

From: [Dory Rand](#)
To: [PRAINFO](#)
Cc: [Ginger, Paul](#)
Subject: Draft Bulletin: Risk Management Guidance for Higher Loan-to-Value Lending in Communities Targeted for Revitalization, OMB Control No. 1557-NEW
Date: Monday, February 22, 2016 5:34:05 PM
Attachments: [image001.png](#)
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To Whom It May concern:

Woodstock Institute submits this comment in support of the Office of the Comptroller of the Currency's proposal to produce a bulletin containing guidance on establishing programs for originating owner-occupied residential mortgage loans that exceed supervisory loan-to-value (SLTV) limits in communities targeted for revitalization. We believe that the proposed collection of information is necessary for the proper performance of the functions of the OCC and that the information has practical utility. With this guidance and proper supervision, these programs can help expand access to home ownership opportunities and revitalize distressed communities.

Woodstock Institute is a leading nonprofit research and policy organization in the areas of equitable lending and investments, wealth creation and preservation, and safe and affordable financial products, services, and systems. Our mission is to create a just financial system in which lower-wealth persons and communities, and people and communities of color, can achieve economic security and community prosperity.

Woodstock Institute requests that the OCC make public its annual evaluations of the overall impact of the banks' higher LTV lending programs in communities targeted for revitalization, including the extent to which banks receive Community Reinvestment Act (CRA) consideration for these programs.

Thank you for the opportunity to comment on this proposal.

Respectfully submitted,

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