

From: [Bruce Luecke](#)
To: regs.comments@federalreserve.gov
Subject: Docket Number R-1723 and RIN Number 7100-AF94
Date: Wednesday, February 10, 2021 5:36:04 PM
Attachments: [image002.png](#)

NONCONFIDENTIAL // EXTERNAL

Docket Number R-1723 and RIN Number 7100-AF94.

To Whom it May Concern,

Homeport welcomes the opportunity to comment on the Federal Reserve Board's Notice of Proposed Rulemaking (NPRM) regarding the Community Reinvestment Act (CRA), a law which we believe is critical to the continued success of housing development and counselling agencies such as Homeport to pursue its work. While the needs of serving the low to moderate (LMI) income population have always been important, both from a social services and economic development perspective, the need has been further magnified during the current COVID-19 pandemic.

Homeport is 501(c)(3) nonprofit and NeighborWorks America affiliate organization based in Columbus, Ohio that provides housing opportunities and related services to low-to-moderate income individuals and families in the Central Ohio region. Homeport's mission is to create strong communities by developing quality, affordable homes on a cornerstone of dignity, security and opportunity. Since its inception Homeport has participated in the development, sale or preservation of more than 4,000 units of housing in Central Ohio. Over the last five years, Homeport has developed over 1,000 rental homes, repaired 148, helped 939 families buy a home, helped keep 325 families in their homes and provided financial counselling and education to almost 9,300 individuals. During this same time, the total amount invested in these activities was just short of \$213,230,868.

While we acknowledge that the modernization of the financial industry does necessitate adjustments to the current CRA regulations, the intent of the regulation is as critical today as ever before. The Fed has described approaches in its Advance Notice of Proposed Rulemaking (ANPR) on CRA that will make CRA exams more objective. If the purpose of the objectivity is to more clearly support the intent of the original Act, then we concur. However, clarity should not be confused with ease. If the hurdle to pass a CRA exam is lowered, we are concerned that banks will not engage in serious efforts to help communities of color and low- and moderate-income (LMI) neighborhoods. To facilitate reaching underserved areas most in need, we strongly support the Fed's proposals to improve data collection including community development financing data.

We agree with the Fed's position that there should be separate tests for retail lending and community development including subtests that rely upon both qualitative and quantitative – including dollar volume and transactions - metrics that are benchmarked against indicators of the community, economy and marketplace. We concur that impact scores should be assigned to each activity rather than the use of a multiplier.

Since digital delivery of banking services was not imagined in the original Act, we support the Fed's proposals to expand assessment areas, which are geographical areas on CRA exams. In addition to

areas around branches, deposit-taking ATMs and loan production offices, assessment areas should also be expanded to include areas where the financial institution has significant lending or deposit taking penetration. We also agree that banks should not have a choice of which assessment areas to serve.

We do not agree with expanding financial education to any income but would support extending it to sub-groups based upon specific need. Finally, in order to meet the broader needs of LMI residents, the Fed should further develop procedures for awarding CRA credit for financing affordable housing that is also unsubsidized.

We appreciate the direction the Fed has taken with its ANPR to acknowledge the changes in the economic landscape since the Act was first enacted and encourage it to remain consistent with the original intent of the Act.

Sincerely,
Bruce Luecke

Bruce Luecke
President & CEO



Direct 614.545.4887
Mobile 614.580.5704

homeportohio.org | bruce.luecke@homeportohio.org

3443 Agler Road | Columbus, Ohio | 43219 | [MAP IT >](#)



Confidentiality Notice: This e-mail message is intended only for the person or entity to which it is addressed and may contain confidential and/or privileged material. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply e-mail and destroy all copies of the original message.