

From: [Joseph Garcia](#)
To: [Comments](#)
Subject: [EXTERNAL MESSAGE] CRA Comments Regarding: RIN 3064-AF22
Date: Tuesday, April 07, 2020 3:35:20 PM

Robert E. Feldman, Executive Secretary
Attention: Comments RIN 3064-AF22
Federal Deposit Insurance Corporation
550 17th Street NW
Washington, DC 20429

Re: Community Reinvestment Act Regulations, Notice of Proposed Rulemaking (FDIC Docket ID RIN 3064-AF22)

The Community Reinvestment Act is a vital component for economic development and community success. The current proposal to change the CRA threatens the equation for such positive outcomes and therefore should not be considered as any basis for a final rule.

Additionally, in order to appropriately and accurately measure CRA effectiveness requires more than a quantitative approach. There are human success stories to be told.

Another major concern is that at this time of unprecedented financial crisis and stressors on our economy due to COVID-19, communities and banks need stability, not upheaval. Now is not the time to completely overhaul the CRA system. To do so would have a negative effect on economic recovery.

Chicanos Por La Causa Inc., a multi-state nonprofit that utilizes and supports CRA in its current successful form, implores that both the OCC and FDIC read and fully appreciate the public comments seeking a new proposal in place of the current proposal – one that better aligns with the goals and intentions of the Community Reinvestment Act.

Thank you for your consideration.

David Adame

President & CEO

Chicanos Por La Causa Inc.

1112 E. Buckeye Road

Phoenix, AZ 85034