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February 16, 2021

Ann E. Misback, Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue NW
Washington, DC 20551
Via Email: regs.comments@federalreserve.gov

RE: Docket Number R-1723 and RIN Number 7100-AF94

Dear Sec. Misback and Board of Governors:

The Greater Rochester Community Reinvestment Coalition (GRCRC) would like to thank the Federal Reserve Board (Fed) for putting out this detailed Advance Notice of Proposed Rulemaking (ANPR) to solicit input from the public about ways to modernize the Community Reinvestment Act (CRA) while increasing its fidelity to its original purpose and Congressional intent. **We ask that the Fed use what we are learning from the COVID-19 pandemic and its disparate impact on communities of color and low- and moderate-income neighborhoods to strengthen the rigor of CRA exams in order to promote institutional change so that we can have a just recovery from the pandemic and address other crises like climate disruption,[1] the increasing economic inequality, and white supremacy.** For example, while the Fed has described approaches in its ANPR that will make CRA exams more objective and transparent, questions remain about whether the Fed's approach will reduce the high rate of CRA grade inflation. If nearly every bank continues to pass their CRA exams, banks will not engage in strenuous efforts to help communities of color and low- and moderate-income (LMI) neighborhoods recover from the pandemic's devastation.

GRCRC was launched in 1993 to generate and continue discussions about lending patterns in Rochester. Convened by Empire Justice Center, GRCRC has met with numerous banks and state and federal regulators during CRA exams and mergers and submitted dozens of data-driven comments to the appropriate state and federal regulators who have oversight of the banks.

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[1] The New York State Department of Financial Services recently released a guidance letter to its regulated banks about receiving New York State Community Reinvestment Act credit for financing climate resiliency for low- and moderate-income communities.
https://www.dfs.ny.gov/industry_guidance/industry_letters/il20210209_cra_consideration

GRCRC, Empire Justice Center, and its predecessor organization, the Public Interest Law Office of Rochester, have released seventeen analyses of home mortgage lending, small business lending, and access to credit over the past 27 years (1993-2020). The organizations use data driven analyses to identify strengths and weaknesses in lending patterns and to generate discussions with the top financial depositories in the Rochester NY MSA.[2]

One of the ways Empire Justice Center, GRCRC's convener, responded to the COVID-19 pandemic was to connect with local banks in March 2020 to urge them to participate in the Paycheck Protection Program and reach out to smaller businesses, especially those owned by people of color. We also analyzed the publicly available data and found that of the Paycheck Protection Program (PPP) loans made in the 25th Congressional District (Rochester NY and most of Monroe County), only 5% or 472 loans went to self-employed individuals and independent contractors, while corporations received 6,781, or 72% of the loans.[3] Ninety percent of Black and Brown businesses are one-person businesses, so the lack of lending to self-employed people disproportionately affected Black and Brown businesses. When the most recent round of the PPP was approved on December 27, 2020, Empire Justice Center again reached out to local banks and CDFIs, this time to collaborate on two webinars (with language translation and American Sign Language interpretation) for small businesses about the program and how to apply.

Empire Justice Center also wrote a piece for the National Community Reinvestment Coalition's report on redlining and COVID-19 disparities to illustrate the ongoing legacy of redlining in the Rochester NY community in policing, housing and health.[4] The NCRC report includes a CDC Social Vulnerability Index (SVI)[5] to evaluate the resilience of neighborhoods to a wide range of hazards including human and natural disasters and outbreak of diseases, such as COVID-19. Using this index, we noted that the most socially vulnerable neighborhood in Rochester (rated "hazardous" in the original 1938 Home Owners Loan Corporation (HOLC) map) has an average life expectancy that is 10 years less than that of the most resilient neighborhood (rated "best" in the original HOLC map).

[2] The most recent analyses are "#AllTogetherNow: Improving Small Business Lending in the Rochester NY Community" (found at: https://empirejustice.org/wp-content/uploads/2018/01/alltogethernow-s.pdf) and "Too Big to Fail…Too Poor to Bank: How Mainstream Financial Services Can Help Low-Income Working Families Succeed" (found at: https://empirejustice.org/wp-content/uploads/2018/09/Access-to-Credit-Report-2018-FINAL.pdf).

[3] https://empirejustice.org/news/press-release-black-brown-businesses-not-access-paycheck-protection-program-monroe-county-compared-established-businesses/

[4] https://empirejustice.org/news/covid-19-disparities-rochester-ny-legacy-redlining-city-frederick-douglass-susan-b-anthony/

[5] https://www.atsdr.cdc.gov/placeandhealth/svi/index.html

Strengthening CRA is a critical component of a just recovery and economy

As a result of our years of work with our fellow coalition members, with local, regional and national banks and credit unions, with homeowners, consumers and small businesses, and with state and national coalitions, we urge the Fed to incorporate the following priorities into its updated rule.

- Increase the focus of CRA on Black, Indigenous, People of Color (BIPOC), BIPOC communities and small businesses of color.
- Increase transparency in CRA performance evaluations about the results of fair lending tests and increase their weight in CRA scores.
- Focus analyses of small business lending on lending to the smallest businesses, to small businesses in low-moderate income and BIPOC communities, and to minority business enterprises (MBEs).
- Change parts of the retail lending evaluation to assure that banks meeting the presumptive satisfactory rating are serving communities with responsible, quality products.
- Include credit card lending, auto lending (including indirect auto lending) and other types of consumer lending in the Retail Test.
- Examine banks at the holding company level and make the inclusion of affiliates mandatory.
- Require that limited purpose banks that are consumer lenders undergo both the community development test and the retail lending test.
- Assure that assessment areas support and reflect a commitment to local communities.

Strengthen CRA to increase lending to BIPOC and businesses of color and investing in BIPOC communities

We appreciate that the Fed recognizes the importance of addressing racial inequities, and asks (Q2), "In considering how the CRA's history and purpose relate to the nation's current challenges, what modifications and approaches would strengthen CRA regulatory implementation in addressing ongoing systemic inequity in credit access for minority individuals and communities?"[6]

[6] Federal Reserve Board, Advanced Notice of Proposed Rulemaking (ANPR), Community Reinvestment Act Regulation BB Docket No. R-1723, RIN 7100-AF94, Federal Register, Vol. 85, No. 202, Monday, October 19, 2020, Proposed Rules, p. 66413, https://www.federalreserve.gov/aboutthefed/boardmeetings/files/cra-fr-notice-20200921.pdf.

The purpose of CRA is to meet community credit needs in neighborhoods that were, and often continue to be, credit deserts. These communities were deliberately denied access to credit by government policies and actions that made it clear that neighborhoods with African American residents were deemed too unsafe to lend to.[7]

As noted in the ANPR, "Congress enacted the CRA in 1977 primarily to address economic challenges in predominantly minority urban neighborhoods that had suffered from decades of disinvestment and other inequities. Many believed that systemic inequities in credit access—due in large part to a practice known as ''redlining''—along with a lack of public and private investment, was at the root of these communities' economic distress."[8]

Even with the passage of the Community Reinvestment Act (CRA) and the updates in the implementing regulations, CRA is still focused on low- and moderate-income (LMI) families and neighborhoods and not on BIPOC families and communities.

This focus on LMI communities has not worked. Reports on access to credit at the national, state and local level continue to describe the ongoing challenges faced by African American, Latinx and new American immigrant residents. These communities borrow predatory products and do not have access to safe and affordable credit. Auto loans for used cars to subprime borrowers are priced to result in default, particularly for borrowers of color. Borrowers have their credit destroyed.

Empire Justice Center released two separate reports that document how city of Rochester residents continue to live in credit deserts.[9] Changes in the local, national and global economy have resulted in postindustrial cities ravaged by distressed neighborhoods.

We urge the Fed to use the act's legislative history to address the history of redlining and ongoing disadvantages experienced by redlined communities. Thus, GRCRC agrees with the NCRC that the most direct way to increase access to credit and capital for people of color is to add performance measures on the CRA tests and subtests that assess lending, investing and services to people of color and communities of color.

In addition, CRA exams can include racial and ethnic demographic data in performance context analysis and require banks to affirmatively include communities of color in their assessment areas on CRA exams. The Board could also provide CRA consideration for lending and

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[7] Richard Rothstein. 2017. The Color of Law: A Forgotten History of How Our Government Segregated America.
[8] ANPR, p. 66412.
[9] "#AllTogetherNow: Improving Small Business Lending in the Rochester NY Community" (found at: https://empirejustice.org/wp-content/uploads/2018/01/alltogethernow-s.pdf) and "Too Big to Fail...Too Poor to Bank: How Mainstream Financial Services Can Help Low-Income Working Families Succeed" (found at: https://empirejustice.org/wp-content/uploads/2018/09/Access-to-Credit-Report-2018-FINAL.pdf).

investing in majority nonwhite census tracts outside of assessment areas just as the Board is considering for Indian reservations and other underserved areas. At the very least, the Fed could add a category on CRA exams of underserved census tracts, which would likely include a high number of communities of color.

Increase transparency in CRA performance evaluations about the results of fair lending tests and increase their weight in CRA scores.

We are pleased to see that one of the Board's objectives is to "Recognize that CRA and fair lending responsibilities are mutually reinforcing,"[10] and that the Fed is considering adding the Military Lending Act, the Servicemembers Civil Relief Act, and UDAAP to the laws considered when reviewing discriminatory or other illegal credit practices to determine CRA ratings.[11] We urge the Board to add the Americans with Disabilities Act (ADA) to the list of statutes influencing fair lending reviews. Customers with disabilities need to be fully protected and have unfettered access to banking. This includes not only physical access to branches but also ease of use regarding websites and mobile banking.

GRCRC also urges the Board to increase the transparency of fair lending tests and their impact on CRA evaluations. This is another way to make race and ethnicity more explicit on CRA exams and for the public to know whether a bank is serving or harming BIPOC communities. The Board discusses that it will be updating the criteria on fair lending reviews to consider the root cause of discrimination, the severity, the duration, and the pervasiveness. It will also consider a bank's compliance management system's ability to identify and correct fair lending issues. How a bank meets or does not meet these criteria should be spelled-out in the performance evaluation, as well as some of the analyses underlying the conclusions, and how a bank's CRA grade will be impacted by these criteria and any plans to correct fair lending issues. We also urge the Fed to increase the weight of fair lending tests on CRA exam scores. These changes are likely to improve bank retail lending to people and communities of color, helping to address the vestiges of redlining.

Focus CRA-eligible small business lending on businesses in communities of color, to MBEs and to the smallest businesses

Since the start of the pandemic, more than 440,000 African American businesses have been closed or 41% compared to just 17% of White-owned small businesses.[12] Discrimination in lending contributes significantly to racial disparities in small business survival rates. An NCRC investigation found that African American testers applying for Paycheck Protection Program

[10] ANPR, p. 66410.
[11] ANPR, p. 66459.
[12] https://www.nationalgeographic.com/history/2020/07/black-owned-businesses-may-not-survive-covid-19/.

(PPP) loans for their small businesses during the pandemic were likely to receive less information or encouragement to apply than White testers.[13] As seen above, Empire Justice Center found disparities in the size and types of businesses accessing the loans, indicating that minority business enterprises (MBEs) received fewer PPP loans. CRA must be strengthened considerably in order to combat discrimination and help impacted businesses and our communities recover from the pandemic.

An analysis Empire Justice Center did of CRA small business lending in the Rochester NY MSA in 2015 found that only 9% of the loans and 12% of the dollar volume of lending went to businesses located in non-white census tracts, even though these tracts contained 18% of the Rochester area businesses.[14]

These are just some of the analyses that show the need to adjust the types of small business lending eligible for CRA credit. In addition to lending to businesses in low-moderate income neighborhoods, banks should be examined on their lending to the smallest businesses, in BIPOC communities, and to minority business enterprises (MBEs). We urge the Board to find ways in its rule to encourage banks to lend to these underserved businesses and communities.

The Fed's careful approach to evaluating retail lending needs some changes to assure that banks meeting the presumptive satisfactory rating are serving communities with responsible, quality products.

GRCRC appreciates the Board's careful approach to evaluating a bank's retail lending, especially the initial screen of whether a bank is doing enough retail lending relative to its deposits compared to other banks in the assessment area to be eligible for a possible presumptive satisfactory rating.[15]

We are also pleased to see that the Board is proposing two different metrics—the percentage of a bank's loans in LMI geographies and the percentage of loans to LMI borrowers, and then comparing these metrics to two benchmarks—community (demographics of an assessment area, such as the number of owner-occupied units, the percentage of low-income families, or the percentage of small businesses or small farms) or market (the aggregate lending to targeted areas or targeted borrowers by all lenders operating in the same assessment area). We ask that the Fed

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[13] Anneliese Lederer, Sara Oros, Sterling Bone, Glenn Christensen, Jerome Williams, Lending Discrimination within the Paycheck Protection Program, NCRC, July 2020, https://ncrc.org/lending-discrimination-within-the-paycheck-protection-program/ and follow-up report, Lending Discrimination during COVID-19: Black and Hispanic Owned Businesses, November 2020, https://ncrc.org/lending-discrimination-during-covid-19-black-and-hispanic-women-owned-businesses/.
[14] ibid, p. 7
[15] ANPR, p. 66420.

assure that lending in LMI geographies to middle and upper-income borrowers is not resulting in the displacement of Black and Brown and/or LMI families.

GRCRC agrees with the Board's proposal that a bank must meet the presumption of satisfactory across the major product lines, and not only for a subset of the products.[16] However, the Fed needs to assure that performance measures and thresholds are not only reasonable but also rigorous. The result must not be an increase in CRA ratings inflation. The presumption of satisfactory must not become a safe harbor, rendering a ratings downgrade by an examiner virtually impossible despite evidence of discrimination or evidence of neglecting a particular credit need in a target area or of a target population.

The Board is considering taking the lower of the two thresholds of the community benchmark or the market benchmark for determining a presumptive satisfactory rating.[17] GRCRC asks that the Board instead use a weighted approach. Since the community benchmark is usually the more difficult benchmark, it will usually be lower and if used, will drive aggregate lending levels and percentages of loans to LMI borrowers lower over time. Instead, the community and market benchmark could be weighted to reflect relative difficulty, giving the more difficult benchmark a lower weight. For example, the community benchmark can be weighed at 40% and the market benchmark can be weighed at 60%. However, if a metropolitan area or rural county is deemed affordable by housing affordability indices, the lower benchmark should be discarded for the higher benchmark, which would create a higher threshold.

GRCRC also is concerned that the proposed quantitative approach to the presumptive satisfactory rating of retail lending does not sufficiently consider the quality of the products and if they are in fact meeting the needs of the communities.

One of the areas to include in reviewing the quality of CRA activities is how a bank is serving the needs of LMI individuals with disabilities or the limited English proficient (LEP) and deaf/hard-of-hearing communities. This could include affordable housing that is also accessible; affordable consumer loans for assistive technology or to make home or vehicle modifications; or providing financial education services that are fully accessible, including for those who are LEP or deaf or hard-of-hearing.[18]

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[16] ANPR, p. 66424.

[17] ANPR, p. 66424.

[18] For more on how to reform CRA for LMI people with disabilities, see: https://www.nationaldisabilityinstitute.org/wp-content/uploads/2019/06/cra-closing-the-disability-gap.pdf.

Include credit card lending, auto lending (including indirect auto lending) and other types of consumer lending in the Retail Test.

GRCRC supports the Board's proposal to create a "second prong of the Retail Services Subtest that focuses specifically on the degree to which deposit products are responsive to the needs of LMI consumers."[19] Deposit product data should be relatively easy for banks to provide by assessment area. When banks close or consolidate branches, they move customers housed at that branch to another nearby branch, indicating that banks have information on customers by branch and the deposit products they use. As for benchmarks of how well these deposit products serve LMI consumers, GRCRC suggests that the Fed use organizations like the CFE Fund to create standards like those used for its Bank On certified checking and other transaction accounts.[20] Empire Justice Center used Bank On criteria to assess the quality of checking and checkless debit card accounts of Rochester NY area banks.[21]

Access to responsible consumer credit also needs to be part of CRA evaluations. We appreciate that the Fed notes the importance of responsible consumer lending to LMI consumers and is proposing how consumer lending might be a more regular component of CRA exams. LMI consumers or those with subprime credit currently have inadequate access to responsible consumer loans, including small dollar loans to finance emergency expenses, automobile loans (particularly for rural counties and other parts of the country without regular transit service), credit cards, and student loans.

A lack of regular examination of consumer lending contributes to an over-reliance on high-cost and abusive lending such as payday lending in LMI communities. A 2018 GAO study found that only 25 percent of large bank exams looked at consumer lending while only 3 percent of intermediate small bank and 6 percent of small bank exams evaluated consumer lending.[22]

GRCRC is especially concerned about abusive auto lending. In Rochester NY, working families need cars to get to work. Work schedules are not fixed and change at the last minute. Entry level jobs are in locations that don't have reliable public transportation or affordable housing. For individuals in rural areas, public transit is not even an option.

This makes Upstate New York a haven for subprime indirect auto lenders and unscrupulous "Buy Here Pay Here" dealers who know that most of these individuals would not be able to get an affordable loan from a bank. These car loans have abusive and discriminatory interest rates,

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[19] ANPR, p. 66433.
[20] https://joinbankon.org/
[21] "Too Big to Fail…" op cit #8.
[22] Government Accountability Office, *Community Reinvestment Act: Options for Treasury to Consider to Encourage Services and Small-Dollar Loans When Reviewing Framework*, GAO-18-244: Published: Feb 14, 2018. Publicly Released: Mar 16, 2018, https://www.gao.gov/products/GAO-18-244

with high loan-to-value ratios ranging from 125-175%. Long loan terms mean that the car stops running before the loan is paid. The dealer then refinances the amount of the unpaid loan into a new loan. That leads to higher and higher loan-to-value ratios.

These abusive practices have been documented by two of our coalition members, Legal Assistance of Western New York (LawNY) and a local community development financial institution (CDFI), Genesee Co-op FCU (GCFCU). LawNY represents consumers who are trapped in high cost loans in which the final price of the auto has been inflated by fees and extended warranties often without the knowledge of the consumer. GCFCU works with members, almost all Black and Brown people, to refinance them out of these abusive loans into ones that are affordable and sustainable.

That is why it is important to include as much of this lending as possible in a bank's CRA exam. GRCRC is continuing to urge banks and credit unions to develop responsible consumer loan products, particularly auto loans for subprime borrowers. We want banks to be assessed if they are in fact marketing and originating these loans to LMI borrowers, and if they responsible. CRA examiners should analyze data on fees, costs and default rates to ensure that the consumer lending is responsible and sustainable. The Fed can develop, for each type of consumer loan, criteria and benchmarks as to what makes an affordable, responsible consumer loan product, particularly for LMI or subprime consumers.

A bank's indirect consumer lending activity must also be examined. A bank may not be making consumer loans, but could be partnering with an abusive auto dealer that is making the loans or with payday lender that is "renting" the bank charter in order to exceed state interest rate caps and issue unaffordable loans that trap consumers in a cycle of debt. A bank needs to be examined for the policies and controls it has in place for indirect lending relationships and if the resulting loans are in fact responsible. Any bank not meeting credit needs in a responsible manner must be downgraded on its CRA exam.

Consumer lending should be evaluated routinely on CRA exams if the lending exceeds the thresholds for a major product category on CRA exams. The current treatment of consumer lending as optional on CRA exams unless consumer lending is a substantial majority of a bank's portfolio leaves too much lending unexamined, thereby increasing the chances that such lending is not legitimately meeting the credit needs of LMI consumers in a safe and sound manner. GRCRC believes the threshold for including consumer lending on CRA exams should be based on the number of loans, not dollar volume of lending, as a bank can serve (or harm) a lot of LMI consumers by making a lot of these loans, which don't add up to a large dollar volume of lending. Again, it is critically important that CRA exams carefully assess whether a bank's consumer loans are responsible, affordable, compliant with consumer protection laws, and not unfair or deceptive.

Examine banks at the holding company level and make the inclusion of affiliates mandatory.

Currently, CRA exams are conducted separately for banks that are affiliates and are under control of the same holding company; banks also have the option to either include or exclude affiliate mortgage companies on exams. This creates confusion for the general public, while being prone to abuse. A holding company can shift resources and strategies across banks as their CRA exams come up, thus not adequately serving communities at certain times. Additionally, a bank can include affiliates on evaluations if they are responsibly lending to LMI borrowers and neighborhoods and to exclude them from exams if they are not.[23]

Affiliates' activities are inextricably connected with the goals of the bank and/or holding company. CRA exams need to evaluate the extent to which the entire holding company responds to community needs. An exam at a holding company level may encourage the holding company to strategically plan how their individual banks could better complement each other's efforts and the company's total commitment to community reinvestment. The same reasoning applies in the case of non-bank affiliates that are often retail lender specialists while the bank affiliates can complement their retail lending with strategic community development loans or investments in targeted neighborhoods.

Limited purpose banks that are consumer lenders need to undergo both the community development test and the retail lending test.

GRCRC agrees with the Fed that all limited purpose banks undergo a community development test. However, the current designation of credit card lenders as limited purpose and wholesale lenders not subject to a retail lending test is an abrogation of the responsibility of federal bank agencies to assess whether credit needs are being met in a safe and sound manner. Any limited purpose bank whose purpose is one or more type of retail lending should also undergo a retail lending test in addition to the community development test. If not done already, these institutions also need to undergo a fair lending test, the results of which should affect its CRA score.

[23] See NCRC comments at https://ncrc.org/ncrc-comments-regarding-advance-notice-of-proposed-rulemaking-docket-id-occ-2018-0008-reforming-the-community-reinvestment-act-regulatory-framework/ for an example of optional inclusion and the abusive practices of Suntrust Mortgage Company, which Suntrust Bank excluded from its CRA exam of 2013, under heading, *The U.S. Treasury On The Right Track: Automatic Inclusion Of Affiliates On CRA Exams*.

Assessment areas must emphasize local communities, particularly LMI and BIPOC communities, and support and reflect a commitment to local lending, investments and services

As we modernize the regulations to bring them up-to-date with the transformations and technological changes in the financial services sector, the regulations need to continue to focus on local communities and LMI communities, and to take into account BIPOC communities.

We generally support the Fed's proposals to expand assessment areas on CRA exams. In addition to areas around branches, assessment areas must also include areas outside of branches with significant amounts of bank lending or deposit-taking. We appreciate that regulators already review assessment areas for any attempts at carving out LMI and BIPOC neighborhoods, and work with banks to correct this. We ask the Fed to require full political subdivision assessment areas for small banks, unless the bank can prove it does very little business in the census tracts it wants to exclude, the tracts are not adjacent to the branch or deposit-taking ATM, and the tracts are not low-income or majority nonwhite census tracts. We support the full county assessment areas for large banks.

Bank assessment areas should be made public, and easily accessible by the public, at the beginning of exam cycles, and should include a map of the assessment area with the bank's branches/offices and deposit-taking ATMs, as well as a list of the census tracts included.

GRCRC does not support the idea of national assessment areas for internet banks. This would allow internet banks to cherry pick those areas in which it is easiest to conduct CRA activities rather than areas most in need of credit and capital. Local assessment areas and evaluations are more in line with CRA's statutory purpose to serve local communities and more accurately measure banks' responsiveness to local needs. We suggest that the Fed take an approach similar to that of the NCRC and use data analysis to find state or local areas that are not served by traditional banks or lenders but that are served by the internet bank and designate those as internet bank assessment areas. This should help increase access to credit and investments in rural areas and states, as well as Native American reservations.

We applaud the Fed proposal to eliminate distinctions between full-scope and limited-scope assessment areas. Full-scope assessment areas, which are usually the largest cities, count more on current CRA exams than limited-scope areas that generally are smaller cities and rural counties. Often, communities of color, Native American reservations and other underserved communities continue to receive less CRA-related loans and investments because they are in limited-scope areas.

Conclusion

Now is the time to use our legal and regulatory tools to create deep change in our nation's institutions to address ongoing inequities. We appreciate the direction the Fed has embarked in its ANPR, particularly around the original intent of the CRA in addressing the vestiges of redlining and credit deserts. This proposal serves as an important starting point for an interagency rulemaking to strengthen the CRA and take a critical step toward banks that contribute to more resilient communities and an equitable recovery. At the same time, we ask the Fed to consider these comments to strengthen its proposal, increase transparency and assure bank accountability to the local communities in which they do business.

GRCRC supports the analysis and recommendations in the detailed letter of the National Community Reinvestment Coalition dated February 16, 2021. Please consider the NCRC comments part of this letter.

Thank you for your thoughtful consideration of these comments.

Sincerely,

Ruhi Maker

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