



MID-SIZE BANK COALITION OF AMERICA

*February 16, 2021*

*Via Electronic Mail  
Board of Governors,  
Federal Reserve System*

Re: *Community Reinvestment Act: Docket No. R-1723 and RIN 7100-AF94*

Ladies and Gentlemen:

The Mid-Size Bank Coalition of America (“MBCA”)<sup>1</sup> appreciates the opportunity to comment on the Advance Notice of Proposed Rulemaking (the “ANPR”) of the Board of Governors of the Federal Reserve System (“Board”) intended to transform and modernize the regulations implementing the Community Reinvestment Act of 1977 (“CRA”). We appreciate the care and attention the Board has devoted to developing the proposed regulations in this complex area. We commend the Board for the hard work and creative thinking that are evident throughout the ANPR and for its commitment to developing an innovative, 21<sup>st</sup> Century CRA regulation – an objective we strongly endorse.

MBCA and its members wholeheartedly support the stated purpose of the CRA, which is to encourage depository institutions to help meet the credit needs of the communities in which they operate, including low- and moderate-income (“LMI”) communities, consistent with safe and sound operations. We also support the Board’s efforts to enhance transparency, objectivity, and consistency in the measurement of CRA performance and award ratings.

Rather than provide detailed comments in this letter, MBCA would like to summarize several broad principles that it suggests for the Board’s consideration:

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<sup>1</sup> Founded in 2010, the MBCA is a distinct and singularly focused “self-help” organization for mid-size banks that has the direct involvement of each of its member banks’ CEOs and most of their management committee members. The MBCA’s 102 member banks average approximately \$20 billion in size and collectively serve customers and communities through more than 10,000 branches in all 50 states, Washington, DC, and three U.S. territories. The MBCA’s member banks currently have combined assets exceeding \$1.8 trillion, deposits of nearly \$1.5 billion, and total loans of more than \$1.2 trillion. Thirty of MBCA’s members are the largest independent institutions headquartered in their respective states. For example, MBCA member banks in Arkansas, Connecticut, Hawaii, Mississippi, Oklahoma, Oregon, Tennessee, Virginia and Wisconsin are both headquartered in and the largest independent institutions serving those states.



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- The Board should reach agreement with the FDIC and OCC on a consistent, interagency rulemaking and examination approach to CRA.
- The Board should balance its desire for more or different data against the substantial burden and cost that this will impose on banks.
- Traditional banks that rely heavily on physical facilities should have the flexibility to establish – or to retain – single or small numbers of facilities such as branches, deposit taking ATMs and LPOs in markets without triggering burdensome assessment area treatment, especially geographically large assessment areas.
- CRA rules for identifying eligible community development loans, investments and services should clarify – and broaden – what qualifies as CD loans, investments and services.
- The MBCA understands that several of the other bank trade groups whose members include our midsize bank members will likely submit comment letters that address the foregoing points in greater detail.

The MBCA appreciates the opportunity to comment on the ANPR and looks forward to working with the Federal Reserve System to improve the effectiveness of the CRA. If you have any questions, please do not hesitate to contact the undersigned by phone at 213-335-4344 or by e-mail [brent.tjarks@midsizebanks.com](mailto:brent.tjarks@midsizebanks.com).

Sincerely,

A handwritten signature in black ink, appearing to read 'BT', is written over a faint, light-colored circular watermark or seal.

Brent Tjarks  
Executive Director  
The Mid-Size Bank Coalition of America



MID-SIZE BANK COALITION OF AMERICA

1. Ameris Bank (Moultrie, GA)
2. Apple Bank (New York, NY)
3. Arvest Bank (Fayetteville, AR)
4. Associated Bank (Green Bay, WI)
5. Atlantic Union Bank (Richmond, VA)
6. BancorpSouth (Tupelo, MS)
7. Banner Bank (Walla Walla, WA)
8. BankUnited (Miami Lakes, FL)
9. Banc of California (Santa Ana, CA)
10. Bank of Hope (Los Angeles, CA)
11. Bank Leumi USA (New York, NY)
12. Bank of Hawaii (Honolulu, HI)
13. Bank OZK (Little Rock, AR)
14. Berkshire Bank (Pittsfield, MA)
15. BOK Financial (Tulsa, OK)
16. Bremer Bank (Saint Paul, MN)
17. Busey Bank (Champaign, IL)
18. Cadence Bank (Houston, TX)
19. Cathay Bank (Los Angeles, CA)
20. Cenlar FSB (Ewing, NJ)
21. Centennial Bank (Conway, AR)
22. Central Banccompany (Jefferson City, MO)
23. CIT Bank (Pasadena, CA)
24. Citizens Business Bank (Ontario, CA)
25. City National Bank (Los Angeles, CA)
26. City National Bank of Florida (Miami, FL)
27. Columbia Bank (Tacoma, WA)
28. Commerce Bank (Kansas City, MO)
29. Community Bank (De Witt, NY)
30. Cullen/Frost Bankers (San Antonio, TX)
31. Customers Bank (Phoenixville, PA)
32. Dollar Bank (Pittsburgh, PA)
33. EagleBank (Bethesda, MD)
34. Eastern Bank (Boston, MA)
35. East West Bank (Pasadena, CA)
36. F.N.B. Corporation (Pittsburgh, PA)
37. FirstBank Holding Company (Lakewood, CO)
38. First Citizens Bank (Raleigh, NC)
39. First Financial Bank (Cincinnati, OH)
40. First Financial Bankshares (Abilene, TX)
41. First Hawaiian Bank (Honolulu, HI)
42. First Horizon Bank (Memphis, TN)
43. First Interstate Bank (Billings, MT)
44. First Merchants Bank (Muncie, IN)
45. First Midwest Bank (Itasca, IL)
46. First National Bank of Omaha (Omaha, NE)
47. First United Bank (Durant, OK)
48. Flagstar Bank (Troy, MI)
49. Fulton Financial (Lancaster, PA)
50. Glacier Bank (Kalispell, MT)
51. Great Western Bank (Sioux Falls, SD)
52. Hancock Whitney Bank (Gulfport, MS)
53. Heartland Financial (Dubuque, IA)
54. Hilltop Holdings (Dallas, TX)
55. Independent Bank (McKinney, TX)
56. International Bancshares (Laredo, TX)
57. Investors Bank (Short Hills, NJ)
58. Mechanics Bank (Richmond, CA)
59. MidFirst Bank (Oklahoma City, OK)
60. NBT Bank (Norwich, NY)
61. New York Community Bank (New York City, NY)
62. Northwest Bank (Warren, PA)
63. OceanFirst Bank (Toms River, NJ)
64. Old National Bank (Evansville, IN)
65. Pacific Premier Bank (Irvine, CA)
66. PacWest Bank (Beverly Hills, CA)
67. People's United Bank (Bridgeport, CT)
68. Pinnacle Bank (Lincoln, NE)
69. Pinnacle Financial Partners (Nashville, TN)
70. Popular Community Bank (New York, NY)
71. Provident Bank (Iselin, NJ)
72. Raymond James Bank (Saint Petersburg, FL)
73. Renasant Bank (Tupelo, MS)
74. Rockland Trust (Rockland, MA)
75. Sandy Spring Bank (Olney, MD)
76. SeaCoast Bank (Palm Beach, FL)
77. ServisFirst Bank (Birmingham, AL)
78. Signature Bank (New York, NY)
79. Silicon Valley Bank (Santa Clara, CA)
80. Simmons Bank (Pine Bluff, AR)
81. South State Bank (Winter Haven, FL)
82. Sterling National Bank (Montebello, NY)
83. Stifel Bank & Trust (Saint Louis, MO)
84. Synovus Bank (Columbus, GA)
85. TCF Bank (Sioux Falls, SD)
86. Texas Capital Bank (Dallas, TX)
87. Third Federal Savings (Cleveland, OH)
88. TIAA Bank (Jacksonville, FL)
89. TowneBank (Portsmouth, VA)
90. Trustmark Bank (Jackson, MS)
91. UMB Financial (Kansas City, MO)
92. Umpqua Bank (Roseburg, OR)
93. United Community Bank (Blairsville, GA)
94. United Bankshares (Charleston, WV)
95. Valley Bank (Wayne, NJ)
96. Veritex Community Bank (Dallas, TX)
97. WaFd Bank (Seattle, WA)
98. Webster Bank (Waterbury, CT)
99. WesBanco Bank (Wheeling, WV)
100. Western Alliance Bank (Phoenix, AZ)
101. Wintrust Financial (Rosemont, IL)