

Docket Number R-1723 and RIN Number 7100-AF94

February 12, 2021

To Whom It May Concern:

Trellis believes it is crucial to strengthen CRA rules in order to address the financial needs of communities all over Arizona and especially in rural communities.

Trellis is an Arizona, non-profit 501(c) (3) organization that has been serving the community since 1975 providing housing counseling and education, building affordable housing for-sale, and as a Community Development Financial Institution (CDFI) providing mortgage lending to increase homeownership opportunities among low-moderate income individuals and families. Trellis' mission is to make stable homes and communities possible by educating, building and lending. Trellis has helped hard-working families realize the dream of financially-stable homeownership for 45 years. Building wealth through homeownership is at the heart of the mission.

Between 1975 and 2020, Trellis has helped over 3,800 families purchase their first home, built or rehabilitated 316 homes and trained or counseled over 46,000 families/individuals in financial management primarily to buy a home. Trellis has originated and/or facilitated more than 2,100 mortgage loans totaling an estimated \$172 million. And, during the Great Recession, Trellis helped more than 4,800 struggling homeowners save their homes from foreclosure.

Without CRA, much of the work and positive impact in our communities would've not been possible. Trellis has benefitted from philanthropic support to help fund housing counseling, education and financial coaching. Further support has been received to offset the costs of construction for affordable housing developments, to help fund innovative technology in building products, just to name a few.

As a CDFI, Trellis has benefitted from investments to fund a revolving loan pool that provides first and second mortgages and down-payment assistance. Without CRA, these investments types would not happen.

The Fed should retain the state level and on subtests. Reducing the number of ratings would not be good because it would reduce the number of distinctions in performance. We need ways that will encourage banks to be more responsive to the financial needs of the community and flexible during times like a pandemic.

Financial institutions should receive CRA credit for partnerships with legitimate, community nonprofit organizations, like HUD approved, CDFI's, chartered with national groups like NeighborWorks America. CRA will play an important part for the COVID19 recovery especially equitable recovery among people of color and communities of color. It is important that CRA track data by gender, race/ethnicity and disability to address the inequities among these underserved groups.

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At Trellis we embrace technology and have shifted service delivery during the pandemic, but we also recognize that not everyone has access to technology or the knowledge to navigate it. We urge that financial institutions do more to help meet the needs of those who don't have digital access to enjoy online banking. Cyber security continues to be of concern and populations like communities of color are vulnerable and prime for attack.

Finally, we urge that all the regulatory agencies agree on one set of regulations. Thank you for the opportunity to provide comments. Please strengthen CRA to benefit low-moderate income communities.

Respectfully,

Patricia Garcia Duarte  
President & CEO  
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cc: Senator Krysten Sinema  
Senator Mark Kelly  
Congressman Ruben Gallego  
Congressman Gregg Stanton