NATIONAL
LEASED HOUSING
ASSOCIATION

October 13, 2026

The Honorable Jonathan V. Gould
Comptroller of the Currency
Office of the Comptroller of the Currency
400 7th Street, SW
Washington, DC 20219

The Honorable Travis Hill
Chairman
Federal Deposit Insurance Corporation
550 17th Street, NW
Washington, DC 20429

Re: Community Reinvestment Act Regulations; Docket ID OCC-2026-0694; RIN 1557-AF57; RIN 3064-AG31

Dear Comptroller Gould and Chairman Hill:

On behalf of the National Leased Housing Association (NLHA), I submit these comments on the proposed amendments to the Community Reinvestment Act (CRA) regulations published on August 12, 2026. NLHA represents public housing authorities, nonprofit organizations, and private owners, managers, developers, and lenders that provide homes to low-income families, seniors, and people with disabilities through the Section 8 Project-Based Rental Assistance (PBRA), Housing Choice Voucher, and other federal housing programs.

NLHA is a signatory to a separate letter led by the National Association of Affordable Housing Lenders (NAAHL), and we fully support its recommendations. We write separately to highlight three ways the proposal would affect the federally assisted housing stock our members own and operate.

1. Preservation of HUD-assisted housing depends on CRA-motivated equity. Much of the nation's Section 8 and public housing stock is decades old and needs recapitalization. A typical preservation transaction, including Rental Assistance Demonstration (RAD) conversions, combines Low-Income Housing Tax Credit (LIHTC) equity, tax-exempt bonds, and bank debt alongside a renewed rental assistance contract. Banks supply most LIHTC equity, and CRA is a key reason they do. The proposal would move roughly 376 banks from large bank to intermediate bank treatment, ending their separate investment test, and would narrow the definition of "complex" activities to those tied to a loan. Together, these changes would weaken demand for Housing Credit equity, especially in rural and smaller markets. Lower equity pricing widens financing gaps that must be filled by HUD, state agencies,

or deferred repairs. We urge the agencies to preserve a significant, separate weight for community development investments and to recognize Housing Credit equity investments, including those without an accompanying bank loan, as complex and responsive activities.

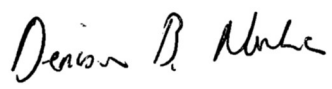
2. The final rule should confirm the treatment of HUD-assisted housing. We support the proposal's clearer definition of affordable housing, including its recognition of rental housing "undertaken in conjunction with an explicit Federal, State, local, or Tribal government affordable housing program" (proposed §§ 25.12 and 345.12, "affordable housing," paragraph (1)(i)(D)). We also support the agencies' plan to publish an illustrative list of qualifying activities. As the agencies finalize the definition and the list, we ask them to confirm two points. First, loans, investments, and grants that support the acquisition, rehabilitation, refinancing, or preservation of properties assisted under Section 8 Project-Based Rental Assistance, project-based vouchers, the Rental Assistance Demonstration, Section 202, Section 811, and public housing qualify under paragraph (D). Second, where a rental assistance contract covers only some of a property's units, the pro rata calculation under paragraph (1)(i)(B) should count every unit restricted for low- or moderate-income households under any government program or regulatory agreement, not only the units with a subsidy contract. Many preservation transactions layer a partial assistance contract with Housing Credit or HUD use-agreement restrictions on the remaining units, and the proposal does not say how those layers are counted.

3. Grants for resident services and nonprofit capacity should remain eligible. Many assisted properties rely on bank grants to fund service coordinators, after-school programs, and support to help older adults age in place. Nonprofit owners and housing authorities also depend on grants to build the capacity to take on difficult preservation projects. The proposed 15 percent cap on recipients' administrative and overhead costs, and its new documentation requirements, would fall hardest on small organizations. We ask the agencies to confirm that resident services and capacity building for nonprofit housing providers are eligible community development purposes, and to drop or substantially raise the overhead cap.

Closing

NLHA shares the agencies' goal of a CRA framework that is clearer and less burdensome. We urge you to pursue it without reducing the capital that keeps federally assisted homes safe, decent, and affordable. Thank you for considering our views.

Respectfully submitted,



Denise Muha
Executive Director
National Leased Housing Association