

## **MEMORANDUM**

**TO:** Public File – Notice of Proposed Rulemaking – Community Reinvestment Act

**FROM:** Jonathan McKernan, Member, FDIC Board of Directors

**DATE:** February 28, 2023

**SUBJECT:** Meeting with Representatives of the National Association of Affordable Housing Lenders (NAAHL)

On February 23, 2023, Director McKernan met with representatives of NAAHL to discuss their views on the Notice of Proposed Rulemaking to amend the rule implementing the Community Reinvestment Act (87 Fed. Reg. 33,884). The discussion covered topics relating to the proposal's framework for delineating retail lending assessment areas, multipliers and benchmarks for assigning ratings under the retail lending test, and the role of performance context in assigning ratings.

The NAAHL participant was Benson Roberts. The FDIC participants were Director McKernan and Ryan Rappa, the Deputy to Director McKernan.