

*Human Resource Development Foundation, Inc.  
Human Resource Development and Employment, Inc.*

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**MEMORANDUM**

**TO:** Office of Thrift Supervision  
**FROM:** Homer R. Kincaid, Executive Director *Homer R. Kincaid*  
Human Resource Development Foundation, Inc.  
**DATE:** January 13, 2005  
**RE:** Comment/"2004-53, 2004-54"

Human Resource Development Foundation, Inc. (HRDF), Human Resource Development and Employment, Inc. (HRDE) and Unity Housing, Inc., private non-profit organizations charged with serving financially disadvantaged West Virginians, strongly oppose the Office of Thrift Supervision proposal to give CRA credit to thrift institutions for activities in rural and disaster areas with no benefit for low and moderate income individuals areas. It is also essential that large institutions remain accountable for investments and services as well as their lending.

Thank you for your time and attention.

HRK/DE/sm  
aft 4009, afl-cio

