



April 8, 2020

The Honorable Joseph Otting, Comptroller
Office of the Comptroller of the Currency
400 7th Street SW, Suite 3E-218
Washington, DC 20219

The Honorable Jelena McWilliams, Chair
Federal Deposit Insurance Corporation
550 17th Street, NW
Washington, DC 20429-0002

RE: Docket ID OCC-2018-0008; RIN 1557-AE-34, 3064-AF22; - Reform of the Community Reinvestment Act

Dear Comptroller Otting and Chair McWilliams:

New Kensington Community Development Corporation (NKCDC), a charter member of NeighborWorks America in Kensington, Philadelphia, stands strongly opposed to the proposed changes to the Community Reinvestment Act (CRA).

Like most American cities, Philadelphia suffers from a legacy of institutionalized racial discrimination in housing as well as employment, health care, education, criminal justice and many other areas. The consequences of redlining in Philadelphia are still keenly felt today: it is nearly three times harder for African Americans to get a conventional mortgage than their White peers, and about twice as hard for Latinos. Predominantly Black and Hispanic neighborhoods continue to have less infrastructure and less investment than predominantly White ones. Through no fault of their own, whole Philadelphia communities continue to be handicapped by a long legacy of unethical and shortsighted decisions.

Don't add to that legacy. Since 1977, the CRA has made impressive strides in providing access to safe, sustainable banking and financial products to formally redlined low and moderate-income communities like our community of Kensington. Each year NKCDC is able to provide free

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housing counseling and first-time homebuyer education to hundreds of Kensington residents, often giving families access to safe, affordable homes for the first time in their lives.

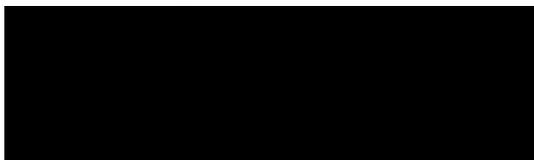
Quality housing is not simply a place to sleep. Safe, affordable housing makes a profound impact on health, reducing chronic disease and hospitalizations and improving everything from life expectancy to school attendance. Affordable housing is also key to gaining and sustaining wealth that lifts homeowners out of poverty and insures the financial stability of their children.

Each year NKCDC receives thousands of dollars in support from banks to help right the wrongs of America's past. The proposed changes to the CRA cripple this progress. Letting banks pass the CRA exam while failing in half of their assessment areas invites banks to cut their support. Changing the definition of CRA activities to include condos or even stadiums in low to moderate-income communities allows banks to close big deals and neglect the very community members the act was designed to help.

Philadelphia is a city struggling to pull itself up. We will not succeed if we neglect half our citizens. Strong families build strong neighborhoods, and strong neighborhoods are the foundation for a Philadelphia that improves the nation's economy.

NKCDC strongly encourages the FDIC and OCC to ignore the proposed CRA amendments and instead work with the Federal Reserve Board to create an interagency rule that bolsters the good progress already achieved under CRA.

Sincerely,



Beatrice J.E. Rider
Interim Executive Director