



The Leadership Conference



National Urban League



November 19, 2018

Reforming the Community Reinvestment Act Regulatory Framework  
Docket ID OCC-2018-0008

To Whom it May Concern:

The undersigned groups maintain that the Community Reinvestment Act (CRA) has been one of the most valuable laws for increasing access to capital and credit for low- and moderate-income (LMI) communities. Any CRA reform effort needs to tread carefully and build upon CRA's success. When Senator Proxmire and other lawmakers were crafting CRA in 1977, their focus was on redlining in LMI communities and communities of color. As envisioned by the CRA statute, the antidote to redlining was CRA exams scrutinizing lending on a local level.

We agree that CRA needs an update. The agencies must expand assessment areas (geographical areas on CRA exams), require the inclusion of mortgage company affiliates on CRA exams, include communities of color on CRA exams, improve data, and increase opportunities for public input. In contrast, the OCC's proposals would undermine CRA's pillars of public input and local accountability and would thus result in significant declines in CRA-related loans, investments, and services. NCRC estimates that the OCC's dilution of assessment areas and local accountability would result in a dramatic loss in home and small business lending over a five year time period that would range from \$52 to \$105 billion.<sup>1</sup>

**Assessment Areas Must be Expanded**

CRA exams currently reach conclusions about bank performance in assessment areas or geographical areas encompassing bank branches. For banks that make the great majority of their loans through branch networks, assessment areas are effective in rating them. However for other banks that use the internet or other non-branch means to make large numbers of loans, current

assessment area definitions must change (*ANPR Question 13*). Assessment areas can include geographical areas such as states, metropolitan areas, or rural counties where banks do not have branches but have significant volumes of loans or other business activity. Some OCC exams including the Bank of the Internet designate assessment areas in this manner.<sup>2</sup> Inexplicitly, the ANPR does not build upon this precedent. Instead, it discusses how lending and other activities outside of areas with bank branches can be considered in “the aggregate.”<sup>3</sup> An “aggregate” consideration of activities outside of branch networks would not evaluate the activities in local areas and would fail to determine how responsive the activities were to local needs.

Estimates from studies conducted by Federal Reserve economists suggest that lending in LMI census tracts would be 10 to 20 percent lower when assessment areas are eliminated from exams or reduced in importance.<sup>4</sup> Any change in CRA must therefore retain assessment areas.

### **Automatic Inclusion of Affiliates on CRA Exams**

CRA exams allow banks to either include or exclude their mortgage company affiliates on CRA exams. The natural tendency is for affiliates to be included on evaluations if they are lending to LMI borrowers and neighborhoods and to be excluded from exams if they are not. The optional inclusion of affiliates must be replaced with automatic inclusion.

### **People and Communities of Color Must be Considered on CRA Exams**

In response to *ANPR Questions 16 and 17*, evaluations of lending to people and communities of color would further satisfy the original intent of the CRA legislation. During the 1977 hearings on CRA, Senator Proxmire stated, “banks will take their deposits from a community and instead of reinvesting them in that community, they will actually or figuratively draw a red line on a map around the areas of their city, sometimes in the inner city, sometimes in the older neighborhoods, sometimes ethnic and sometimes black, but often encompassing a great area of their neighborhood.”<sup>5</sup>

Before the last changes to the CRA regulation in 1995, CRA exams analyzed lending to minorities as part of the fair lending section, which could be readily revived.<sup>6</sup> In addition, the agencies could develop a list of underserved census tracts based on data analysis showing low levels of loans per capita. A substantial number of these tracts would likely be predominantly minority. Lending, investment, and services in these tracts then could be evaluated by CRA exams.

### **CRA Ratings Must be Made More Rigorous**

During the past several years, more than 98 percent of banks have passed their CRA exams. If the pass rate was not this high, CRA would be even more effective in motivating increases in loans, investments, and services to LMI communities. One way to improve rigor is if the overall ratings were accompanied by a publicly released point score.<sup>7</sup> For example, an Outstanding rating could be achieved if a bank had a score of 90 to 100, while a Satisfactory rating could be achieved if a bank had a score of 70 to 90. This point scale would reveal more gradations in performance. For example, a Satisfactory rating accompanied by a score of 70 is just barely

passing while a Satisfactory rating accompanied by a score of 89 is essentially a High Satisfactory rating.

### **Data Must be Improved on CRA Exams**

The small business loan part of the lending test is not as rigorous as the home lending section because the small business data is not as detailed. Therefore, small business data must be improved to include more categories rather than only lending to businesses above and below \$1 million in revenue. Likewise, the community development (CD) parts of the exam must be improved with annual CD data for census tracts and counties. In addition, banks must be penalized via lower ratings if their CD activity finances displacement of LMI people such as low-income tenants from multifamily housing.

### **Community Benefits Agreements and Conditional Approvals Considered on CRA Exams**

We appreciate that the OCC's June 2018 memo instructs CRA examiners to determine whether banks are meeting the goals in CRA plans required in conditional merger approvals.<sup>8</sup> Any conditional merger approval, however, must include a bona fide plan that focuses lending, investment, and service on LMI borrowers and communities. CRA examiners must also assess bank compliance with community benefit agreements (CBAs) that are negotiated with community groups and include clear goals. In addition, a passing CRA rating must not become a safe harbor providing expedited merger approvals. Bank performance may have changed since the last CRA exam, necessitating analysis of whether the merger will confer public benefits.

### **The OCC's One Ratio Concept would Diminish Assessment Areas and Public Input**

The one ratio would consist of the dollar amount of a bank's CRA activities (loans, investments, and services to LMI borrowers and communities) divided by the bank's assets. The ratio is supposed to reflect CRA effort compared to a bank's capacity and would influence a bank's CRA rating.<sup>9</sup> While the one ratio may have a simplistic allure, it would interfere with the ability of examiners to ensure that banks are meeting their statutory responsibilities. The statute states that banks "have continuing and affirmative obligations to help meet the credit needs of the local communities in which they are chartered."<sup>10</sup> The key word is local.

One ratio cannot tell an examiner, a bank, or a member of the public how responsive a bank is to its various assessment areas. In contrast, current CRA exams scrutinize the extent to which a bank makes loans, investments, and services to LMI people and communities in its assessment areas. Also, an exam focused on the one ratio would not be able to effectively consider community group comments regarding banks' records on meeting local needs (*Question 11 of the ANPR*).

Weighting cannot overcome the flaws of a one ratio. For instance, an investment of \$1 million in a distressed community can be weighted by a factor of two, meaning it will count for \$2 million in the numerator of the ratio (*see Question 10 of the ANPR*). Consider how complicated and subjective it would be to do this weighting for banks, particularly those which serve several states. Also, generous and frequent weighting (multiplying loans and investments by 2 or more) could easily result in half or less the dollar amount of loans and investments.

## **Analysis of Branches and Services Must Remain on CRA Exams**

In response to *ANPR Question 27*, branches must remain on CRA exams because they are critical for helping LMI people obtain loans. Academic research has revealed that home and small business lending increases in LMI neighborhoods with bank branches.<sup>11</sup> In contrast, when branches close, lending decreases for several years, especially small business lending.<sup>12</sup>

## **The OCC Must not Broaden CRA Away from the Focus on Credit Needs of LMI People and Communities**

Industry trade associations have advocated broadening CRA consideration for activities such as infrastructure improvements and financial education for middle- and upper-income people and communities.<sup>13 14</sup> However, diverting attention away from LMI communities is contrary to Senator Proxmire's intention that CRA rectify redlining and increase access to credit for underserved populations. Redlining and market imperfections unfortunately continue to afflict LMI communities. Therefore, dilution of attention to LMI communities will significantly decrease lending in them.

The ANPR discusses the possibilities of expanding the range of activities considered by CRA such as digital literacy or internships.<sup>15</sup> However, consideration for activities that do not directly combat redlining and/or lack of access to banking will result in a regulation that frustrates the purpose of CRA to revitalize credit starved communities.

If home and small business lending to LMI people and communities were no longer considered as hinted at in *ANPR Question 21*, this would violate the intent of Senator Proxmire who was concerned that the agencies were not assessing whether banks were meeting credit needs.<sup>16</sup> In addition, consumer lending meets important needs such as buying vehicles in areas lacking transit. CRA exams must consider consumer lending and ensure that it is responsible and does not violate consumer protection law. Finally, the OCC in *Question 23* asks whether Small Business Administration (SBA) standards should be used in evaluating the financing of small businesses. The SBA standards include businesses with several millions of dollars in revenue and would divert CRA exams from their focus on assessing whether banks are meeting the needs of the smallest businesses.<sup>17</sup>

## **Asset Thresholds for CRA Exams: Reform Must not Reduce Requirements for Any Category of Banks**

Eliminating the Intermediate Small Bank (ISB) category as some advocate means that the ISB banks would just have a retail test which does not consider their community development financing.<sup>18</sup> NCRC estimates that ISBs finance about \$3 billion annually in CD projects or about the same amount of annual funding as the Community Development Block Grant (CDBG) program. If the CD test is eliminated for ISB banks, their CD financing would plummet.<sup>19</sup> We also oppose any other changes to asset categories that would eliminate the service test and analysis of branching.

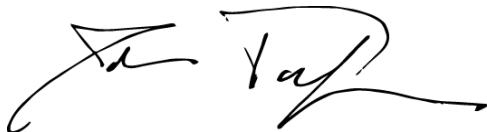
## Conclusion

Bolstering the effectiveness of CRA would entail increasing opportunities for public input, improving data on CRA exams, mandating the inclusion of affiliates, evaluating bank financing to people and communities of color, and expanding assessment areas. In contrast, the OCC proposes reforms that would result in less lending, investing, and services in LMI communities. These changes include the one ratio, diverting attention from LMI communities, and broadening consideration of activities that are not related to meeting credit and community development needs.

Over the last several months, the OCC has made unilateral changes to CRA that stretch out CRA exams for large banks and weaken fair lending and merger reviews of all banks. The OCC must rescind these changes and align any future changes to the CRA regulation and examination procedures with the Federal Reserve Board and the Federal Deposit Insurance Corporation (FDIC).<sup>20 21 22</sup>

We are submitting this letter on behalf of the underserved organizations. If you have any questions, please contact us or Josh Silver, Senior Advisor at NCRC, on 202-628-8866.

Sincerely,

A handwritten signature in black ink, appearing to read "John Taylor". The signature is fluid and cursive, with a long horizontal stroke at the end.

John Taylor  
President and Founder, NCRC

A handwritten signature in black ink, appearing to read "Jesse Van Tol". The signature is fluid and cursive, with a long horizontal stroke at the end.

Jesse Van Tol  
Chief Executive Officer, NCRC

## **National Organizations**

AFL-CIO

Americans for Financial Reform

Center for Responsible Lending

Democracy Collaborative

Leadership Conference on Civil and Human Rights

League of United Latin American Citizens

Local Initiatives Support Corp (LISC)

NAACP

National Coalition for Asian Pacific American Community Development (CAPACD)

National Alliance of Community Economic Development Association (NACEDA)

National NeighborWorks Association

National Urban League

US PIRG

## **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 and Economic Rights Advocates  
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  
REACH  
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

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

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.  
River City Housing  
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  
HomeFree-USA  
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

Detroit People's Platform  
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

Covenant Faith Outreach Ministries Inc./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  
Community Development Corporation of Oregon  
Grounded Solutions Network  
Kate Allen Community Development Services  
Neighborhood Economic Development Corporation  
ONABEN  
Redix Consulting Group, LLC  
REACH Community Development  
Willamette Neighborhood Housing Services

**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**

Arx Advantage Housing Consultants  
BCL of Texas  
Community Council of Greater Dallas  
Covenant Community Capital  
C.R.C.  
Dallas City Homes  
El Paso Collaborative for Community & Economic Development  
Frameworks Community Development Corporation  
Harlingen CDC  
Home Sweet Home Community Redevelopment  
Housing Channel  
Humanitas Community Development Corporation  
Jefferson Community Housing Development Foundation, Inc.  
Mathis Economic Development Corporation  
New Hope Housing, Inc.  
Our Casas Resident Council INC.

PeopleFund

Pine Place Development, LLC

PVAMU

Southeast Houston CDC

Texas Homeless Network

The Alliance

The CREED

VN TeamWork, Inc.

Women Opting for More Affordable Housing Now, Inc. (WOMAN, Inc.)

## **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

---

<sup>1</sup> NCRC Forecast: *Weakening the Community Reinvestment Act Would Reduce Lending by Hundreds of Billions of Dollars*, September 2018, <https://ncrc.org/ncrc-forecast-weakening-the-community-reinvestment-act-would-reduce-lending-by-hundreds-of-billions-of-dollars/>

<sup>2</sup> See Bank of the Internet's CRA exam, <https://www.occ.gov/static/cra/craeval/nov16/716456.pdf>

<sup>3</sup> Office of the Comptroller of the Currency, Reforming the Community Reinvestment Act Regulatory Framework Advance Notice of Proposed Rulemaking (ANPR), Federal Register, Vol. 83, No. 172, Wednesday, September 5, 2018, Proposed Rules p. 45057, <https://www.regulations.gov/document?D=OCC-2018-0008-0001>

<sup>4</sup> Lei Ding and Leonard Nakamura, *Don't Know What You Got Till It's Gone: The Effect of the Community Reinvestment Act on Mortgage Lending in the Philadelphia Market*, Federal Reserve Bank of Philadelphia, Working Paper 17-15, June 2017, <https://www.philadelphiafed.org/-/media/research-and-data/publications/working-papers/2017/wp17-15.pdf>

<sup>5</sup> Congressional Record, June 6, 1977, p. 17630.

<sup>6</sup> Examples of people of color analyzed by CRA exams include; Federal Reserve Bank of Richmond, CRA Exam of Signet Bank, January 1996, pgs. 18-20, <https://www.federalreserve.gov/dcca/cra/1996/460024.pdf> and Office of Thrift Supervision CRA

---

Exam of CenFed Bank, November 1995, p. 9,

[https://www.occ.gov/static/cra/craeval/OTS/CRAE\\_01788\\_19951127\\_60.pdf](https://www.occ.gov/static/cra/craeval/OTS/CRAE_01788_19951127_60.pdf)

<sup>7</sup> CRA exams today have a point score range of 1 to 24 that is not intuitive, and the points are not publicly released.

<sup>8</sup> OCC, *Description: Supervisory Policy and Processes for Community Reinvestment Act Performance Evaluations*, OCC Bulletin 2018-17, June 2018, <https://www.occ.gov/news-issuances/bulletins/2018/bulletin-2018-17.html>

<sup>9</sup> Office of the Comptroller of the Currency (OCC), Advance Notice of Proposed Rulemaking (ANPR), Federal Register, Vol. 83, No. 172, Wednesday, September 5, 2018, <https://www.gpo.gov/fdsys/pkg/FR-2018-09-05/pdf/2018-19169.pdf>, pgs. 45056 and 45057.

<sup>10</sup> Section 802(a)(3) of the CRA statute.

<sup>11</sup> For a literature review of the impact of branches and assessment areas, see Josh Silver, *The Importance of CRA Assessment Areas and Bank Branches*, NCRC, June 2018, <https://ncrc.org/the-importance-of-cra-assessment-areas-and-bank-branches/>

<sup>12</sup> Hoai-Luu Q. Nguyen, Do Bank Branches Still Matter? The Effect of Closings on Local Economic Outcomes, December 2014, <http://economics.mit.edu/files/10143>

<sup>13</sup> Rachel Witkowski, *Will CRA Finally Get its Makeover*, American Banker, March 9

<sup>14</sup> American Bankers Association, CRA Modernization, *Meeting Community Needs and Increasing Transparency*, December 2017, p. 2,

[https://www.aba.com/Advocacy/Documents/CRA-](https://www.aba.com/Advocacy/Documents/CRA-WhitePaper2017.pdf#_ga=2.192150499.839944790.1512674294-422164602.1512674294)

[WhitePaper2017.pdf#\\_ga=2.192150499.839944790.1512674294-422164602.1512674294](https://www.aba.com/Advocacy/Documents/CRA-WhitePaper2017.pdf#_ga=2.192150499.839944790.1512674294-422164602.1512674294)

<sup>15</sup> ANPR, page 45057-45058.

<sup>16</sup> Congressional Record - Senate, January 24, 1977, p. 1958.

<sup>17</sup> U. S. Small Business Administration Table of Small Business Size Standards Matched to North American Industry Classification System Codes. Version 2017. Available online at

[https://www.sba.gov/sites/default/files/2018-](https://www.sba.gov/sites/default/files/2018-07/NAICS%202017%20Table%20of%20Size%20Standards.pdf)

[07/NAICS%202017%20Table%20of%20Size%20Standards.pdf](https://www.sba.gov/sites/default/files/2018-07/NAICS%202017%20Table%20of%20Size%20Standards.pdf).

<sup>18</sup> American Bankers Association, Second Published Request for Comments Under the Economic Growth and Regulatory Paperwork Reduction Act of 1996 (February 13, 2015), p. 7,

<https://www.regulations.gov/document?D=FFIEC-2014-0001-0077>

<sup>19</sup> NCRC, *Intermediate Small Banks, the Forgotten but Significant Resource for Affordable Housing and Community Development*, <https://ncrc.org/intermediate-small-banks-forgotten-significant-resource-affordable-housing-community-development/>

<sup>20</sup> OCC Bulletin 2018-17, June 15, 2018, <https://www.occ.gov/news-issuances/bulletins/2018/bulletin-2018-17.html>

<sup>21</sup> OCC Bulletin 2018-23, August 15, 2018, <https://www.occ.gov/news-issuances/bulletins/2018/bulletin-2018-23.html>

<sup>22</sup> 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>