

04/06/2020

To Whom It May Concern:

My name is Sarah Carroll. I am an individual who has had to work hard. I started my adult life not being able to afford more than \$50 a week for groceries (including diapers and formula) for my family of five. I have served my country in the armed forces. I am currently serving my community working as a government employee and serving our low- and moderate-income community (of which I am a part of).

I 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 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.

The only reason I was able to become a homeowner was that I have the VA option and my family allowed me to purchase a family home at a discounted rate. This home allowed me to build enough equity to purchase my second home. Most people like me that have worked for more than twenty years and lived paycheck to paycheck do not get that gift. Our system is broken from the very beginning and gutting the Community Reinvestment Act will not get us closer to a society that

provides everyone the opportunity to be partners in the community in the way that this act was intended.

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.

Sarah Carroll



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