



August 4, 2022

Board of Governors of the Federal Reserve System

Federal Deposit Insurance Corporation

Office of the Comptroller of the Currency

Re: Docket ID OCC-2022-0002; Docket No. R-1769; RIN 7100-AG29; RIN 3064-AF81

To Whom It May Concern:

On behalf of Linc Housing, I am writing in support of Housing Partnership Network's recommendations regarding the joint notice of proposed rulemaking (NPR) to amend regulations implementing the Community Reinvestment Act (CRA).

As one of California's leading nonprofit developers, Linc Housing builds, renovates, and preserves sustainable affordable homes for seniors, families, and special needs populations throughout the state. Our more than 80 properties are known for excellent design, outstanding management, and life-enhancing services. Across the state Linc provides community development, resident services, and Intensive Case Management Services to over 13,000 low-income residents. Like many affordable housing developers, Linc's work is largely supported by an active network of banking industry partners. The CRA has been instrumental in incentivizing banks' commitment to community stewardship, and has expanded the impact of these developments through partnerships with mission-based developers like Linc.

Linc thanks the Office of Comptroller of the Currency (OCC), the Federal Reserve Board (Board) and the Federal Deposit Insurance Corporation (FDIC) (collectively 'the agencies') for their work to modernize CRA, and their requests for feedback. Linc believes Housing Partnership Network (HPN) recognizes the intricacies of CRA's impact on the capacity of community development organizations, and we are thankful for the



opportunity to support their comments regarding the NPR. We are pleased to see many of the proposed changes to CRA, such as the inclusion of housing financed with low-income housing tax credits (LIHTC), the HOME Investment Partnership Program, and project based rental assistance in the definition of affordable housing.

As you continue to consider the NPR, we urge you to take the following concerns into account, which are reflected in HPN's comments and are of special interest to Linc as a developer and service provider:

- Include race as an explicit factor for CRA Evaluations
- Require a minimum amount of Community Development Financing activities to be in the form of an equity investment for a bank to receive a passing rating
- Rebalance the retail test performance and community development test performance so that each account for 50% of a bank's rating
- Expand the affordability standard for NOAH consideration to 30% of 80% AMI
- Reconsider the reclassification of bank size to avoid eliminating community development obligations for almost 800 banks
- Implement robust examiner training

Thank you for the opportunity to comment on the NPR to amend regulations implementing the Community Reinvestment Act. This issue is of utmost importance to our organization, and we appreciate your work developing the NPR and your openness to our feedback.

Sincerely,



Rebecca Clark, Chief Executive Officer
Linc Housing Corporation