



WOODSTOCK
INSTITUTE

Advancing Economic Security
and Community Prosperity

March 30, 2020

Board of Directors

Chair

Byna Elliott
Fifth Third Bank

Treasurer

Manuel Jimenez
Marquette Bank

Secretary

Michael Seng
John Marshall Law School

Members

Natalie Abatemarco
Citi Community Development

Ravi Aurora
MasterCard

Bobbi Ball
Partners in Community Building

Calvin Bradford
Calvin Bradford & Associates, Ltd.

Eva Brown
Fifth Third Bank

Thomas FitzGibbon, Jr.
Evergreen Bancgroup

Jesus Hernandez, PhD
JCH Research

Martina Hone
YWCA Metropolitan Chicago

Juan Carlos Linares
City of Chicago

Gabriela Roman
Spanish Coalition for Housing

Matthew Roth
IFF

Founder

Sylvia R. Scheinfeld
1903-1990

Comptroller Joseph Otting
Office of the Comptroller of the Currency
400 7th Street, SW
Washington, DC 20219

Chair Jelena McWilliams
Federal Deposit Insurance Corporation
550 17th Street, NW
Washington, DC 20429

RE: **Community Reinvestment Act Regulations, Docket ID OCC-2018-0008**

Dear Comptroller Otting and Chair McWilliams:

Woodstock Institute strongly urges you to extend the comment period on the Notice of Proposed Rulemaking (NPR) titled *Community Reinvestment Act Regulations* by 90 days to allow interested and impacted parties to develop and submit informed comments on this far-reaching proposal. The COVID-19 crisis is justifiably occupying both your and our attention, as well as the attention of our allies and partners – many of whom are stretched thin by the magnitude of this immense public health emergency. As you know, the NPR is long and intricate and, as proposed, will have a significant impact on banks and the communities they serve across the country. The interests of informed rulemaking and open and transparent government are best served by extending the comment period by an additional 90 days.

About Woodstock Institute

Woodstock Institute is a leading nonprofit research and policy organization in the areas of equitable lending and investments; wealth creation and preservation; and safe and affordable financial products, services, and systems. Woodstock Institute works locally and nationally to create a financial system in which economically and racially segregated communities can safely borrow, save, and build wealth so that they can achieve economic security and community prosperity. Our key tools include: applied research; policy development; coalition building; and technical assistance. Woodstock Institute has been a recognized economic justice leader and bridge-builder between communities and policymakers in this field since it was founded in 1973 near Woodstock, Illinois.

Very truly yours,

Jean Pogge
Interim Director