NATIONAL LOW INCOME HOUSING COALITION

NLIHC's HoUSed Campaign for Long-Term Housing Solutions

August 11, 2026

Welcome & Introductions

David Gonzalez Rice

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Agenda

NATIONAL LOW INCOME HOUSING COALITION

Welcome & Introductions

- David Gonzalez Rice, Senior Vice President of Policy, NLIHC

Implications of DHS's Public Charge Rule for HUD Programs

- Maddie Geschu, Director of Policy & Advocacy, Protecting Immigrant Families Coalition

Proposed Changes to the CRA and Impact on Communities

- Kevin Hill, Senior Policy Advisor, National Community Reinvestment Coalition

Field Update

- Duaa-Rahemaah Hunter, Statewide Organizer, Washington Housing Alliance
- Todd Holloway, Disability Integration Advisor, Washington State Coalition on Inclusive Emergency Planning

Take Action

- Lindsay Duvall, Manager of Member Engagement, NLIHC

Implications of DHS's Public Charge Rule for HUD Programs

NATIONAL LOW INCOME HOUSING COALITION

Maddie Geschu

Director of Policy & Advocacy

Protecting Immigrant Families Coalition

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Proposed Changes to the CRA and Impact on Communities

NATIONAL LOW INCOME HOUSING COALITION

Kevin Hill

Senior Policy Advisor

National Community Reinvestment Coalition

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National Community Reinvestment Coalition

THE OCC/FDIC'S PROPOSED ROLLBACK OF THE CRA

pline Implications of e changes in bank es

As a result:

- Banks below $1 billion would lose community development requirements
- Banks between $1.649 billion and $10 billion would no longer receive the full large-bank examination with separate lending, investment and service tests
- Jeopardizing at least half a billion per year in loans and investments for affordable housing and other community needs

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Details of OCC/FDIC Proposal: **How Banks are Rated**

Current Approach

Half of banks have community development responsibilities, and the largest banks are also evaluated for branches and must report small business loans.

$1.6 billion and up

Large Banks (694 total – 16% of all banks)
Lending Test (retail and CD loans)
Investment Test (investments, grants)
Service Test (branches, products, volunteer hours)
Small biz reporting required

$412 million - $1.6 billion

Intermediate Small Banks (1,357 total – 32% of all banks)
Lending Test (retail loans)
Community Development Test (loans, investments, services, grants combined)
No small biz reporting

$412 million and below

Small Banks (2,236 total – 52% of all banks)
Lending Test (retail loans)
No community development or service test
No small biz reporting

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termediate, and large
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Bank size	Current rule	Proposed rule
Small	< $412 million	<$1 billion
Intermediate	>$412 million to $1.649 billion	>$1 billion to $10 billion
Large	>$1.649 billion	>$10 billion

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uired community
velopment test

Puts affordable housing and community development investment and financing at risk, especially in smaller markets

- By raising the "small bank" threshold from $412 million to $1 billion, it would eliminate community development evaluations for roughly 814 banks, or about 40% of the banks currently subject to that requirement.
- The share of all banks with community development responsibilities would fall from roughly half to less than one-third.
- In 16 states, at least one-third of the banks would no longer face that requirement, with rural and Southern states particularly affected.
  - Iowa would go from 109 banks evaluated for community development to 63
  - Louisiana would fall from 62 to 32.

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;iness lending for
ıks under $10 billion

Hides lending gaps and make banks harder to hold accountable.

- The proposal would limit reporting requirements to banks with more than $10 billion in assets. Banks with assets of $10 billion or less would no longer be required to collect and report CRA data on small-business loans, small-farm loans, community-development loans and assessment areas.

- Lending gaps cannot be addressed when they are hidden.
  - Rule eliminates 11% of CRA small-business lending data nationwide.

- Six states—Iowa, Louisiana, Maine, Mississippi, North Dakota and South Dakota—would lose nearly one-quarter of their data.

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anch loss will be
tionwide; acute in
ral areas

Puts thousands of branches nationwide at risk; particularly acute in rural areas.

- Raising the large-bank threshold to $10 billion would eliminate separate branch evaluations for 417 banks.

- More than 5,000 branches in LMI census tracts—30% of all LMI branches nationwide—and more than 4,000 branches in majority-people-of-color tracts—23% of all such branches—would lose this scrutiny.

- Twenty-eight states would lose evaluations for at least one-third of their LMI-area branches, and 22 states would lose evaluations for at least one-third of branches in majority-people-of-color tracts.

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cking and savings
ducts

Undermines the financial health of unbanked and underbanked communities

- Under the current large-bank service test, examiners consider retail banking services broadly, including deposit products.

- The proposed rule would restrict the service test to “credit services” and exclude deposit services such as checking and savings products from CRA consideration.

- For large banks still subject to the service test, examiners would no longer evaluate whether checking and savings accounts are affordable.

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e end goal is to limit
A through the
urts.

Uses the courts to narrow CRA and restrict future modernization

- As part of this rulemaking, the OCC and FDIC are trying to get the court to declare that no future rule may examine lending beyond banks' branch footprints or evaluate deposit products.
- Agencies are asking a court to prohibit future administrations from attempting a different approach.
- The supposedly "technical" changes in the proposed rule provide cover for a much broader and bolder attempt to limit CRA's reach through the courts.

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Next Steps

Together We Can Defend CRA

- Our coalition has successfully stopped harmful CRA rules before
- This won't be quick or easy, but effective organizing and mobilization still gets results
- But none of our organizations will be successful at stopping this by acting alone

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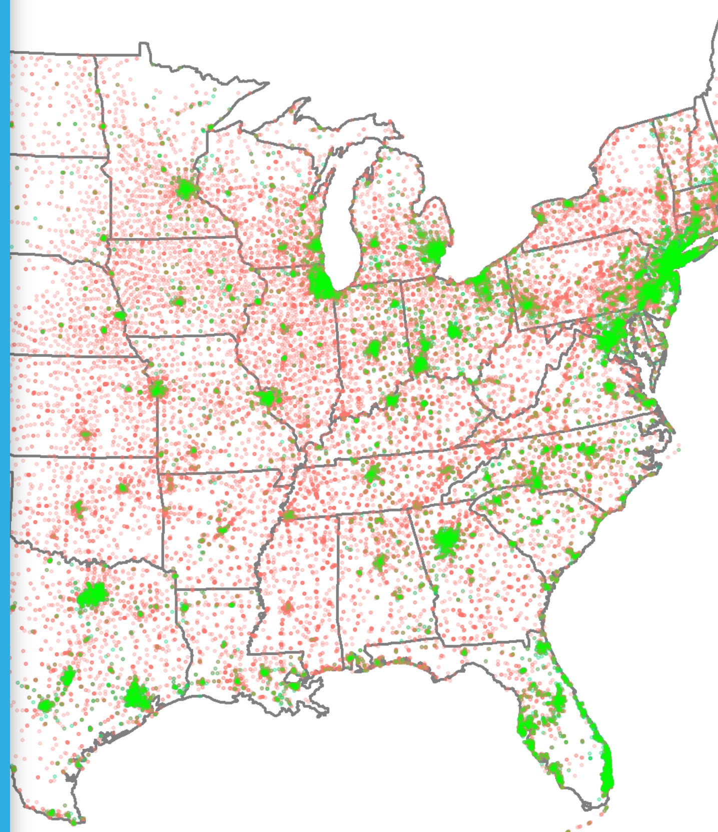
Next Steps

Rallying Opposition



- NCRC will circulate a sign on letter, as well as templates that make it easy for orgs to submit their own comment letter
- NCRC will provide research on how specific states will be affected
- Providing toolkits to help reach out to local media and elected officials about the consequences of less local capital for affordable housing, small business assistance, workforce development, etc.
- Connect with NCRC's Policy Team for support, and monitor NCRC's CRA page for resources
  khill@ncrc.org
  ncrc.org/cra

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National Community Reinvestment Coalition

Q&A

Field Update

NATIONAL LOW INCOME HOUSING COALITION

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Take Action

NATIONAL LOW INCOME HOUSING COALITION

Lindsay Duvall

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Resources & Next Steps

NATIONAL LOW INCOME HOUSING COALITION

- **Contact** your members of Congress: https://nlihc.quorum.us/campaign/157066/
- **Become a member** of NLIHC: www.nlihc.org/membership
- **Connect** to your Field Team member: outreach@nlihc.org

Join our next National HoUSed Campaign Call:

Tuesday, September 8 at 4:00 -5:00 pm ET