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**To:** cra.reg@occ.treas.gov; Comments  
**Subject:** [EXTERNAL MESSAGE] OCC; Docket ID OCC-2018-008; RIN 3064-AF22

**COMMUNITY SERVICE PROGRAMS OF WEST ALABAMA, INC.  
601 Black Bears Way  
TUSCALOOSA, AL 35401**

ATTN: Chief Counsel's Office  
Office of the Comptroller of Currency

Mr. Robert Feldman  
Executive Secretary  
Federal Deposit Insurance Corporation

We are writing to provide comments regarding the proposed changes in the Community Reinvestment Act Regulations. As a NeighborWorks® organization, we are committed to advocating for initiatives/causes that impact vulnerable populations. The proposed CRA will definitely affect low/moderate individuals, families and communities in negative ways.

1. Our first concern is the lack of transparency and accountability in the evaluation process. Since the process appears more convoluted and limiting, there would be significant decrease in resources and investments available to the vulnerable populations noted above.
2. CRA was initially instituted to fill the needs of only LMI families and communities. The proposed changes now broaden the scope of benefits to include much higher income groups, ie, higher revenue farms moderate income households and public facilities that would not necessarily bring benefit to LMI families. Focus on benefits to LMI families and communities must remain the priority of CRA.
3. Avoidance of Illegal practices and discriminatory actions must be emphasized in administering CRA. Otherwise, many benefits to LMI communities and families will be diminished.
4. Since our NeighborWorks® organization has a predominantly rural coverage area (only one county of 10 is urban), we are very concerned about decreased bank performance in small areas, particularly rural ones. CRA needs to continue to be responsive to local needs in these areas with limited resources.
5. Devaluing bank branches in LMI communities would eventually lead to a decrease in bank presence and actual lending in these areas.
6. Allowing banks rated "outstanding" to be re-evaluated every five years instead of every two-three years would result in decreased oversight and less accountability regarding addressing the needs of LMI families and communities.

It is imperative that the CRA continue to focus on providing resources to the communities of vulnerable populations in order to uplift families in their pursuit of self-sufficiency and economic security.

Thank you for your consideration in this matter.

Cynthia W. Burton  
Executive Director

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