



August 5, 2022

Re: Federal Reserve, FDIC, and OCC Notice of Rulemaking on the Community Reinvestment Act  
**Federal Reserve Docket Number R-1769 and RIN Number 7100-AG29**  
**FDIC RIN 3064-AF81**  
**OCC Docket ID OCC-2022-0002**

To Whom It May Concern:

LaCasa, Inc. (LaCasa) appreciates the opportunity to comment on the Joint Notice of Proposed Rulemaking (NPR) on the Community Reinvestment Act published on June 3, 2022 by the Board of Governors of Federal Reserve System (Board), the Federal Deposit Insurance Corporation (FDIC), and the Office of the Comptroller of the Currency (OCC). The Community Reinvestment Act (CRA) is a critical tool in addressing economic disparities on a broad basis and is an important catalyst to our local work in northern Indiana. We appreciate the joint efforts of the agencies to strengthen CRA in order to ensure that banks engage in meaningful efforts in the communities where they are most needed.

LaCasa is a 52-year-old community development corporation working in Elkhart County, Indiana. We focus on strengthening housing opportunities for working families, strengthening under-resourced neighborhoods, and empowering working adults to succeed financially. We own and operate a portfolio of 350 affordable housing units in Elkhart county, support (counseling and matched savings) 30 new homeowners annually, educate 300 people annually with our financial empowerment curriculum, and support neighborhood leaders across our county, with a focus on low to moderate income communities.

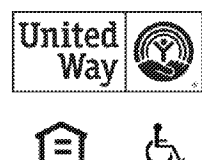
Our effectiveness and the continued development of our community relies on the investments of financial institutions. CRA investments have been critical in supporting the economic feasibility of developing and maintaining our portfolio of quality affordable housing. Many of the graduates of our Master Your Money course have benefited from a local bank CRA micro-loan product that helps them build credit. This particular loan is offered with no fees or interest charged and has been a wonderful opportunity for participants in our trainings. Many of our first-time home owners access mortgage products that qualify as CRA investments.

LaCasa supports the automatic enrollment of activities undertaken with a CDFI as eligible for CRA credit. While we do not have this designation, we see the important impacts CDFI products have in stimulating economic development for under-resourced households, businesses and communities. We encourage a similar automatic eligibility status for all NeighborWorks America members. As a NeighborWorks America member, all of our work is toward creating opportunity for people and communities with fewer resources and in line with the intent of CRA. We believe that NeighborWorks organizations (NWOs) are ideal CRA investment vehicles, and that this automatic eligibility is a win for communities and financial institutions.

LaCasa has 5 active Low Income Housing Tax Credit projects. We encourage the inclusion of LIHTC when measuring community impact.

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Lacasa joins others in expressing concern that the weighting of the community development and retail tests create a top rating (outstanding) that will be unattainable to most financial institutions and that this will disincentivize excellence in CRA investment. We encourage rule makers to work to ensure that the tests create pathways and incentives toward excellence.

Lacasa expresses thanks for the work happening on this critical community development and accountability tool. Thank you for considering our feedback on areas for improvement.

Sincerely,



Chris Kingsley  
President/CEO

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