

Community Reinvestment Act Joint Public Hearing, August 12, 2010
Individual Presentation: Jean Ishmon

[Applause]

Jean Ishmon:

Good afternoon. My name is Jean Ishmon. I'm from Northwest Indiana Reinvestment Alliance, and I'm also a board member for the National Community Reinvestment Coalition. I've been in the field of fair housing and fair lending for about 25 years, and our agency has relationships -- some good and some bad -- with lending -- our lending institutions, as well as our regulators at least -- for at least 21 years, we've been involved in this.

When we began to monitor HMDA data and CRA evaluations, oftentimes, there were needs for us to supply written comments and letters to the lenders and request that they put -- be put into their CRA files. When regulators came out to the institutions, they would contact our agency and discuss the comments and our relationships with our banks. For at least 10 to 15 years that I can recall, I've only had maybe two of those calls. I've only seen at least two regulators that came through or talked to them about the conditions of what's going on in our communities and our neighborhoods.

We need the regulators to get back to the -- to the basics and do their jobs, simply. Allow community groups to participate in the process. In Northwest Indiana, we have a Bankers Community Council that meet on a quarterly basis. We come together to share programs and projects that are being provided to residents of Lake County, Indiana and how the lenders and community groups can come -- can work together. The alliance banking community -- the banking community -- I'm sorry -- meets with each -- with each of our lenders on a yearly basis to discuss HMDA data and their evaluations. We don't wait for the regulators to contact us anymore. We call them.

In addition, we have hosted meetings with the regulators, banks, and our community groups. And, during those meetings, the question was asked by a bank: Why is it that the safety and soundness examiners [phonetic] who handle risk, economy, and lending standards come out to monitor -- they come out to monitor. They ask them, you know, why are they making loans in low and moderate income communities -- income communities. And, then, the compliance examiners come out and they tell them to get credit to everyone, including the low and moderate income communities. The -- excuse me -- the banks went on -- the bank went on to say that the CRA officers -- to the CRA officers that were present, It seems that these two departments seriously disagree in-house. And that affects their performance, as well as ours, as a result. These departments do not talk to each other and seem not to really like each other. They need to stop.

[Laughter]

You know, they need to stop. We need them to be on one accord and just simply do their job. Lastly, I agree with the National Community Reinvestment Coalition that the assessment area or the geographic -- and of the CRA exam must cover the great majority of bank loans. Thank you.