The Colorado Health Foundation™

Comments on Community Reinvestment Act Regulations; Docket ID OCC-2026-0694; RIN 1557- AF57; RIN 3064-AG31

Thank you for the opportunity to provide comments on the Office of the Comptroller of the Currency's (OCC) and Federal Deposit Insurance Corporation's (FDIC) proposed amendments to the Community Reinvestment Act (CRA) regulations. The Colorado Health Foundation ("CHF" or "the Foundation") is a statewide, nonprofit and nonpartisan philanthropic organization with a mission to improve the health and well-being of Coloradans. Through community engagement, research, grantmaking, and private sector investments, the Foundation works to ensure that everyone in Colorado has what they need to be healthy. The Foundation has a particular interest in ensuring that communities across Colorado have access to the capital, affordable housing, financial services, and economic opportunities that support good health and well-being.

The Foundation recognizes the agencies' stated goals of reducing regulatory burden for community banks and providing greater clarity in the CRA framework. This proposed rule, however, would substantially narrow CRA examination and reporting requirements by raising the small-bank threshold from less than $412 million to less than $1 billion, establishing an intermediate-bank category of $1 billion to $10 billion, and limiting the full large-bank framework to banks with more than $10 billion in
assets.

These changes would move hundreds of banks into less intensive examination categories and reduce separate scrutiny of community-development lending, investments, branches, and services. The Foundation is concerned that the proposal could weaken accountability for whether banks are meeting local credit and investment needs, particularly in smaller and rural markets where community and regional banks can play an especially important role.

For these reasons, the Foundation respectfully urges the agencies to withdraw these proposed changes that would significantly narrow community-development, investment, service, and data-reporting requirements.

READ THE FULL LETTER

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Announcements

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BY

The Colorado Health Foundation