

Community Reinvestment Act

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Federal Reserve 12 CFR Part 228 | Reg. BB | Docket No. R-1769 | RIN 7100-AG 29
FDIC 12 CFR Part 345 | RIN 3064-AF 81

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RE: CRA NPR Public Comment

Thank you for your community development leadership and efforts to strengthen and modernize the Community Reinvestment Act (“CRA”) regulatory framework and for the opportunity to comment on the CRA Notice of Proposed Rulemaking.

The U.S. Economic and Workforce Leadership Coalition (“U.S. Coalition”) represents the interests of the nation’s nearly 100 million low-and-moderate-income (“LMI”) consumers in every state in America. U.S. Coalition LMI Upward Mobility stakeholders include the faith-based community with brick-and-mortar in-person service-based facilities in every LMI community in America.

Today’s economy and job market conditions, including the growing numbers of job vacancies and aged U.S. workforce population that continues to retire, for the first time in America represent a unique opportunity to drive low-and-moderate-income (“LMI”) Upward Mobility for millions of LMI consumers. This is accomplished via LMI workforce leadership and development leading to essential life skills training, placement, and retention in higher paying careers. Vital to successful LMI Upward Mobility are low-income workforce access to the loan products referred to below.

In short, we ask that you ensure that the modernized CRA regulations provide credit to community investor and community development debt provider banks that invest in OCC-approved equity fund vehicles as if the banks themselves were directly making the LMI workforce, auto, home, microenterprise, and affordable housing loans to the LMI consumers benefiting from said LMI loans made via OCC-approved equity fund structures and or OCC-chartered community development bank vehicles. Such vehicles can drive greater level of LMI efficiency thereby dramatically increasing LMI market loan penetration while reducing LMI loan losses and thus strengthening the LMI bank investments and LMI-qualified bank debt to said vehicles. Such vehicles are best LMI-partnered and better positioned to drive, maintain, and service said LMI loan activity more efficiently. We also recommend a special favorable distinction under CRA for the above-mentioned LMI loan assets so that bank capitalization requirements as now promulgated by the Federal Reserve under Basel do not prove to disincentivize banks from purchasing and keeping until maturity said LMI loans in their loan portfolios.

We welcome the opportunity to further discuss the dramatic community development based LMI Upward Mobility implications of the above in LMI communities nationwide while you assess the public commentary received from LMI stakeholders by the regulating agencies.

Yours truly in LMI Upward Mobility success,

United States Economic and Workforce Leadership Coalition
C/O: HCCW Economic and Workforce Leadership Center of Excellence
1021 W. National Avenue
Milwaukee WI 53204

Direct: w/ Text and Voice Messaging

JF/jv