

Instructions: Template Tool for Individualized Comments on the OCC and FDIC Proposed CRA Rule, shared by the National Community Reinvestment Coalition (NCRC). Comments are due Monday, October 12 at 5 pm EST

Introduction: The below Template Tool for Individualized Comments on the OCC and FDIC Proposed CRA Rule is designed to assist organizations in crafting and submitting their *own* comment letters and contains guidance about how to ensure that their comment letter reflects information about the organization's experience, interests, and concerns.

Template: Below is a comment from the Network. You should replace the Network's name and description with information from your own organization. Here are 8 optional arguments that relate to the proposal's: (1) reduction in community investment expectations for all banks; (2) less-community development scrutiny of banks; (3) possible reduction in bank branches and access to banking services; (4) loss of support for local organizations; (5) elimination of purpose test for economic development, weakening connection to LMI community benefits; (6) expansion of what infrastructure projects qualify for CRA credit; (7) narrowing the activities subject to CRA examination; and (8) and making it more difficult to hold banks accountable. Please use the arguments that best reflect your organization's experience, interests, and concerns.

Submit your comment: Once your comment letter is complete, you should submit it to both the OCC and the FDIC. Information about filing is available at www.regulations.gov.

For the OCC: 1. Go to <https://regulations.gov/>.

2. Enter Docket ID "OCC-2026-0694" in Search box and click "Search"

3. Follow instructions to copy and paste your comment letter into the box below the displayed document information or to attach/upload it. Provide the required information.

For the FDIC: Email your comment letter to comments@fdic.gov, reference RIN 3064-AG31 in the subject line.

SAMPLE LETTER

Via electronic submission

Jonathan V. Gould
Comptroller of the Currency (OCC)
Office of the Comptroller of the Currency
400 7th Street SW
Washington, DC 20219
Attn: Chief Counsel's Office

Travis Hill, Chairman
Federal Deposit Insurance Corporation (FDIC)
550 17th Street, NW
Washington, DC 20429

Re: Comment in Opposition to OCC and FDIC Notice of Proposed Rulemaking on
Community Reinvestment Act Regulations [OCC Docket ID OCC-2026-0694; RIN
1557-AF57] [FDIC RIN 3064-AG31]

Dear Comptroller Gould and Chairman Hill:

The Housing and Community Development Network of New Jersey (HCDNNJ) submits this comment in opposition to the Notice of Proposed Rulemaking referenced above (CRA NPRM) issued by the Office of the Comptroller of Currency (OCC) and the Federal Deposit Insurance Corporation (FDIC) because it would significantly weaken the Community Reinvestment Act (CRA). In addition, given the complexity of the rule and scope of the changes, we also request that the OCC and FDIC, before making any proposed changes, carefully analyze the likely consequences for low- and moderate-income communities, provide an opportunity to comment on the analysis and evidence the agencies identify supporting any changes, and extend the current comment deadline by 60-days.

Since 1989, the Housing and Community Development Network of New Jersey (the Network) has worked to improve the environment for the work of community development corporations (CDCs), and to strengthen their capacity to create housing and revitalize distressed neighborhoods throughout New Jersey. The Network is the statewide association of over 250 non-profit housing and community development corporations, individuals, professional organizations, and prominent New Jersey corporations that support the creation of housing choices and economic opportunities for low- and moderate-income community residents. The Network and our members share a commitment to promoting economic justice and the empowerment of low-income individuals and communities, and encouraging wider participation in the framing and implementation of public policies.

We and our CDC members have been involved in Community Reinvestment Act agreements and have worked with banks throughout New Jersey to improve the effectiveness of the community development sector and promote lending in low- and moderate-income communities. Banks have been valued partners, and we are concerned that the proposed rule will substantially reduce CRA scrutiny for banks that will result in less bank support for community development, bank services and support for nonprofit organizations. In addition, we believe the proposed rules will

jeopardize access to credit and mainstream financial services in low- and moderate-income neighborhoods.

According to national data, 28 of 63 banks in New Jersey will lose large bank status, meaning there will be less scrutiny on their operations. In New Jersey, this means that 13 of 82 banks will not have a community development obligation at all, which will hurt the work of HCDNNJ and our members whose mission is to uplift low- and moderate-income communities. In addition, the state may lose 15.2% of banks who are doing business in low- and moderate-income communities, cutting those communities off from financial services. Finally, 7.8% of banks will no longer have to disclose the small business lending they do. For these reasons, we ask your agency to oppose these new rules and protect community reinvestment.

Thank you in advance for your consideration.

Very Truly Yours,