



Jelena McWilliams
 Chairman
 Federal Deposit Insurance Corporation
 550 17th St NW,
 Washington, DC 20429

Joseph M. Otting
 Comptroller of the Currency
 Office of the Comptroller of the Currency
 400 7th Street, SW
 Washington, D.C. 20219

Jerome H. Powell
 Chair of Board of Governors
 Federal Reserve System
 Constitution Ave NW & 20th Street NW
 Washington, DC 20551

Dear Chairman McWilliams, Comptroller Otting, and Chairman Powell:

Since 1977, the Community Reinvestment Act (CRA) has driven inclusion and equity in the financial markets. The act compels banks to serve the credit needs of their communities. It became an indispensable tool for historically marginalized communities excluded from the financial mainstream. The Office of the Comptroller of the Currency, the Federal Deposit Insurance Company and the Federal Reserve are considering changes to CRA regulations and examination procedures. We, the undersigned civil rights, fair lending, community, consumer rights groups, and labor groups support improvements that strengthen the CRA. However, we

must not undermine the effectiveness of CRA by designing a new framework that fails to hold banks accountable for meeting credit needs of their local communities. We are writing to urge you to support the National Community Reinvestment Coalition's (NCRC) general reform principles. CRA reform that does not account for all of these principles will endanger the mission of the CRA, and will be opposed by all of the undersigned organizations.

The CRA has leveraged trillions of dollars in responsible loans, investments, and services for traditionally underserved communities.¹ CRA is one of the most effective community development laws in that it does not require public subsidy and instead focuses on the obligation of financial institutions to reinvest deposits into the communities that use and patronize banks. The OCC, FDIC and Federal Reserve are considering changes to CRA regulations and examination procedures. We must not undermine the effectiveness of CRA by designing a new framework that fails to hold banks accountable for meeting credit needs of local communities. We cannot afford to weaken one of the most effective community development tools our country has for rebuilding redlined neighborhoods.

Reforming CRA must not become a pretext for relaxing CRA. We believe that regulatory reform should be accompanied by legislative reform that extends CRA coverage to the entire financial industry. If the regulatory agencies contradict or contravene these principles, we will oppose the reform efforts.

- **Assessment Areas Must be Preserved and Expanded** – CRA exams must retain a local geographical focus. Congress passed CRA in response to the redlining of communities. Currently, CRA exams judge bank performance in assessment areas or geographical areas that contain bank branches and deposit-taking ATMs.² These assessment areas work for many banks that do most of their lending through branches. However, other banks make loans through non-branch means such as the internet. In addition, financial technology companies (fintechs) have recently applied to the federal banking agencies for bank charters and fintechs make all of their loans through the internet. Assessment areas can expand to include geographical areas where banks and fintechs are gathering deposits or making loans outside of their branch networks. Rural areas and smaller metropolitan areas must receive more attention on CRA exams. However, it is not acceptable to obliterate assessment areas in CRA exams as some contemplate. This would be contrary to the purpose of CRA to prevent redlining. Moreover, removing assessment areas from CRA exams would decrease lending to LMI communities since research has found that assessment areas bolster lending in modest income communities.³ CRA must continue to adhere to its original purpose to ensure that local community needs are met. Do not remove “community” from CRA.

¹ NCRC, *The Community Reinvestment Act: Vital for Neighborhoods, the Country, and the Economy*, June 2016, <https://ncrc.org/the-community-reinvestment-act-vital-for-neighborhoods-the-country-and-the-economy/>. See also, Josh Silver, *The Community Reinvestment Act at 40: A Careful Review of the Reviews*, September 2017, <https://shelterforce.org/2017/09/14/community-reinvestment-act-40-careful-review-reviews/>

² CRA regulation, see §25.41 assessment area delineation, viewed at <https://www.ffiec.gov/cra/regulation.htm>

³ Joint Center for Housing Studies at Harvard University, *The 25th Anniversary of the Community Reinvestment Act: Access to Capital in An Evolving Financial Services System*, March 2002, <http://www.jchs.harvard.edu/research/publications/25th-anniversary-community-reinvestment-act-access-capital-evolving-financial> Also, see Elizabeth Laderman and Carolina Reid, Federal Reserve Bank of San Francisco, “CRA Lending during the Subprime Meltdown” in *Revisiting the CRA: Perspectives on the Future of the*

- **Avoid Simplistic Measures of Performance** – The existing CRA examination criteria carefully balance various important activities for low- and moderate-income communities. Some have suggested a radical overhaul of examination criteria, for instance, reducing CRA performance to a simple formula such as comparing the sum of CRA activities to bank assets. However, ratios are part and parcel of the comprehensive exam, and one ratio cannot accurately assess a bank’s performance. Relying on a single ratio to determine CRA compliance does not ensure that low- and moderate-income (LMI) communities are being served. This would open the door for banks to pick and choose which communities they serve, potentially leaving out the very communities that CRA was enacted to support. It would also be another attempt to eliminate the focus of CRA exams to local needs that vary across a bank’s footprint. While objective measures of performance can be improved on CRA exams, a reduction of CRA to only a few formulas would contradict the original local focus of the law.
- **Public Participation Must be Safeguarded** – Attempts by the regulatory agencies to truncate public participation requirements are counterproductive and contrary to the intent and purpose of CRA. The heart and soul of CRA is public participation. The public has a right to comment on CRA exams and merger applications. No stakeholder has better insights than community residents. If banks and regulatory agencies do not seriously consider the comments of community residents, they will not effectively respond to local credit needs.
- **Maintain the Importance of Branches** – Currently, the CRA service test places primary emphasis on bank branches while still considering alternative service delivery. Some have proposed deemphasizing branches on CRA exams.⁴ A large body of research documents that home and small business lending increases to LMI borrowers in areas with more branches.⁵ Deemphasizing bank branches on CRA exams would cause banks to pay less attention to neighborhoods where they receive deposits, thereby increasing redlining. Moreover, lending and bank services to LMI people would likely decline.
- **Focus Must Remain on Low- and Moderate-Income Individuals and Neighborhoods** – Some have proposed expanding the range of activities that qualify on CRA exams to include financing initiatives that may have city-wide benefits but that are not necessarily focused on LMI individuals or neighborhoods. For example, providing favorable consideration to financing the construction of hospitals regardless of where they are located.⁶ No one disputes the necessity for these institutions but health facilities located in affluent parts of metropolitan areas do not significantly benefit LMI people. CRA must not be diluted to divert resources away from neighborhoods that were the original impetus for CRA.

Community Reinvestment Act, a Joint Publication of the Federal Reserve Banks of Boston and San Francisco, February 2009, https://www.frbsf.org/community-development/files/cra_lending_during_subprime_meltdown11.pdf

⁴ Memorandum for the Office of the Comptroller of the Currency, the Board of Governors of the Federal Reserve System, the Federal Deposit Insurance Corporation from the Department of Treasury, Community Reinvestment Act – Findings and Recommendations, <https://home.treasury.gov/sites/default/files/2018-04/4-3-18%20CRA%20memo.pdf>

⁵ *Access to Capital and Credit in Appalachia and the Impact of the Financial Crisis and Recession on Commercial Lending and Finance in the Region*, a NCRC report for the Appalachian Regional Commission, <https://ncrc.org/access-to-capital-and-credit-in-appalachia-and-the-impact-of-the-financial-crisis-and-recession-on-commercial-lending-and-finance-in-the-region/>

⁶ For a discussion of the hospital example, see Rachel Witkowski, *Will CRA Finally Get its Makeover*, American Banker, March 9

- **Discrimination and Violations of Consumer Protection Law Must be Penalized on CRA Exams** – The OCC has issued a memo that dilutes the negative impact of discrimination and violation of consumer protection law on a bank’s CRA rating.⁷ Instead of being emulated by the other agencies, this approach must be rescinded. A bank is not serving credit needs in a satisfactory manner if it is engaging in illegal and harmful activities on a large scale, behavior which now results in ratings downgrades.
- **Bank Activity to People of Color and Communities of Color Must be Considered on CRA Exams** – Bank lending, investing, and service to people and communities of color must also be considered on CRA exams, which now only consider low- and moderate-income borrowers and communities. Communities of color were the original communities redlined when Congress passed CRA and remain disproportionately victimized by predatory lending and a lack of prime, conventional lending.⁸
- **Banks Cannot Be Allowed to Merge after They Fail CRA Exams** – The OCC has also made it easier for banks with failed CRA ratings to grow through mergers with other financial institutions or acquiring branches.⁹ Since only about two percent of banks fail on an annual basis, these institutions are exceptionally poor CRA performers.¹⁰ Currently, the only penalty for a failed CRA grading is the possibility of denial of merger or branch applications; one of only a few sticks that motivate banks to pass their CRA exams. A presumption that applications will be denied for failed CRA performance must remain the regulatory practice.
- **Affiliate Activities Must be Considered** – A number of banks own mortgage companies that are included now on CRA exams only at the option of banks. This approach can lead to manipulation of CRA exams and the exclusion of mortgage companies when they engage in abusive practices or do not lend to LMI borrowers. Affiliates must be automatically considered in CRA exams. In addition, NCRC believes that CRA must be applied broadly throughout the financial industry to include mortgage companies, credit unions, insurance companies, securities firms, and investment banks. The broad expansion of CRA would require an act of Congress while these principles above are devoted to regulatory reform.
- **Refine CRA Ratings**– Only about 2 percent of banks fail their CRA exams annually while about 90 percent are judged to have Satisfactory performance and close to 10 percent are judged to have Outstanding performance. This rating system fails to identify banks with various levels of CRA performance. The agencies should either introduce another rating category to the current four ratings or supplement the ratings with a point scale that can reveal more distinctions in performance. This would be fairer for communities and reward banks outperforming their peers but whose performance is not reflected adequately in the ratings.

⁷ OCC, Impact of Evidence of Discriminatory or Other Illegal Credit Practices on Community Reinvestment Act Ratings, October 2017, <https://www.occ.gov/news-issuances/bulletins/2017/bulletin-2017-40.html>

⁸ NCRC, Home Mortgage and Small Business Lending in Baltimore, <https://ncrc.org/home-mortgage-and-small-business-lending-in-baltimore-and-surrounding-areas/> and NCRC Foreclosure in the Nation’s Capital, <https://ncrc.org/foreclosure-in-the-nations-capital-how-unfair-and-reckless-lending-undermines-homeownership/>

⁹ OCC, Impact of CRA Ratings on Licensing Applications, November 2017, <https://www.occ.gov/publications/publications-by-type/other-publications-reports/ppms/ppm-6300-2.pdf>

¹⁰ NCRC analysis of CRA ratings. The ratings can be found on the FFIEC webpage via <https://www.ffiec.gov/craratings/default.aspx>

- **Community Benefit Agreements Must be Recognized** – Community benefit agreements (CBAs) are negotiated between banks and community groups and commit banks to specific levels of loans, investments, and services to low- and moderate-income and minority communities over a multiple year time period. Banks have signed CBAs in the context of merger applications or to improve lackluster CRA performance. The agencies must not discourage CBAs and should recognize them as a valuable means to improve CRA performance.

The Community Reinvestment Act is integral to increasing access to capital, credit and basic banking services in underserved communities. To combat rising inequality and place-based disparities in economic opportunity, we need a vital CRA. Regulatory reform must invigorate CRA, not eviscerate it. We request a meeting with your offices to ensure that our perspectives are taken into account in this very important effort and look forward to continued dialogue with you regarding improving the rigor and implementation of CRA.

Sincerely,

National Community Reinvestment Coalition (NCRC)

National Groups

Allied Progress

AFL-CIO

Americans for Financial Reform

Center for Responsible Lending

Consumer Action

HomeFree USA, Inc.

Housing Assistance Council

The Leadership Conference on Civil and Human Rights

NAACP

National Alliance of Community Economic Development Association (NACEDA)

National Coalition for Asian Pacific American Community Development (CAPACD)

National NeighborWorks Association

National Trust Community Investment Corporation

National Trust for Historic Preservation

National Urban League

Prosperity Now

Public Citizen

The Democracy Collaborative

UnidosUS (Formerly NCLR)

Alabama

Alabama Association of Community Development

Building Alabama Reinvestment

Center for Fair Housing, Inc.

Community Action Association of Alabama

Fair Housing Center of Northern Alabama

MLK Avenue Redevelopment Corporation

National Business League of Alabama

Titusville Development Corp

Urban Impact, Inc.

Arizona

Arizona Housing Coalition

Behold Charities International

Chicanos Por La Causa

Junto Affordable Housing Inc.

Newtown Community Development Corporation

Prima County Community Advocate

Arkansas

Community Resources Technicians

People Trust

California

Access Plus Capital

American GI Forum

Azul MSI

Black Business Association

California Coalition for Rural Housing

California Community Economic Development Association

California FarmLink

California Housing Partnership

California Reinvestment Coalition

California Resources and Training

CashCommunityDevelopment.org

CCEDA

CDC Small Business Finance

Center for Urban Economics and Design

Chicana Latina Foundation

City of Livingston

Council of Asian Americans Business Associations CA

CRHCC

Democracy at Work Institute

EAH Housing

El Concilio of San Mateo County

Fathers and Families of San Joaquin

Haven Services

Housing Coalition Educators

IEWBC

Inland Empire Latino Coalition

Law Foundation of Silicon Valley

Montebello Housing Development Corporation

The National Cultural Center of the Native Americans

Neighborhood Housing Services of the Inland Empire

Northern Californian Community Loan Fund

OCCUR

Peoples' Self-Help Housing

Robert Zdenek Associates- Connecting Communities

Rural Community Assistance Corporation

San Francisco African American Chamber of Commerce

Self-Help Enterprises

Tenderloin Neighborhood Development Corporation (TNDC)

The Central Valley Urban Institute

The Greenlining Institute

UCI Paul Merage School of Business

Vermont Slauson Economic Development Corporation

Colorado

Douglas County Housing Partnership

First Nations Oweesta Corporation

Mi Casa Resource Center

Connecticut

Concerned Black Clergy Council of Waterbury

Connecticut Citizen Action Group

Hartford Community Loan Fund

Neighborhood Housing Services of Waterbury

Women's Institute for Housing & Economic Development

Yale University Program for Recovery and Community Health

District of Columbia

Advocates for Elder Justice, Hilda & Charles Mason Charitable Foundation, Inc.

Anacostia Economic Development Corporation

Central American Resource Center (CARECEN)

Housing Up

Latino Economic Development Center

Laura Zam Enterprises

MANNA, Inc.

National Association of American Veterans, Inc.

Network for Developing Conscious Communities

Partners for Livable Communities

Romijen Wellness

Delaware

Be Ready Community Development Corporation

CCHS

Central Baptist Community Development Corporation

Delaware Community Reinvestment Action Council, Inc.

Edgemoor Revitalization Cooperative, Inc.

Ellendale Community Civic Improvement Association

Habitat for Humanity of New Castle County

Housing Alliance Delaware

National Council on Agricultural Life & Labor Research Fund, Inc. (NCALL)

Nehemiah Gateway Community Development Corp.

Neighborhood House, Inc.

University of Delaware

Florida

Affordable Homeownership Foundation Inc.

BBIF Florida

Bright Community Trust

CDC of Tampa

CEGTBA, Inc.

Clearwater Neighborhood Housing Services Incorporated

Community Reinvestment Alliance of South Florida

Consolidated Credit Solutions, Inc.

Debt Management Credit Counseling

FL Alliance of Community Development Corporations

Florida Housing Coalition

Fusilier Realty Group

Future Leaders Community Development Corporation

H.O.M.E.S., Inc.

Haitian American Community Development Corporation

Home Ownership Resource Center of Lee County, Inc.

Housing and Education Alliance

Lee County Housing Development Corp.

Metro North Community Development Corp.

Mezrah Consulting

Miami Beach CDC

Neighborhood Housing Services of South Florida

Neighborhood Renaissance, Inc.

New Urban Development

Real Estate Education And Community Housing Inc.

REVA Development Corporation

Solita's House Inc.

South Florida CLT

St. Petersburg Neighborhood Housing Services, Inc. (dba Neighborhood Home Solutions)

Struggle for Miami's Affordable and Sustainable Housing, Inc.

Trinity Empowerment Consortium

Urban Philanthropies

We Help Communities to Develop Corporation

Wealth Watchers Inc.

Georgia

CCCS of the Savannah Area, Inc.

Community Outreach Training Center, Inc.

D&E, The Power Group

Georgia Advancing Communities Together, Inc.

Housing Justice League

JCVision and Associates, Inc.

National Housing Counseling Agency

Southwest Georgia United Empowerment Zone, Inc.

Hawaii

Council for Native Hawaiian Advancement

Hawai'i Alliance for Community-Based Economic Development

Hawaiian Community Assets

Illinois

Chicago Community Loan Fund

Chicago Urban League

Economic Growth Corp.

Global Network

IFF

Institute of Cultural Affairs [ICA]-USA

NHS of Chicago

Northwest Side Housing Center

Oak Park Regional Housing Center

Open Communities

Partners in Community Building, Inc.

Spanish Coalition for Housing

Universal Housing Solutions CDC

Woodstock Institute

NHS of Chicago

Indiana

Community Investment Fund of Indiana

Fay Biccard Glick Neighborhood Center at Crooked Creek

Gary Economic Development Corporation

HomesteadCS

HOPE of Evansville, Inc.

Irvington Development Organization

John Boner Neighborhood Centers

LaCasa, Inc.

Mapleton Fall Creek Development Corporation

Martin University

Martindale Brightwood Community Development Corporation

Memorial CDC

Northwest Indiana Reinvestment Alliance

NSP Consultants, LLC

Pathfinder Services, Inc.

Prosperity Indiana

Westside Community Development Corporation

Iowa

River Cities Development Services

Scott County Housing Council

Kentucky

Louisville Affordable Housing Trust

REBOUND, Inc.

The Urban Coalition of Appraisal Professionals

Louisiana

Foundation for Louisiana

Greater New Orleans Housing Alliance

HousingNOLA

Kingsley House Inc.

LiftFund Inc.

Multi-Cultural Development Center

Neighborhood Development Foundation

New Day Homeowner Services

People's Organization of Social Equality

Treme Market Branch

UMOJA Institute of African America Culture Trade and Economic Development Inc.

Massachusetts

BCC

Common Capital

Dorchester Bay Economic Development Corporation

Fair Housing Center of Greater Boston

Fenway Community Development Corporation

Lawrence CommunityWorks, Inc.

Local Enterprise Assistance Fund (LEAF)

Mass. Association of Community Development Corp.

Massachusetts Affordable Housing Alliance

Massachusetts Communities Action Network

NeighborWorks Southern Mass

Oak Hill CDC

Revitalize Community Development Corporation

Urban Edge

Maryland

Baltimore Community Lending, Inc.

Baltimore Neighborhoods, Inc.

CityLabs USA

Coppin Heights CDC

Greater Baltimore Community Housing Resource Board

Heritage United Church of Christ

Housing Options & Planning Enterprises, Inc.

Maryland Consumer Rights Coalition

Neighborhood Housing Services of Baltimore

People of Change Coalition

Southeast Community Development Corporation

The Historic Marble Hill Community Association

Maine

Coastal Enterprises, Inc.

Genesis Community Loan Fund

Quattrucci & Company

Michigan

Bridging Communities, INC.

Building Families First Community Organization

Building Movement Project/Detroit People's Platform

CDAD

Community Economic Development Association of Michigan

Cooperative Capital

Detroit Homeownership Center CDC

Detroit Non-Profit Housing

Fair Housing Center of Metropolitan Detroit

Financial Justice Coalition

GenesisHOPE

Housing Resources, Inc.

Metro Community Development, Inc.

Michigan Community Action

Michigan Community Reinvestment Coalition

Mid Michigan Community Action Agency

Neighborhood Legal Services Michigan

Neighborhood Service Organization (NSO)

New Development Corporation

New Hope Community Development

Southwest Economic Solutions

Southwest Solutions

U SNAP BAC

Minnesota

Asian Economic Development Association

Community Reinvestment Fund, USA

Dayton's Bluff Neighborhood Housing Services

Jewish Community Action

Mid-Minnesota Legal Aid

Voices for Racial Justice

Missouri

AltCap

Community Property Ventures

Consumers Council of Missouri

CREA

Forward Through Ferguson

International Institute Community Development Corporation

Justine Petersen

Metropolitan St. Louis Equal Housing and Opportunity Council

NHS of Kansas City, Inc.

Old North St. Louis Restoration Group

R.A.A.- Read, Aim, Advocate

Travois

Useful Community Development

Washington University School of Social Work

Mississippi

Breakthrough Community Services, Inc.

CFORM/CovenantCDC

Golden Triangle Housing Services

Housing Education and Economic Development

Mississippi Housing Partnership

Nebraska

Family Housing Advisory Services

Neighborworks Lincoln

New Mexico

Southwest Neighborhood Housing Services

United South Broadway Corporation

New York

Affordable Housing Partnership Homeownership Center

Albany Community Land Trust

Arbor Housing and Development

Association for Neighborhood and Housing Development (ANHD)

Beaulac Associates LLC

Bridge Street Development Corporation

Buffalo Niagara Community Reinvestment Coalition

Center for NYC Neighborhoods

Central Islip Civic Council

CNY Fair Housing, Inc.

Community Capital New York

Community Development Alliance of the Capital District

Community Loan Fund of the Capital Region, Inc.

Devotion NYC

Empire Justice Center

Fair Finance Watch

HomeSmartNY

Human Development Services of Westchester

La Fuerza Unida, Inc.

Long Island Housing Services, Inc

New Economy Project

New York State Senator James Sanders

New York State Wide Senior Action Council

NHP Foundation

PathStone Enterprise Center

Rockland Housing Action Coalition

Rural housing Opportunities Corp.

St. Nicks Alliance

TSC Grand, Ltd.

United Tenants of Albany, Inc.

White Wing Education Community

University Neighborhood Housing Program

New Hampshire

New Hampshire Community Loan Fund

New Jersey

Fair Housing Council

Jersey Counseling & Housing Development, Inc.

National Housing Institute

New Jersey Association on Correction

New Jersey Citizen Action

NJ NAACP

Urban League of Essex County

Nevada

Nevada Legal Services

North Carolina

Action NC

Centre for Homeownership & Economic Development Corporation

Circle of Mercy

Community Link

DHIC

Durham Regional Financial Center

EXCEED, Inc.

Henderson & Company

NC Housing Coalition

New Frontier CDC

North Carolina Housing Coalition

Rebuild Durham Inc.

S J Adams Consulting

The Institute of Minority Economic Development

White Oak Foundation Inc.

Ohio

Akron NAACP

Advocates for Basic Legal Equality

Akron Baptist Church

Another Chance Ohio

Antioch Baptist Church

Baptist Ministers Conference of Cincinnati

Breaking Chains Inc.

Buckeye Shaker Square Development Corp.

Burten, Bell, Carr Development, Inc.

Catholic Commission of Summit County

Central Ohio Fair Housing Association, Inc.

Charisma Community Connection

Cincinnati Change Inc.

Cincinnati Community Action Agency

City of Bedford Heights

City of Cleveland Heights, Ohio

City of Cleveland- Dept. of Community Development

City of Dayton Human Relations Council

City of South Euclid

CityWide Development Corporation

Cleveland Neighborhood Progress

Collective Empowerment Group

Communities United for Action

Community Action Agency of Cincinnati-Hamilton County

Community Development Corporations Association of Greater Cincinnati

Community Development for All People

Community Housing Solutions

Community Matters

County Corp

Detroit Shoreway Community Development Org.

ECDI

Economic and Community Development Institute

Education Motivation Success, Inc.

Empowering and Strengthening Ohio's People (ESOP)

Fair Housing Center

Fair Housing Contact Service

Fair Housing Resource Center, Inc.

Faith Community Alliance of Greater Cincinnati

Famicos Foundation

Federation of Network Ministries

Friends of the African Union Chamber of Commerce

Greater Cincinnati Microenterprise Initiative (GCMI)

Greater Cleveland Reinvestment Coalition

Greater Dayton Minority Business Assistance Center

Habitat for Humanity of Greater Dayton

Hamilton County Community Reinvestment Group

Harrison Township

Heart to Heart Family Support Center

Helping Hands Community Outreach

Home Repair Resource Center

Homes on the Hill, CDC

Isonomy Consulting

Jerry Sykes, Toledo City Councilman

JOVIS

J-RAB

L.A. Keyz Financial Services

Madisonville Community Urban Redevelopment Corporation

Metro West Community Development Organization

Miami Valley Fair Housing Center, Inc.

Miami Valley Urban League

Mustard Deed Development Center

Nazareth Housing Dev. Corp.

Neighborhood Housing Services of Greater Cleveland

NeighborWorks Collaborative of Ohio

Ohio CDC Association

Ohio Fair Lending

Omega Community Corporation

One South Euclid

Peter Ujvagi, Toledo City Council Member

Rebuilding Together Dayton

Slavic Village Development

Small Business Development Center at TEC

The Fair Housing Center

The Pride Through Empowerment Foundation, Inc.

Village Capital Corporation

Working in Neighborhoods

YWCA Dayton

Oklahoma

Mvskoke Loan Fund

Oregon

CASA of Oregon

Community Housing Fund

Grounded Solutions Network

Kate Allen Community Development Services

ONABEN

Redix Consulting Group, LLC

REACH Community Development

Pennsylvania

Allentown Housing Authority

Amani

Center for Family Services, Inc.

Clarifi

Community Action Committee of the Lehigh Valley, Inc.

Community First Fund

Community Neighbors United

Five/Four Advisors

Hilltop Alliance

Lancaster Equity CDC

Neighborhood Housing Services of Greater Berks, Inc.

Oakland Planning and Development Corporation

Philadelphia Association of Community Development

Philadelphia Chinatown Development Corporation

Pittsburgh Community Reinvestment Group

Southwest Community Development Corporation

United Communities Southeast Philadelphia

Uptown Partners of Pittsburgh

ASSETS

Rhode Island

Capital Good Fund

Church Community Housing Corporation

Housing Network of Rhode Island

HousingWorks RI

NeighborWorks Blackstone River Valley

South Dakota

GROW South Dakota

South Carolina

Greenville County Redevelopment Authority

Tennessee

BLDG Memphis

Chattanooga Organized for Action

Good Neighbor Foundation HomeOwnership Center

Latino Memphis

Lincoln Park Neighborhood Association

Memphis Urban League

New Level Community Development Corp

Tennessee Fair Housing Council

The Fifteenth Avenue Baptist CDC

You Can Make It HomeOwnership Center

Texas

BCL of Texas

Covenant Community Capital

Haelingen CDC

Home Sweet Home Community Redevelopment

Housing Channel

Humanitas Community Development Corporation

Jefferson Community Housing Development Foundation, Inc.

Our Casas Resident Council INC.

Pine Place Development, LLC

Southeast Houston CDC

Utah

Jon M. Huntsman School of Business at Utah State University

Neighborhood Nonprofit Housing Corporation

Vermont

Fair Housing Project, CVOEO

Housing Vermont

Virginia

Community Business Partnership

Emerging Financial Concepts

Housing Opportunities Made Equal of Virginia

SCDHC

Southside Community Development and Housing Corporation

Washington

Beacon Development Group

Greenfield Institute

Northwest Fair Housing Alliance

Wisconsin

Citizen Action of Wisconsin

Forward Community Investments

Havenwoods Economic Development Corp

Inner City Redevelopment Corp.

Metropolitan Milwaukee Fair Housing Council

NeighborWorks Green Bay

Nothing Less, Inc.

Riverworks Development Corporation

Urban Economic Development Association of Wisconsin, Inc.

Wisconsin Partnership for Housing Development

Cc: Senate Banking and HFSC leadership