

December 11, 2019

The Honorable Jelena McWilliams
Chairman
Federal Deposit Insurance Corporation
550 17th Street, NW
Washington, DC 20429

Martin J. Gruenberg
Member, FDIC Board of Directors
Federal Deposit Insurance Corporation
550 17th Street, NW
Washington, DC 20429

The Honorable Joseph Otting
Comptroller of the Currency
Office of the Comptroller of the Currency
400 7th Street, SW
Washington, DC 20219

The Honorable Kathleen Kraninger
Director
Consumer Financial Protection Bureau
1700 G St. N.W.
Washington, D.C. 2055

Dear FDIC Board of Directors,

For almost its entire 40-year history, the Community Reinvestment Act (CRA) has resulted in interagency consensus among the prudential regulators. We are very concerned that OCC's regulatory framework, and specifically its' insistence on a dollar volume metric, expanding what is CRA qualifying and other changes that could dilute the power of the law for low- and moderate-income (LMI) communities, has fractured the consensus among prudential regulators on how best to implement a law so vital to lending, investments and financial services, including bank branches, in LMI communities. We are very concerned that while the OCC's proposal may appear on its face to have some benefit for important but select communities, overall it will serve to reduce lending, investing and services and the type of innovative and sometimes complex approaches that directly benefit and target LMI and underserved communities. From what we have learned about the various reform ideas on the table, we believe that the Federal Reserve Board has also put forth alternative and more incremental regulatory approaches that warrant some public consideration. LMI communities deserve better, have a lot at stake in this rewrite and could benefit from the type of consistency and clarity that will not dilute CRA, but will increase and improve not only lending, but also community development financing and services in underserved communities.

At this stage in the rulemaking process, we would urge the FDIC Board to play a more constructive and instrumental role in bringing the regulators together around a unified approach, and particularly, if many FDIC-regulated banks will not be bound by the OCC's regulatory framework. The FDIC should not join a flawed OCC-led approach that will weaken CRA obligations for the nation's largest financial institutions. We urge the FDIC Board not to join the notice of proposed rulemaking at this time, and wait until the public has an opportunity to fully vet the OCC's framework. In addition, we want to make you aware that we have been urging the OCC to open a substantial notice and comment period for such a complex rulemaking that is longer than that for the advance notice of proposed rulemaking, that acknowledges the complexity of the issues being considered, the importance of the impact on LMI and underserved communities and the fact that the open comment period will be consumed, in part, by the holiday season. The comment period should be at least 120 days long.

Sincerely,

National Groups

National Community Reinvestment Coalition

Allied Progress

AFL-CIO

Americans for Financial Reform

Center for Responsible Lending

Consumer Action

Credit Builders Alliance

HomeFree USA, Inc.

Housing Assistance Council

The Leadership Conference on Civil and Human Rights

NAACP

NAACP Legal Defense Fund

National Alliance of Community Economic Development Association (NACEDA)

National Coalition for Asian Pacific American Community Development (CAPACD)

National Community Stabilization Trust

National Consumer Law Center (on behalf of its low income clients)

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)
Upward Mobility Initiative

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

Accion

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
CashCommunityDevelopment.org
CCEDA
California Resources and Training

California Reinvestment Coalition
CDC Small Business Finance
Center for Urban Economics and Design Chicana Latina Foundation
Central Valley Urban Institute
City of Livingston
Council of Asian Americans Business Associations (CAABA)
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
Mutual Housing California
The National Cultural Center of the Native Americans
Neighborhood Housing Services of the Inland Empire
Northern Californian Community Loan Fund
OCCUR
Opportunity Fund
Peoples' Self-Help Housing
Robert Zdenek Associates- Connecting Communities
Rural Community Assistance Corporation
San Francisco African American Chamber of Commerce
Self-Help Enterprises
Small Business Majority
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

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

District of Columbia

African Diaspora Directorate
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

Florida

Affordable Homeownership Foundation Inc.
Allapattah Collaborative CDC
BBIF Florida

Bright Community Trust
CDC of Tampa
CEGTBA, Inc.
Clearwater Neighborhood Housing Services Incorporated
Community Fund of North Miami-Dade
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
Global Acquisitions & Investments
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
Social Venture Partners – Miami
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 "2" 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.
H.O.P.E. Through Divine Intervention
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
Heartland Alliance for Human Needs and Human Rights
Housing Action Illinois
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

Indiana

Community Investment Fund of Indiana
Fay Biccard Glick Neighborhood Center at Crooked Creek
Gary Economic Development Corporation
Homestead Consulting Services
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
Louisville Urban League
REBOUND, Inc.
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 American Culture Trade and Economic Development
Inc.

Massachusetts

BCC
Common Capital
Community Service Network Inc.
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. (MACDC)
Massachusetts Communities Action Network
Massachusetts Affordable Housing Alliance
NeighborWorks Southern Mass
Oak Hill CDC
Revitalize Community Development Corporation
Urban Edge

Maryland

727 Mgt. LLC
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 for Change Coalition
Southeast Community Development Corporation
The Historic Marble Hill Community Association

Maine

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
U SNAP BAC NON PROFIT HOUSING

Minnesota

Asian Economic Development Association
Community Reinvestment Fund, USA
Dayton's Bluff Neighborhood Housing Services
Jewish Community Action
Metropolitan Consortium of Community Developers
Mid-Minnesota Legal Aid
Voices for Racial Justice

Mississippi

Breakthrough Community Services, Inc.
CFORM-Covenant Community Development Corporation
Golden Triangle Housing Services
Housing Education and Economic Development
Mississippi Housing Partnership

Missouri

AltCap
Community Property Ventures
CREA
Consumers Council of Missouri
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.- Ready, Aim, Advocate
Travois
Useful Community Development
Washington University School of Social Work

Nebraska

Family Housing Advisory Services
Neighborworks Lincoln

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
New Jersey Community Capital
NJ NAACP
Urban League of Essex County

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.
University Neighborhood Housing Program
White Wing Education Community

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
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 Seed 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.
Tri-County Independent Living Center
Village Capital Corporation
Working in Neighborhoods
YWCA Dayton

Oklahoma

Mvskoke Loan Fund

Oregon

CASA of Oregon

Community Development Corporation of Oregon

Community Housing Fund

Grounded Solutions Network

Kate Allen Community Development Services

ONABEN

Radio Consulting Group, LLC

REACH Community Development

Pennsylvania

Allentown Housing Authority

Amani

Ceiba

Center for Family Services, Inc.

Clarifi

Community Action Committee of the Lehigh Valley, Inc.

Community First Fund

Community Neighbors United

Fair Housing Rights Center in Southeastern Pennsylvania

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

Rhode Island

Capital Good Fund

Church Community Housing Corporation

Housing Network of Rhode Island

HousingWorks at RWU

NeighborWorks Blackstone River Valley

South Carolina

Greenville County Redevelopment Authority

South Dakota

GROW South Dakota

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

Texas Appleseed

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
Office of Rural & Farmworker Housing (ORFH)

Wisconsin

Citizen Action of Wisconsin
Disability Justice
Forward Community Investments
Havenwoods Economic Development Corp
Inner City Redevelopment Corp.
Metropolitan Milwaukee Fair Housing Council
Milwaukee Christian Center
Movin' Out, Inc
NeighborWorks Green Bay
Nothing Less, Inc.
Riverworks Development Corporation
Urban Economic Development Association of Wisconsin (UEDA)
Wisconsin Partnership for Housing Development
Wisconsin Voices / African American Roundtable