



120 E. Main Street, Ravenna, Ohio 44266

August 1, 2022

RE: NPR Comments for Community Reinvestment Act
OCC: Docket ID OCC-2022-0002
FDIC: RIN 3064-AF81
Federal Reserve Board: Docket No. R-1769 and RIN 7100-AG29

To Whom it May Concern:

My name is Stacy Brown, and I am the Executive Director of Neighborhood Development Services, Inc. (NDS). We are a non-profit organization whose mission is to revitalize neighborhoods and communities primarily for the benefit of low and moderate income households through the multi-state provision (statewide in Ohio) and/or promotion of affordable housing, community and economic development, job creation, and mental health, addiction and recovery services.

I appreciate the opportunity to offer comments to the Notice of Proposed Rulemaking regarding the Community Reinvestment Act. As a non-profit, affordable housing provider, we feel strongly that the community reinvestment act is necessary to encourage investment in affordable housing as well as banking services for low and moderate-income communities. While I see many positive aspects of the current NPR, I would like to offer a few comments / suggestions to improve the impact of the rules on low and moderate-income communities.

First, I appreciate the suggestion to provide automatic eligibility for CRA credit to activities undertaken with a CDFI organization. However, I would urge you to extend this automatic eligibility to other groups with similar mission-based goals and superior qualifications, such as NeighborWorks organizations, Community Housing Development Organizations as defined by HUD, HUD-approved Counseling Agencies and HUD-approved non-profit organizations. Each of these groups undergo rigorous review by their respective organizations and have the added benefit of deep knowledge in the local community. It is clear that these organization play a key role in community revitalization as an effective driver of capital.

I also urge the agencies to utilize the Low Income Housing Tax Credit (LIHTC) program as an impact factor for CRA. This vital affordable housing tool is allocated by each state to include prioritization of local areas that can most benefit from the expansion of affordable housing options and addressing community needs. This level of local involvement in necessary in any

The proposed rule suggests using Home Mortgage Disclosure Act (HMDA) data as a tool to produce exam tables describing lending by race; however this information does not contribute toward a bank's rating. Due to present racial disparities in lending, I would propose that the CRA final rule allow CRA exams to incorporate lending by race and ethnicity in geographical areas experiencing discrimination or showing racial disparities in lending activities. In order to more fully address the CRA's goal to re-stabilize capital investment in communities often excluded from banking investment initially caused by racist housing and planning practices, I encourage a more robust use of data surrounding impacts regarding race.

Finally, the agencies' proposal includes significant improvements in data collection requirements for community development activities, deposits, and automobile lending. However, the proposed rule does not require all



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information to be made public, which will likely limit the accountability of the banks to the public, particularly when determining a bank's effectiveness in reaching underserved communities. As such, we propose the agencies expand data collection to all large banks as opposed to the current proposal which only applies to banks with assets of more than \$10 billion in the case of deposits and automobile lending.

I appreciate the opportunity to offer comments and suggestions for the proposed changes to the Community Reinvestment Act. Thank you for your careful consideration of these comments and for your diligence in establishing new rules and regulations for lenders.

Sincerely,



Stacy Brown
Executive Director
Neighborhood Development Services, Inc.



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