



October 13, 2026

Chief Counsel's Office
Attention: Comment Processing
Office of the Comptroller of the Currency
400 7th Street SW, Suite 1E-216
Washington, DC 20219
Via portal: <https://www.regulations.gov/document/OCC-2026-0694-0001>

Jennifer M. Jones, Deputy Executive Secretary
Attention: Comments—RIN 3064-AG31
Federal Deposit Insurance Corporation
550 17th Street NW
Washington, DC 20429
Via email: comments@FDIC.gov

*Re: Community Reinvestment Act Regulations, 91 Fed. Reg. 52114 (Aug. 12, 2026); OCC
Docket ID OCC-2026-0694, RIN 1557-AF57; FDIC RIN 3064-AG31*

Dear Sir or Madam:

The Indiana Affordable Housing Council (IAHC) appreciates the opportunity to comment on the proposed Community Reinvestment Act (CRA) regulations. We strongly oppose the proposal to increase the large bank asset threshold from approximately \$1.65 billion to \$10 billion, which would eliminate the separate investment test for banks with assets between those levels.

IAHC is a statewide membership organization dedicated to the preservation and expansion of affordable housing throughout Indiana. Our members include developers, owners, property managers, lenders, investors, syndicators, nonprofits, and other professionals involved in all aspects of affordable housing. The developments our members finance, build, and manage depend on Low-Income Housing Tax Credit (LIHTC) equity, and the CRA investment test is a key reason for banks to be involved.

Removing the separate investment test for banks currently subject to it could weaken demand for LIHTC and reduce the equity available for affordable housing developments. Weaker investor

demand generally means lower prices for credits, so the same credit allocation generates less equity for construction. For developers, that shortfall could create financing gaps, delay construction, or prevent otherwise viable developments from moving forward. For Hoosiers, the result will be fewer affordable homes.

Rural communities in Indiana would be particularly hard hit by this change. Banks with less than \$10 billion in assets play an outsized role in financing affordable housing in rural areas. Affordable Housing Tax Credit Coalition (AHTCC) survey data shows that approximately one-third of LIHTC equity investments from banks below this threshold supported rural markets. By comparison, roughly eight (8) percent of all LIHTC equity in a CohnReznick industry-wide sample was invested in nonmetro counties, a proxy for rural and small-town markets. Eliminating the separate investment test for these banks could therefore disproportionately reduce the equity available for affordable housing in rural communities.

This concern is particularly timely following the recent expansion of LIHTC through the One Big, Beautiful Bill. Additional tax credits create an opportunity to address housing needs but realizing that opportunity requires sufficient private investment. We recognize the agencies' goal of reducing regulatory burden. However, we urge you to pursue that goal while preserving strong incentives for affordable housing investment. We respectfully ask the agencies to retain the existing asset threshold and the separate investment test.

Thank you for considering our comments and the potential effects of this proposal on affordable housing development and the communities our members serve.

Sincerely,



Erika E. Scott
President, IAHC Board of Directors

cc: Senator Todd Young
Representative Rudy Yakym
Representative Erin Houchin