COMMUNITY OPPORTUNITY ALLIANCE
UNTIL ALL THRIVE

Community Opportunity Alliance

Take Action on CRA

Advocacy Toolkit



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

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.

Build Your CRA Comment Letter

Use this Local Evidence Worksheet to build your own comment letter.

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 by the proposed rule? How?**

_____
_____
_____
_____

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.

Template to Create Your 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 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 9 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 9.

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 **[CITY, STATE AND/OR 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 CITY, STATE AND/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 **[CITY, STATE AND/OR 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. The full proposed rule can be found in the Federal Register.

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 all three of the following COA staff members. 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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