

CRA Reform: A Community Organization Perspective

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- Coalition of 600 community-based organizations
- CRA, data, and fair lending advocacy
- Programs – housing counseling, small business technical assistance
- GROWTH – purchase and rehab REOs
- <http://www.ncrc.org>

What we agree on



- More certainty and predictability helps create more lending and investing
- 1-800-CRA-help – how to make this manageable, early determinations
- Database on CD would really help.
- Need for assessment area reform
- Component test reform
- [See NCRC blog for areas of agreement](#)

Do No Harm!



- One ratio
- Redefine CRA away from focus on LMI communities
 - accommodate projects that benefit LMI and MUI, pro rata consideration
- Redefine CRA away from community development
 - it is not general philanthropy
- Keep focus on combating redlining, access to credit, and revitalizing neighborhoods
- Asset thresholds
- See recent [NCRC law review article](#)

Assessment Area Reform



- NCRC proposal – retain AAs where branches are. 70% of bank lending in AAs
- NCRC proposal - create new AAs where retail activity is high volume or important to locality
- Two part proposal covers traditional banks and non-traditional banks & fintechs
- Separate AAs for retail and CD?

CD data and outside AA



- Annual CD data – is it all that different from what banks do now – binders of CD for examiners and OCC quarterly reports
- How this would help with outside AA consideration
- Can keep track in between exams of CD in AAs
- Identify underserved counties, add these to statewide and regional consideration

Component tests



- Lending and CD
- Service – do not eliminate, make better, retain importance on branches (needed to serve LMI) and data on accounts
- Weights of tests

CRA ratings reform



- Are 90 percent of banks really satisfactory
- Low and High Sat
- 100 point scale