

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

Description:

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Comment ID: 137990

From: Chicanos Por La Causa, Inc., Lydia Guzman

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

Subject: R-1723 Community Reinvestment Act

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Comments:

Date: Feb 16, 2021

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

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Your comment: Re: Docket Number R-1723 and RIN Number 7100-AF94

To whom it may concern:

Chicanos Por La Causa, Inc. offers a wide range of behavioral health services through three programs: Centro De La Familia, housed at our Maryvale Community Service Center; Centro Esperanza in Mesa; and Friendship, located at our headquarters in Phoenix. We provide counseling services, substance abuse, HIV services, domestic violence shelters and support programs, parenting programs and early childhood development programs among others.

The Community Reinvestment Act has strengthened investing in community health by financing mental health clinics that serve lower-income adults and children in underserved communities of color and tribal lands. Continued support of the CRA will ensure that the social determinates of health in these communities are addressed.

CRA's investment in community wellness is especially important during this pandemic as the need to reach, educate and treat communities of color is critical because data shows that these communities are contracting the COVID-19 virus at a higher rate because many of essential workers, yet they are getting tested less and getting vaccinated at a much lower level.

The Federal Reserve Board must strengthen the rigor of CRA exams to ensure that financial institutions give back to the communities they serve by providing banks the opportunity to support, hospitals, and community development practitioners to work in tandem to tackle health and wealth inequities to address these social determinates of health. This is especially important during the pandemic as smaller medical providers seek funding to provide services to marginalized communities, many of which struggle to access medical care because they may be uninsured or underinsured. Chicanos Por La Causa also provides Housing Counseling to individuals seeking to purchase a home. Most are first time homebuyers, some come from a family who may have never owned a home. Through our programs, individuals receive financial literacy education, and they are given all the tools needed to be a successful homeowner. The CRA's requirements on financial institutions have ensured that individuals have opportunities to purchase homes in the communities they desire, many of

which are communities they've grown up in, that in the past were victims of redlining.

Thanks to the CRA, these communities have flourished with a rise in home ownership, in turn creating a strong foundation of a community vested in their own economic empowerment.

In conclusion, we respectfully submit that the CRA rules needs to be modernized, and not relaxed. We want new language explicitly stating the law's obligation to fairly serve all races and ethnicities. It's important to the development of our communities.

Sincerely,

Lydia Guzman, Director of Advocacy & Civic Engagement,  
Chicanos Por La Causa, Inc.

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