Submission Information

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Via electronic submission

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Attn: Chief Counsel's Office

Travis Hill, Chairman
Federal Deposit Insurance Corporation (FDIC)
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[Via email to Comments@fdic.gov]

Re: Comment on Proposed Community Reinvestment Act Regulations [OCC Docket ID OCC-2026-0694; RIN 1557-AF57] [FDIC RIN 3064-AG31]

Introduction and ANHD Context

The Association for Neighborhood and Housing Development (ANHD), alongside its member organizations listed below, submits this comment in opposition to the Notice of Proposed Rulemaking referenced above (CRA NPRM) issued by the Office of the Comptroller of Currency (OCC) and the Federal Deposit Insurance Corporation (FDIC)[1] as it aims to weaken the Community Reinvestment Act (CRA) significantly. In addition, given the complexity of the rule and scope of the changes, we also request that the OCC and FDIC, before making any proposed changes, carefully analyze the likely consequences for low- and moderate-income communities, provide an opportunity to comment on the analysis and evidence the agencies identify supporting any changes, and extend the current comment deadline by 60 days.

ANHD is a nonprofit membership-based organization made up of over 86+ community-based organizations across New York City. Our mission is to build community power to secure affordable housing and create thriving, equitable neighborhoods for all New Yorkers. We also convene the Equitable Reinvestment Committee (ERC), a member-led body that holds financial institutions accountable for economic, geographic, and racial inequities. Through years of responsible banking efforts, ANHD has seen firsthand how the CRA remains essential to ensuring financial institutions serve all communities, particularly those historically excluded from access to banking and credit.

[1] Community Reinvestment Regulations, 91 Fed. Reg. 52121 (proposed Aug. 12, 2026).

Since 2010, banks have lent nearly $5 trillion in CRA-qualified mortgages and small business loans nationwide, including an estimated $368 billion in the New York City Metropolitan Statistical Area (MSA) alone.[2] These investments have financed affordable housing, small businesses, and community infrastructure, creating jobs and projects that strengthen local economies and ensure economic prosperity for all New Yorkers. Research from the Federal Reserve Bank of Philadelphia found that when census tracts lose CRA eligibility, home purchase lending drops by 10%[3], and small-business lending declines by nearly 10% in urban areas.[4] This shows CRA's impact and how crucial it has been in creating both pathways to access credit and wealth building.

New York City illustrates why strong CRA implementation remains necessary. NYC is home to some of the nation's largest financial institutions and financial markets, yet access to affordable credit, banking services, homeownership, small-business financing, and community development capital remains a challenge in our city. The proposed rule would substantially reduce or narrow CRA scrutiny for banks and would change how regulators evaluate community development, bank services, and support for nonprofit organizations. Our biggest concern is that these changes are being considered without an adequate analysis of their likely effects on low- and moderate-income communities and on communities that have experienced historic discrimination, disinvestment, and redlining. For ANHD and our members, the CRA is an important law for ensuring that financial institutions remain accountable to, and reinvest in, the communities in which they operate.

I. Reduction in Community Investment Expectations for All Banks

The proposed CRA rule aims to upend banks' incentives to invest in communities. For example, it suggests that a total of just 0.625% of a bank's Tier 1 capital devoted to either community development loans or investments would be enough to receive a passing CRA rating.[5] However, that percentage is far lower than the percentage the National Community Reinvestment Coalition (NCRC) determined the largest banks currently devote to community investments and loans.

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[2] NCRC. (2025, July 9). Community Reinvestment Act » NCRC. National Community Reinvestment Coalition. https://ncrc.org/communityreinvestmentact/#Lending

[3] Ding, L., & Nakamura, L. (2017). "Don't know what you got till it's gone"—The effects of the Community Reinvestment Act (CRA) on mortgage lending in the Philadelphia market. In Working Paper. https://doi.org/10.21799/frbp.wp.2017.15

[4] Ding, L., Lee, H., & Bostic, R. W. (2018). Effects of the Community Reinvestment Act (CRA) on small business lending. In Working Paper. https://doi.org/10.21799/frbp.wp.2018.27

[5] The agencies have proposed that banks receive CRA credit previously backed well below for outside their assessment areas if the banks surpass a benchmark of 0.625% of its tier 1 capital for community development loans and likewise 0.625% for investments. 91 Fed. Reg. 52121, 52140 (proposed Aug. 12, 2026). We are concerned that the practical effect of this proposal is that the benchmark will serve not as a floor, but a ceiling.

NCRC, of which ANHD is a member organization, analyzed the most recent CRA performance evaluations of all sixty-nine of the OCC and FDIC-supervised banks in the top 100 banks by assets. The findings show that banks currently conduct approximately $102 billion annually in community development loans and investments inside their assessment areas and that the median percentage of annual community development lending in assessment areas was 6.8% of Tier 1 capital and a median of 3.6% of Tier 1 capital for annual CRA-qualified investments.[6] **If each bank were beholden to the proposed threshold of 0.625% of Tier 1 capital for community development lending and investments, combined activity would fall to approximately $14.9 billion annually: a decrease of approximately $87.1 billion, or 85%.** Similarly, the proposal encourages banks to use strategic plans to make their CRA compliance easier and more predictable. In other words, facilitating and encouraging banks to go through strategic plans would allow them to dictate metrics that serve them, not the communities they are in. This is backed by previously proposed guidance that set strategic plan benchmarks for CRA performance well below historical levels of community development activity.[7]

The CRA helps support the ecosystem of lending, investment, banking services, nonprofit partnerships, affordable housing, small-business financing, and community development activity that New York City neighborhoods rely on. ANHD's experience shows that bank partnerships can translate into tangible resources for New Yorkers and our members.

The CRA has long served as a cornerstone for fostering public-private partnerships, encouraging financial institutions to invest and lend in low- and moderate-income neighborhoods. At ANHD, we've seen the impact of these partnerships firsthand. In collaboration with Flagstar Bank, we launched the New York Community Cares (NYCC) Grant Program, a five-year, $1.25 million initiative supporting community-based organizations across New York City. Through NYCC, our member organizations receive funding to help tenants access housing-related services and vital financial resources that strengthen neighborhood stability and economic opportunity. The CRA, passed alongside other landmark civil rights laws in response to systemic redlining and discrimination, remains a cornerstone of our work and a key source of financial capital from banks for low-income communities. The proposed rulemaking would be undoing decades of progress and simultaneously exacerbate harm in already disadvantaged communities.

II. Raising Asset Thresholds Would Reduce Meaningful CRA Scrutiny

[6] NCRC, *CRA's New Benchmark Could Put 84% of Current Community Development Activity at Risk*, (Sept. 10, 2026), https://ncrc.org/cras-new-benchmark-could-put-85percent-of-current-community-development-activity-at-risk/.
[7] NCRC, *The Proposed CRA Rule's Strategic Plans: A More Predictable Path to Doing Less (Sept 1, 2026),* https://ncrc.org/the-proposed-cra-rules-strategic-plans-a-more-predictable-path-to-doing-less/.

ANHD and its members are concerned that substantially raising the asset thresholds used to determine how banks are evaluated could reduce the depth of CRA scrutiny applied to financial institutions in New York City. The relevant question is not simply how many banks would be reclassified nationwide. Regulators should examine where those institutions operate, which communities they serve, and which lending, investment, service, and community development activities would consequently receive less scrutiny. For context, the rulemaking proposal would substantially raise the asset thresholds that determine how regulators evaluate banks under CRA. Banks with assets below $1 billion would be treated as small banks, while banks with assets between $1 billion and $10 billion would generally be evaluated under the less demanding intermediate-bank framework rather than the more comprehensive tests applied to large banks.[8] The proposal would also eliminate several CRA data collection and reporting requirements currently applicable to large banks for institutions with $10 billion or less in assets, including reporting on small-business and community development lending.[9]

Nationwide, approximately 800 banks would no longer receive a community development evaluation because the proposal would raise the small-bank threshold from $412 million to $1 billion.[10] The 417 banks newly classified as intermediate rather than large banks would no longer be examined under separate CRA investment and service tests. Instead, their community development loans, investments, and services would be evaluated under a combined community development test. These reclassifications, and the resulting reduction in community development scrutiny, could have significant consequences for affordable housing and community development, including a reduction in incentives for banks to invest in Low-Income Housing Tax Credits (LIHTC).

For New York City specifically, these changes could further exacerbate our housing and affordability crisis by creating fewer incentives for financial institutions to meaningfully invest in the communities they serve. The potential impact across New York is significant. According to NCRC's state-level analysis of the proposed CRA changes:

- **21.7% of banks would lose their community development obligation;**
- **40.4% of banks would lose their large-bank status.**

These figures demonstrate the potential scale of reduced CRA scrutiny and transparency across New York. For New York City, where financial institutions play a critical role in financing affordable housing, supporting community-based organizations, providing small-business credit, and investing in low- and moderate-income neighborhoods, the consequences could be significant. At a time when New Yorkers continue to face a severe housing and affordability crisis, federal regulators should be strengthening incentives for meaningful community reinvestment, not reducing the level of accountability applied to financial institutions.

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[8] *Community Reinvestment Act Regulations*, 91 Fed. Reg. 52,114, 52,120–23 (proposed Aug. 12, 2026).
[9] *Id.* at 52,120.
[10] NCRC, *The Proposed 2026 CRA Rollbacks: Key Takeaways and Why it Matters* (Aug. 3, 2026), https://ncrc.org/2026-cra-rollbacks/.

The existence of New York State's own Community Reinvestment Act further highlights the importance of maintaining strong reinvestment laws. New York has continued to recognize the role that financial institutions play in meeting local credit and community development needs. Strong state oversight, however, should complement rather than fill in for federal CRA obligations. Weakening the federal framework could leave fewer institutions subject to robust community development scrutiny and ultimately reduce the tools available to communities to hold financial institutions accountable.

III. Branches, Deposit Services, and Banking Access Remain Essential in New York City

Access to physical bank branches and affordable banking services remains essential to meeting the credit and financial service needs of low- and moderate-income communities. While banking has increasingly shifted toward digital services, brick-and-mortar branches continue to serve an important role for small businesses, seniors, and households that may face barriers to accessing digital banking services. The proposed changes to CRA service evaluations risk reducing scrutiny of branch access and deposit services at a time when significant disparities in access to mainstream banking continue to exist in New York City.

ANHD's analysis of the Federal Deposit Insurance Corporation (FDIC) found that the summary of deposit data shows that New York City's branch network has continued to contract. Across the five boroughs, the number of FDIC-reported banking offices declined from 1,478 in June 2023 to 1,393 in June 2026, a net decline of 85 locations, or approximately 5.8 percent. Looking specifically at full-service brick-and-mortar locations, the number declined from 1,440 to 1,359 over the same period, a decline of approximately 5.6 percent.[11]

At the same time, disparities in access to mainstream banking remain. Recent research from the New York City Department of Consumer and Worker Protection found that approximately 238,900 New York City households, or 7.0 percent, were unbanked in 2023, compared with 4.2 percent nationally. The disparity is particularly significant in the Bronx, where 13.5 percent of households were unbanked, more than three times the national rate.[12] These figures demonstrate that the number of branches alone does not fully capture whether communities have meaningful access to safe, affordable, and accessible banking services.

Research from the Federal Reserve Bank of New York further demonstrates why branch access matters. New York Fed researchers highlighted evidence that following merger-related branch

[11] Association for Neighborhood & Housing Development analysis of Federal Deposit Insurance Corporation, *Summary of Deposits*, branch-level data as of June 30, 2023, June 30, 2024, June 30, 2025, and June 30, 2026. Analysis limited to FDIC-reported offices in Bronx, Kings, New York, Queens, and Richmond Counties. Calculations by ANHD.
[12] New York City Department of Consumer and Worker Protection, *DCWP Releases Updated Research Brief: 238,900 Households in NYC Are Unbanked* (Sept. 2025). DCWP research

closures, small-business lending in affected census tracts declined by 13 percent and remained lower for more than eight years.[13] This research underscores the role that physical branches and local banking relationships can play in maintaining access to credit.

Against this backdrop, reducing CRA scrutiny of branches and deposit services further exacerbates access disparities, especially for low- and moderate-income communities in NYC. NCRC's state-level analysis estimates that under the proposed CRA changes:

- **17.7 percent of bank branches in low- and moderate-income census tracts would be jeopardized; and**
- **14.4 percent of branches in communities of color, or 152 of 1,057 branches, would be jeopardized**.[14]

These statewide figures are particularly concerning when considered alongside existing banking-access disparities in New York City. NCRC's analysis reflects branches that would be affected by the proposed reduction in large-bank CRA status, rather than a projection that these branches would necessarily close. The concern is that branches serving low- and moderate-income communities and communities of color could lose the level of CRA service scrutiny currently associated with large-bank examinations.

CRA examinations should continue to meaningfully evaluate branch distribution, branch openings and closures, affordable deposit products, and the accessibility and responsiveness of banking services to low- and moderate-income communities. Digital banking can and has expanded access, but it should supplement rather than replace banks' responsibility to maintain meaningful and accessible banking services in the communities it serves.

IV. Community Development Rules Should Not Undermine Support for Local Organizations

ANHD is concerned that the proposal's treatment of community development grants could discourage banks from supporting smaller community-based organizations that play an essential role in meeting the needs of low- and moderate-income communities.

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[13] Donald P. Morgan, Maxim L. Pinkovskiy & Bryan Yang, *Banking Deserts, Branch Closings, and Soft Information*, Federal Reserve Bank of New York, Liberty Street Economics (Mar. 7, 2016). The authors discuss research finding that merger-related branch closings were followed by a 13 percent decline in small-business lending in affected census tracts and that the decline persisted for more than eight years. New York Fed research

[14] National Community Reinvestment Coalition, *CRA 2026 Comment Resources and State-Level Impact Analysis*, New York interactive state analysis (2026). NCRC characterizes the affected branches as "jeopardized" under the proposed CRA changes. NCRC CRA interactive map

Under the proposal, a grant or donation would receive CRA consideration only if it is directly used for a program, project, or initiative with a primary purpose of community development and meets applicable geographic requirements. **For large banks, the proposal would also require that a recipient's indirect costs for administering the grant or donation not exceed 15 percent**. The agencies state that this requirement is intended to ensure that grant dollars directly support community development activities rather than organizational overhead.

Our experience demonstrates why this distinction is not so simple in practice. ANHD receives direct financial support from financial institutions, including general operating grants, that help sustain our work across housing, small business, responsible banking, research and data, education, technical assistance, etc. This flexible support helps maintain the staff, systems, and organizational capacity necessary to carry out community development work.

We see this dynamic from the grantmaking side as well. ANHD administered and distributed funding through the New York Community Cares Fund (NYCC), which grew out of commitments associated with New York Community Bank's acquisition of Flagstar Bank. Through NYCC, ANHD typically distributes grants of approximately $12,500 to 10 to 15 ANHD member organizations each year. The flexibility of these grants allows organizations to support staffing, outreach, research, technical assistance, housing work, and general operating needs while filling financial gaps that more restricted funding won't cover.

Recent NYCC grantees demonstrate the impact of these relatively modest financial resources. Chhaya Community Development Corporation used NYCC support in connection with tenant outreach and education that reached more than 150 tenants, including approximately 60 Mandarin-speaking tenants, while providing interpretation to expand participation. Another member organization, Fifth Avenue Committee, used its support for eviction-prevention counseling and tenant outreach, including work that helped tenants secure stable leases and needed repairs. Asian American for Equality (AAFE) reported that NYCC funding helped support a housing team that provided 300 one-on-one housing counseling services alongside tenant education and multilingual housing assistance.

These experiences inform our concern with a 15 percent indirect-cost threshold. Smaller community-based organizations often operate with limited financial and administrative capacity. Staff time, rent, technology, accounting, compliance, and other operating expenses are part of the infrastructure needed to deliver housing counseling, tenant education, small-business assistance, financial education, and other community development services. **A rigid threshold could make smaller organizations more difficult for banks to support under CRA** and encourage funding decisions based on which organizations are at a threshold that would grant them CRA credit rather than which are best positioned with established rapport across NYC neighborhoods.

ANHD and its members urge the agencies to reconsider the proposed 15 percent indirect-cost requirement and avoid grant eligibility standards that could discourage flexible support for smaller community-based organizations. At minimum, the agencies should evaluate how the requirement would affect organizations of different sizes and administrative capacities and whether it could redirect funding away from organizations serving low- and moderate-income communities. **CRA should encourage banks to support organizations that are best positioned to meet community needs, not simply those that are easiest for banks to document.**

V. CRA Credit Should Demonstrate Meaningful Benefit to LMI Communities; Eliminating "Purpose Test" Does the Opposite

ANHD and its members have consistently emphasized that the **CRA should evaluate impact, not simply activity**. Financing should have a meaningful connection to the people and communities CRA is intended to serve. Broadening CRA credit eligibility for economic development or infrastructure projects without sufficient attention to potential ripple effects on low- and moderate-income communities creates space to distance and eliminate financial capital where our city needs it most.

A project's location in or proximity to an LMI neighborhood should not be the sole criterion in determining meaningful community benefit. Regulators should maintain standards that require banks to show how their activity and lending respond to community needs and create tangible economic benefits for low- and moderate-income communities.

Under current CRA guidance, financing a qualifying small business does not automatically constitute economic development. The activity must also satisfy a requirement known as the "purpose test," meaning it must promote economic development by supporting permanent job creation, retention, or improvement for low- or moderate-income people or in low- or moderate-income communities.

The proposed rule aims to eliminate the "purpose test," and thus under the proposal, banks could earn CRA credit for business financing without showing it creates, preserves, or improves jobs for low- and moderate-income communities. Instead, financing could qualify as economic development based primarily on the type and size of the business and whether the financing expands, improves, or preserves the business's productive capacity, physical presence, or employment base.

Our members are concerned that this change would weaken the connection between CRA economic-development credit and the people and communities CRA is intended to benefit. Specifically, a loan that helps a qualifying business expand does not necessarily create jobs, increase economic opportunity in an underserved neighborhood, or address the needs of low- and moderate-income communities.

Our CDFI and community-based members demonstrate how targeted capital can translate into measurable community benefit. Renaissance Economic Development Corporation, an ANHD member serving low- and moderate-income communities and under-resourced entrepreneurs, reports providing more than 2,500 small-business loans, deploying nearly $66 million in loan capital into

New York City communities, helping create or retain more than 7,000 New York City jobs, and providing technical assistance to more than 10,000 small-business owners and entrepreneurs.[15] Another ANHD member, the Leviticus Fund, reports making $337 million in loans for housing and community development since 1983, with 75 percent of that lending supporting housing for low-, very low-, or extremely low-income households.[16] These examples demonstrate the importance of maintaining a CRA framework that incentivizes financial institutions to direct capital toward organizations with a demonstrated ability to reach the most underserved.

Under the proposal, the agencies would assume that financing that expands or strengthens a qualifying business will benefit the surrounding community, without requiring the bank to demonstrate that those benefits reach low- and moderate-income workers or neighborhoods. The agencies themselves acknowledge that eliminating the purpose test would expand the universe of activities eligible for CRA credit.

Instead of eliminating the purpose test, the agencies should first analyze what additional activities would qualify under the new definition, where those activities are likely to occur, and whether bank financing could shift away from activities that create or retain jobs for low- and moderate-income people or in low- and moderate-income communities. The agencies should also explain why eliminating the existing connection to these outcomes is consistent with CRA's requirement to assess banks' records of meeting the credit needs of their entire communities, including low- and moderate-income communities.

VI. Proposal Will Narrow the Activities Subject to CRA Examination and Hide Lending Gaps.

Under the current rule, large banks are generally evaluated on their home mortgage and small-business lending. The proposal outlines two options for focusing examinations on products designated as a bank's "major product lines": either evaluating the two largest product lines based on overall lending volume or determining major product lines based on the lending a bank conducts within a particular assessment area. Either approach could allow weak performance in a lower-volume product to escape meaningful scrutiny even when that type of credit is important to the local community.

This is particularly concerning for small-business lending in New York City. Of the city's roughly 220,000 businesses, 98 percent employ fewer than 100 people and 89 percent employ fewer than 20.[17] Yet significant disparities in access to credit remain. As ANHD documented in our analysis of small-business lending, only 32 percent of Black-owned businesses are fully approved for financing

[15] Renaissance Economic Development Corporation, "About Our Mission," accessed September 20, 2026, Renaissance Economic Development Corporation.
[16] Leviticus 25:23 Alternative Fund, *2025 Annual Report* (2025), Leviticus Fund 2025 Annual Report.
[17] Association for Neighborhood & Housing Development, "Better Small Business Lending Requires Better Data: Why Implementing Section 1071 Cannot Wait," Nov. 20, 2025, ANHD

compared with 56 percent of white-owned businesses, while 40 percent of Black-owned businesses are completely denied loans or credit compared with 18 percent of white-owned businesses.[18] Research from Accompany Capital cited by ANHD also found that only 15 percent of women entrepreneurs surveyed received start-up capital, and only half of that funding came from bank loans.[19] These needs do not become less important simply because small-business lending represents a smaller share of a particular bank's business.

Before any narrowing of the activities subject to CRA examination, the agencies should analyze the impact these changes would have on low- and moderate-income people and communities, including whether they could reduce lending that responds to demonstrated community needs. **The agencies should not allow a bank's business model to determine which community credit needs receive CRA scrutiny.** The agencies should also explain why these changes are consistent with CRA's requirement to assess banks' records of meeting the credit needs of their entire communities, including low- and moderate-income neighborhoods.

VII. CRA Reporting Data and Transparency Are Necessary for Community Input and Accountability.

ANHD and our members are concerned that the proposal would significantly reduce the CRA data available to communities, regulators, and researchers. Under the current framework, banks above the applicable threshold annually collect and report data on small-business, small-farm, and community development lending. The proposal would limit these requirements to banks with more than $10 billion in assets, meaning hundreds of banks would no longer be required to report this information.[20] For ANHD and our members, access to reliable lending data is essential to understanding whether financial institutions are meeting local credit and community development needs.

ANHD has long used CRA and other publicly available bank data to inform our community development work, document gaps and impact, and hold institutions accountable. Through our *State of Bank Reinvestment in New York City* research, we have analyzed more than 20 banks operating in New York City across branches and banking products, multifamily and home mortgage lending, community development activity, small-business lending, and CRA-eligible grants.[21] We use this research with our members to identify lending and investment gaps, evaluate bank performance, and

[18] *Id.* (citing National Urban League data regarding disparities in financing approval and denial rates between Black- and white-owned businesses).
[19] *Id.* (citing Tshering Gurung et al., *The Accompany Capital NYC Women Entrepreneurs Surveys* (2023).
[20] Office of the Comptroller of the Currency & Federal Deposit Insurance Corporation, *Community Reinvestment Act Regulations*, proposed rule (2026); Office of the Comptroller of the Currency, "Community Reinvestment Act: Interagency Notice of Proposed Rulemaking," Bulletin 2026-35 (July 31, 2026).
[21] Association for Neighborhood & Housing Development, "State of Bank Reinvestment in NYC Annual Report," accessed Sept. 20, 2026, ANHD State of Bank Reinvestment in NYC.

engage financial institutions around community needs. ANHD has similarly used HMDA data to identify disparities in mortgage access and lending outcomes.[22]

NCRC estimates that **the proposal would eliminate approximately 11 percent of CRA small-business lending data nationwide and 8.2 percent of the data currently available in New York State.**[23] Less data means less ability for ANHD, our members, regulators, and communities to identify lending gaps and hold financial institutions accountable for meeting local credit needs.

Before reducing CRA reporting requirements, the agencies should consider the value this information provides to the communities CRA is intended to serve. **ANHD's experience demonstrates that CRA data is not simply a regulatory reporting requirement; it is a community accountability tool.** The agencies should preserve reporting requirements that allow communities and our members to meaningfully assess whether banks are meeting the credit needs of their entire communities, including low- and moderate-income neighborhoods.

Conclusion

ANHD and our members have long relied on the Community Reinvestment Act as an accountability tool to evaluate whether banks are meeting the credit and community development needs of New York City neighborhoods. Through ANHD's Responsible Banking work, we use lending and branch data, CRA examinations, community input, research, and direct engagement with financial institutions to identify gaps and advance greater investment in low- and moderate-income communities. These tools have supported work ranging from small-business and mortgage lending to affordable housing preservation and partnerships among community organizations, financial institutions, regulators, and public agencies.

The proposal would make significant changes to that framework, yet the agencies have not sufficiently demonstrated what those changes would mean for the communities CRA is intended to serve. Before proposing such changes, the OCC and FDIC should identify which low- and moderate-income communities would receive less CRA scrutiny; quantify the branches, lending, investments, services, and community development activities affected; determine whether those impacts would be concentrated in particular communities; and consider alternatives that reduce regulatory burden without sacrificing meaningful community accountability. The agencies describe reducing regulatory burden as one of the proposal's objectives, but that analysis must also account for

[22] Association for Neighborhood & Housing Development, "Fair Lendng Data at Risk!," Sept. 26, 2019, ANHD Fair Lending Data at Risk.
[23] National Community Reinvestment Coalition, "Community Reinvestment Act," 2026 proposed-rule analysis and interactive map, NCRC CRA analysis.

the consequences of reduced oversight and the history that led to the CRA's enactment in the first place, as we have laid out throughout this comment letter.

Given these concerns, ANHD, alongside its member organizations, urges the OCC and FDIC to rescind the proposal until a more thorough analysis of its community impacts is prepared and made available for public comment. CRA remains an essential tool for ensuring that banks are accountable for meeting the credit needs of their entire communities. The agencies should not advance changes that materially weaken that accountability without demonstrating that they are consistent with CRA's purpose and will not reduce meaningful lending, investments, services, and community development activity in low- and moderate-income communities.

ANHD and member organizations also urge the agencies to extend the comment period by at least 60 days beyond the current October 13, 2026, deadline. The proposal makes substantial changes to bank classifications, community development, branch and service evaluations, nonprofit grants, data reporting, and other core elements of CRA implementation. Community-based organizations and many of our members do not have dedicated staff, yet their experience is essential to understanding how these changes will be detrimental. Additional time would allow organizations to evaluate the proposal, gather examples from the communities they serve, and provide the agencies with a more complete record before any final rule is considered.

Thank you for the opportunity to comment on this important matter. If you have any questions, please contact me at Barika.W@anhd.org or Steven Molina, Equitable Reinvestment Policy Associate, at steven.m@anhd.org

Sincerely,

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