

Acting Chairman Martin J. Gruenberg  
Federal Deposit Insurance Corporation  
550 17<sup>th</sup> Street NW,  
Washington, DC 204229

Acting Comptroller Michael J. Hsu  
Office of the Comptroller of the Currency  
400 7<sup>th</sup> Street SW, Suite 3E-218  
Washington, DC 20219

Chairman Jerome Powell  
Federal Reserve Board of Governors  
20<sup>th</sup> Street and Constitution Avenue NW  
Washington, DC 20551

RE: Federal Deposit Insurance Corporation: 12 CFR Part 345, RIN 3064-AF81  
Federal Reserve System: Docket No. R-1769, RIN 7100-AG29  
Office of the Comptroller of the Currency: Docket ID OCC-2022-0002, RIN 1557-AF15

August 3, 2022

Dear Acting Comptroller Hsu, Acting Chairman Gruenberg, and Chairman Powell:

Associated Churches of Fort Wayne & Allen County (aka AC) is a 77-year-old faith-based organization that brings together over 5,000 volunteers from 134 congregations and local organizations to pray, serve, and work together to improve our community and respond to those in need. We partner with the entire community to help those less fortunate.

I believe our financial intuitions have a greater responsibility than most, so I write to share my concern about the proposed changes given to our banks surrounding CRA investments.

We need all our banks to join us in caring for our community. We believe that reclassifying banks as small and intermediate small banks (ISB) would reduce community reinvestment activity. We need to hold all our financial intuitions “Banks” accountable at all levels of their growth.

As we try to provide aid to our children and families most in need in our community, banks are needed to help generate equitable growth across the community, not just in certain growth areas. As AC acts as a community convener to garner resources to serve the poor, we want to make sure that our banks are well represented.

We call on our member churches, community groups, and the community at large (including Banks) to come together to provide support for families and youth – addressing both tangible and intangible needs with compassionate care and support. Associated Churches addresses priority needs in the community by providing targeted services in two focus areas: 1) Basic Needs; 2) Youth and Family Support.



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BASIC NEEDS: Food and basic support for those most in need.

\*Neighborhood Food Network: 21 food pantries from churches and social service agencies in neighborhoods throughout the community. In 2021, the food bank network provided 1,103,964 meals to 23,961 families (73,598 individuals including 27,465 children).

\*Military Families: Hardship support for military personnel and their families. In 2021, 175 families received hardship aid and 282 families were provided holiday assistance.

\*Abel's Offering: Promotes community gardens; encourages donation of fresh, locally grown produce; aids in establishing and sustaining new community gardens.

YOUTH AND FAMILY SUPPORT: Continuum of care from birth through teens.

\*A Baby's Closet: Educates parents of infants and toddlers in breast feeding, parenting skills, infant nutrition, well-baby needs. Provides referrals for immunizations and other community resources. Coupons earned from participation and redeemed for baby items. During 2021, A Baby's Closet served 1,148 individuals. In 2021, to further assist our families, we enhanced our program with a new service component we are calling "Journey Beside Mothers" to provide peer support groups and one on-one mentors for expectant and new mothers with a special focus on the needs of mothers dealing with Post-Partum Depression or anxiety.

\*Let's Grow: Provides support to strengthen struggling non-profit urban childcare programs create a safe environment for children to learn to be prepared for kindergarten. Provides guidance on earning certification and financial support through grants funded by the Foellinger Foundation. In 2021, we assisted 20 childcare facilities with a total combined enrollment of 696 children.

\*Rising Stars: Recruits volunteer groups, primarily from local churches, groups, and businesses to partner with individual schools to provide support and encouragement for students, staff and families (i.e., tutoring, food, clothing, school supplies, adopt-a-family for Christmas, teacher and staff appreciation gifts and meals). Rising Stars train partners to deliver character education for children and facilitate family engagement workshops.

\*The Landing: Is a Celebrate Recovery for middle and high school youth every Wednesday evening in a casual setting that promotes interaction and discussion for youth struggling with feelings of isolation, depression, bullying or other issues.

COMMUNITY NEED: While the current unemployment rate is low, families continue to be under pressure from high rates of inflation, especially on essential items such as food and gas. Families also continue to feel the strain of the ongoing Covid pandemic as community rates remain high.

We have noticed an increase in the number of homeless people in and around in our community. A “tent city” has emerged at the corner of Hanna and Wayne Streets. There is an ongoing and even growing housing issue in our community. Behind these emerging symptoms, we know the community has systemic issues. A poverty study conducted in 2018 by Purdue University Fort Wayne’s Research Institute showed that 14.3% of the population in Allen County is “food insecure,” meaning that within the last 12 months, the family has worried they would run out of food. The study also identified 37 census tracts as “food deserts,” meaning the area has a poverty rate of 20% or more and no grocery store within half a mile in urban areas and 10 miles in rural areas. This means nearly 1/3 of Allen County residents live in designated food deserts. These issues are pervasive and persistent.

AC programs focus on supporting families’ emotional needs. A Baby’s Closet’s new mentoring component, Journey Beside Mothers, supports vulnerable new mothers. We go to where vulnerable, at-risk mothers live, and more and more, they are finding their homes in hotel rooms because of soaring high rent and the lack of affordable housing.

We feel compelled to do something about this issue as a faith community. We will need banks to come to the table responsibly to help address the inequalities, disinvestment, and other disadvantages in our community.

Please consider bolstering the rigor of the CRA examination to hold our banks at a higher level of responsibility to give back to our community.

Respectfully,



Rev. Roger F. Reece, Executive Director  
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