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From: HowBAC5@aol.com
Sent: Friday, April 02, 2004 5:40 PM
To: regs.comments@occ.treas.gov; regs.comments@federalreserve.gov; regs.comments@fdic.gov; regs.comments@ots.treas.gov; jsilver@ncrc.org
Subject: Proposed Changes to CRA

This email is to voice my objections to any proposed changes to the regulation implementing the Community Reinvestment Act (CRA) passed in 1977.

I recall when the Act was first passed...how it prompted banks to put in place bank personnel of color in positions termed CRA Manager and etc. At the same time the position carried some decision making authority.

Some years later the regulations were modified "watered down" and immediately I observed how banks removed the position titles of CRA Manager, shifted staff around...and began using positions titles as "Community Affairs Officer," "VP Community Banking Group," and "VP Community Development." And to add injury to insult...the position no longer carried any authority.

Less you think my comments comes from an isolated or novice view point. Our nonprofit community development entity has a long history with the local banking/lending industry dating back to early 1970s...as such we have one of the strongest reputations among these institutions as a business development/technical assistance, employment training, and economic development services entity. By the same token it has been our experience that the presence of CRA in its original intent...and left alone...does promote increased access to credit for affordable housing, community economic development, access to capital and consumer services to low-income communities of color.

I am appalled that any of your federal agencies would recommend any proposed changes, when we all can point to significant findings across America that show that not many, if any banks/lenders at all met the "equality benchmark" for loans less than \$100,000 or to businesses with revenues less than \$1 million in these neighborhoods.

Study after study show that even major credit card lenders, do not lend to businesses with revenues less than \$1 million in low-income neighborhoods. Again this is pervasive all across the country...a far cry from living up to the "American ideal of equal opportunity"

Loan data reveal constantly dropping percentages of loans in low-and moderate-income areas. In a few cases, large areas have been declared Community Express (SBA related) eligible by virtue of high unemployment or high minority levels, but numerous loans within these areas are in middle-and upper-income census tracts.

This is a situation that must be remedied by these major financial institutions...unfortunately history proves that it only gets done when U.S. Congress and each of you within your federal agencies exert the proper roles of investigation and oversee.

I repeat investigation and overseeing...not marginalize and minimizing.

Kindest regards,

Van G. Howard
Founder and President

04/14/2004