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Community and Economic Development Association of Cook County, Inc.
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1300 West Northwest Highway
Mount Prospect, Illinois 60056
847/392-2332 • Fax 847/392-2427

Bloom-Rich Community
Development Association
Chicago Heights Community
Service Center
1203 West End Avenue
Chicago Heights, Illinois 60411-2491
708/754-4575 • Fax 708/754-4595

Ford Heights Office
1647 Cottage Grove Avenue
Ford Heights, Illinois 60411-3899
708/758-2510 • Fax 708/758-0825

CEDA Center for Community Action
53 East 154th Street
Harvey, Illinois 60426-3645
708/339-3610 • Fax 708/331-4539

CEDA Neighbors At Work
1229 Emerson
Evanston, Illinois 60201-3524
847/328-5166 • Fax 847/328-9262

Proviso-Leyden Council for
Community Action, Inc.
1108 W. Madison Street
Maywood, Illinois 60153-1939
708/450-3500 • Fax 708/450-0589

Southeast CEDA
3518 West 139th Street
Robbins, Illinois 60472-2002
708/371-1220 • Fax 708/371-1247

Southwest Development Association
5818 South Archer Road
Summit, Illinois 60501-1410
708/458-2736 • Fax 708/458-9532

CEDA Near West
5142 West 25th Street
Cicero, Illinois 60804
708/222-3824 • Fax 708/222-0026

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NATIONAL CONGRESS FOR
COMMUNITY ECONOMIC
DEVELOPMENT

July 14, 2000

**Manager
Dissemination Branch
Information Management & Services Division
Office of Thrift Supervision
1700 G Street, NW
Washington, DC 20552**

Dear Sir/Madam:

I am writing from the Community and Economic Development Association of Cook County, Inc. (CEDA), the largest Community Action Agency in the United States. Our organization's mission is to create a climate of awareness within which conscious, self-directed social change toward the elimination of poverty and its causes can take place on the part of individuals, families and community institutions. I urge you to make significant changes in the proposed Community Reinvestment Act "sunshine" regulations. These regulations threaten investment in lower-income areas and seek to punish organizations for discussing the credit needs of our communities. We understand that financial institutions have already used the sunshine provisions as an excuse not to enter into CRA agreements. CRA is crucial to the economic regeneration of lower-income communities and the new regulations must not be allowed to hinder CRA's impact. We would, therefore, like to recommend that the following changes be implemented immediately:

CRA Contacts

The regulation must cover all CRA discussions and not provide exemptions for bank or regulator initiated contacts. To narrow the definition of CRA contact in any other way could create the perception that the federal government is favoring certain types of CRA discussions by exempting them from the reporting requirements.

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DISSEMINATION DIVISION
OFFICE OF THRIFT SUPERVISION
1700 G STREET, NW
WASHINGTON, DC 20552



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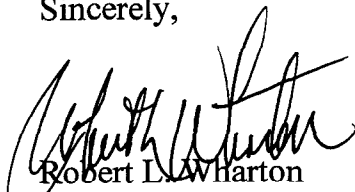
Groups covered by the sunshine provisions should not be subject to time-unlimited reporting requirements. Only CRA contacts that occur in the six months before a CRA agreement should trigger reporting of that agreement. To cover the situations where a CRA contact is made after a CRA agreement particularly during CRA examinations and applications for merger or acquisition, contacts that occur up to three months after an agreement is reached should also be counted as CRA contacts.

Reporting Requirements

To minimize the reporting burden on community organizations, the reporting requirements should be satisfied by existing reports. Wherever possible, a nonprofit's IRS 990 form should allow sufficient reporting of expenditures under an agreement. This form contains more than enough information to examine major categories of expenditures. A consolidated report should be allowed where an organization has two or more agreements.

We appreciate that the federal banking agencies have a difficult task of developing regulations for a confusing statute. We respect the steps that have already been taken to reduce the burden for neighborhood organizations, banks and other parties that are committed to community development. We urge the federal agencies to adopt our suggestions for streamlining the sunshine regulations and thereby reduce the potential damage they may cause to revitalizing inner city and rural communities.

Sincerely,



Robert L. Wharton
President/CEO