

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

Description:

---

Comment ID: 137339

From: Justin Moriarty

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

Subject: R-1723 Community Reinvestment Act

---

Comments:

Date: Oct 02, 2020

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

Document ID: R-1723

Revision: 1

First name: Justin

Middle initial: R

Last name: Moriarty

Affiliation (if any):

Affiliation Type: ()

Address line 1: 515 NW Saltzman Rd, #304

Address line 2:

City: Portland

State: Oregon

Zip: 97229

Country: UNITED STATES

Postal (if outside the U.S.):

Your comment: I watched the posted meeting regarding this request, and find that there seems to be some key missing incites. I have an Idea the Board will find effective in modernizing the CRA framework. I see that the Board is having trouble determining how to assess the CRA regs are being followed. Simple solution: create a ArcGIS map that would visually map loans be geo location. The Board could then visualize where these loans are being issued with consideration to the Assessment Boundaries. For example the Board could utilize the already collected data points from the CFPB and create matrix overlays to compare this data with other data points. This will effectively solve the biggest issue present here which in my opinion is the lack of visual over site and therefore a baseline to track the regulations and how the are being followed. thank you for your time respectfully, Justin M.