

CHAIRMAN
James Baker
VICE CHAIRMAN
Veronica Henry



March 30, 2020

To Whom It May Concern:

The Frederick Coalition for Financial Success (FCFS) works to develop financial stability within Frederick County, Maryland through the development of financial resources and education for practitioners and the community. Our members include non-profit organizations, state and local governmental entities, and credit union and banking institutions throughout Frederick.

In light of the proposed changes, we strongly oppose the Office of the Comptroller of the Currency's (OCC) and the Federal Deposit Insurance Corporation's (FDIC) Notice of Proposed Rulemaking (NPRM) regarding the Community Reinvestment Act (CRA). CRA requires that deposit-taking institutions meet the convenience and needs of the low- and moderate-income (LMI) communities in which they operate. Over the decades, CRA has leveraged significant amounts of loans and investments in LMI communities; Since 1996, banks have issued almost \$2 trillion in small business loans and community development loans and investments in LMI communities.

FCFS has worked with local banks for years to provide financial literacy workshops, monthly credit workshops, and even holiday food drives for low- and moderate-income families in Frederick. Additionally, over the last 3-years, the coalition has cultivated relationships with local banks to develop a Bank On¹ Program within our community.

A successful Bank On Program is a win-win opportunity for any community as it connects low- and moderate-income unbanked and underbanked families to safe, reputable banking institutions. Banking institutions, in turn, create financial education programs and packages which further secure the trust between the financial institution and the public. This expands upon both financial literacy for clients as well as clientele numbers for the institution.

Frederick's Bank On Program is ready to kick-off in August of this year. However, with these proposed changes there would be no incentive for our local banks to create accounts that target the needs of our low- and moderate-income families. Sadly, without Bank On, we can expect to see a continued decrease in the number of individuals who are safely banked with a trusted financial institution. This would be unfortunate for low- and moderate-income families and banks alike.

Alternatively, FCFS advocates that the OCC and FDIC will discard the NPRM and instead work with the Federal Reserve Board and propose an interagency rule that will modernize CRA in a way that will increase reinvestment in LMI communities. This is the only way in which we all win.

Sincerely,

A black rectangular redaction box covers the signature of the sender.

Frederick Coalition for Financial Success
Frederick Maryland

¹ BankOn, Cities for Financial Empowerment Fund. <https://joinbankon.org/about/>. March 30, 2020.