

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

Description:

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From: HUD, Richard Perrelli

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

Subject: R-1723 Community Reinvestment Act

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Comments:

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Your comment: Allow bank investors of Ginnie Mae securities, whose collateral in the securities disclosure states 100% of loans are in Low-Moderate Income Tracts, to be given CRA Audit credit by regulatory agencies in regards to mandated CRA investments. This would increase momentum in ESG investing by FIs in regards to Low-Moderate Income Tracts; and in return make it easier for FIs to get CRA compliance credit. Currently investment flows are focused on just the local community of the respective local financial institution; making it sometimes tedious for the local institution to fulfill and depriving that low-moderate income tract of potential external investments. Opening the CRA to a national level at this time from its current micro focus; could bring larger investment flows into Low-Moderate Income Tracts potentially having a greater positive effect on those communities than the current CRA policy.