March 24, 2019

The Honorable Joseph M. Otting
Comptroller of the Currency

The Honorable Jelena McWilliams
Chairman, Federal Deposit Insurance Corporation

Dear Comptroller Otting and Chairman McWilliams:

On behalf of the undersigned organizations, the National Community Reinvestment Coalition (NCRC) requests an immediate suspension until the end of the health crisis of the comment period for the proposed changes to the Community Reinvestment Act (CRA) contained in Docket ID OCC-2018-0008 and RIN 3064-AF22. The COVID-pandemic is of a breadth and depth that the global community has not experienced in decades. The pandemic threatens the health of millions of our fellow citizens and residents.

This grave pandemic demands a comprehensive and all-encompassing response. The health and wellbeing of our fellow citizens and residents are at stake. The undersigned organizations must immediately drop all policy-related matters and help their clients and communities with basic survival. The undersigned organizations providing housing counseling will be intervening to stop foreclosures, evictions, and other adverse actions for homeowners and tenants who will be unemployed, laid-off, or sickened by the deadly virus. Likewise, the undersigned organizations providing counseling to small business owners will be assisting these owners survive deep and dramatic declines to their revenues, as virtually the entire country is now effectively sheltering-at-home and not venturing outside except for necessities. The scale of needed assistance is likely to be massive and matched only by a few other dire historical events.

Recent actions of Congress and the federal regulatory agencies further demonstrate the gravity of the emergency. The fiscal stimulus and relief packages moving through Congress are of a scale equaling those of the Great Depression and Recession. The Federal Reserve System is likewise embarking on quantitative easing and emergency lending activities last witnessed during the Great Recession.

The Internal Revenue Service (IRS) recognized the impact of the crisis on taxpayers by allowing for extensions of virtually all tax payments until July 15. The Federal Housing Finance Agency (FHFA) has likewise instructed Fannie Mae and Freddie Mac to suspend foreclosures and

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1 See https://home.treasury.gov/news/press-releases/sm948
evictions for at least 60 days. Similarly, the Department of Housing and Urban Development instituted a halt on foreclosures and evictions for homeowners with FHA-insured mortgages.

All hands are on deck dealing with our national and global emergency. It is inappropriate to focus on comments on proposed CRA rules at this time, given the dire and grave needs of our fellow citizens and residents that our organizations are addressing.

Additionally, our organizations cannot provide sufficient attention to the complex changes contemplated by the proposed rulemaking. CRA critically affects the institutional lending infrastructure in low- and moderate-income (LMI) communities. Without a robust CRA, housing and lending markets in LMI communities suffer from negative externalities due to a lack of private sector activity and competition among financial institutions. Less lending activity results in less information on housing stock and borrower characteristics in LMI communities, which further leads to still less lending in a downward spiral.

Thus, any changes to CRA must increase the level of competition and bank activity in LMI communities. Responding to the demands of a pandemic, both community organizations and banks are unable to provide comments fully informed by thorough analyses of how the complex proposal will affect the level of bank activity in LMI communities, particularly since there are so many interlocking pieces in the proposal that interact in complicated ways.

The extension of the comment period began on March 9 and ends on April 8. The pandemic’s crippling impact became apparent shortly after March 9. Thus, the 30-day extension was not effectively an extension since an unprecedented global natural disaster has diverted our collective attention.

In the interests of a fair and informative rulemaking, we urge you to implement a suspension immediately. This is a rulemaking of profound importance to LMI communities. It deserves serious and sustained attention, which stakeholders cannot provide in the face of COVID-19.

Sincerely,

Jesse Van Tol
CEO

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2 See https://www.fhfa.gov/News/Press/Pages/FHFA-Suspends-Foreclosures-and-Evictions-for-Enterprise-Backed-Mortgages.aspx
Undersigned organizations

National
Americans for Financial Reform Education Fund
Center for Community Progress
Center for Responsible Lending
Consumer Action
Credit Builders Alliance
Enterprise Community Partners
Equal Voice Action
Healthcare Anchor Network
Housing Assistance Council
Local Initiatives Support Corporation
NAACP
NAACP Legal Defense and Educational Fund, Inc.
NACEDA
National Association of American Veterans, Inc.
National CAPACD
National Consumer Law Center
National Fair Housing Alliance
National League of Cities
National NeighborWorks Association
National Urban League
Opportunity Finance Network
Prosperity Now
Small Business Majority
The Democracy Collaborative
UnidosUS; formerly NCLR
U.S. PIRG

Alabama
Birmingham Business Resource Center
Building Alabama Reinvestment
Center for Fair Housing, Inc.
Community Action Association of Alabama
Community Action Partnership of North Alabama, Inc.
Community Service Programs of West Alabama, Inc.
Hispanic Interest Coalition of Alabama
Moton Center Education Foundation, INC.

Alaska
Alaska PIRG

Arizona
Pima County Community Land Trust

California
ASIAN, Inc.
Beneficial State Foundation
Build Healthy Places Network
California Capital Financial Development Corporation
California Coalition for Rural Housing
California Reinvestment Coalition
CDC Small Business Finance
EAH Housing
East Bay Housing Organizations
Ephesians Community Development Center
Housing California
Non-Profit Housing Association of Northern California (NPH)
Opportunity Fund
Richmond LAND
The Greenlining Institute

*Colorado*

PUSH CO- Parents United for Supported Housing
Urban Land Conservancy

*Connecticut*

Beulah Land Development Corporation
Frog Hollow Consulting
Haynes Construction Co

*Delaware*

Delaware Community Reinvestment Action Council, Inc.

*District of Columbia*

Coalition for Non Profit Housing and Economic Development
DOUGLASS COMMUNITY LAND TRUST

*Florida*

Affordable Homeownership Foundation, Inc.
BBIF Florida
Broward County Minority Builders Coalition, Inc.
Catalyst Miami
Centro de Ayuda para los Hispanos Inc.
Children's Services Council of Broward
Communities In Schools of Miami, Inc.
Community Reinvestment Alliance of South Florida
Delray Beach Community Land Trust
FL Alliance of Community Development Corps. Inc.
Florida Housing Coalition
Global Acquisitions & Investments
Lee County Housing Development Corp.
Legal Aid Service of Collier County, Inc.
McDougal Consulting
Metro North Community Development Corp.
Neighborhood Housing Services of South Florida
Neighborhood Renaissance
New Urban Development LLC
Operation Veteran Homeownership
Overtown Optimist Club
Paragon Florida
Real Estate Education and Community Housing Inc.
SFBPN
South Florida Community Land Trust
Struggle for Miami's Affordable and Sustainable Housing, Inc.
SVP Miami
Urban Philanthropies
Wroy Professional Services

**Georgia**
Georgia Advancing Communities Together, Inc.
H.O.P.E. THROUGH DIVINE INTERVENTION, INC.

**Hawaii**
Hawai'i Alliance for Community-Based Economic Development

**Illinois**
Brighton Park Neighborhood Council
Chicago Community Loan Fund
Chicago Lawyers’ Committee for Civil Rights
Chicago Rehab Network
Housing Action Illinois
IFF
Illinois People's Action
Neighborhood Housing Services of Chicago
NW HomeStart, Inc.
The Resurrection Project
Woodstock Institute
UIC John Marshall Law School

**Indiana**
Habitat for Humanity of Elkhart County
Habitat for Humanity of Indiana
HonesteadCS.org
Indianapolis Neighborhood Housing Partnership
Legacy Foundation
New Hope Services, Inc.
Northwest Indiana Reinvestment Alliance
Region III-A EDD & RPO
The Center for the Homeless, Inc.

Kentucky
L Home
REBOUND, Inc.
River City Housing, Inc.

Louisiana
Greater New Orleans Housing Alliance
HousingNOLA
HousingLOUISIANA
Louisville Urban League
Multi-Cultural Development Center
Southern Mutual Help Association, Inc.

Maine
Coastal Enterprises, Inc.

Maryland
Community Development Network of MD
Fair Housing Action Center of Maryland
Grow Home
Housing Authority for the City of Frederick
Housing Initiative Partnership
Maryland Consumer Rights Coalition
Residential Housing Counseling Agency
United Way of Frederick County

*Massachusetts*
Community Development Partnership
Community Service Network Inc.
Domus Incorporated
Housing Corporation of Arlington
Lawrence CommunityWorks
MA Affordable Housing Alliance
MA Association of Community Development Corporations
Massachusetts Community & Banking Council, Inc.
Mill Cities Community Investment
Policy and Management Associates, Inc.
Preservation of Affordable Housing, Inc. (POAH)
solutions4community llc

*Michigan*
Bridging Communities, Inc.
CDAD
Community Economic Development Association of Michigan (CEDAM)
Fair Housing Center of Metropolitan Detroit
GenesisHOPE
HOPE Village Revitalization
Lena Park Community Development Corporation
New Development Corp
Southwest Economic Solutions

*Minnesota*
American Indian Community Development Corporation
Jewish Community Action
West Bank CDC

*Mississippi*
City of Jackson
Housing Education and Economic Development (HEED)
Hope Enterprise Corporation

*Missouri*
DeSales Community Development
Dutchtown South Community Corporation
HEDC
Justine PETERSEN
Old North St. Louis Restoration Group
Metropolitan St. Louis Equal Housing and Opportunity Council
R.A.A. - Ready, Aim, Advocate

*Montana*
Montana Fair Housing
New Jersey
ArtPride New Jersey
Housing and Community Development Network of NJ
New Jersey Citizen Action

New York
Association for Neighborhood and Housing Development
Banana Kelly Community Improvement Association
Empire Justice Center
Fair Finance Watch
Neighborhood Housing Services of Queens CDC
New York Housing Conference
PathStone Enterprise Center
SAGE

North Carolina
Prosperity Unlimited, Inc.
Reinvestment Partners
WE TEAM Youth Services, Inc. for North Carolina
Welfare Reform Liaison Project, Inc.

Ohio
City of Cleveland Heights
City of Dayton
Church of Our Saviour/La Iglesia de Nuestro Salvador
County Corp
Friends of the African Union
Harvard Community Center Community Development Corp.
Homes on the Hill, CDC
JOVIS
NeighborWorks Collaborative of Ohio
Neighborhood Housing Partnership of Greater Springfield
Ohio CDC Association
Old Brooklyn Community Development Corporation
United Way of Greater Cleveland
Working In Neighborhoods
Youngstown Neighborhood Development Corporation

Oregon
CASA of Oregon
Grounded Solutions Network
Housing Oregon
REACH Community Development

Pennsylvania
Ceiba
Chester Community Improvement Project
Community Action Committee of the Lehigh Valley
Community Legal Services of Philadelphia
North 5th Street Revitalization Project
PIDC
Philadelphia Association of Community Development Corporations
Pittsburgh Community Reinvestment Group
Rhode Island
HousingWorks RI
West Elmwood Housing Development Corp

South Carolina
Allendale County ALIVE
Anderson Interfaith Ministries
A Stan Davis, Leadership Development Consultant
Bellwether Non-Profit Advisors
Black River United Way
BEREAN COMMUNITY DEVELOPMENT CORP
CommunityWorks
conNECKtedTOO
Genesis Homes, Inc.
Habitat for Humanity of Greenville County
Habitat for Humanity of York County
Homes of Hope, Inc.
Jasper County Neighbors United
Lake City
Midlands Housing Trust Fund
New Life Career & Business
Santee-Lynches Affordable Housing & CDC
South Carolina Association for Community Economic Development (SCACED)
SC Community Loan Fund
SC Promise Zone
SC UpLift Community Outreach
Wilson Consulting Associates
Williamsburg Enterprise Community Commission, Inc.

*Tennessee*
- Austin T. Harrison LLC
- Building Memphis
- Center for Transforming Communities
- Chattanooga Neighborhood Enterprise
- Fast Track Realty
- Heights Community Development Corp
- Jacobs Ladder Community Development Corporation
- Memphis Medical District Collaborative
- MidtownMemphis.org
- Neighborhood Housing Opportunities, Inc.
- NHO Management, Inc.

*Texas*
- Avenue Community Development Corporation
- Housing Channel
- Southern Dallas Progress Community Development Corporation
- TACDC
- Recon Foundation
- TCH Development, LLC
- WOMAN, Inc.
Virginia
AHDC
Wesley Housing

Washington
Beacon Development Group
Housing Development Consortium of Seattle-King County
InterIm CDA
Low Income Housing Institute
Office of Rural and Farmworker Housing

Wisconsin
Layton Blvd West Neighbors
Metropolitan Milwaukee Fair Housing Council
Southside Organizing Committee