

Proposal: 1723 (AF94) Reg BB - Community Reinvestment Act

Description:

Comment ID: 137450

From: Bridget T. Peck

Proposal: 1723 (AF94) Reg BB - Community Reinvestment Act

Subject: R-1723 Community Reinvestment Act

Comments:

Date:Jan 21, 2021

Proposal:Regulation BB: Community Reinvestment Act [R-1723]

Document ID:R-1723

Revision:1

First name:Bridget

Middle initial:T

Last name:Peck

Affiliation (if any):

Affiliation Type: ()

Address line 1:1212 Circle Drive

Address line 2:

City:Scottsbluff

State:Nebraska

Zip:69361

Country:UNITED STATES

Postal (if outside the U.S.):

Your comment:The board's efforts to update the CRA are much appreciated; however, these efforts do not appear to be designed with community banks in mind, particularly those institutions under \$10B in asset size. The very nature of a community bank is to support the community it serves with lending to a variety of income levels, investing in community endeavors, donating to community needs, and providing countless volunteer hours to many organizations that serve low to moderate income individuals and areas. While the idea of quantitative measurements is appealing in its apparent simplicity and objectivity, and might make a lot of sense for a national bank, it is difficult to imagine a metric that adequately captures all the impact of a community bank in a small town or rural area. I strongly suggest the asset threshold for a large bank subject to such measurements be \$10B or more. The proposed concepts regarding community development would be helpful, including the ability to access a pre-approved list of organizations that qualify for community development and the expansion of qualifying services. Currently, community banks donate many volunteer hours to their communities, but few of those hours qualify for community development. Expanding that definition would reward banks who invest their time in the communities they serve.

Thank you for the opportunity to provide input.