Principles for a Strong Community Reinvestment Act

Please sign this letter on behalf of your organization by October 2, 2026.

COA will formally submit this letter to regulators.

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:

We, the undersigned members and partners of the Community Opportunity Alliance, write regarding the agencies' proposed amendments to the Community Reinvestment Act regulations. Our network includes state and regional housing and community development associations, community-based organizations, and partners working in low- and moderate-income communities across the country. Together, we help residents and local institutions turn capital into affordable homes, thriving small businesses, essential services, and stronger neighborhoods.

Our associations occupy a distinctive place in this system. They connect local organizations to one another and to banks, public agencies, funders, and policymakers; identify needs that may not be visible through lending data alone; build the capacity of organizations to deploy capital; and help effective practices spread across communities. This network-level perspective informs the principles below.

CRA works best when it creates a clear public obligation for banks to understand and meet community credit needs—and when communities have the information and voice necessary to hold institutions accountable. Any revision should strengthen that compact. We urge the agencies to apply the following principles in reconsidering the proposal:

Put community needs and impact first.

The largest factor in CRA consideration should be the extent to which an activity responds to documented needs of LMI people and places and produces meaningful benefits. The rule should not favor particular labels or categories when the benefit to the community is limited or incidental.

Match responsibility to the way banks do business today.

Banks increasingly serve customers and generate substantial lending outside branch-based assessment areas. CRA examinations should follow that activity. Retail lending assessment areas (RLAAs), or a comparable approach, should carry meaningful community development responsibilities, not simply offer additional places where a bank may receive credit.

Address racial inequity directly.

CRA was enacted in response to redlining, yet income-only measures cannot reveal the full pattern of racial disparities in credit access and investment. The agencies should use available race and ethnicity data in performance context, impact analysis, transparency, and coordination with fair lending enforcement.

Preserve community development responsibility across the banking system.

The proposed asset thresholds would turn many banks currently classified as large into intermediate banks and significantly reduce their community development obligations. That would be a step backward. Requirements may be right-sized, but banks with substantial assets and market presence—including intermediate banks—should retain meaningful and distinct community development responsibilities.

Protect flexible grants and the infrastructure behind community impact.

Flexible grants are not ancillary to community development. They make the system work. Banks rely on state and regional associations and other community development networks to understand changing local needs, build relationships with trusted organizations, identify and strengthen potential partners, and inform effective investment strategies. These associations convene practitioners, provide training and technical assistance, coordinate policy and data work, connect smaller and rural organizations to resources, spread promising practices, and create space to test new approaches. In doing so, they make the field more responsive, innovative, and impactful.

Operating support, capacity building, technical assistance, coalition work, and state and regional coordination also make individual projects and transactions possible. CRA should continue to recognize these investments. A rigid 15 percent overhead test and new recipient-level data collection would discourage effective grants—particularly grants that support organizations and systems serving multiple communities — and impose burdens on banks and nonprofits without measuring community benefit.

Maintain transparency, public participation, and strong data.
Communities need accessible data and a meaningful role in identifying needs, evaluating performance, and commenting on bank activities. Reduced reporting and narrower examinations would make lending gaps harder to identify and bank performance harder to assess.

Act through one interagency framework.
The OCC, FDIC, and Federal Reserve should administer consistent CRA standards. Different rules for similarly situated banks would confuse communities, weaken accountability, and create incentives to choose regulators based on the obligations they impose.

We urge the agencies to revise the proposal consistent with these principles and to work with the Federal Reserve toward a unified rule that modernizes CRA while preserving its core purpose: to ensure that federally insured banks help meet the credit needs of their entire communities, including low- and moderate-income neighborhoods. As organizations that connect community priorities, local capacity, and financial institutions, we stand ready to help shape a framework that produces stronger and more equitable community outcomes.

Sincerely,

Organization

Name

Title

City and State