



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 15.¹ The Federal Housing Finance Agency (FHFA) has likewise instructed Fannie Mae and Freddie Mac to suspend foreclosures and

¹ See <https://home.treasury.gov/news/press-releases/sm948>



evictions for at least 60 days.² Similarly, the Department of Housing and Urban Development instituted a halt on foreclosures and evictions for homeowners with FHA-insured mortgages.³

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 8.⁴ 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,

A handwritten signature in black ink, appearing to read "Jesse Van Tol". The signature is written in a cursive, flowing style.

Jesse Van Tol
CEO

² See <https://www.fhfa.gov/Media/PublicAffairs/Pages/FHFA-Suspends-Foreclosures-and-Evictions-for-Enterprise-Backed-Mortgages.aspx>

³ https://www.hud.gov/press/press_releases_media_advisories/HUD_No_20_042

⁴ For the notice of the extension, see <https://www.regulations.gov/document?D=OCC-2018-0008-1960>



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