



October 29, 2021

Submitted Electronically

Chief Counsel's Office,
Attention: Comment Processing,
Office of the Comptroller of the Currency,
400 7th Street SW, Suite 3E-218,
Washington, DC 20219
Docket ID OCC-2021-0014

Re: Community Reinvestment Act Regulations; RIN 1557-AF12

Dear Ladies and Gentlemen,

The Wisconsin Bankers Association (WBA) is the largest financial trade association in Wisconsin, representing over 200 state and nationally chartered banks, savings and loan associations, and savings banks. WBA appreciates the opportunity to comment on the Office of the Comptroller of the Currency's (OCC) notice of proposed rulemaking to replace the current Community Reinvestment Act (CRA) rule with rules based on the 1995 CRA rules (proposal).

On June 5, 2020, OCC published a final rule to adopt a new CRA framework. This proposal effectively rescinds that CRA final rule, in an effort to facilitate the issuance of joint CRA rules between OCC, the Board of Governors of the Federal Reserve, and Federal Deposit Insurance Corporation (agencies). WBA appreciates OCC's recognition of the challenges posed by the 2020 final rule, and its rescission of that rule, to facilitate any future CRA rulemaking on an interagency basis.

Wisconsin banks support the vital role CRA plays in their communities and have reported meaningful growth in loan activity and investments in low- and moderate-income communities since the law's enactment. CRA's objectives help banks better serve their communities and grow their core business. While Wisconsin banks remain committed to CRA and standby its purpose, many expressed significant concern regarding the final rule, particularly the lack of coordination taken with the other agencies.

As such, WBA supports OCC's proposal to align the OCC's CRA rules with the current Board and FDIC CRA rules and to facilitate on-going interagency work to modernize the CRA rules and create consistency for all insured depository institutions. WBA appreciates the opportunity to comment on OCC's notice and supports its efforts to work with the other agencies on a unified CRA framework.

We appreciate your consideration of these comments.

A handwritten signature in black ink that reads "Rose Oswald Poels".

Rose Oswald Poels
President/CEO