

From: WestStar Bank, Anita Werner  
Proposal: 1456 - CRA; Interagency Questions & Answers Regarding Community Reinvestment;  
Notice  
Subject: CRA; Interagency Questions & Answers

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Comments:

Ladies & Gentlemen:

WestStar Bank, El Paso, TX appreciates the opportunity to comment on the Proposed Revisions to the Community Reinvestment Act; Interagency Questions and Answers issued by the Board of Governors of the Federal Reserve System, the Office of the Comptroller of the Currency and the Federal Deposit Insurance Corporation. Specifically we'd like to offer comments on CFR Ss \_\_.12 (g)(2)-1 regarding community services targeted to low- or moderate-income individuals.

In the past when our bank has provided community services to a school (such as providing employees as volunteers to teach the Junior Achievement curriculum) we have documented the fact the school is located in a low- to moderate-income area (by geo-coding the school's address to obtain the census demographic). Based upon this information we have concluded it serves children from the surrounding low- to moderate-income neighborhood. According to the proposed change it sounds like we would now have to take this a step further and obtain documentation that the majority of the students attending the school qualify for free or reduced-price meals under the USDA's National School Lunch program? If that is the case then we definitely oppose this revision.

As a community bank CRA officer, I have no idea how to obtain the additional information to document the majority of the students attending the school we are offering our services to qualify for free or reduced-price meals under the USDA's National School Lunch program. Nor do I feel this is necessary. In my opinion, geo-coding the address of the school provides a reasonable assurance that the majority of the students who attend the school are also from the same demographic as the school's geo-coded census demographic. Why burden community bankers with providing more data that may be difficult to obtain? (A visit to the USDA.gov website did not reveal any way to obtain the data from them.) Geo-coding the address has proven sufficient in our CRA documentation for many years; why add another layer to this process? This same section of proposed revisions also suggests using data indicating the recipients of other community services we may provide are recipients of Medicaid to prove they are people of low- to moderate-income (as Medicaid is generally available only to individuals with limited income and assets). Again, I ask the question; how is a community bank CRA officer to obtain this information when we are addressing a group of people who are living in a homeless shelter regarding how to budget and manage their money? I doubt the homeless shelter will provide us with this type of data. (A visit to the Medicaid.gov website did not reveal any way to obtain the data from them.) Moreover why should I have to get this when I can provide the examiners with information regarding the services this homeless shelter provides? In many cases the homeless shelter is even located in a low-

to moderate-income area where I can also provide the geo-coded census demographic information. Again, why burden community bankers with providing more data that may be hard to obtain?

In summary, if we are interpreting these proposed changes correctly, we believe that they will simply add another layer of bureaucracy to our current CRA documentation efforts. Why would we want to burden the very people we are serving (schools and other non-profit entities) with asking them to provide us with data as outlined in this proposed revision so we can prove to examiners that the community services we are offering are serving low- or moderate-income people? I would think they would not want to disclose this information due to privacy concerns for their students or clients. Plus most schools and non-profits simply don't have the staffing to provide data like this to whoever is requesting it. I would urge you to keep things simple, apply some common sense and drop these proposed revisions.

Sincerely,

ANITA G. WERNER | FIRST VICE PRESIDENT  
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