

Inland Fair Housing and Mediation Board

August 11, 2010

Jennifer J Johnson, Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue, Northwest
Washington, DC 20551

RE: Docket ID OCC-2010-0011, R-1386, RIN 3064-AD60

Dear Ms. Johnson:

The following are the comments of Inland Fair Housing and Mediation Board (IFHMB) on the agencies' hearings to review aspects of Community Reinvestment Act (C R A) regulations and how the agencies should revise them to better serve the goals of C R A and the needs of under-served communities. These revisions are particularly important because of the current lack of bank responsiveness to low-income communities and communities of color.

Since 1982, IFHMB, a private non-profit fair housing agency, has served low-to-moderate income individuals and families in the Inland Empire region generally and, specifically, in the San Bernardino County area with education on fair housing rights and responsibilities. In 1993, IFHMB became a HUD-approved housing counseling agency and, thus, expanded its service base to cover both the Riverside and Imperial County areas with housing counseling services as well. As you are aware, the Riverside/San Bernardino County regions led the nation in the number of foreclosures just one short year ago.

The Community Reinvestment Act has promoted fair and equitable access to financial services for more than three decades. C R A has meant sound products that were offered to under-served communities and people as a result of interaction promoted by the C R A.

California is experiencing a devastating and growing economic crisis. The difficult straits of California's small businesses are a critical piece of this economic crisis and high unemployment that is only now beginning to receive attention. C R A evaluation and data collection can make a difference in promoting lending by financial institutions to small, minority-owned and women-owned institutions, particularly those in low-income communities.

The agencies need to revise the data collected on small businesses to reflect the current array of businesses and stimulate growth of small and micro businesses that employ more than half of all workers.

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It is positive that under the *Dodd-Frank Bill of 2010* lenders will be required to report race and gender of borrowers of small business loans, the census tract location of the business, action taken with respect to the application (approved or rejected), and revenue of the business. The agencies should immediately implement these data collection requirements.

Data now collected looks only at businesses by revenue for those with annual revenue of \$1million or less annually. A huge portion of minority- and women-owned businesses have revenues of \$500,000 or less annually. Data should also be collected for loans less than \$250,000 and between \$251,000 and \$500,000 to businesses with revenues of \$1 million or less annually.

Data for size of loans is now collected for loans less than \$100,000, between \$100,000 and \$250,000, and greater than \$250,000. Data on loans between \$250,000 and \$500,000 should also be collected.

C R A examinations should compare overall small business lending to the proportion of lending to small, women-owned and minority-owned businesses in low-income neighborhoods as well as the overall amount of lending.

Data should also be collected that shows the annual percentage rate (APR) of loans made.

Data should be collected that distinguishes between term and revolving debt as well as interest rates.

One of the critical issues for small, minority-owned and women-owned businesses is the importance of business advisory services. These services may be provided to help a business keep from needing to go deeper in debt by making their human resources or marketing or other efforts more efficient They may also be deployed by lenders to help borrowers stay on time with their debt repayment

IFHMB looks forward to the implementation of these revisions to the regulations this year.

Sincerely,

**Lynne Anderson
Executive Director**