

For Release Upon Delivery

10:00 a.m.

May 19, 2021

STATEMENT OF
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ACTING COMPTROLLER OF THE CURRENCY
before the
COMMITTEE ON FINANCIAL SERVICES
UNITED STATES HOUSE OF REPRESENTATIVES
May 19, 2021

Statement Required by 12 U.S.C. § 250:

The views expressed herein are those of the Office of the Comptroller of the Currency and do not necessarily represent the views of the President.

Introduction

Chairwoman Waters, Ranking Member McHenry, and members of the Committee, I am pleased to provide an update on the activities underway at the Office of the Comptroller of the Currency (OCC) to ensure that national banks and federal savings associations operate in a safe, sound, and fair manner.

Throughout the pandemic, the OCC has placed a priority on the health and safety of its workforce and taken steps to safeguard employees while maintaining their ability to ensure that the banks we supervise meet the objectives of our mission. The banks have played an important part in our nation's ongoing response to the COVID pandemic by providing essential banking services and needed capital and by extending credit to hundreds of millions of households and businesses.

Last week I was sworn in as Acting Comptroller of the Currency. It is a tremendous honor to work with the 3,500 dedicated professionals of the OCC. I appreciate the confidence Secretary Yellen has shown in me by appointing me to this important post. I am looking forward to building on the agency's long history and rich heritage.

I am a career public servant and a bank supervisor at my core. My experiences at the Securities and Exchange Commission, U.S. Department of the Treasury, International Monetary Fund, and the Board of Governors of the Federal Reserve System over the past 19 years have spanned periods of growth, crisis, reform, and recovery. I have seen firsthand the benefits that financial innovation and healthy competition can bring, as well as the harm that excessive risk taking, ineffective risk management, poor internal controls and lax compliance can inflict on families and businesses, the banking system, and the economy. I am proud to have worked alongside some of the smartest and most dedicated public servants in the world to repair and restore confidence in the financial system so that consumers, businesses, and communities can save, borrow, and participate in the economy.

Promoting fairness and inclusion in banking is a fundamental part of the OCC's mission. The events of the past year have compelled me and many others to consider whether we are achieving fairness across many aspects of society, including banking. I look forward to working with members of the committee, fellow regulators, community groups, banks, academics, and the staff of the OCC to ensure that the banking system works for *everybody*, especially those who are vulnerable, underserved, and unbanked.

My testimony today is focused on my priorities for the OCC and the review of key

regulatory standards and pending actions that I immediately initiated upon taking office.

Priorities

As Acting Comptroller, I have a responsibility to address urgent problems and issues facing the OCC and federal banking system. I see four challenges requiring the agency's immediate attention: (1) guarding against complacency by banks, (2) reducing inequality in banking, (3) adapting to digitalization, and (4) acting on the risks that climate change presents to the financial system.

(1) Guarding Against Complacency by Banks

I believe the banking system, especially large banks, is at risk of becoming complacent.

Despite a once-in-a-lifetime pandemic, the banking system remains healthy. Key measures of financial strength – capital and liquidity ratios – are strong. Bank capital levels are well above where they were before the Great Recession, and bank liquidity is also substantially higher.

Banks are also profitable. Despite the extraordinary impacts of the pandemic on the economy, by year-end 2020, the banking system had largely recovered. Banks' average return on equity in the fourth quarter of 2020 slightly exceeded the average bank ROE in the fourth quarter of 2019 (11 percent versus 10.8 percent).

However, I am concerned that as the economy recovers and returns to normal, overconfidence leading to complacency is a risk. Indeed, the \$10 billion in cumulative losses related to Archegos, a non-bank financial company, reminds us of the importance of sound risk management.

Many large banks have ambitious growth plans, a robust merger outlook, and a “risk on” posture evident from investor calls. When done prudently, growth can provide significant benefits to consumers, communities, investors, and the U.S. economy. When done in an unsafe, unsound, and unfair manner, however, excessive growth can cause significant damage. One of our most important tasks as bank supervisors is to identify, assess, and act before that is the case.

My experience has made me sensitive to certain signals. Capitulation is one. In a dynamic economy, there is a constantly evolving set of products, practices, and clients that banks avoid, or limit exposure to, based on their risk appetite. For instance, a year ago at the height of the pandemic, most large financial firms avoided crypto-related activities and limited their exposures to Special Purpose Acquisition Companies (SPACs).

Today things are different. In some cases, banks have done the work necessary, developed the risk management capabilities, and put in place the appropriate resources to engage prudently with these products, practices, and clients. In other cases, because of market demand and/or a fear of losing client share, banks have set aside their initial risk management concerns and engaged with more risk imprudently. Distinguishing between cases that are appropriate and those that are not, is a task for supervision (as distinct from regulation) and a critical component of guarding against complacency in the current environment.

Another critical task is ensuring that banks maintain robust financial positions, especially with regards to capital and allowances for loans and lease losses. The agency's *Semiannual Risk Perspective* report provides analysis and insights into these and other risks facing banks and federal savings associations.¹ The report shows that credit risk remains elevated and is transitioning as the economic downturn continues to affect some borrowers' ability to service their debts and as economic activity accelerates as regions of the nation emerge from the pandemic. Assistance programs and federal, state, and local stimulus programs have suppressed past-due levels. Strategic risks associated with banks' management of net interest margin compression and efforts to improve earnings are elevated. Banks attempting to improve earnings may be tempted to implement measures including cost cutting, increasing credit risk, or extending duration. Operational risk is elevated because of a complex operating environment and increasing cybersecurity threats. Compliance risk is elevated as banks' expedited efforts to implement assistance programs challenge established change management, product, and service risk management practices.

Complacency is not a binary state. It often starts with small tradeoffs. Take, for instance, how banks respond to earnings pressures. Despite very low funding costs from low rates, loan growth is flat to declining. The impact of CARES Act programs on the business of banks, particularly mid-sized and community banks, was profound. Commercial and industrial loans, driven by PPP lending, expanded 3.1 percent for 2020. However, absent the PPP, C&I lending would have shrunk 9.1 percent. With such compressed margins, banks of all sizes may be tempted to reach for yield, operate beyond their risk appetites, or compromise their sound risk management.

¹ See <https://occ.gov/publications-and-resources/publications/semiannual-risk-perspective/index-semiannual-risk-perspective.html>

In addition, the country’s recent experience with the Solar Winds and Colonial Pipeline cyber-attacks underscores the need for banks to maintain and fortify a strong cybersecurity posture and risk management controls. The OCC is coordinating with the Federal Reserve and FDIC to conduct cybersecurity reviews at the largest banks, and recently issued a paper on Sound Practices to Strengthen Operational Resilience² and a Notice of Proposed Rulemaking (NPR) on Computer Security Incident Notification.³ The OCC looks forward to receiving comments on the NPR and engaging with the industry to institute best practices in this area.

As supervisors, being vigilant and guarding against complacency will help ensure that the banking system remains safe, sound, and fair, and can support a strong economic recovery.

(2) Reducing Inequality in Banking

Reducing inequality must be a national priority. The events of the last two years have brought our history of financial inequality into sharp relief. Recent research by the Brookings Institute illustrates the stark economic inequality faced by communities of color. In the average U.S. metropolitan area, homes in neighborhoods where the share of the population is 50 percent Black are valued at roughly half the price as homes in neighborhoods with no Black residents, suggesting that the most important source of generation wealth building has been denied this segment of the population.⁴

The pandemic has had a disproportionate impact on minority households and businesses and threatens to further exacerbate financial disparities. The Federal Reserve’s Survey of Household Economics and Decisionmaking, known as SHED, provides further evidence of the historical disparities experienced by communities and the impact the pandemic has had on the most vulnerable within our nation. The most recent report from that survey released in May showed the gap in financial well-being between White adults and Black and Hispanic adults grew by 4 percentage points since 2017 alone and more than a third of Black and Hispanic adults reported

² OCC News Release 2020-144. “Agencies Release Paper on Operational Resilience.” October 30, 2020 (<https://occ.gov/news-issuances/news-releases/2020/nr-ia-2020-144.html>).

³ OCC News Release 2020-175. “Agencies Propose Requirement for Computer Security Incident Notification.” December 18, 2020 (<https://www.occ.gov/news-issuances/news-releases/2020/nr-ia-2020-175.html>).

⁴ Andre Perry, Jonathan Rothwell, and David Harshbarger. “The Devaluation of Assets in Black Neighborhoods.” Metropolitan Policy Program at Brookings. November 2018.

doing worse financially than prior to the pandemic.⁵ Black and Hispanic households have been more likely to lose income and have trouble making rent or mortgage payments during the pandemic,⁶ while minority-owned small businesses have been hit harder than white-owned small businesses.⁷ The recovery threatens to leave these and rural communities even further behind.⁸

Banks can play an important role in preventing this and closing the wealth gap. Historically, many low-income individuals have been treated by banks as either credits to be avoided or credits to be exploited. The OCC's twin missions of ensuring equal access to financial services and fair treatment speak to both of these challenges.

To address this problem, the OCC must work to *strengthen* regulations implementing the Community Reinvestment Act (CRA). While the OCC's 2020 final rule took an important step in attempting to improve upon the framework put in place in 1995, I believe there is significant room for improvement. First, circumstances have changed because of the pandemic, and we should examine the extent to which its aftermath will have a disproportionate impact on minorities, rural communities, and vulnerable groups. Second, the public has provided helpful feedback on the Federal Reserve's advance notice of proposed rulemaking. Third, we have learned important lessons based on the partial implementation of the 2020 rule. I have asked staff to review the 2020 final rule with these considerations in mind. All options are under consideration, including rescinding or substantially revising the current rule and working with the Federal Reserve and FDIC on a joint proposal. Without prejudice to the outcome of the review, I am committed to following normal procedures and seeking public comment on any changes. The CRA is too important to do otherwise—all voices need to be heard and considered.

Second, we must be vigilant in examining and enforcing fair lending laws that promise fair

⁵ "Economic Well-Being of U.S. Households in 2020." Board of Governors of the Federal Reserve System. May 2021.

⁶ Sharon Cornelissen and Alexander Hermann. "A Triple Pandemic? The Economic Impacts of COVID-19 Disproportionately Affect Black and Hispanic Households." Joint Center for Housing Studies. Harvard University. July 7, 2020.

⁷ André Dua, Deepa Mahajan, Ingrid Millán, and Shelley Stewart. "COVID-19's effect on minority-owned small businesses in the United States." McKinsey. May 27, 2020.

⁸ Emily Moss, Kriston McIntosh, Wendy Edelberg, and Kristen Broady. "The Black-white wealth gap left Black households more vulnerable." Brookings Institute. December 8 2020 (<https://www.brookings.edu/blog/up-front/2020/12/08/the-black-white-wealth-gap-left-black-households-more-vulnerable/>).

treatment and consumer protection and are intended to correct systemic bias of the past. The OCC will not hesitate to use the full range of tools under our supervisory authority to remediate deficiencies when we see them. When warranted, this may include assessing penalties and taking enforcement actions to hold banks accountable for violations of laws and regulations.

Third, we must call out racial, gender, and other biases and push for change where needed. For instance, the OCC has been monitoring increasing concerns about racial bias in appraisals, particularly in residential lending.⁹ The OCC is engaged with stakeholders to raise awareness and facilitate improvements in the appraisal process, making sure banks have the valuation information and data they need to underwrite their loans and manage their risks, and that the process is fair, objective, and free from bias.

Finally, in addition to regulatory action and supervision, we have leveraged our status as a respected and knowledgeable federal agency to convene leaders and inspire action toward solving long-standing problems within our financial system. Such is the goal of Project REACH.

Origin and Scope of Project REACH

Last summer, in the midst of the nation's calls for racial and economic equality, the OCC conceived and launched the "Roundtable for Economic Access and Change" (known as Project REACH).¹⁰ Project REACH brings together leaders of banking, civil rights, technology, and business organizations to identify and reduce specific barriers that prevent underserved and minority communities from full, equal, and fair participation in the nation's economy. Project REACH convenes those with the ability to help reduce inherent and structural obstacles so underserved populations have the same opportunities to succeed and benefit from the nation's financial system as others. The OCC has dedicated staff supporting the project.

Shortly after launch, the participants of Project REACH identified several key barriers to financial inclusion and equity for underserved populations, including lack of usable credit scores, low rates of homeownership, and poor access to capital for minority-owned and small businesses.

⁹ "Black Homeowners Face Discrimination in Appraisals." *New York Times*. August 27, 2020 (<https://www.nytimes.com/2020/08/25/realestate/blacks-minorities-appraisals-discrimination.html>).

¹⁰ "OCC Announces Project REACH to Promote Greater Access to Capital and Credit for Underserved Populations" News Release 2020-89. July 10, 2020 (<https://occ.gov/news-issuances/news-releases/2020/nr-occ-2020-89.html>).

Four national workstreams, described below, were formed to address those.

Inclusion for credit invisibles: Forty-five million Americans—disproportionately poor and minority—lack a credit score and cannot obtain mortgages, credit cards, or other lending products. Yet many people in this segment pay rent, utilities, and other recurring financial obligations. Project REACH participants are evaluating models that use alternative data sources, including rent payments, utility bill payments, and other direct debit authorizations to demonstrate on-time payment history and boost the measurable creditworthiness of many Americans. Some of the banks engaged in this workstream are working with technology firms to develop a pilot program that would evaluate data and boost the creditworthiness of gig economy workers. These can help tear down a major barrier to economic access for millions of consumers and minority entrepreneurs, who currently rely on their personal credit to secure business loans. Today, some large banks are in the process of issuing credit cards and other consumer lending products to individuals with no credit score. Other progress in this area was reported in the press last week regarding a collaborative effort to test the use of alternative data and underwriting to provide broader responsible access to credit for previously underserved people.¹¹

Revitalization of Minority Depository Institutions (MDIs): The number of MDIs has declined over the years. The remaining MDIs are critical sources of credit and financial services in their communities, but face challenges with accessing capital, adopting new technology, and modernizing their infrastructures. Project REACH recognizes opportunities for partnerships that deliver sustained financial assistance to help MDIs remain a vibrant part of the economic landscape. The OCC has expanded relationships between larger banks and MDIs through capital investments dedicated to improving the technological infrastructure of MDIs so they can offer the same benefits to their customers like remote capture and faster electronic payment platforms.

Last fall, we developed a pledge for larger banks to support MDIs.¹² To date, 22 banks have signed the pledge to provide dedicated technical assistance to help with talent development for MDI staff, as well as diversification of product offerings, and have committed nearly half a

¹¹ Peter Rudegeair and AnnaMaria Andriotis. “JPMorgan, Others Plan to Issue Credit Cards to People With No Credit Scores.” *Wall Street Journal*. May 13, 2021 (<https://www.wsj.com/articles/jpmorgan-others-plan-to-issue-credit-cards-to-people-with-no-credit-scores-11620898206>).

¹² See OCC Project REACH Pledge to Strengthen Minority Depository Institutions. (<https://www.occ.gov/news-issuances/news-releases/2020/nr-occ-2020-166a.pdf>).

billion dollars in investments to MDIs. Most recently, we facilitated a meeting between the National Bankers Association, which represents minority financial institutions, and three of the largest service providers to mid-sized and community banks to assess how they can build better business relationships with MDIs and offer more affordable, innovative solutions to them.

Increasing homeownership and the inventory of affordable housing: Homeownership is one of the primary ways that families build wealth. Notably, since the Great Recession, the homeownership gap between Blacks and whites has *grown* to its highest level in 50 years.¹³ One of the biggest barriers to homeownership for minority borrowers is that they do not have enough saved for a down payment. Working with civil rights and community-based groups, several participating banks have developed or expanded down payment assistance programs for minority and underserved homebuyers. These programs work in conjunction with community groups with counselors approved by the U.S. Department of Housing and Urban Development to provide consumers educational support for eligibility in these programs.

To increase the inventory of affordable housing, particularly in densely populated markets, Project REACH participants are exploring converting bank-owned housing inventories into affordable homes through low-cost transfer and renovation loans. This has included proposals to repurpose underutilized and surplus commercial real estate into mixed-use facilities that would include residential property and provide additional homebuying opportunities.

Expanding access to capital for minority-owned and small businesses: Project REACH participants also are engaged in evaluating models and strategies that facilitate loan participations and consortium lending to minority-owned and small businesses. The effort involves developing a consortium model whereby MDIs, community development financial institutions (CDFIs), and larger banks collaborate to support agricultural businesses and emerging commercial enterprises and industries in rural and native communities, such as clean energy and broadband.

To support small businesses more generally, other Project REACH participants are identifying the challenges of collateral requirements and transitioning entrepreneurs from over-utilization of consumer credit towards establishing a commercial credit profile and small business identity that meets the qualifications for small business trade lines. Participants also are currently developing a comprehensive guide for entrepreneurs to point them to the resources they need along

¹³ Urban Institute, “Breaking Down the Black-White Homeownership Gap” Feb. 21, 2020.

the business development continuum.

Finally, a few participating Project REACH banks have created and offered virtual procurement showcases for minority-owned enterprises and entrepreneurs from underserved communities to build better business relationships and provide opportunities for growth and expansion.

While the four workstreams noted above are national in scope, the path to economic inclusion is often local. Needs differ across communities and markets. That is why we have created area-specific demonstrations of Project REACH where local stakeholders directly voice what their needs are and how to overcome their specific and unique economic barriers. Regional programs and efforts have expanded to Los Angeles, and several other cities are under consideration as areas of focus.

*OCC's Commitment to Diversity and Inclusion*¹⁴

As an agency, we also need to do our part to reduce inequality and improve our own diversity, equity, and inclusion. As Acting Comptroller, I am committed to continuing to promote these efforts and ensure that they continue to be areas of focus for my Executive Committee.

The OCC engages in comprehensive hiring, recruitment, and employee retention strategies to support efforts to expand agency diversity. We also provide a wide range of formal and informal career development opportunities to provide leadership skills to our employees, which are crucial for career development. Additionally, the OCC has eight employee network groups,¹⁵ each of which serve as a collective voice in communicating workplace concerns and providing input to management around diversity and inclusion programs within the OCC. These have proven to be a valuable means to attract and retain employees from diverse backgrounds and create an inclusive work environment for all employees.

¹⁴ Testimony of OMWI Director Joyce Byrd Cofield before the House Financial Services Subcommittee on Diversity and Inclusion, September 8, 2020 for a detailed explanation of our diversity and inclusion programs (<https://www.occ.gov/news-issuances/congressional-testimony/2020/ct-occ-2020-118-written.pdf>).

¹⁵ These employee network groups are the Coalition of African-American Regulatory Employees (CARE); Generational Crossroads; HOLA; Network of Asian Pacific Americans (NAPA); PRIDE; The Women's Network (TWN); Veterans Employee Network (VEN); and the Differently Abled Workforce Network (DAWN).

Such efforts have made some progress. Over the past 10 years, the OCC’s total minority workforce has increased, and both manager and senior-level manager positions held by minority and female populations also have increased.¹⁶ While the trend is positive and strides have been made, more needs to be done.

For the third consecutive year, the OCC will host its High School Scholars Internship Program (HSSIP) this summer, a six-week paid internship for nearly 100 minority students from public and charter high schools in the District of Columbia. This program provides an opportunity for students to explore a variety of career paths at the OCC, gain an understanding of the financial services industry, and engage in enrichment activities on financial literacy and leadership fundamentals. In addition to our HSSIP program, the OCC has provided minority college students paid internship opportunities for more than a decade through its National Diversity Internship Program.

(3) Adapting to Digitalization

The business of banking is changing rapidly, driven by three related trends: (1) the mass adoption of digital technology, (2) the rise of payments, and (3) technological innovations developed outside of the banking system.

For me, it is hard not to feel some *déjà vu*. In the 1990s and 2000s, “disintermediation” was the watchword. Securities firms and capital markets were disintermediating bank lending and the innovation was focused on financial engineering (credit default swaps, collateralized debt obligations, etc.). While this led to greater efficiency in the allocation of credit from savers to borrowers, it also gave rise to a large and less regulated shadow banking system, which eventually collapsed and contributed to the Great Recession.

Today, banks are again being disintermediated but in a different way. Instead of securities firms and capital markets, it is fintechs and technology platforms. Instead of lending, it is payments processing. Instead of financial engineering, it is application programming interfaces, machine learning, and distributed ledgers.

¹⁶ The OCC’s minority population has increased from 30 to 36 percent. Manager positions held by minority and female populations increased from 21 to 28 percent and 37 to 39 percent respectively. Senior level manager positions held by minority and female employees increased from 20 to 25 percent and 27 to 30 percent respectively.

I believe these trends cannot be stopped. They bring great promise, but also risks. Banks and the regulatory community must adapt to them.

My primary concern is that the regulatory community is taking a fragmented agency-by-agency approach to these trends, just as it did in the 1990s and 2000s. To the extent there is interagency coordination, it tends to be tactical, to deal with a pressing issue, such as Facebook's Diem. The key strategic question which the regulatory community must answer collectively is: Where should we set the regulatory perimeter? To my knowledge, there is not a shared understanding of the answer to that question and no overarching strategy to achieve it.

At the OCC, the focus has been on encouraging responsible innovation. For instance, we created an Office of Innovation, updated the framework for chartering national banks and trust companies, and interpreted crypto custody services as part of the business of banking. I have asked staff to review these actions.

My broader concern is that these initiatives were not done in full coordination with all stakeholders. Nor do they appear to have been part of a broader strategy related to the regulatory perimeter. I believe addressing both of these tasks should be a priority.

Finally, I would like to share my preliminary perspective on licensing and charters. Notwithstanding the strong oversight and enhanced provisions the OCC requires, some are concerned that providing charters to fintechs will convey the benefits of banking without its responsibilities. Others are concerned that refusing to charter fintechs will encourage growth of another shadow banking system outside the reach of regulators. I share both of these concerns. Denying a charter will not make the problem go away, just as granting a charter will not automatically make a fintech safe, sound, and fair. I will expect any fintechs that the OCC charters to address the financial needs of consumers and businesses in a fair and equitable manner and support the important goal of promoting the availability of credit. Recognizing the OCC's unique authority to grant charters, we must find a way to consider how fintechs and payments platforms fit into the banking system, and we must do it in coordination with the FDIC, Federal Reserve, and the states.

(4) Acting on the Risks that Climate Change Presents to the Financial System

As Secretary Yellen has noted, climate change poses an existential risk. Multiple government agencies are charged with addressing the environmental and social problems that

climate change presents. Our focus at the OCC is on understanding how climate change may impact the safety and soundness of the institutions we supervise.

For supervisors, the problem statement is straightforward: banks are exposed to physical and transition risks. Physical risks include the increased frequency, severity, and volatility of extreme weather and the associated impact on the value of financial assets and borrowers' creditworthiness. Transition risks relate to adjustments to a low-carbon economy and include associated policy changes from Congress and other authorities, technology changes, and litigation.

The actions that need to be taken are less simple, however. Banks and supervisors are still developing methods for identifying, measuring, and managing physical and transition risks. Based on my observations, this will not be an easy or swift task.

Given this, I believe the OCC can help most if it adopts a two-pronged approach. First, we must engage with and learn from others. The OCC already participates in the Basel Committee on Banking Supervision's Task Force on Climate-Related Financial Risks. The group has taken stock of member initiatives on climate-related financial risks, cataloguing them for member organizations to benefit from one another's experience. Building on this, I have asked OCC staff to explore joining the Network for Greening the Financial System (NGFS), a group of central banks and supervisors from across the globe interested in addressing climate change through the sharing of best practices and development of climate and environment-related risk management. The more perspectives and experiences we can leverage, the better.

Second, we must support the development and adoption of effective climate risk management practices at banks. The OCC's approach to date has been to monitor climate change-related developments at banks. I have asked staff to build on this approach and develop options for taking more concrete actions. These could include hosting or co-hosting a conference focused on climate change risk management practices at financial institutions, performing a thorough review of our existing policies, and evaluating a range of bank practices relative to identification and measurement, and risk management approaches. Managing the risks of climate change will require a collective effort and we will seek opportunities to hear from all stakeholders of our federal banking system.

At the most recent Financial Stability Oversight Council meeting, Secretary Yellen called out climate change as a financial stability risk. The OCC is committed to collaborating with FSOC and other FSOC members, as well as market participants and international standard-setting bodies

to inform our approach to the financial stability implications of climate change.

As Acting Comptroller, I will work to ensure the agency is proactive in this space and acts with the sense of urgency.

Reviews

Shortly after I started, I requested a review of key regulatory standards and matters pending before the agency. Those items include the 2020 Community Reinvestment Act (CRA) final rule and associated NPR related to performance benchmarks, interpretative letters and guidance regarding cryptocurrencies and digital assets, and pending licensing decisions. For each, the review is considering a full range of internal and external views, the impact of changed circumstances, and a range of alternatives.

With regards to the CRA, we recently issued a Bulletin and letters to banks pausing the mandatory data collection associated with the rule and indicating that the final rule is under reconsideration. Before making any changes to the CRA final rule, we plan to seek public input, consistent with the requirements of the Administrative Procedure Act. As noted, all options are under consideration.

The Fair Access rule is not part of the review. The agency declined to enact the rule before I became Acting Comptroller, and I have no intention of revisiting that decision.

The disposition of other standards and matters will depend on the facts and circumstances of each case. In all stages of the review, I will keep an open mind. I expect the review to conclude this summer when I will evaluate findings and announce next steps.

Conclusion

I am committed to ensuring that OCC-supervised banks operate in a safe and sound manner, meet the credit needs of their communities, treat all customers fairly, and comply with laws and regulations. As we emerge from the pandemic, I will do my part to ensure that the national banking system continues to serve as a source of strength to the U.S. economy, extends opportunities to underserved populations, and meets the evolving banking needs of the consumers, businesses, and communities it serves.