

**Consumer Bankers Association and Bank Policy Institute Meeting with Agency Staff  
Community Reinvestment Act NPR  
June 30, 2022**

On June 30, 2022, staff from the Board of Governors of the Federal Reserve System (Board), the Federal Deposit Insurance Corporation (FDIC), and the Office of the Comptroller of the Currency (OCC) (collectively, “the agencies”) met virtually with members of the Consumer Bankers Association (CBA) and the Bank Policy Institute (BPI) for a discussion on the Community Reinvestment Act (CRA) Notice of Proposed Rulemaking (NPR or proposal). The agencies’ staffs provided a brief overview of the goals and objectives of the NPR. CBA and BPI members in attendance then had an opportunity to ask questions and provide views with respect to the proposal. The discussion focused on the attached questions CBA submitted to the agencies prior to the meeting, and covered the following topics: considerations for a cost-benefit analysis of the proposal, implementation period and applicability dates, increased resources needed to comply with the proposal, performance standards, safety and soundness issues related to the proposed performance standards, retail lending assessment areas, the proposal’s treatment of retail lending assessment areas as substantive equivalents of facility-based assessment areas, strategic plans, purchased loans, product lines, in-direct lending, the definition of “deposits,” performance test weightings, community development data reporting, and the community development definition of “affordable housing.”

In discussing the issues raised by CBA and BPI members, agency staff referred to the NPR, including the preamble and regulatory text. Agency staff also encouraged members to submit detailed comments on the proposal, especially with respect to areas of concern raised at the meeting.



[CBA Questions for Agency Call.pdf](#)

Meeting Attendees:

Agencies:

Grovetta Gardineer, Senior Deputy Comptroller, OCC  
Vonda Eanes, Director for CRA and Fair Lending Policy, OCC  
Patrick Tierney, Assistant Director, Bank Advisory, OCC  
Heidi Thomas, Special Counsel, OCC  
Emily Boyes, Counsel, OCC  
Kevin Behne, Counsel, OCC  
Mark Pearce, Director, Division of Depositor and Consumer Protection, FDIC  
Jonathan Miller, Deputy Director, Policy & Research, FDIC  
Pamela Freeman, Senior Community Development Analyst, FDIC  
David Sharp, Special Assistant, FDIC  
Sherry Betancourt, Counsel, FDIC  
Carrie Johnson, Division of Consumer and Community Affairs, Board

CBA/BPI:

Richard Hunt, CBA President and CEO  
David Pommerehn, CBA General Counsel and Senior Vice President  
Ebony Johnson, CBA Vice President, Associate General Counsel

Lloyd W. Brown, II, Chair, CBA CRA Committee  
Elizabeth Trotter, Vice Chair, CBA CRA Committee  
James Matthews, CBA CRA Committee  
Yvonne Blumenthal, CBA CRA Committee  
Warren Traiger, Buckley LLP  
Numerous other CBA and BPI members