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To: Comments
Cc: Maria Gaitan
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To Whom It May Concern:

Consolidated Credit is a national 501c3 HD approved nonprofit agency. Our mission is to help Americans achieve affordable and sustainable homeownership and eliminate debt by receiving sound financial education and counseling to help them stabilize and enrich their lives.

We depend on the investment of our bank partners to provide foreclosure prevention counseling, home buying education and counseling and financial education to the communities we serve.

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 proposal would make it so banks no longer have an obligation to make mortgage loans in neighborhoods with low and moderate incomes., 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 proposal redefines community development to include large infrastructure projects like stadium improvements in LMI Opportunity Zones which further encourages banks to seek out larger deals over smaller loans to meet the ratio for the total dollar volume metric, The definition of affordable housing would be relaxed to include middle-income housing in high cost areas, The proposal would redefine small businesses and family farms with higher revenues again encouraging banks to focus on larger loans to bigger businesses instead of smaller community-style loans., The proposal would lessen the public accountability of banks by not accurately measuring its responsiveness to local needs.

From our experience, when a financial crisis unfolds, like the one we are experiencing right now due to COVID-19, low income individuals and families are the most affected as their employment is directly curtailed. How can a stadium in a low income community take precedence to providing small businesses and low income individuals the opportunities to access credit? The increase need is here and now. Our housing counselors have been fielding calls from desperate homeowners looking for assistance in these troublesome times.

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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