

From: Shawnee Housing Authority [shawha@swbell.net]
Sent: Friday, January 21, 2005 12:38 PM
To: Comments, Regs
Cc: jfalcusan@nahro.org
Subject: 2004-53 Community Reinvestment Act

Regulations Comments
Chief Counsel's Office
Office of Thrift Supervision
1700 G Street NW
Washington, DC 20552

<>Attention: No. 2004-53 <>

To Whom It May Concern:

The Housing Authority of the City of Shawnee, Oklahoma would like to take this opportunity to comment on the Office of Thrift Supervision's notice of proposed rulemaking concerning Community Reinvestment Act (CRA) regulations. We oppose the proposed changes because they would reduce housing-community development-related lending in low- and moderate-income communities and allow federally chartered thrifts to design their own watered-down CRA exams and invest in affluent areas with no CRA penalty. Please consider these comments regarding the proposed new rule to relax the Community Reinvestment Act requirements: <>

The Housing Authority of the City of Shawnee provides decent, safe, sanitary and affordable housing to low and moderate income families. Our Special Programs department provides opportunities for homeownership for low and moderate income families. We provide asset development, employment assistance, housing counseling, homebuyer education and Section 8 Homeownership.

If the investment test is eliminated, thrifts will have a substantially reduced incentive to finance the development of affordable rental housing through the use of Low Income Housing Tax Credits. <>

We rely on our partners in the lending industry to assist us in providing speakers, refreshments and materials to our Homebuyer Education classes, technical assistance, and flexibility in lending products to meet the needs of our buyers. <>

CRA mandates have laid the groundwork for promising partnerships in the future. Our area lending institutions have taken the first steps in partnering to provide more opportunities for low and moderate income families. There is yet progress to be made to further the mission to include more flexible loan products and coordination with local and state programs to supply funds for IDAs, low or no down payment and closing cost programs, keeping interest rates and payments low, and providing funding to non-profits to sustain Homebuyer Education and Housing Counseling activities. <>

Our position is that this is a counterproductive measure that will reverse the momentum that has been gained in the President's homeownership initiative. Institutions protected by federal deposit insurance should not have regulations relaxed in their requirement to invest in the very communities that support them and keep them in business. <>

Thank you for entertaining this comment.

Mynda Bowden<>
Family Self-Sufficiency Coordinator and Housing Counselor
Housing Authority of the City of Shawnee, Oklahoma