COMMUNITY OPPORTUNITY ALLIANCE
UNTIL ALL THRIVE

Community Opportunity Alliance

Take Action on CRA

Member Advocacy Toolkit

Public comments must be received on or before October 13, 2026.

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▸ CRA Advocacy To-Do List

The Community Opportunity Alliance (COA) asks members to take some or all of the following actions between now and October 13:

- ☑ Sign COA's principles-based comment letter.
- ☑ Complete our member survey with an example, story, or data for COA's technical comment letter.
- ☑ Submit your own organizational comment letter.
- ☑ Participate in a post-Summit comment clinic or office hour.
- ☑ Mobilize community development organizations or other organizations in your state or network.

▸ Key Dates for CRA Advocacy

Scan the QR Code for links to all materials and resources below

- Community Opportunity Alliance Principles-Based Sign-On Letter
  Deadline: October 2

- Member Survey — Share What Is Happening in Your Community
  Deadline: September 4

- CRA Comment Letter Clinics (Members only, mark your calendars. Follow the QR code to register):
  - September 18 | 12–1:00 PM ET
  - October 1 | 12–1:00 PM ET

- Official Federal Register Comment Period
  Deadline: October 13

2026 CRA Proposed Rule: a Preliminary Analysis

Billions at Stake for Community Development Organizations and the Communities They Serve

On July 31, 2026, the Office of the Comptroller of the Currency (OCC) and the Federal Deposit Insurance Corporation (FDIC) released a proposal to revise Community Reinvestment Act (CRA) regulations. The Federal Reserve did not join the proposal. The 60-day comment period began on August 13 when the rule was published in the *Federal Register*. The comment period ends on October 13.

This preliminary analysis focuses primarily on the parts of the proposal most directly tied to the community development field and to banks' community development responsibilities and the community development tests. Changes to the retail test and to how regulators evaluate banks' product lines are important, but they are not our primary area of expertise. We will leave detailed analysis of those provisions to organizations with deeper experience in retail lending and bank product evaluation.

COA's preliminary view: The proposal would narrow bank accountability and weaken the community development infrastructure that helps capital reach low- and moderate-income (LMI) people and places. Modernization should make CRA more responsive to how banks operate today, not reduce responsibility or transparency. Over the next 60 days, we look forward to working with our members to test and refine these conclusions and develop the full Technical Comment Letter that the Community Opportunity Alliance (COA) will submit to regulators.

Six concerns that will guide our analysis:

1. Community needs should drive CRA credit.

The proposal would clarify and expand categories of qualifying activities, but eligibility alone is not enough. The largest factor in CRA consideration should be the extent to which an activity responds to documented LMI community needs and produces meaningful benefits. Banks should earn CRA credit based on a project's demonstrated impact, not simply because it fits a regulator's preferred category, size, or purpose.

2. CRA responsibility must follow modern banking activity.

A framework that focuses on brick and mortar bank branches no longer captures where banks take deposits, make loans, and build market share. Yet the proposal does not meaningfully modernize assessment areas, a significant shortcoming. COA has supported retail lending assessment areas (RLAAs) as one practical way to establish responsibility when a bank has substantial lending activity outside its branch footprint. RLAAs are not the only approach worthy of consideration, however. The final framework should evaluate the available options and ensure that community development responsibility follows a bank's meaningful market activity, wherever that activity occurs.

3. Higher asset thresholds would be a major step backward.

The proposal would classify banks below $1 billion as small and banks from $1 billion to $10 billion as intermediate. Many banks currently treated as large would become intermediate and could lose separate investment and service tests, while hundreds of smaller institutions could lose a distinct community development evaluation. That significant reduction in community development responsibility is a step backward, especially in rural areas, smaller cities, and markets where intermediate banks are leading community development partners.

4. The grant restrictions misunderstand how community development works.

The proposal would limit CRA consideration to grants directly used for a specific plan, project, or initiative and require large banks to document that recipients' overhead does not exceed 15 percent. The proposal also asks whether grant consideration should be eliminated altogether. Flexible grants sustain staff, partnerships, statewide and regional infrastructure, and capacity building. Investing in these systems helps the field evolve, mature, and innovate over time. Grants also support the local and regional organizations that banks rely on to identify community needs, understand the markets where they invest, and build effective community development strategies. The proposed recipient-level data collection would burden banks and nonprofits without demonstrating greater community benefit.

5. CRA cannot address redlining while ignoring race.

Income and race are not interchangeable. A credible CRA framework should use available data to reveal racial disparities in access to mortgage, small-business, consumer, and community development credit; incorporate that information into performance context and impact review; and coordinate CRA with fair lending enforcement.

6. The banking agencies must act together.

The OCC and FDIC proposal would create different standards for similarly situated banks based on charter and regulator. Fragmentation creates confusion for banks and communities, weakens accountability, and invites regulatory arbitrage. The OCC, FDIC, and Federal Reserve should develop a consistent interagency framework.

What the proposal would change:

Issue	From: Current Rule	To: Proposed Rule
Bank size and tests	Banks below $412 million receive the streamlined small-bank lending test. Intermediate small banks, from $412 million to $1.649 billion, receive a lending test and a separate community development test. Banks at or above $1.649 billion receive separate lending, investment, and service tests.	Banks below $1 billion would be small; banks from $1 billion to $10 billion would be intermediate; and only banks above $10 billion would be large. Many banks now evaluated as large would lose separate investment and service tests, and some smaller banks would lose a distinct community development evaluation.
Assessment areas	Assessment areas are generally tied to a bank's main office, branches, deposit-taking ATMs, and the surrounding geographies where it conducts a substantial portion of its business.	The branch-based approach would remain largely intact. The proposal does not create a meaningful way to assign responsibility in markets where banks have substantial activity but no physical branches.
Grants	Qualified investments may include grants and donations that support community development. The rules do not impose a 15 percent recipient-overhead test or require every grant to be tied to one specific plan, project, or initiative.	CRA consideration would be tied to a specific community development plan, project, or initiative. Large banks would have to document that a grant recipient's overhead does not exceed 15 percent. The agencies also seek comment on eliminating grant consideration entirely.

Services	The large-bank service test considers both retail banking services and community development services, including the availability and effectiveness of delivery systems.	The large-bank service test would focus on credit services and exclude deposit services, narrowing the range of services considered.
Data and retail review	Large banks are subject to CRA data collection and reporting requirements, and retail lending performance is evaluated across relevant lending activity.	Banks newly reclassified as intermediate would receive reduced data collection and reporting requirements. Retail review would focus on a bank's "major product lines." COA will rely on organizations with deeper retail expertise for detailed analysis of this change.
Eligible activities	The rules use broad community development definitions, supported by interagency guidance and illustrative examples. Activities are evaluated based on the facts and circumstances.	The rules would codify qualifying and non-qualifying examples and revise definitions covering affordable housing, civic assistance, economic development, and revitalization or stabilization.
Agency coverage	The OCC, FDIC, and Federal Reserve operate under a generally consistent interagency framework.	The changes would apply to OCC- and FDIC-regulated banks without participation by the Federal Reserve, creating different standards based on a bank's charter and regulator.

We believe a strong CRA framework should:

- Preserve meaningful community development obligations for banks of substantial scale, with requirements calibrated, not erased, for intermediate institutions.
- Evaluate banks wherever their lending and business activity creates a meaningful market presence, including through retail lending assessment areas.
- Prioritize demonstrated LMI community need and measurable benefit when determining the value of qualifying activities.
- Use race-conscious data and analysis to expose disparities and strengthen accountability, consistent with fair lending law.
- Recognize flexible grants, operating support, capacity building, and state or regional systems as essential community development infrastructure.
- Recognize community development organizations and the state, regional, and national networks that support them as critical partners in building a field that is resilient, impactful, innovative, dynamic, and equipped to work effectively with banks and regulators.
- Maintain robust public data, community input, and transparent examinations, under one consistent interagency rule.

Member Sign-On Letter

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

Scan the QR Code to sign onto this letter by October 2

Share What's Happening in Your Community with COA

Use the QR Code below to complete COA's short member survey.
Survey Deadline: September 4

Responses to this survey will be central to how COA shapes its technical comment letter.

This survey has three goals: (1) identify members' highest CRA policy priorities; (2) collect concrete examples, data, and other evidence for COA's technical comment letter; and (3) document the proposal's practical consequences for low- and moderate-income people, places, and community development organizations.

You do not need to be an expert on the full proposal. Answer what you can.

The survey asks for:

- Your organization and geography.
- The proposed changes that are most important for COA to address.
- One strong example or data point and why it matters.
- Any supporting report, link, or source.
- How you would like to participate during the comment period.
- Your permission preferences for follow-up and attribution.

Especially useful evidence includes:

- A currently large bank that would become intermediate under the proposal.
- A flexible grant that supports operating capacity, capacity building, or state/regional infrastructure.
- Bank activity in a market outside its branch footprint.
- An LMI activity whose strong community benefit may receive weak or uncertain consideration.
- A racial disparity that income-only analysis fails to reveal.
- The likely burden of proposed recipient-level grant data collection.

Build Your CRA Comment Letter

Use this Local Evidence Worksheet to build your own comment letter — page 1 of 2

1. **What proposed change concerns you most?**
    - Eligible activities and demonstrated LMI community benefit
    - Assessment areas and bank activity beyond branches
    - Race, racial disparities, and fair lending accountability
    - OCC and FDIC acting without the Federal Reserve
    - Bank-size thresholds and reduced community development duties
    - Restrictions on grants, operating support, overhead, or data collection
    - Reduced data collection, services, or public transparency

2. **Which banks, programs, partnerships, communities, or geographies would be affected?**

3. **What specific example demonstrates the likely effect?**
   Include names, places, time periods, dollar amounts, lending volume, grant size, or other concrete details when possible.

4. **Who would lose financing, services, organizational capacity, information, or influence?**

5. **What should the agencies do instead?**
   State the change you want as directly as possible.

6. **What facts or documents can support your example?**
   Consider bank CRA evaluations, Home Mortgage Disclosure Act data, public reports, grant records, project documents, surveys, testimony, press coverage, or organizational experience.

Starter State or Regional Association Letter

Use the template provided on the next page for your comment letter on proposed Community Reinvestment Act changes

How to use the template:

Keep the opening and conclusion, then choose the two or three modules that best reflect your members' experience. Delete the other modules and all bracketed instructions before submitting your letter.

- Add at least one specific local example, data point, member observation, or bank partnership in each module you use.
- Connect that evidence to a likely local consequence and a clear request to the agencies.
- Verify that the proposal title, docket numbers, RINs, deadline, addressees, bank classifications, and submission method. You can find that information in the Submission Instructions on page 18 of this toolkit.

DRAFTING TIP: A focused letter on two or three issues will be more useful than a generic letter covering every concern.

IMPORTANT: Customize this draft with local evidence. Do not submit it unchanged.

DEADLINE: Submit your letter to regulators by October 13, 2026, using the instructions on page 18.

Template Comment Letter

[DATE]

Office of the Comptroller of the Currency
400 7th Street SW, Suite 1E-216
Washington, DC 20219

Federal Deposit Insurance Corporation
550 17th Street NW
Washington, DC 20429
Submitted electronically through the Federal Deposit Insurance Corporation's public-comment portal

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

To the Comptroller of the Currency and the Board of Directors of the Federal Deposit Insurance Corporation:

[ORGANIZATION NAME] appreciates the opportunity to comment on the proposed amendments to the regulations implementing the Community Reinvestment Act (CRA). We represent **[NUMBER AND TYPES OF MEMBERS]** working in **[STATE / REGION] to [CORE COMMUNITY DEVELOPMENT ACTIVITIES**]. Together, our members serve **[TYPES OF COMMUNITIES OR PEOPLE SERVED]**.

Our members work with banks as lenders, investors, grantmakers, and community partners. Through that work, we see how CRA affects the capital and relationships available to local organizations. **[ADD ONE SHORT EXAMPLE OR FACT THAT ESTABLISHES YOUR ASSOCIATION'S EXPERIENCE.]** We are focusing our comments on **[TWO OR THREE ISSUES SELECTED BELOW]**.

Optional module: Reduced community development responsibility

[IDENTIFY AFFECTED BANKS AND THEIR CURRENT ROLE IN YOUR STATE OR REGION.] Under the proposed thresholds, **[BANKS OR NUMBER OF BANKS]** would face a reduced community development evaluation. Our members expect this could **[DESCRIBE A PRACTICAL LOCAL EFFECT ON LOANS, INVESTMENTS, SERVICES, GRANTS, OR PARTNERSHIPS]**.

We ask the agencies to preserve a meaningful, required community development evaluation for banks of substantial scale, with expectations calibrated to their capacity and market presence.

Optional module: Flexible grants and community development capacity

Flexible bank grants help organizations retain staff, prepare projects, provide technical assistance, coordinate partners, and respond to changing needs. **[DESCRIBE ONE GRANT OR PARTNERSHIP, WHAT IT SUPPORTED, AND WHAT IT MADE POSSIBLE.]** The proposed 15 percent overhead test and recipient-level documentation would likely **[DESCRIBE THE LOCAL CONSEQUENCE].**

We ask the agencies to remove those requirements and evaluate grants based on their community development purpose, responsiveness to need, and expected impact. The final rule should recognize associations, coalitions, and intermediaries as part of the infrastructure that makes local projects possible.

Optional module: Bank responsibility beyond branches

[DESCRIBE A BANK WITH SUBSTANTIAL LENDING, DEPOSITS, OR MARKET SHARE OUTSIDE A STRONG BRANCH FOOTPRINT.] The current approach would allow the bank to conduct significant business in **[MARKET]** without a corresponding, required community development responsibility there. This matters because **[LOCAL CONSEQUENCE]**.

We ask the agencies to establish a lending- or deposit-based mechanism, or another workable approach, that creates meaningful community development responsibility wherever a bank has substantial activity.

Optional module: Local needs and community impact

In **[PLACE]**, **[LOCAL PLAN, NEEDS ASSESSMENT, MEMBER EXPERIENCE, OR RESIDENT INPUT]** identifies **[NEED]**. **[ORGANIZATION OR PARTNERSHIP]** responded through **[ACTIVITY]**, producing **[RESULT]**. This example shows why transaction size or a favored category does not always reflect an activity's value to a community.

We ask the agencies to give substantial weight to responsiveness, depth of benefit, and credible local input when evaluating community development activity.

Optional module: Racial disparities

[ADD RELIABLE STATE OR LOCAL DATA OR MEMBER EXPERIENCE SHOWING A RACIAL OR ETHNIC DISPARITY IN CREDIT OR INVESTMENT.] Income measures remain important, but they do not show whether residents and entrepreneurs of different races have equitable access to credit and opportunity.

We ask the agencies to use available race and ethnicity data in performance context, impact analysis, public reporting, and coordination with fair lending supervision and enforcement.

Optional module: Data, public input, and consistent rules

Our association uses CRA data and public participation to **[IDENTIFY GAPS, ADVISE BANKS, EDUCATE MEMBERS, OR PARTICIPATE IN EXAMINATIONS]**. **[ADD ONE EXAMPLE.]** Reduced reporting or narrower examinations would make it harder to understand whether banks are meeting needs across our market.

We ask the agencies to preserve useful public data, meaningful community participation, and sufficient examination coverage. We also urge the Office of the Comptroller of the Currency, the Federal Deposit Insurance Corporation, and the Federal Reserve to administer one consistent CRA framework.

Conclusion

CRA affects whether organizations in **[STATE / REGION]** can secure the financing, grants, expertise, and partnerships needed to address **[LOCAL NEEDS]**. We urge the agencies to **[RESTATE YOUR TWO OR THREE REQUESTS IN ONE SENTENCE]**. We would welcome the opportunity to provide additional information as the agencies continue this rulemaking.

Thank you for considering our comments.

Sincerely,
[NAME]
[TITLE]
[ORGANIZATION]

Submission Instructions

How to Submit Your Comment Letter to Regulators

Deadline: October 13, 2026

Because this proposal was issued jointly by the Office of the Comptroller of the Currency and the Federal Deposit Insurance Corporation, submit the same final comment letter to both agencies.

Before submitting

- Put your organization's comment on its letterhead.
- Include the proposal title and agency identifiers:
  Community Reinvestment Act Regulations; OCC Docket ID OCC-2026-0694; RIN 1557-AF57; FDIC RIN 3064-AG31
- Sign the letter and save it as a PDF with a clear filename, such as:
  [Organization Name]_CRA_Comment_Letter.pdf
- Remove all drafting instructions, brackets, and placeholders.
- Do not include confidential information. Submitted comments and attachments may become publicly available.

1. Submit to the Office of the Comptroller of the Currency

1. Go to Regulations.gov.
2. Search for **OCC-2026-0694**.
3. Open the docket for **Community Reinvestment Act Regulations**.
4. Select **Comment**.
5. Enter the requested information and upload your signed letter.
6. Make sure your submission identifies the agency as **OCC** and includes **Docket ID OCC-2026-0694**.
7. Submit the comment and save the confirmation or tracking number for your records.

2. Submit to the Federal Deposit Insurance Corporation

Email your signed letter to **comments@fdic.gov**.

Use this subject line: **Comment on Community Reinvestment Act Regulations – RIN 3064-AG31 – [Organization Name]**

Attach the signed PDF and include a short message such as:

> Attached is [Organization Name]'s comment on the proposed Community Reinvestment Act Regulations, RIN 3064-AG31. Thank you for considering our comments.

Save a copy of the sent email and attachment for your records.

After submitting

Please send a copy of your final letter to COA staff. This will help us understand the issues members raised and document the field's participation.

Frank Woodruff - fwoodruff@communityopportunityalliance.org
Dawne Troupe - dtroupe@communityopportunityalliance.org
Kadasha Hershey - khershey@communityopportunityalliance.org

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