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CALIFORNIA REINVESTMENT COALITION

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The Honorable Joseph Otting  
Comptroller of the Currency  
Office of the Comptroller of the Currency

The Honorable Jelena McWilliams,  
Chairman  
Federal Deposit Insurance Corporation

Re: Request to end, suspend CRA rulemaking  
Docket ID OCC-2018-0008 and RIN 3064-AF22.

Dear Comptroller Otting and Chair McWilliams,

We, the undersigned organizations and individuals, request that your agencies immediately end rule making efforts relating to the Community Reinvestment Act (CRA), with its comment period scheduled to close on April 8, 2020. At the least, we urge you to suspend such efforts during the current COVID-19 pandemic.

This request follows similar requests for suspension from various community organizations, Congressional leaders, and industry groups.

We believe that the OCC and the FDIC, as with all levers of the federal government, should focus resources on responding appropriately to the current health emergency gripping the nation.

This has no doubt been the reaction of most community organizations throughout California and throughout the nation. Our efforts are focused on responding to the current crisis and the huge economic and health impacts it is having and will continue to have on our communities. Family members and friends, clients and constituents, are worried about remaining healthy, paying rent, making mortgage payments, having a job to report to, keeping a small business open, and ensuring there is food on the table.



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As such, community organizations that would otherwise participate in the current rule making process by submitting comments, may be prevented from evaluating and commenting on every problematic aspect of the proposed rule. This is especially problematic in that the proposed rule is complex and will change a regulatory scheme that has been in place for some time. In addition, public comments submitted by April 8, 2020 will not at all reflect the unknown low and moderate income community needs of a new post COVID-19 America. Accordingly, the public record on which you will be basing your decisions will be incomplete and inadequate.

The idea that the agencies would consider pressing forward with this CRA rule making is all the more distressing given our collective analysis that the proposed rule will weaken this critical civil rights law, and result in LESS reinvestment in communities and LESS accountability for banks at a time when the vulnerable neighborhoods meant to be protected by the CRA are at great risk of being disproportionately harmed by the current crisis.

Once we come out of this crisis, we will need a stronger CRA to urge banks to be partners in creating and preserving stable homeownership and affordable housing opportunities; building small businesses that support entrepreneurs, hire locally and serve their communities; providing bank account and other products that help consumers build wealth while avoiding predatory lenders; and fighting discrimination and displacement. The current proposal will frustrate these goals.

As such, we urge you to end your plans for reform to the CRA. In the alternative, we urge you to suspend CRA rule making efforts.

If you have any questions about this request, please feel free to contact Kevin Stein at California Reinvestment Coalition at [kstein@calreinvest.org](mailto:kstein@calreinvest.org).

Thank you for your consideration of our views.

Very Truly Yours



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CALIFORNIA REINVESTMENT COALITION

Able Works  
Abundant Housing LA  
Alain McLaughlin Photography Inc  
Anti-Eviction Mapping Project  
Bankers Small Business CDC of California  
Bay Area Solidarity  
Beverly and Vermont Community Land Trust  
California Capital Financial Development Corporation  
California Coalition for Rural Housing  
California Community Land Trust Network  
California Housing Partnership  
California Progressive Alliance  
California Public Banking Alliance  
California Reinvestment Coalition  
CAMEO- California Association for Micro Enterprise Opportunity  
CCEDA  
CDC Small Business Finance  
Center for California Homeowner Assoc Law  
Central Valley Realist Board  
Chinatown Community Development Center  
City Heights Community Development Corp  
City Ministry Network  
City of Livingston  
Coachella Valley Housing Coalition  
Coalition for Economic Survival (CES)  
Coalition for Humane Immigrant Rights (CHIRLA)  
Community Economic Justice Unit at East Bay  
Community Law Center  
Community Housing Opportunity Corporation  
Community HousingWorks  
Community Vision Capital & Consulting  
Congregations Organized for Prophetic Engagement  
Consumer Federation of California  
Consumers for Auto Reliability and Safety  
Crenshaw Subway Coalition  
CRSP  
East Bay Housing Organizations  
El Pajaro Community Development Corporation  
FACES|Family Assessment Counseling & Edu  
Fair Housing Advocates of Northern California  
Fair Housing Council of the San Fernando Valley  
Fair Now  
Faith and Community Empowerment  
Fresno CDFI  
Greenlining Institute  
Housing California  
Housing Equality & Advocacy Resource Team  
Housing Rights Committee of San Francisco  
HPP CARES  
Inquilinos Unidos  
LA Forward  
Legal Aid Foundation of Los Angeles  
Low-Income Self-Help Center  
Lynroc Tenant Association , Rocklin Ca. 95677  
Main Street Launch  
Merritt Community Capital Corporation  
Multicultural Real Estate Alliance for Urban Change  
MyPath  
National CAPACD  
National Fair Housing Alliance  
Neighborhood Housing Services of Los Angeles County  
Northern California Land Trust  
One Redwood City  
Opportunity Fund  
Partnership for Working Families  
PolicyLink  
Public Good Law Center  
Public Law Center  
Reigniting Empowered Expressiveness & Motivation  
Reinvent South Stockton Coalition  
Renaissance Entrepreneurship Center  
Sacramento Housing Alliance  
SAJE (Strategic Actions for a Just Economy)  
Santa Ana Early Learning Initiative  
Self-Help Enterprises  
Self-Help Federal Credit Union  
Service Employees International Union  
SF Council of Community Housing Organizations  
SFMade  
South Bay Progressive Alliance  
Southern California Association of NonProfit Housing (SCANPH)  
Strategic Actions for a Just Economy (SAJE)  
Tenderloin Neighborhood Development Corporation (TNDC)  
The Central Valley Urban Institute  
The Kennedy Commission  
The Public Interest Law Project



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The Unity Council  
UC Student Workers' Union—UAW 2865  
Ventura County Community Development  
Vermont Slauson EDC  
VIP Best Insurance Agency  
Women Organizing Resources, Knowledge and Services (WORKS)  
Women's Economic Ventures  
Working Solutions  
Youth Finance Institute of America

Individuals

Monica Montgomery, San Diego City Councilmember, Co-Chair, San Diego City County  
Reinvestment Task Force  
Nathan Fletcher, San Diego County Board of Supervisors, Co-Chair, San Diego City County  
Reinvestment Task Force  
Maria Benjamin, SF MOHCD  
William Pavao, Executive Director Emeritus, TCAC  
Caitlin Sanford, Former financial regulator, California Department of Business Oversight  
Rosa Guerrero Contreras  
Robert Kane  
Timothy Killikelly  
Patricia Krackov  
Denzel McCollum, Jr.  
Angella McQueen  
Sarah Ringler  
Robert Foster Thompson