

## National Community Renaissance (National CORE) Comment Letter

April 1, 2020

Chief Counsel's Office

Attn: Comment Processing, Office of the Comptroller of the Currency  
400 7<sup>th</sup> Street SW, Suite 3E-218  
Washington, DC 20219

Robert E. Feldman, Executive Secretary

Attn: Comments, Federal Deposit Insurance Corporation  
550 17<sup>th</sup> Street NW  
Washington, DC 20429

**Re: Community Reinvestment Act Regulations**  
**Docket ID OCC-2018-0008; RIN 1557-AE34**  
**Docket ID FDIC-RIN 3064-AF22**

National Community Renaissance (National CORE) appreciates the opportunity to comment on the Joint Notice of Proposed Rulemaking issued by the Office of the Comptroller of the Currency (OCC) and the Federal Deposit Insurance Corporation (FDIC) to modernize the Community Reinvestment Act (CRA) regulations. As the proposed rule correctly observes, the landscape for community development has changed since the enactment of the CRA in 1977 and it is important that the regulations be updated to reflect this change.

National CORE is writing to express its views on a number of critical issues that we believe are integral to the success of any modernization effort, including most importantly, maintaining a holistic approach to affordable housing and the housing credit to ensure that the production of affordable housing is not inadvertently diminished.

National CORE is one of the nation's largest and most accomplished non-profit affordable housing developers, with a 25-year track record in community revitalization. Headquartered in Southern California and with a strong presence in Arkansas, Florida, and Texas, National CORE develops, redevelop, rehabilitates, and manages quality affordable housing - often in a partnership with public housing agencies, cities, counties, or other localities.

Our projects revitalize the communities in which the housing is located and provide a [REDACTED] services, which include Self-sufficiency; Family Services (job training, homeownership); Senior Services (case management, meals); Child Development (Headstart, state pre-school, reading/math skills); and Youth Development (academic enrichment, homework assistance, physical education).



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## Critical Importance of the CRA for Affordable Housing and the Housing Credit

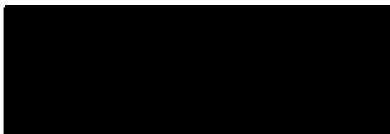
For over four decades, CRA has successfully encouraged banks to serve low- and moderate-income (LMI) borrowers and communities, influencing where and how mortgages and small business loans are made, whether community development projects are financed, and how banks and communities work together.

As a developer of affordable housing, National CORE has witnessed how integral the CRA has been in promoting equity investment in affordable housing. Based on our experience, we firmly believe that maintaining a holistic approach for affordable housing is essential to meeting this goal. Accordingly, National CORE urges the OCC and FDIC to avoid making reforms that could decrease investment in the Housing credit or affordable housing more broadly. As noted by other commentators in the Advanced Notice of Proposed Rulemaking, a properly designed regulatory framework will serve communities and their stakeholders well for many years.

The importance of the Housing Credit cannot be underscored enough. Since its inception in 1986, the Housing Credit has financed the production and preservation of more than three million affordable rental homes for veterans, seniors, working families, and people with special needs. Most affordable housing developed in the United States utilizes the Housing Credit, making it the primary tool for creating and preserving affordable rental housing. As rents continue to rise, the Housing Credit is becoming an even more essential tool. According to Harvard University's Joint Center for Housing Studies, the Housing Credit helps meet the needs of the more than 11 million households who now pay more than half of their income in rent, leaving little left each month for health care, transportation, food and other necessities.

At a time when our nation faces a severe affordability crisis and growing shortage of affordable housing, which is being exacerbated by the severe economic disruption caused by the coronavirus, we urge the OCC and FDIC to ensure that our nation's primary affordable housing delivery mechanism is at least as efficient and effective as it is today.

By incentivizing private sector investment in affordable housing, the CRA has been instrumental in making the Housing Credit a highly efficient public-private partnership. The vast majority of private investors in the Housing Credit are motivated by the CRA. Approximately 85 percent of Housing Credit capital from depository institutions is subject to the CRA.



**Steve PonTell, President and CEO**  
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