

Author Full Name : Anonymous**Received Date :** 07/16/2025 06:16 PM**Comments Received :**

(a) Whether the collection of information is necessary for the proper performance of the functions of the OCC, including whether the information has practical utility.

- There is some concern as to whether the OCC will continue to offer this Form following the NPRM to rescind the 2023 CRA Final Rule, although I note that the Federal Register Description (90 FR 27388, 27389) does not reference the 2023-2025 proposed and final rules. This Form continues to have practical utility for OCC-supervised banks. Each of the federal banking agencies should all offer this resource to the banks that they evaluate for CRA purposes, as well as other interested parties.

The Form currently offers a helpful method to ensure a loan, investment, or service fits within the scope of the fairly ambiguous and subjective language in the CRA regulations and definition of "Community Development" (notwithstanding the 2015 CRA Q&As, which are somewhat helpful). By offering some measure of assurances that banks will receive CD credit for their proposed loan, investment, or service, the confirmation increases the likelihood of banks engaging in CD activities. That directly contributes to banks' abilities to meet the credit needs of their local communities, and aligns with the letter and spirit of the CRA.

Further, the Form enables other submitters to request confirmation of eligibility when working with OCC-supervised banks to identify the cost-benefit of proposed activities. This may increase community engagement, public participation, and encourage bank involvement in CD activities.

I'm uncertain whether National Banks and Federal Savings Associations are now required to submit their requests via BankNet; however, I believe it prudent to continue to offer the ability to submit this Form via other means to ensure banks, consortiums, and other third-parties are able to seek clarification without the need or expectation to directly submit a request to be attached to the bank's BankNet profile. Assurances of confidentiality, alone, does not seem to be sufficient to address the potential concerns of requiring the use of BankNet to submit these types of requests.

(c) Ways to enhance the quality, utility, and clarity of the information to be collected.

- Consider providing an updated list of qualifying activities that covers current and future periods. Many banks improperly rely on the OCC's CRA Illustrative List of Qualifying Activities for activities initiated after December 31, 2021 period. Offering an updated list, or even 'examiner guidance' may assure banks of the eligibility of their activities without the need to rely on this Form. Thus, the Form would potentially be used less frequently, but for the more complex or novel activities (thereby enhancing its systemic value).