

JESUIT  
CONFERENCE  
THE SOCIETY OF JESUS IN THE UNITED STATES

Manager  
Dissemination Branch  
Internal Management & Services Division  
Office of Thrift Supervision  
1700 G Street NW  
Washington DC 20552  
Attention: Docket No. 2000-44

To Whom It May Concern:

I am writing to you on behalf of the Jesuit Conference Board of the Society of Jesus in the United States. There are approximately 4000 U.S. Jesuit priests and brothers working abroad and in our domestic projects, which include: 29 Jesuit affiliated universities and colleges; 50 Jesuit high-schools and middle schools; and nearly 100 Jesuit parishes across the country. Jesuits and their institutions are especially attuned to issues raising questions of structural economic justice, and the effect on marginalized communities and individuals, in accordance with the social teaching of the Roman Catholic Church.

These concerns are clearly jeopardized by the proposed "sunshine" regulation. While the regulatory agencies have evidently considered a wide range of perspectives in drafting this regulation, it nevertheless significantly reduces the efficacy of the Community Reinvestment Act (CRA). CRA works because it enables collaboration between banks and community members in serving the credit needs of any number of communities. This regulation causes a breakdown of that critical collaboration from both sides.

By making CRA-related speech subject to onerous reporting and disclosure, community participation in the ongoing dialogue about the performance of a bank in meeting its credit obligations will be reduced. At the same time, banks will be far less inclined to seek partnerships that entail new reporting requirements. Indeed, presumably in anticipation of the promulgation of this egregious regulation, this second outcome has already been documented by several community organizations. As a result of straining the collaborative CRA relationship for both partners, the regulation will result in fewer creative and progressive partnerships that innovate to help serve marginalized populations.

To mitigate these central problems, the regulatory bodies are encouraged to consider the specific proposals issued by the National Community Reinvestment Coalition (NCRC), of which the Jesuit Conference is a member. We look forward to your next effort.

Sincerely,

British Robinson, Director  
Office of Social and International Ministries