

**From:** [Matthew L. Evans](#)  
**To:** [cra.reg@occ.treas.gov](mailto:cra.reg@occ.treas.gov); [Comments](#)  
**Subject:** [EXTERNAL MESSAGE] RIN 3064-AF22  
**Date:** Wednesday, April 08, 2020 8:58:21 AM

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April 8, 2020  
Chief Counsel's Office  
Attention: Comment Processing  
Office of the Comptroller of the Currency  
400 7th Street, SW  
Suite 3E-218  
Washington, DC 20219  
Robert E. Feldman  
Executive Secretary  
Attention: Comments  
Federal Deposit Insurance Corporation  
550 17th Street NW  
Washington, D.C. 20429

**Re: Docket ID OCC-2018-0008/RIN 3064-AF22 (Proposed Community Reinvestment Act Regulations)**

To Whom It May Concern:

Thank you for the opportunity to provide comments on these proposed rule changes to the Community Reinvestment Act (CRA). The United Philanthropy Forum's network of philanthropy support organizations covering the country represent thousands of private, community and corporate foundations serving a nonprofit sector that employs one of every ten Americans. Many of these organizations have a long history of productive partnerships with our banking institutions on CRA activities benefitting low and moderate income communities throughout our country.

We realize the comment period closes on April 8 on the OCC-FDIC Notice of Proposed Rulemaking related to the CRA. However, we strongly urge you to extend the comment period until 90 days after the National Emergency Declaration concerning COVID-19 is declared to be over.

The data received from our members and the network they serve in just the last 60 days confirms that with massive layoffs in the service, retail and manufacturing sectors, the impact on low and moderate income families is exceeding, as never before experienced, the capacities they have to respond to critical needs. The uncertainty of proposed changes to the CRA, which we believe will result in less CRA activity and reduced accountability to these communities, is not helpful as we all rally together to overcome this outbreak of COVID-19.

New and renewed partnerships are going to be necessary between business, government, and nonprofits, as we together assemble the resources needed to protect the health, safety and economic resiliency of all our American communities. A rushed rulemaking process will contribute to the fear and uncertainty on the part of our nonprofits, foundations, banks and other CRA stakeholders in tackling both immediate and long term needs for our most vulnerable communities.

Thank you for considering our request to extend the comment period to allow for all CRA stakeholders to offer their perspectives once this crisis has passed.

Sincerely,

**Matthew L. Evans** | Director of Public Policy

United Philanthropy Forum: A network for the common good