Insert date

To: OCC, Ms. Vonda J. Eanes

Director for CRA and Fair Lending Policy Compliance

Office of the Comptroller of the Currency

400 7th Street SW, Washington, DC 20219

Re: Docket ID OCC-2018-0008

Dear Ms. Eanes:

The *insert the name of your organization* is deeply concerned with the Advance Notice of Proposed Rulemaking (ANPR) for the Community Reinvestment Act (CRA). The ANPR proposal undermines the original intent of the CRA – to better meet the credit needs of low- and moderate-income people and communities. We ask the OCC to withdraw the ANPR and to engage collaboratively with stakeholders and regulators to develop a process that will improve CRA for low- and moderate-income people (LMI) and communities. The current proposal lowers the bar for banks in meeting their statutory obligations.

The CRA is a critical tool for ensuring banks meet the credit of needs of low- and moderate-income people in the communities they serve.  It was a landmark response to red-lining practices that targeted communities of color, practices that continue today. It is a fundamental financial pillar of community and economic development and is needed now more than ever. *Insert something about CRA has benefited your community*

This would occur because the OCC proposes “one ratio” approach to CRA ratings allows banks to self-police and eliminates the vast majority of CRA requirements. With more than 96% of banks receiving a satisfactory or better rating, the vast majority of the banking industry is not having difficulty meeting the requirements established by existing CRA regulations. There is no reason that the bar for CRA compliance needs to be lowered.

The ANPR allows banks to receive CRA credit for investments and activities that do not target LMI borrowers or areas. This undermines the intent of CRA and ignores that CRA was a response to red-lining.

*Insert any other information about CRA*