

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

Description:

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Comment ID: 138043

From: Suzanne Carlson

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Subject: R-1723 Community Reinvestment Act

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Comments:

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Dear Federal Reserve System,

I appreciate the Federal Reserve Board encouraging public input on ways to modernize and improve the Community Reinvestment Act (CRA).

An updated CRA that responds to changes in the banking sector—such as the decrease in community-based banks and the evolving ways in which consumers use banks—will have a modest impact unless the evaluation process for banks awards "outstanding" and "satisfactory" grades less frequently than in the past. The current rating system suggests that the banking system is doing a good job meeting the CRA's goals, which is clearly not the case.

We need an evaluation process that more meaningfully addresses systemic inequities in access to credit, expands financial inclusion, and combats redlining, particularly for communities of color and rural communities. Access to credit includes affordable mortgage and home equity loans for sustainable homeownership, as well as affordable and flexible small business credit, savings, and loan products that create a foundation for sustainable small businesses.

This means a CRA that includes an explicit focus on racial equity. Data consistently shows that if income is controlled for as a variable, loan denials correlate to race. Examiners should downgrade bank ratings when persistent disparities are found in lending or banking services, including for small business loans.

I am most concerned that our country begin to reduce the racial wealth gap through intentional focus on supporting home ownership among communities of color. When CRA evaluations take place, the examiners must take account of whether the banks have provided mortgage and home equity loans to persons of color to increase the possibility of affordable home ownership amongst communities who need this assistance and focus.

Sincerely,  
Suzanne Carlson