



August 4, 2022

Office of the Comptroller of the Currency  
Michal J. Hsu

Acting Comptroller of the Currency  
400 7<sup>th</sup> Street SW, Suite 3E-218  
Washington, D.C. 20219

Via online submission: <https://www.regulations.gov/commenton/OCC-2022-0002-0001>

Federal Reserve System

Jerome H. Powell

Chair of Board of Governor

20<sup>th</sup> Street and Constitution Avenue NW and 20<sup>th</sup> Street NW  
Washington, D.C. 20551

Via Email: [regs.comments@federalreserve.gov](mailto:regs.comments@federalreserve.gov)

Federal Deposit Insurance Corporation

Martin J. Gruenberg, Acting Chairman

550 17<sup>th</sup> Street NW

Washington, D.C. 20429

Via online submission: [comments@fdic.gov](mailto:comments@fdic.gov)

RE: CRA NPR Comments  
OCC Docket ID OCC-2022-0002;  
FDIC RIN 3064-AF81;  
Federal Reserve Docket No. R-1769 and RIN 7100-AG29

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

Nevada HAND appreciates the opportunity to offer comments on the Community Reinvestment Act (CRA) Notice of Proposed Rulemaking (NPR) issued by the Federal Reserve Board of Governors (Federal Reserve), Office of the Comptroller of the Currency (OCC), and the Federal Deposit Insurance Corporation (FDIC).

Nevada HAND Inc. is the state of Nevada's largest 501(c)(3) nonprofit organization dedicated to the development, construction, and management of high-quality affordable homes and supportive services for working families and seniors. Our organization serves residents with onsite wellness, school success, workforce development, financial education, and community engagement services that create opportunities for residents to live well and for neighborhoods to thrive. Today, there are 35 Nevada HAND communities that providing affordable housing for over 7,900 Southern Nevadans.

As a nonprofit, affordable housing provider, we feel strongly that the CRA is essential to encouraging investment in affordable housing as well as banking services for low- and moderate-income communities. The NPR represents significant changes to the CRA regulation, and we praise the work you have done with these changes. While we appreciate the agencies' efforts to improve and strengthen the CRA, we offer the following recommendations to further advance the impact of the CRA:

**Automatic Eligibility for NeighborWorks Organizations:**

NeighborWorks Organizations should be included in the same logic as that used for CDIFs, which allows for the automatic enrollment of activities undertaken as eligible for a CRA credit. NeighborWorks America is Congressionally-chartered and membership in the network requires passing rigorous financial and management assessments. According to the regulators, CDFIs play a key role in community revitalization as an effective driver of capital and are, therefore it would be presumed to qualify for CRA credit given these organizations would need to meet specific criteria to prove that they have a mission of promoting community development and provide financial products and services to low- or moderate-income individuals and communities. The same can be said for NeighborWorks organizations, therefore extending the same treatment would align with the intent of the modernized CRA rule. Similarly, we recommend the agencies extend this treatment to HUD-designated Community Housing Development Organizations (CHDOs), HUD-approved Housing Counseling Organizations, and HUD-approved Nonprofit Organizations.

**Low-Income Housing Tax Credit (LIHTC):**

For the past 29 years, Nevada HAND has developed strong relationships with banking partners to create affordable housing through the Low-Income Housing Tax Credit Program (LIHTC). LIHTC is one of the most powerful community investments financial institutions can make. The current proposed rule does not include LIHTC as an impact factor for CRA. Nevada HAND depends on financial institution loans and tax credit investments for the production of affordable multi-family housing. If it is not measured, it may not be a continued priority investment area. With rising construction and acquisition costs, the funding that LIHTC investors can provide is more essential than ever. Including LIHTC as an impact factor for CRA will lead to increased demand and competition for investors, which will increase the equity yield for projects.

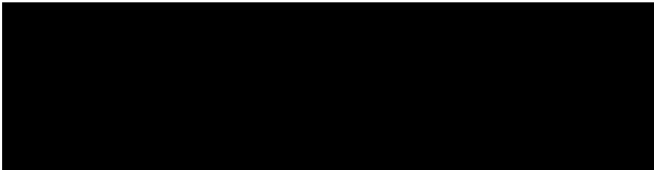
**Making Data Publicly Available:**

The CRA changes include significant improvements in data collection requirements for community development activities, deposits, and automobile lending. However, the proposed rule does not require all 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. By expanding data collection to all banks as opposed to the current proposal which only applies to banks with assets of more than \$10 billion, we can ensure greater accountability.

**Conclusion:**

Nevada HAND thanks the agencies for the work you have done to improve the transparency and rigor of CRA with this rewrite of the regulations. We thank you for the opportunity to provide input. Please contact Audra Hamernik at [ahamernik@nevadahand.org](mailto:ahamernik@nevadahand.org) if you have any questions.

Sincerely,



Audra Hamernik  
President & CEO, Nevada HAND