



Neighborhood Housing Services of Baltimore, Inc.

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April 1, 2020

The Honorable Joseph Otting, Comptroller
Office of the Comptroller of the Currency
400 7th Street SW, Suite 3E-218
Washington, DC 20219

The Honorable Jelena McWilliams, Chair
Federal Deposit Insurance Corporation
550 17th Street, NW
Washington, DC 20429-0002

RE: Docket ID OCC-2018-0008; RIN 1557-AE-34, 3064-AF22; - Reform of the Community Reinvestment Act

Dear Comptroller Otting and Chair McWilliams:

I am writing from the perspective of a Finance Professional at Neighborhood Housing Services of Baltimore, Inc., a NeighborWorks organization. I oppose several changes in the proposed CRA amendment, especially regarding the following proposals:

To let banks pass their CRA exams while failing in half of their assessment areas.

This will have a significant negative impact on vulnerable communities by allowing banks to receive credit for only certain areas of investment. Sometimes the most vulnerable communities are also considered the highest risk communities. Historically, this perception has led to redlining and significant, long-term disinvestment in the areas that need investment the most.

To let banks get credit for activities done anywhere.

Again, this will allow banks to opt for “less risky” investments in areas that are not suffering from a lack of resources. It is critical that assessment areas for CRA requirements are maintained to protect progress built by investments that have come into these areas as a result of CRA. Stopping investment to these areas could reverse any development and improvements and jeopardize the future health of the communities.

To change definitions of CRA activity to include things like stadiums in LMI communities.

Allowing banks to invest in larger projects will create the “easy” path to satisfying their CRA investment requirements in one fell swoop without providing resources to areas that have the greatest need. Stadiums, for example, are rarely, if ever, lacking in funding from a wide variety of resources, whereas vulnerable neighborhoods have suffered disinvestment for over 50 years.

These, and other aspects of the proposed changes, will likely have a devastating impact on communities that need CRA investment the most. Please reconsider the proposed changes.

Sincerely,

[Redacted Signature]

John Godwin, M.B.A.

Deputy Director for Finance and Administration

