October 13, 2026

The Honorable Jonathan V. Gould
Comptroller of the Currency
Office of the Comptroller of the Currency
400 7th Street, SW
Washington, DC 20219

The Honorable Travis Hill
Chairman
Federal Deposit Insurance Corporation
550 17th Street, NW
Washington, DC 20429

Re: Community Reinvestment Act Regulations; Docket ID OCC-2026-0694; RIN 1557-AF57; RIN 3064-AG31

Dear Comptroller Gould and Chairman Hill:

The undersigned organizations represent communities across the country and the organizations and institutions that serve them. We build and preserve affordable housing, finance small businesses and community facilities, provide critical services, support homeownership and economic opportunity, and invest in communities of all sizes, including rural and Tribal communities. We appreciate the opportunity to comment on the proposed rule.

We write because proposed changes to CRA, taken together, could significantly reduce community development activity and the lending, investment, grants, and other critical resources available for low- and moderate-income communities. Dramatic drops in CRA-motivated community development activity would hurt local economies and businesses, exacerbate the affordable housing shortage, reduce local jobs, and weaken affordability for households, especially in rural communities and smaller markets, at a time when our country is focused on those very priorities.

The scale of CRA's impact is significant. In 2024 alone, CRA incentivized more than $430 billion in loans and investments in low- and moderate-income communities, nearly six times the combined federal budgets of HUD, USDA's Rural Housing Service, the Small Business Administration, and the CDFI Fund.[1]

For nearly 50 years, CRA has helped bring private capital into communities and strengthen partnerships between banks and the organizations that serve them. Through these partnerships, banks have financed affordable housing and homeownership, small businesses, community facilities, health care, childcare, economic development, and other essential community needs. At a time when communities face significant affordable housing shortages, rising costs, and constrained public resources, the CRA framework should continue to support and strengthen these partnerships.

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[1] Center for Affordable Housing Lending, *Incentive to Impact* (July 2026).

We urge you to ensure that the final rule does the following:

I. **Maintain meaningful community development responsibilities for banks of all sizes.** Raising the asset thresholds that determine how banks are evaluated under CRA would significantly reduce the number of institutions subject to community development expectations. For instance, if the "small bank" definition were to be raised to banks with less than $10 billion in assets, more than 1,500 banks, or 36 percent of all banks, would no longer be incentivized to provide community development loans or investments. In 2024, these banks reported nearly $27 billion in community development loans, representing 35 percent of all community development loans made that year.

In many communities, particularly smaller and rural markets, these institutions are important sources of financing and investment. Removing or substantially reducing their community development responsibilities would reduce the focus on community development financing and risks leaving fewer partners available to finance affordable housing, small businesses, community facilities, and other local priorities.

Furthermore, changes to the evaluation framework should incentivize community impact in underserved parts of the country without reducing current levels of investment in other markets. At a time when households are struggling to afford basic necessities, investments that strengthen local economies and expand housing options for families are especially critical.

II. **Preserve strong expectations for community development lending and investment.** Communities need different types of capital to meet different needs. Loans are critical, but they are not interchangeable with investments. Equity investments and other forms of capital support affordable housing through the Low-Income Housing Tax Credit (Housing Credit), economic development through the New Markets Tax Credit (NMTC), CDFIs, and other activities that often cannot be supported through conventional lending alone.

Proposed changes to the evaluation framework, including how community development performance contributes to a bank's overall CRA rating, could reduce the relative importance of community development investments. The final rule should preserve a strong and balanced role for both community development lending and investment and not unintentionally reduce investment in affordable housing and other critical community development activities. For instance, the Housing Credit, which was permanently expanded and strengthened in the *One Big Beautiful Bill Act* has built or preserved 4.13 million affordable homes. However, weakening CRA community development requirements risks undermining the very program Congress just invested in.[2]

[2] The ACTION Campaign, *Low-Income Housing Tax Credit Impact in the United States* (Feb. 2026).

III. **Protect grants and other support for nonprofit and community-based organizations.** Across the country, families, older adults, veterans, and small businesses are served by nonprofit and community-based organizations that rely on grants to operate. CRA-qualifying grants support housing counseling, financial education, small business assistance, food access, health and human services, and other essential activities.

Operating support and capacity building through grants are critical for nonprofit organizations that are a lifeline to hard-to-serve communities and that take on difficult to develop projects. These organizations are also important local employers. Nonprofits employ 12.8 million workers nationwide, accounting for nearly 10 percent of all private-sector jobs.[3] Reducing support for these organizations could affect both the services communities rely on and local jobs.

The proposed approach to evaluating grants, including restrictions on eligible uses and extensive new documentation requirements, would increase compliance burden and could force banks to reduce grant support, particularly to smaller organizations, including those serving rural and other under-resourced communities. CRA should continue to recognize grants and contributions that advance eligible community development purposes and respond to demonstrated community needs without applying new burdensome regulations.

IV. **Keep low- and moderate-income people and communities at the center of CRA as intended by statute.** CRA was enacted to address persistent gaps in access to credit and investment. Low- and moderate-income communities represent a significant share of the country, with more than one in four Americans living in a low- or moderate-income census tract.[4] The need for affordable housing, access to small business financing, and support for other economic and community development remains most acute for low- and moderate-income families and communities. Expanding CRA's focus to increasingly broader populations or a wide array of new activities could unintentionally shift critical private capital away from low- and moderate-income households and leave underserved communities behind.

Taken together, changes to income targeting, community development definitions, evaluation standards, and other provisions could significantly shift where CRA-motivated capital flows and reduce the focus on low- and moderate-income communities, resulting in less affordable housing supply, fewer jobs for low- and moderate-income workers, and reduced access to vital community resources. The final rule should preserve a clear and meaningful focus on the low- and moderate-income households and communities CRA was intended to serve.

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[3] U.S. Bureau of Labor Statistics, "Nonprofits accounted for 12.8 million jobs, 9.9 percent of private-sector employment, in 2022" (Aug. 16, 2024).

[4] Federal Financial Institutions Examination Council, *Findings from Analysis of Nationwide Summary Statistics for 2024 Community Reinvestment Act Data* (2025).

We support efforts to make CRA clearer, more consistent, and workable for institutions of different sizes and business models. **As your agencies pursue these objectives, we urge you to protect the community development outcomes CRA has made possible for nearly 50 years.** The measure for success should ultimately be the impact in communities: whether affordable homes get built and preserved, small businesses can access capital, community facilities get financed, nonprofit organizations have the resources to serve their communities, and low- and moderate-income households and neighborhoods continue to benefit from bank lending and investment.

On behalf of the communities we serve, our organizations urge you to ensure that any changes to the Community Reinvestment Act strengthen, rather than diminish, the partnerships and investment that CRA makes possible across the country.

Sincerely,

National

ACC Capital

Affordable Housing Investors Council

American Council for an Energy-Efficient Economy

American Wood Council

Ann Cone Consulting, LLC

BlueHub Loan Fund

Bon Secours Mercy Health

Bradley Site Design

Brikwell

Broadstreet Impact Services

Buckeye Community Hope Foundation

Capital Impact Partners

Carras Community Investment, Inc.

CDFI Coalition

Center for Community Self-Help

Cinnaire

CohnReznick

Commonwealth Development Corporation

Community Development Bankers Association

Community Health Center Capital Fund

Community Housing Capital

Community Housing Works

Community Preservation Corporation

Community Solutions

Compass Working Capital

Corporation for Supportive Housing

Council of Large Public Housing Authorities

Council of State Community Development Agencies

CREA, LLC

CUBIT Development Group LLC

Dauby O'Connor & Zaleski, LLC

Diamond and Associates

ELOM LLC

Enterprise Community Partners

Evergreen Real Estate Group

Fairview Housing Partners

Friday Eldredge & Clark LLP

Gardner Capital Partners, Inc.

Guaranty Commercial Title, Inc.

Gulf Coast Housing Partnership

Habitat for Humanity International

Healthcare Anchor Network

Homeless at the End

Homes & Hope

Housing Advisory Group

Housing Assistance Council

Housing Partnership Network

IFF

Inclusiv

INVESTMENT BANK EEMBA Bank Company US

JASCO Community Services

Klein Hornig LLP

L4 Advisors, LLC

Lagom

LeadingAge

LEO Impact Capital

Lincoln Avenue Communities

LoanWell, Inc.

Local Enterprise Assistance Fund (LEAF)

Local Initiatives Support Corporation (LISC)

Low Income Investment Fund (LIIF)

Lutheran Services in America

LWO Properties, LLC

Mercy Community Capital

Mercy Housing

Mercy Investment Services

MHP

Midwest Housing Equity Group

Milestone Development LLC

MTW Collaborative

National Affordable Housing Management Association (NAHMA)

National Apartment Association

National Association for Latino Community Asset Builders (NALCAB)

National Association of Affordable Housing Lenders

National Association of Housing and Redevelopment Officials (NAHRO)

National Association of Housing Cooperatives

National Association of Local Housing Finance Agencies

National Association of Realtors

National Association of State & Local Equity Funds

National Center for Healthy Housing

National Church Residences

National Coalition for the Homeless

National Community Stabilization Trust (NCST)

National Council of Nonprofits

National Council of State Housing Agencies

National Housing Conference

National Housing & Rehabilitation Association

National Housing Trust

National Leased Housing Association

National Low Income Housing Coalition

National Multifamily Housing Council

National NeighborWorks Association

National Trust Community Investment Corporation

National Women's Affordable Housing Network

Native CDFI Network

Next Step Network

Novogradac

NYAH Advisors, LLC

OCCH

OCFC

Olea

Oweesta Corporation

Partners for the Common Good

Partners for Rural Transformation

Pluralize Capital

Preservation Management, Inc.

Preservation of Affordable Housing (POAH)

PreservingUS Inc.

Prestigious Planning Services LLC.

Primary Care Development Corporation

Prosperity Now

Public Housing Authorities Directors Association (PHADA)

RDF

Reinvestment Fund

Riverstone Platform Partners

RMCRC

Royal American Management

RubinBrown LLP

SDS Capital Group

SLJ Consulting, LLC

SoHo Housing Partners, LLC

Stewards of Affordable Housing for the Future

SUN Resource Development

Tareen Development Partners

TM Associates Management, Inc

Travois, Inc.

Twain Financial Partners

UnidosUS

The United States Conference of Mayors

Up for Growth Action

Vista Multifamily

The Wishcamper Companies

Alabama
Enterprise Housing Authority

Alaska
Fairbanks Neighborhood Housing Services

Arizona
Athena Studio

Local Initiatives Support Corporation- Arizona

Arkansas
Rockwell Housing Solutions, LLC

California
Affirmed Housing

Big Brothers Big Sisters of Orange County and the Inland Empire

California Association of Housing Authorities

California Association of Nonprofits

California Housing Consortium

Community Economics, Inc. (CEI)

Community Housing Development Corporation

Community Housing Improvement Program (CHIP)

EAH Housing

East LA Community Corporation

Genesis LA

Gubb & Barshay LLP

Housing Authority of the City of Santa Barbara

Housing Authority of the County of San Mateo

Housing Leadership Council of San Mateo County

Housing Trust Silicon Valley

LeadingAge California

LifeSTEPS

LISC Bay Area

LISC San Diego

Main Street Launch

Merritt Community Capital Corporation

Monterey Bay Economic Partnership

Neighborhood Partnership Housing Services

Resources for Community Development

Santa Clara County Housing Authority

SPUR

Townspeople

Working Solutions CDFI

Colorado
Colorado Nonprofit Association

Foothills Regional Housing

Grand Junction Housing Authority

Housing Colorado

Inclusive Community Solutions LLC

Thistle Community Housing

Connecticut
Beulah Land Development Corporation

Building Neighborhoods Together

Chrysalis Center

Habitat for Humanity North Central CT

HOPE Partnership, Inc.

Housing Authority of the City of Bristol

Housing Development Fund, Inc.

LISC Connecticut

Neighborhood Housing Services of New Haven

NEST

New Neighborhoods

NINA

TEAM, Inc

Thames River Community Service

Urban League of Greater Hartford

Delaware
Housing Alliance Delaware

NeighborGood Partners

Florida
Blue Sky Communities

Carteret Management Corp.

Florida Apartment Association

LISC Jacksonville

Rural Neighborhoods

Georgia
Atlanta Neighborhood Development Partnership (ANDP)

CARE Urban Strategies

Flint Area Housing Authority

Ga Affordable Housing Coalition

Georgia Advancing Communities Together, Inc.

Habitat for Humanity Northwest Metro Atlanta

Housing Authority of Macon-Bibb County

Housing Authority of the City of Eastman

Landbridge Development, LLC

Martin Riley Associates

McKenzie Investments, LLC

NeighborWorks Columbus

Hawaii
Hawaii HomeOwnership Center

Mutual Housing Association of Hawaii, Inc.

Idaho
City of Boise

Gem State Housing Alliance (Idaho)

Illinois
Affordable Housing LLC

The Alden Foundation

Ambit Capital Structures LLC

Celadon Partners, LLC

Chicago Community Loan Fund

Chicago Department of Housing

Community Investment Corporation

Community Partners for Affordable Housing

Housing Action Illinois

Illinois Housing Council

Landmarks Illinois

Ricor Development LLC

UNIVERSAL HOUSING SOLUTIONS CDC

Indiana
Bloomington Housing Authority

Champion Contracting

Hamilton County Area Neighborhood Development, Inc.

Merchants Bank of Indiana

Neighborhood Development Associates, LLC

Prosperity Indiana

Rauch, Inc.

Summit Hill CDC

Iowa
Community Housing Initiatives, Inc.

Greater Des Moines Habitat for Humanity

Home Opportunities Made Easy, Inc. (HOME, Inc.)

Kansas
Kansas Housing Association

Kentucky
The Housing Partnership, Inc.

Kentucky Affordable Housing Coalition

Kentucky Housing Corporation

Wabuck Development Company

Louisiana
Grambling Housing Authority

Project Build a Future

Providence Community Housing

Wisznia Company, Inc.

Maine
3Rivers

Auburn Housing Authority

Coastal Enterprises, Inc. (CEI)

Community Housing of Maine

The Genesis Fund

Kaplan Thomson Architects

LRG Realty Management

Maine Affordable Housing Coalition

Mainspring

Midcoast Council of Governments

Penquis

South Portland Housing Authority

Westbrook Development Corporation

Maryland
BridgeWater Real Estate Brokerage

Homes for America

Maryland Affordable Housing Coalition

Massachusetts
Allston Brighton Community Development Corporation

Cambridge Housing Authority

Coalition for a Better Acre

Coalition for an Equitable Economy

Codman Square Neighborhood Development Corporation

Community Action Agency of Somerville, Inc.

Community Economic Development Assistance Corporation (CEDAC)

Community Economic Development Center of SE MA

Doherty Law Firm

Downtown Taunton Foundation

DVM Housing Partners

East Boston Community Development Corporation

Franklin County Community Development Corporation

Gurnet Real Estate Group

Harborlight Homes

Hilltown CDC

Homeowner's Rehab, Inc.

Housing Corporation of Arlington

Housing Partners, Inc.

Just A Start

Lawrence CommunityWorks

LISC Massachusetts

Massachusetts Association of Community Development Corporations

Massachusetts Housing Investment Corp.

Massachusetts Housing Partnership

Mission Hill Neighborhood Housing Services Inc.

MPZ Development LLC

The Neighborhood Developers

New Seasons Development LLC

NewVue Communities

Oxbow Urban LLC

Revitalize Community Development Corporation

Worcester Community Housing Resources, Inc.

Michigan
Community-Up

Grand Rapids Housing Commission

Kalamazoo Community Foundation

LISC

Michigan Community Capital

Minnesota
Landon Group

MetroPlains

Neighborhood Development Alliance, Inc (NeDA)

Southwest Minnesota Housing Partnership

Washington County CDA

Mississippi
One Voice

Missouri
Beyond Housing

KC CDFI Coalition

Montana
CR Builders, LLC

Homeword, Inc.

NeighborWorks Montana

Nebraska
NeighborWorks Lincoln

Norfolk Housing Agency

RMDX Development

Nevada
Habitat for Humanity Las Vegas Inc

Southern Nevada Regional Housing Authority

New Hampshire
Housing Action NH

New Hampshire Center for Nonprofits

New Hampshire Community Loan Fund

New Hampshire Housing Authorities Corporation

New Jersey
Collaborative Support Programs of New Jersey

Coming Home of Middlesex County, Inc.

Elizabeth Coalition to House the Homeless

Family Promise Union County

Homeless Solutions

Housing and Community Development Network of New Jersey

Housing Partnership of New Jersey

Institute for Families

LISC-New Jersey

NJ Coalition to End Homelessness

Supportive Housing Association of New Jersey

York Street Project

New Mexico
La Plaza de Encuentro gathering Place

Meals on Wheels New Mexico

New Mexico Eviction Prevention & Diversion

New Mexico Thrives

YES Housing, Inc.

New York
Cain Properties LLC

CSD Housing, LLC

Delphi Drug & Alcohol Council, Inc. DBA Delphi Rise

New York Housing Conference

Nonprofit New York

RUPCO, Inc

North Carolina
CAHEC

Cape Fear Housing Coalition

Givens Communities

Kehillah Living, LLC

Landmark Asset Services, Inc.

Linden View

Mountain Housing Opportunities, Inc.

North Dakota
Beyond Shelter, Inc.

Great Plains Housing Authority

North Dakota Coalition for Homeless People, Inc.

North Dakota NAHRO Chapter

Ohio
Affordable Housing Alliance of Central Ohio

Affordable Housing Trust for Columbus and Franklin County

Barton Communities

CityWide Development

Clermont Metropolitan Housing Authority

Coalition on Homelessness and Housing In Ohio

Community Housing Network

Dayton Region New Market Fund

First Financial Bank

Greater Cincinnati Foundation

Habitat for Humanity of Greater Cincinnati

LISC Cleveland

LISC Greater Cincinnati

LISC Toledo

Ohio Poverty Law Center

Ohio Women's Affordable Housing Network

Ottawa Residential Services, Inc.

Talbert House

Oklahoma
Community Action Project of Tulsa County

Oregon
Dream Development LLC

Hacienda Community Development Corporation

Housing Oregon

Network for Oregon Affordable Housing (NOAH)

Northwest Coastal Housing

Pennsylvania
Commonwealth Cornerstone Group

Community Growth Fund

HDC MidAtlantic

Kensington Corridor Trust

LISC Philadelphia

Neighborhood Housing Services of Greater Berks, INC

Pennsylvania Developers' Council

Pennsylvania Housing Finance Agency

Rhode Island
Crossroads Rhode Island

Economic Progress Institute

Foster Forward

HousingWorks RI

Jamestown Housing Authority

PCF Development

Rhode Island Coalition Against Domestic Violence

South Carolina
Carolina Housing and Community Development Corporation

Midlands Housing Trust Fund

Rock Hill Housing Authority

South Carolina Community Loan Fund

South Dakota
South Dakota Native Homeownership Coalition

Tennessee
The Branch of Nashville

GENERATION HOUSING, LLC

Holladay Ventures

Milan Housing Authority

Southeast Community Capital Corp. dba Pathway Lending

Texas
Avenue Community Development Corporation

Katopody LLC

LISC Houston

LISC San Antonio Office

Texas Affiliation of Affordable Housing Providers (TAAHP)

WHL Advisory Services

Utah
Amethyst Center for Healing

Big Brothers Big Sisters of Utah

BuildUP

Cancer Wellness House dba Survivor Wellness

CCRED, Inc.

Chamber Orchestra Ogden

Columbus Community Center

Community Foundation of Utah

Community Nursing Services

CSCPA

Family Promise of Ogden

Guadalupe Center

Holy Cross Ministries of Utah

Housing Authority of Salt Lake City

Housing Connect

Imagine Ballet Theatre

The INN Between

InterMountain Business Lending & UMLF

Journey of Hope, Inc.

MOSAIC Inter-Faith Ministries

Mountain West Mothers' Milk Bank

NeighborWorks Mountain Country Home Solutions

NeighborWorks Salt Lake

The Nonprofit Homebuilder

Planned Parenthood Utah

Project Read

Rainbird Village, NSP

Rape Recovery Center

Real Life Program

Salt Lake Donated Dental Services

Scenic Utah

Seekhaven Family Crisis and Resource Center

Sinnegy

SustainEnergyFinance

Utah Foster Care

Utah Housing Coalition

Utah Microloan Fund

Utah Nonprofits Association

Utah Water Ways

Versatile Image

Wasatch Adaptive Sports

Wasatch Advocates for Livable Communities (WALC)

WasteLess Solutions

Wonderbloom

Youthlinc

Vermont
Cathedral Square

Common Good Vermont

Evernorth Rural Ventures

Virginia
Culpepper Garden

ForKids

Freedom First Credit Union

Habitat for Humanity of Washington, D.C. & Northern Virginia

KPT Consulting

LISC VA

Nelson County Community Development Foundation

Northern Virginia Affordable Housing Alliance

Staunton Redevelopment and Housing Authority

VCDC

The Virginia CDFI Coalition

Virginia Housing Alliance

Wesley Housing

Washington
Bellingham & Whatcom County Housing Authorities

King County Housing Authority

LISC Puget Sound

Puget Sound Regional Council

West Virginia
The HomeOwnership Center

Wisconsin
Forward Community Investments

Horizon Development Group, Inc.

Housing Resources, Inc.

Wyoming
Wyoming Housing Network, Inc.

Wyoming Neighbors for Housing