



Senior Housing Crime Prevention Foundation

8700 Trail Lake Drive W, Suite 140
Memphis, TN 38125
Toll Free: (877) 232-0895
Fax: (901) 523-3620
www.SHCPFoundation.org

July 29, 2022

Office of the Comptroller of the Currency
Docket ID OCC-2022-0002
RIN 1557-AF15

Federal Reserve System
Docket No. R-1769
RIN 7100-AG29

Federal Deposit Insurance Corporation
RIN 3064-AF81

Submitted to the Federal eRulemaking Portal – Regulations.gov at Docket ID OCC-2022-002

Dear Madam or Sir:

The Senior Housing Crime Prevention Foundation (“Foundation”) is a national organization focused on the prevention of elder abuse and elder financial abuse for low-moderate income seniors who reside in senior housing facilities, HUD housing facilities, and state-Veterans home. Our organization is funded exclusively by community banks through Community Reinvestment Act transactions.

Elder abuse and elder financial abuse continue to have a devastating impact on seniors. With an ever-increasing aging population, these abuses have been described as a “silver tsunami.” Therefore, the mission and work of our Foundation has never been more important.

This is evidenced by the fact that the Foundation has seen consistent growth and currently protects over 109,000 low-moderate income seniors at almost 900 facilities. In addition, we provide educational programs to the banking and healthcare industries on ways to identify and prevent elder financial abuse.

As a result of our unique funding approach through CRA qualified transactions, the economic impact of our Foundation for low-moderate income communities has been –

- \$10.1 million in economic development
- \$4.7 million in small business development
- 22,185 affordable housing units
- \$21.4 million in homeownership and down payment assistance programs

The Community Reinvestment Act is a key policy for families and communities to access credit, affordable banking products and services, such as protecting vulnerable seniors. We support the agencies proposal to establish a publicly available illustrative list of eligible activities for CRA

community development consideration. This list would help banks meet their CRA obligations and add value to the CRA rules. In addition to examples of qualified CRA activities, the illustrative list should include guidance related to the documentation requirements.

Including programs that protect our increasing low-moderate senior population as a qualified activity would be consistent with the guidance in the current Q&A and should be favorably considered in geographies of all different income levels and in metropolitan and nonmetropolitan areas alike.

An illustrative public list of community development activities that meet the requirements for positive CRA consideration would be a welcome tool – it must be open to requests from any interested party and should include a process for regular, timely updates.

On behalf of our Board of Directors and the 109,000 low-moderate income seniors we protect, thank you for the opportunity to provide input. The Community Reinvestment Act is a vital resource for seniors and their families to access service, such as ours.

Sincerely,

A handwritten signature in blue ink, appearing to read "D.C. Lenoir".

David C. Lenoir
President & CEO