



# **COMMUNITY REINVESTMENT IN ACTION:**

Elevating Housing through the CRA





# The Office of the Comptroller of the Currency (OCC)

- Established in 1863
- Independent bureau of the **U.S. Department of the Treasury**.
- Charters, regulates, and supervises all **national banks** and **federal savings associations (FSAs)**.
- Accomplishes its mission by:
  - Supervising nationally-chartered banks and savings associations, representing \$16T in banking assets and 67% of all U.S. banking assets
  - Examining banks for safety and soundness, cybersecurity, anti-money laundering, consumer protection, and the **Community Reinvestment Act**



# OCC Community Affairs

Support the OCC's mission by helping national banks and FSAs to be leaders in providing safe and sound community development financing, making financial services accessible to underserved communities and consumers, while treating their customers fairly.

- CRA **Training** & Technical Assistance
  - Bankers ◆ Communities ◆ OCC Examiners
- Conduct CRA-related **Outreach**
- Support CRA **Examinations** of National Banks & FSAs

# COMMUNITY REINVESTMENT ACT

- CRA encourages banks to help meet the credit needs of the communities in which they operate, including low- and moderate-income neighborhoods, consistent with safe and sound operations.
- Affordable housing is a key component to meeting credit needs in LMI communities



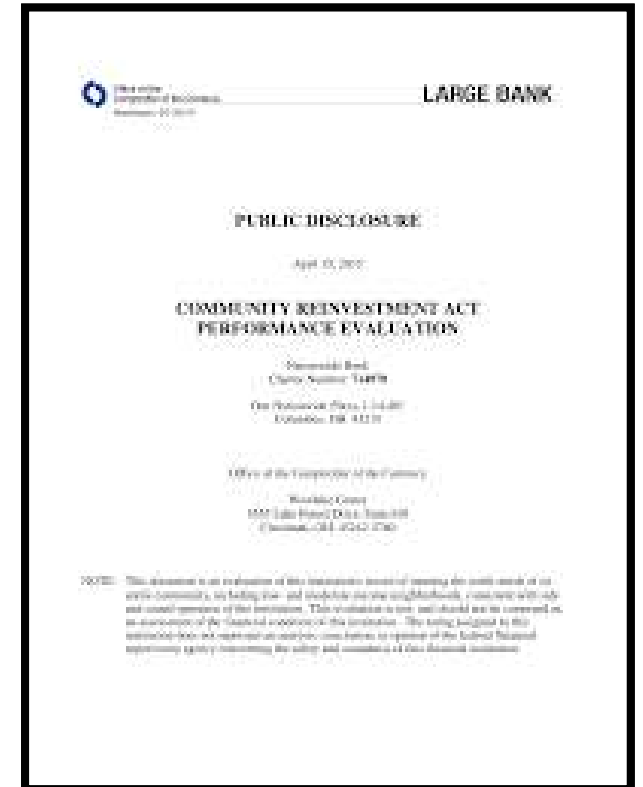
# UNDERSTANDING CRA

- › Banks engage in a variety of lending, investment and service activities in their communities to respond to credit and community development needs
- › Banks provide their CRA activities to regulators to demonstrate the bank's responsiveness in meeting those needs.






# UNDERSTANDING CRA

- Regulators evaluate the bank's CRA performance, rate their performance and prepare a public CRA report for each bank ("public evaluation").
- Regulators will take the bank's CRA record into account when reviewing applications for bank corporate activities, like branching and mergers.



# BANK REGULATORS FOR CRA

Regulator		Oversight
Office of the Comptroller of the Currency (OCC)		Nationally chartered banks
Federal Deposit Insurance Corporation (FDIC)		Non-FRB member, State chartered banks
Federal Reserve Bank (FRB)		FRB member, State chartered banks, Bank Holding Companies

- Excludes credit unions and non-bank financial providers
- To find out the regulator of a financial institution and its insurance status, go to <https://banks.data.fdic.gov/bankfind-suite/bankfind>

# KEY CRA TERMS

- Assessment Area
- Low- or Moderate-Income Individuals
- Low- or Moderate-Income Geographies



# ASSESSMENT AREAS:

Area(s) where bank CRA performance is evaluated

## *INCLUDES*

### Geographic Areas

- Main Office
- Branches
- Deposit-taking ATMs
- Surrounding areas where a bank has originated or purchased a substantial portion of its loans

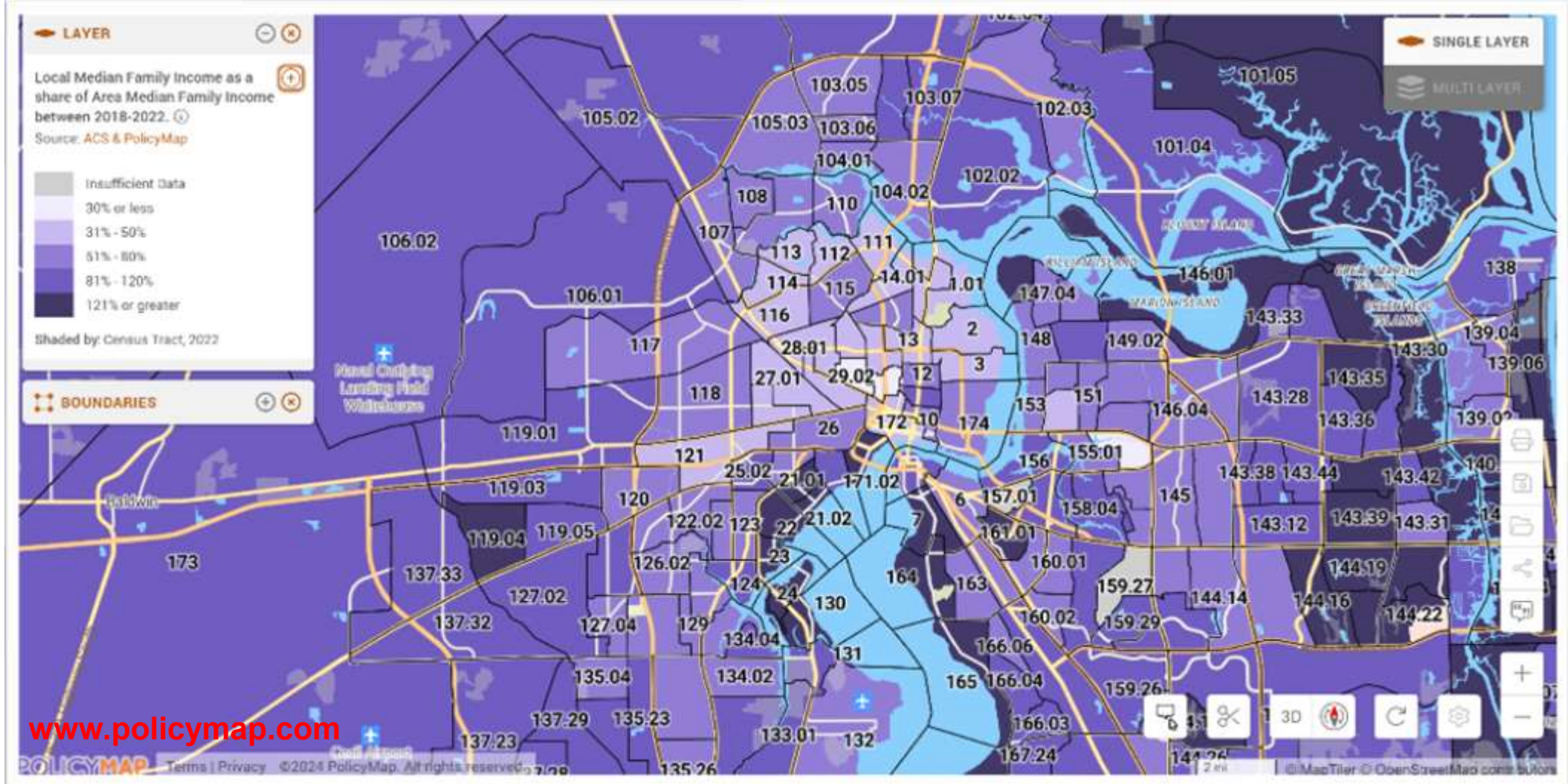


# INCOME CATEGORIES | LMI INDIVIDUALS

	2024 FFIEC Median Family Income	Upper 120% of MFI	Moderate 80% of MFI	Low 50% of MFI
JACKSONVILLE, FL MSA	\$ 98,000	\$ 94,080	\$ 78,400	\$ 49,000
MIAMI-MIAMI BEACH-KENDALL, FL MSA	\$ 90,400	\$ 86,784	\$ 72,320	\$ 45,200
ORLANDO-KISSIMMEE-SANFORD, FL MSA	\$ 79,400	\$ 76,224	\$ 63,520	\$ 39,700
TAMPA-ST. PETERSBURG-CLEARWATER, FL MSA	\$ 88,800	\$ 85,248	\$ 71,040	\$ 44,400
FL NON-MSA	\$ 66,100	\$ 63,456	\$ 52,880	\$ 33,050

Source: FFIEC.gov

# Income Categories | LMI Geographies



# How CRA is EVALUATED

- › CRA Examination Frequency
- › CRA Examination Types
- › Evaluation of Bank Activities




# How CRA IS EVALUATED

## > CRA Examination Frequency

- > CRA performance is evaluated on a periodic basis
- > CRA Evaluation | Every \_\_\_\_\_ months
  - > Small Banks = 36 to 60 months
  - > Intermediate Small Banks = 36 months
  - > Large Banks = 36 months
  - > W/LP = 36 months
  - > Strategic Plan = 36 to 60 months

# How CRA IS EVALUATED

CRA Examination Type 	Retail Lending	Comm Dev Lending	Comm Dev Investments	Retail Banking	Comm Dev Services
Small Bank: Total Assets ≤ \$391 million	Lending Test	Optional			
Intermediate SB: TA \$391MM to \$1,564B	Lending Test	Community Development Test			
Large Bank: TA ≥ \$1,564B	Lending Test		Investment Test	Services Test	
Wholesale or Limited Purpose Bank		CD Test if applicable	CD Test		CD Test
Banks operating under a CRA Strategic Plan	Based on Approved Plan Goals				

# How CRA IS EVALUATED

## RETAIL LENDING ACTIVITIES

- › Home Mortgage Loans
  - › To LMI Individuals
  - › In LMI Geographies
- › Small Business & Sm. Farm Loans
  - › To Small Businesses/Farms
  - › In LMI Geographies
- › Other Loans Categories

Also considers innovative or flexible lending practices that address the needs of LMI individuals or geographies.

## RETAIL BANKING ACTIVITIES

- › Distribution of branches
- › Record of opening and closing branches
- › Availability and effectiveness of alternative delivery systems
- › Range of services provided in each geography

Also considers availability & usage of low-cost deposit accounts and other services that improve access or decrease costs for LMI persons.

# How CRA is EVALUATED

## BANK COMMUNITY DEVELOPMENT ACTIVITIES

- › Loans, Investments & Services for:
  - › *Affordable housing* for low- or moderate-income (LMI) individuals
  - › *Community services* for LMI individuals
  - › Promoting *economic development* by providing financing for small business or farms
  - › *Revitalize or stabilize* certain geographies
    - › LMI Areas ♦ Designated Non-Metro Middle-Income Areas ♦ Designated Disaster Areas

Also considers **innovativeness**, **complexity**, and **responsiveness** to community needs



# How CRA IS EVALUATED

## > CD Loans

- Must benefit the bank's AAs, or
- The broader statewide or regional area (BSRA) that includes the bank's AAs

## > CD Investments

- An investment, deposit, membership share, or grant
- Includes grants and in-kind donations
- Includes municipal investments that have a CD purpose
- Must benefit the bank's AA or BSRA

## > CD Services

- Includes technical assistance services
- Must be related to the provision of financial services or bank staff's expertise/banking role
- Must benefit the bank's AA or BSRA

## EXAMPLES | LOANS & INVESTMENTS

- *Affordable housing* rehabilitation, construction, permanent financing for LMI
- Construct or rehabilitate *community facilities* that are located in LMI areas or that serve primarily LMI individuals;
- Finance *environmental clean-up* or redevelopment of an industrial site as part of an effort to revitalize the LMI community in which the property is located
- Borrowers to finance renewable *energy*, energy-efficient, or *water* conservation equipment in LMI housing

# EXAMPLES | LOANS & INVESTMENTS

- › Nonprofit Organizations serving CD needs
- › Low-Income Housing Tax Credits
- › New Market Tax Credits
- › Local, State or Tribal governments
- › Financial Intermediaries
  - › **Community Development Financial Institutions (CDFIs)**
  - › New Markets Tax Credit CDEs
  - › **Community Development Corporations (CDCs)**
  - › Minority & Women-Owned Financial Institutions
  - › Community Loan Funds
  - › Low-income or Comm. Development Credit Unions



# EXAMPLES | SERVICES

- Technical assistance to nonprofit, tribal, or government organizations serving LMI or economic revitalization and development needs;
- Technical assistance to small businesses or community development organizations
- Serving on the board of directors
- Teaching financial education
- Providing services related to the bank employees' expertise at the bank



# CD ACTIVITIES IN THE BSRA

## Always considered

Activities with a ***direct benefit*** to the bank's AA(s)

OR

Purpose, mandate, or function of the activity is to serve the bank's AA(s)

## May be Considered

If the bank has been responsive to the needs and opportunities in its AA(s) -

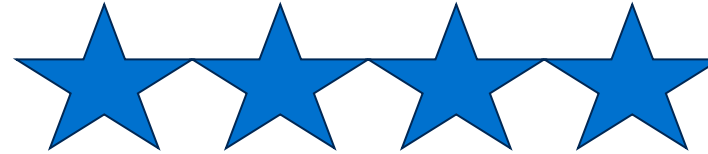
Activities that do not serve and will not benefit the bank's AA(s)

# PERFORMANCE CONTEXT

- Regulators consider internal and external factors that impact CRA performance. For example,
  - demographic data on income levels and housing costs
  - lending, investment and service opportunities
  - the bank's product offerings, business strategy, and capacity
  - the performance of similarly situated institutions
  - the bank's public file and ***any written comments about the bank's CRA performance***
- ***Community Contacts***
  - Regulator interviews with CBOs in the bank's AAs
  - Gather ***information***, determine AA ***opportunities***, understand ***perceptions***, provide ***context***
  - The interviews and your comments are ***confidential!***

# CRA RATINGS

- Outstanding



- Satisfactory



- Needs to Improve



- Substantial Noncompliance



# CRA RATINGS

- Regulators must take into account the banks record of helping to meet the community credit needs when considering any corporate or licensing action.
- Examples include:
  - Branching
  - Mergers
  - Acquisitions
  - Consolidations





# CONTACT INFO

**Lisa Anne Mifflin, NBE | CRCM**

Community Affairs Officer

[lisa.mifflin@occ.treas.gov](mailto:lisa.mifflin@occ.treas.gov)

[www.occ.gov](http://www.occ.gov)



# Community Development Discussion

Rhonda Little, Community Affairs Specialist  
August 27, 2024



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# Agenda

**Community Affairs**

**Economic Inclusion**

**Community Development**

**FDIC Resources and Initiatives**

# COMMUNITY AFFAIRS



- Fosters initiatives to move unbanked and underserved consumers into positive banking relationships
- Promotes collaborations among financial institutions, national, regional and local organizations to advance economic inclusion and support community development projects in underserved markets
- Serves as subject matter experts at industry and community conferences
- Provides technical assistance to financial institutions and FDIC compliance staff

# Economic Inclusion Strategic Plan

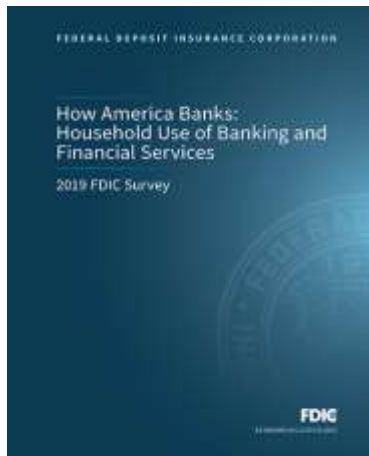
- **Goal:** Promote economic inclusion for all U.S. households
- **Vision:** The FDIC supports economic inclusion by promoting a state in which all U.S. households can establish, sustain, and benefit from banking relationships to create a strong financial foundation, manage their day-to-day finances, build wealth, and live in communities strengthened by bank lending, services, and investments.
- **Economic Inclusion Opportunity Areas:**
  - **1. Create and Sustain Foundational Banking Relationships:** Establish an on-ramp to the U.S. financial system, setting the stage for future financial success.
  - **2. Build Household Financial Stability:** Help households save and increase access to consumer credit to better manage ongoing and emergency expenses.
  - **3. Achieve a Secure Financial Future:** Build household wealth through investments that can foster savings and accumulate value over time.
  - **4. Live in Strong and Healthy Communities:** Encourage bank lending, investments, and services that support strong and healthy communities, including low- and moderate-income (LMI) neighborhoods and other underserved communities.

# Economic Inclusion Pathway



# Economic Inclusion Information and Resources

- **Economic Inclusion (EI) is integral to the FDIC’s mission of maintaining stability and public confidence in the nation’s financial system.**
- **Affordable Mortgage Lending Center**
- **FDIC Resources for Expanding Account Access:**
  - 2021 FDIC [Survey](#): *2021 FDIC National Survey of Unbanked and Underbanked Households*
  - FDIC’s [#GetBanked Webpage](#)
  - Interagency [Q&A](#) Regarding Community Reinvestment





# Need for Community Development

## **Awareness**

- 26 million Americans have no credit score & 1 in 8 do not know what it is
- 75% of Millennial homebuyers say they did not know down payment assistance was available

## ◦ **Access**

- 14.1 million American adults are unbanked
- 75% of today's homebuyers think homeownership is out of their reach

## ◦ **Accountability**

- 42% of 18-34 years looking to buy a home say they do not know what lenders expect of them
- Gen Z & Millennials require “human” digital solutions and want a guide to help them to be the hero of their own story

*\*Sources- FDIC 2021 National Survey of Unbanked and Underbanked Households, CFPB and Fannie Mae reports*

# Affordable Mortgage Lending Center

- The FDIC created the *Affordable Mortgage Lending Guide*, which is a three-part series of publications that identifies key resources for community banks to use for affordable mortgage products.

Part I: Federal Agencies and Government Sponsored Enterprises

Part II: State Housing Finance Agencies

Part III: Federal Home Loan Banks

- The Affordable Mortgage Lending Center is a dedicated website that provides technical resources to gain an overview of a wide variety of programs, compare different programs, and to help identify the next steps for program participation.

# Affordable Mortgage Lending Center Website

Home // Resources // Bankers // Affordable Mortgage Lending Center

Bankers Resource Center

## Affordable Mortgage Lending Center

Last Updated: January 26, 2022

Share This: [!\[\]\(a03a7eb2f4046e1d3c76772003e549ea\_img.jpg\)](#) [!\[\]\(844169987a590ed8c7e31d5d18950e8d\_img.jpg\)](#) [!\[\]\(2af34e678d9364b2f32b7174f4964d2c\_img.jpg\)](#) [!\[\]\(70453908cab6780413d48bd2b8b15c53\_img.jpg\)](#) [!\[\]\(00c909e82d9243e04b2a707a76cc895d\_img.jpg\)](#)

[Affordable Mortgage Lending Center Home](#)

[CRA Related Information](#)

[Activities and Events](#)

[Mortgage Rules Videos](#)

[Money Smart Financial Education Tools](#)

### Mortgage Lending

Mortgage lending is an important element of many community banks' business and Community Reinvestment Act (CRA) strategies. The FDIC's Affordable Mortgage Lending Center is designed as a resource for community banks to help them compare a variety of current affordable mortgage programs and to identify the next steps if they seek to expand or initiate affordable mortgage lending. Offering affordable mortgage loans to a wide range of customers can deepen bank customer relationships and provide an important pathway for borrowers to own their own homes and participate in the mainstream banking system.



# Affordable Mortgage Lending Center: Federal Agencies & Government Sponsored Enterprises

[ABOUT](#)[RESOURCES](#)[ANALYSIS](#)[NEWS](#)

## Federal Agencies and Government Sponsored Enterprises Programs & Products

Last Updated: October 12, 2021

Share This:     

[Affordable Mortgage Lending Center Home](#)

[State Links for Housing Agencies](#)

[Federal Agencies and Government Sponsored Enterprises Programs & Products](#)

[Quick Links for Federal Home Loan Bank Summaries](#)

[Community Affairs Program and Contacts](#)

[Mortgage Rules Videos](#)

Quick Links provides easy access to specific affordable housing programs from federal agencies and the government sponsored enterprises. These programs include guarantee, loan purchase, and subsidy programs that can facilitate mortgage lending by insured depository institutions. It includes programs and products that support home purchase, refinance, manufactured housing, and some home improvement lending by banks. Below you can find direct links to specific HUD/FHA loan programs, USDA rural housing programs, VA, and CDFI Fund programs, as well as Fannie Mae and Freddie Mac products for affordable housing.

PDF Help

[U.S. Department of Housing and Urban Development/FHA](#) >

[Community Development Financial Institutions Fund](#) >

[U.S. Department of Agriculture](#) >

[Fannie Mae](#) >

[U.S. Department of Veterans Affairs](#) >

[Freddie Mac](#) >



# Affordable Mortgage Lending Center: State Housing Finance Agencies

The screenshot shows the FDIC Affordable Mortgage Lending Center website. The top navigation bar includes the FDIC logo and links for ABOUT, RESOURCES, ANALYSIS, NEWS, and a search icon. The main heading is "State Links for Housing Finance Agencies". Below the heading, it states "Last Updated: December 30, 2021" and provides social media sharing options for Facebook, Twitter, LinkedIn, Email, and Print. A left sidebar contains several menu items: "Affordable Mortgage Lending Center Home", "State Links for Housing Agencies", "Federal Agencies and Government Sponsored Enterprises Programs & Products", "Quick Links for Federal Home Loan Bank Summaries", "Community Affairs Program and Contacts", "Mortgage Rules Videos", and "Money Smart Financial Education Tools". The main content area features a paragraph explaining that State Links provides access to affordable housing programs and products from each State Housing Finance Agency, including first mortgage products, down payment and closing cost assistance, mortgage tax credit certificates, homeownership education and counseling, and alternative private mortgage insurance options. It also notes that each state sheet provides contact information for the State Housing Finance Agency and other local sources. Below the text is a map of the United States with state boundaries, intended for users to click on their state of interest for more information.

# Affordable Mortgage Lending Center: Federal Home Loan Banks

ABOUT RESOURCES ANALYSIS NEWS 

## Quick Links for Federal Home Loan Bank Summaries

Last Updated: December 30, 2021 Share This:     

[Affordable Mortgage Lending Center Home](#)

[State Links for Housing Agencies](#)

[Federal Agencies and Government Sponsored Enterprises Programs & Products](#)

[Quick Links for Federal Home Loan Bank Summaries](#)

[Community Affairs Program and Contacts](#)

[Mortgage Rules Videos](#)

[Money Smart Financial Education Tools](#)

Quick Links provide easy access to specific products and services offered by each Federal Home Loan Bank (FHLB). These include affordable lending services, affordable lending products, the Mortgage Partnership Finance<sup>®</sup> Program and the Mortgage Purchase Program (as applicable), Homeownership Set Aside Program operations, as well as descriptions of the specific Homeownership Set Aside products are available. Each FHLB summary also provides important contact information for your FHLB, as well as other important links for education resources and specific product information.

Click on your FHLB of interest for additional information.



# #GetBanked Campaign

- **Dedicated webpage to encourage consumers to open a bank account**  
[fdic.gov/GetBanked](https://fdic.gov/GetBanked) and [fdic.gov/GetBanked-esp](https://fdic.gov/GetBanked-esp)
  - Banners, TV/radio ads in English & Spanish
  - Consumer Resources
- **Help promote the importance of having a banking relationship**
  - Link to the [#GetBanked webpage](https://fdic.gov/GetBanked) on your organization's website
  - Follow us on social media and use our hashtags
    - @FDICgov
    - #GetBanked #FDIC



Consider placing a link to the #GetBanked webpage in English and Spanish on your institution's website.

# How Money Smart Are You?



[PlayMoneySmart.fdic.gov](https://PlayMoneySmart.fdic.gov)

[playmoneysmart.fdic.gov/organization-apply](https://playmoneysmart.fdic.gov/organization-apply)

Spanish game released in 2022

- Online **games** and **resources** about everyday financial topics
- Organization accounts available
  - ✓ Players can “link” their accounts to yours
  - ✓ Track players’ progress playing Games
  - ✓ View/print Certificates of Completion
  - ✓ No information about players’ use of Resources



# CRA Questions & Answers

QUESTION	ANSWER EXCERPT
<p><b><i>§ ll.12(g)(3)–1: “Community development” includes activities that promote economic development by financing businesses or farms that meet certain size eligibility standards. Are all activities that finance businesses and farms that meet the size eligibility standards considered to be community development?</i></b></p>	<p>These activities are considered to promote economic development if they support permanent job creation, retention, and/or improvement</p> <ul style="list-style-type: none"><li>○ by financing intermediaries that lend to, invest in, or provide technical assistance to <b><i>start-ups or recently formed small businesses</i></b> or small farms; or (Page 48526)</li></ul>
<p><b><i>§ ll.12(i)–3: What are examples of community development services?</i></b></p>	<ul style="list-style-type: none"><li>• Providing technical assistance on financial matters to <b><i>small businesses</i></b> or community development organizations, including organizations and individuals who apply for loans or grants under the Federal Home Loan Banks’ (FHLB) Affordable Housing Program</li><li>• Providing <b><i>credit counseling, homebuyer counseling</i></b>, financial planning or other financial services education to promote community development <b><i>and affordable housing</i></b> (Page 48530)</li></ul>

Source: [Interagency CRA Questions & Answers](#)

# Community Development Opportunities

Work to identify community development organizations that leverage innovation in and for the most vulnerable populations to accelerate economic productivity.

Inform financial institutions of the need to partner with these organizations to help support entrepreneurship, affordable housing, and activities that promote economic development by financing small business and small farms.

Encourage banks to support activities that revitalize or stabilize low- and moderate-income geographies, distressed or underserved geographies, and designated disaster areas.

Education is one of the best routes out of poverty and to build generational wealth.

# Specific Ways Banks Can Support Community Development

- Provide experts to present at training sessions (*CRA service*)
- Provide loans to small business and affordable housing (*Lending test*)
- Support pitch competitions (*CRA investment and service*)
- Provide donations and grants to small business (*CRA donations*)
- Provide qualified services to support CD events (*CRA service*)
- Sponsor and participate in Minority Business Initiatives (*CRA investment*)
- Provide loans to promote economic development (*Lending test*)
- Support activities that revitalize or stabilize LMI geographies (*CRA credit*)

# Economic Inclusion and Community Development: Volunteer Income Tax Assistance (VITA)-Related Activities

Financial institutions that partner with VITA sites may be eligible for favorable consideration for VITA-related activities under the CRA regulations. Financial institutions can participate in the IRS VITA program in various ways, including:

- Notifying staff of opportunities to be VITA volunteers.
- Co-sponsoring a VITA program.
- Donating old computer equipment for use in preparing returns.
- Hosting a VITA site at a bank branch.
- Promoting the EITC and VITA program to bank customers, such as by displaying a poster in the lobby or adding a message to bank statements.
- Offering taxpayers the opportunity to begin the process of opening a bank account at a VITA site, whether online or with staff onsite.
- Offering banking products responsive to the needs of VITA clients, whether online or with staff onsite.
- Partnering with the local VITA program to make financial education available to consumers at VITA sites.

# Resources

[Banker Resource Center](#)

[Interagency CRA Q&As](#)

[Fair Lending Technical Assistance Videos](#)

[Subscribe to FDIC Updates](#)

# FDIC Community Affairs Contact

- If you would like assistance in partnering with others on community development, please contact Community Affairs.
- [FDIC Community Affairs](#)
- [rhlittle@fdic.gov](mailto:rhlittle@fdic.gov)
- [FDIC Affordable Mortgage Lending Center](#)
- Follow us on social media **@FDIC.gov**.

# Community Development Discussion

Thank you.



# Community Reinvestment Alliance of Florida

The Community Reinvestment Act, your community and how to get involved.





The CRAF is a nonprofit membership organization. We have 186 members across Florida. We are 1 of 3 organizations nationwide to have partnered with the National Community Reinvestment Coalition (NCRC) on a joint membership agreement.

#### Organization highlights:

- Participated and led the Florida state delegation on 9 Community Benefits Agreements.
- Nonprofit Capacity Building Project (grants to nonprofits with budgets under \$500k)
- The Trade Page (connecting small businesses with needed services – accounting, HR, social media)
- Member of the following boards & committees  
NCRC Board Member, Miami Climate Alliance, Public Land for Public Good, Nonprofit Executive Alliance of Broward, Palm Beach Housing Alliance, South Florida Black Prosperity Alliance, Broward Racial Equity Committee, Miami Dade County Local Community Transportation Board

#### Community Advisory Boards:

Comerica Bank

Truist Bank

First Horizon Bank

Fifth Third Bank

What is the Community Reinvestment Act of 1977 definition?

a. The Community Reinvestment Act of 1977 (CRA) encourages certain insured depository institutions to help meet the credit needs of the communities in which they are chartered, including low- and moderate-income (LMI) neighborhoods, consistent with the safe and sound operation of such institutions.

b. The CRA requires federal banking agencies to

1. assess the institution's record of meeting the credit needs of its entire community, including LMI neighborhoods, consistent with the safe and sound operation of such institution, and
2. take such record into account in its evaluation of an application for a deposit facility by such institution.
3. Link to view every regulated bank CRA examination and view bank exam schedule: FFIEC Community Reinvestment Act [www.ffiec.gov/cra](http://www.ffiec.gov/cra)

## Bank Regulation

Banks are regulated by 3 agencies depending on size. These are the Office of Comptroller of Currency (OCC), Federal Reserve Board (FRB), Federal Deposit Insurance Corporation (FDIC). There are currently 3,983 banks that are regulated by these agencies. Banks can get one of four overall ratings: Outstanding, Satisfactory, Needs to Improve and Substantial Noncompliance. The latter two are considered failing grades. If the bank fails, they are re-evaluated in 12-18 months. During that time before the bank is re-evaluated, it can't merge, be acquired, close branches or open branches.

More than 98% of CRA examinations result in a passing grade, even in cases where there is clear evidence that a bank is excluding populations based on race — or worse, preying on them with predatory products and debt collection practices.

# Why join CRAF?

a. **ENHANCE**

your impact on critical issues facing your community.

b. **ACCESS**

data, training and expertise.

c. **STRENGTHEN**

our collective voice.

d. **INFLUENCE**

local business practices and national policy.

e. **CHAMPION**

fairness and fight discrimination in lending, housing and business.

# Community Benefits Agreements

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CBA's are negotiated when financial institutions merge, are acquired or purchased.

- CRAF has participated in 9 CBA's totaling over \$350 billion dollars with financial institutions.
- NCRC (our national partner) leads negotiations for the banks' footprint.
- CRAF leads the Florida coalition in negotiations with the bank.
- We advocate for investment in Florida specific issues, staff requests, bank CBA reporting and CRA regulation.
- CBA's are not yet a CRA requirement, but are entered into voluntarily by the banks.

## CRAF MEMBERSHIP BENEFITS

1. CRA Education, training.
2. Joint membership available with our national partner NCRC.
3. Partnerships & collaborations with banks, community leaders, government, corporations & other nonprofits.
4. CBA negotiations participation.
5. CRA Regulation advocacy.
6. Discounted fees for partner programs.
7. Participation in the CRAF Just Economy Podcast.

# COMMUNITY REINVESTMENT ALLIANCE OF FLORIDA

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QUESTIONS?

CONTACT INFO:

[www.Crasf.org](http://www.Crasf.org)

Cornell Crews Jr Executive Director [cornell@reinvestmentalliance.org](mailto:cornell@reinvestmentalliance.org)

office: 954.622.4184 cell: 786.266.1158

Olivia Cantu Admin Assist [Oliviac@reinvestmentalliance.org](mailto:Oliviac@reinvestmentalliance.org)

**Questions**

