December 11, 2019

The Honorable Jelena McWilliams
Chairman
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

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

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
NeigborWorks 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