation under the statute to ensure that banks are continually serving community needs. The FDIC and OCC need to discard the proposal, and instead work with the Federal Reserve Board to create an interagency rule that will augment the progress achieved under CRA instead of reversing it.

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Pronouns: she, her, hers

