



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 this letter in opposition of the proposed CRA Amendments. I have worked in the nonprofit, community development field for over 10 years, and I have personally seen the neglected and distressed areas in most of our city be ignored for years. In my current position, serving as Special Projects Manager for Neighborhood Housing Services of Baltimore (NHS), I have been amazed to see the difference that can be made in these communities. Our organization is a chartered member of NeighborWorks America (NWA), as well as a Community Development Financial Institution (CDFI). We have 40+ year history of serving the City of Baltimore, and our reach has expanded to include other counties in Maryland. Our mission is to spark renewed vitality in neighborhoods by engaging community partners, increasing sustainable homeownership and advancing innovative capital solutions. We do this by helping to improve the physical appearance of neighborhoods, stabilizing local real estate markets, and engaging community residents. To do this work, we rely on our local banks as partners in our mission.

Many of the changes that are being proposed would impact not only our work at NHS, but the communities that we work so very hard to serve. For example, letting banks pass the CRA exam while failing in half of their assessment areas could lead to banks cutting back on CRA activities in those areas. And, to change the definition of CRA activities to include larger developments in low to moderate income (LMI) communities, would indeed be doing a disservice to the low to moderate income (LMI) population by allowing banks to concentrate on larger deals rather than smaller development deals that would serve those LMI residents.

NHS provided multiple services including Homebuyer Education, Counseling and Coaching, Lending and Community Engagement, all of which would be negatively affected by the Notice of Proposed Rulemaking (NPRM) on the Community Reinvestment Act (CRA). Then to add insult to injury, the change would likely be less transparent, making it harder for the public to comment on bank performance. I strongly suggest that these amendments be reconsidered.

Respectfully submitted,



Gretchen M. Spell, Special Projects Manager

