Comments on NPR Regarding the Community Reinvestment Act (CRA)

AGENCY: Office of the Comptroller of the Currency (OCC), Treasury.
Agency/Docket Number: Docket ID OCC-2022-0002

I. Background Information

National Disability Institute (NDI), a 501(c)3 nonprofit corporation, appreciates the opportunity to comment on proposed changes to Community Reinvestment Act (CRA) regulations. NDI, for over 16 years, has been singularly focused on advancing financial inclusion for individuals with disabilities and their families nationwide. Through research and demonstration activities in collaboration with government agencies, financial institutions and community nonprofit organizations, we continue to create new knowledge and understanding of the economic disparities faced by millions of individuals with disabilities. We also continue to design and test new intervention strategies that improve the economic stability and security of people with disabilities, which are disproportionately low-income and live in low-income neighborhoods.

On May 5, 2022, the Federal Reserve Board of Governors (FRB), Office of the Comptroller of the Currency (OCC) and Federal Deposit Insurance Corporation (FDIC) issued a joint notice of proposed rulemaking to modernize the CRA regulations to adopt changes in the banking industry that includes the expanded role of mobile and online banking, tailor performance standards to account for differences in bank size, business models and local conditions, promote public engagement and create a consistent regulatory approach that applies to banks regulated by all three agencies.

Although there is near universal agreement across diverse stakeholders of the need to modify and update current CRA regulations, the review of the proposed rule must not shift attention from the original purpose of CRA, which was enacted more than 40 years ago in response to redlining practices of banks that denied loans and access to credit to low- and moderate-income individuals in LMI neighborhoods. Redlining limited opportunity for wealth creation through homeownership. CRA investment, lending and services by banks could do more in lending to LMI borrowers with disabilities to purchase homes and in lending to small businesses owned by individuals with disabilities with revenues under one million dollars. However, not enough is known about the impact on individuals with disabilities, as the data is not routinely collected.

II. Who are people with disabilities?

People with disabilities make up a significant part of the LMI population. Yet, the specific needs of this sizeable subpopulation are often overlooked. In the 2019 FDIC Survey of

Household Use of Banking and Financial Services, the data results call attention to the income inequalities experienced by persons with disabilities. The percentage of households with an annual income of less than $15,000 is 5.6 times higher in households with a disability than those without a disability (32.3% v. 5.8%). The percentage of households with an annual income between $15,000 and $30,000 is 2.3 times higher in households with a disability than those without a disability (22.7% v. 10%). The percentage of households with an annual income of $50,000 or higher in households with a disability is less than half the percentage in those without a disability (28.7% v. 67.2%).

Americans with disabilities are one of the largest minority groups in the country and growing. Estimated numbers vary from 40 million[1] to over 60 million people.[2] COVID continues to further impact the size of the population, as a result of long-term consequences that are still being identified.[3]

The term "disability" describes a diverse group of individuals. A person's disability can be related to vision, hearing, movement, communication, cognition and/or psychosocial issues. A disability can occur at birth, older age or anytime in between. It can be congenital or can arise because of chronic illness, injury, malnutrition or aging. It is estimated that one in four households in the United States has a member with a disability.[4] The diversity of types and severity of disability, age of onset, income and intersection with other marginalized communities defined by race, ethnicity, gender and sexual orientation may compound discriminatory treatment that limits access to credit and financial inclusion.

People with disabilities face significant barriers to financial stability. Low levels of labor participation, lower levels of pay and more unstable income as compared to working-age adults without disabilities, greater levels of medical debt and higher costs of living with a disability all compound the financial challenges of many LMI individuals with disabilities.[5]

The last released data (2019) from FDIC indicates that the unbanked rate for households led by working-age adults with disabilities was 3.6 times higher than the rate of households without working-age adult with disabilities (16.2% v. 4.5%).[6] In terms of credit confidence, working-age adults with disabilities were less likely to apply for

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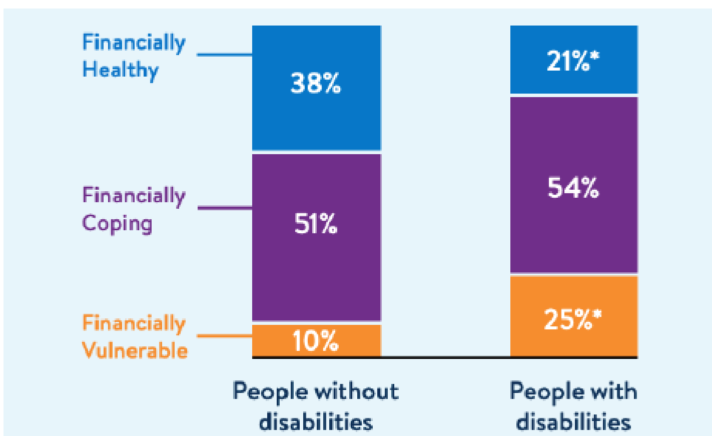
[1] Census ADA Anniversary Disability Data 2021
[2] CDC Disability Impacts All of Us Infographic and Data
[3] GAO Science & Tech Spotlight: Long COVID 2022
[4] Altman BM, Blackwell DL. Disability in U.S. Households, 2000-2010: Findings from the National Health Interview Survey. Fam Relat. 2016 Feb;63(1):20-38. doi: 10.1111/fare.12044. Epub 2016 Jan 11. PMID: 26962270; PMCID: PMC4780669.
[5] NDI Report 2019: Financial Capability of Adults with Disabilities
[6] FDIC 2019 Survey and Report How America Banks: Household Use of Banking and Financial Services at 2.

credit, more likely to be denied or receive less credit than requested and more likely to believe their credit application would be rejected when compared to their nondisabled peers.[7] The difference in rate of savings for unexpected expenses for working-age persons with disabilities and nondisabled head of households was 23.7 percent (45.9% v. 69.6%).[8] Working-age adults with disabilities as head of households were almost twice as likely to use nonbank credit when compared to their nondisabled peers.[9] The difference in internet access for the working-age disabled head of households was 24.7% less than their nondisabled peers (62.6% v. 86.9%).[10] There was a 14.7% difference in smartphone access.[11]

The 2021 Financial Health Network analysis of the Financial Health Pulse Survey revealed that almost 75% of people with disabilities were considered financially coping or vulnerable. Only 21% of people with disabilities were considered financially healthy, a rate that is 17% lower than people without disabilities (38%).[12] Of people with disabilities, 27% reported having mortgage loans, a rate that is 18% lower than people without disabilities.[13]

Figure 1: Financial Health



Source: Financial Health Pulse: 2021 U.S. Trends Report

These data points reinforce the need and opportunity for the proposed rule to be more intentional about how banks of all sizes address specifically the inclusion of people with disabilities who are LMI as a priority in community development financing and services and retail lending and service activities across each of the subtests.

[7] *Ibid* at 53.
[8] FDIC 2019 Survey and Report How America Banks: Household Use of Banking and Financial Services Appendix Tables at 109.
[9] *Supra* 2019 FDIC Survey at 47.
[10] *Supra* 2019 FDIC Survey Appendix at 48.
[11] *Ibid* at 46.
[12] Financial Health Network 2021 Pulse Trends Report at 29.
[13] Financial Health Network (2021) analysis of Pulse Survey Data.

III. General Comments

The proposed changes to defining assessment areas, dividing up community development performance among multiple subtests and approach to scores with public benchmarks, new definitions such as "community supportive services," a new level of emphasis to support workforce development programs, encouragement and credit for support of fiscal intermediaries like community development financial institutions and creation of a list to be regularly updated and available publicly that is non-exhaustive are all promising aspects of the proposed rule.

We are pleased that in the definition of "community supportive services" there is included "(7) Activities that benefit or serve individuals who receive or are eligible to receive Federal Supplemental Security Income, Social Security Disability Insurance, or support through other Federal disability assistance programs." Other examples of federal disability assistance programs that should be listed include Vocational Rehabilitation (VR) services and Home & Community-Based Services (HCBS) under Medicaid waivers. Although this Paragraph 7 is one of many examples of groups and activities covered under the new definition of community supportive services, it is at least clear recognition that individuals with disabilities are and should be a target for community development activities including "childcare, education, workforce development and job training programs, and health services and housing services programs that serve or assist low- or moderate-income individuals."

Historically, banks have been challenged during performance reviews with regulators regarding their level of documentation that the individuals served are LMI. In the NPR, there is a list of activities that create presumptive proof that individuals being served by a variety of means-tested federal programs would be sufficient proof of LMI status. LMI individuals with disabilities would also be included under other activities listed that benefit an LMI population, such as the Supplemental Nutrition Assistance Program (SNAP), Medicaid, Department of Agriculture's National School Lunch Program and HUD's Section 8 program. These examples of services that individuals with disabilities are eligible to receive should serve as proxies for banks to have presumptive proof of LMI coverage.

However, more could be done that provides awareness, understanding and bank attention to individuals with disabilities who are more likely low-income, have challenges with access to credit at significantly higher levels than individuals without disabilities, and have lower employment rates. Additional credit could be awarded to banks for their collaboration with disability-focused community nonprofit organizations and/or government agencies in disaster preparedness and response and climate resiliency activities that specifically benefit LMI individuals in low-income census tracts. Similarly, there is no discussion of additional credit for increasing the number of accessible housing units beyond government standards, as the discussion in the proposed rule relates only to affordability and not accessibility. There should be additional credit for job creation and skills development programs that target LMI individuals with disabilities. There is also no mention of accessibility in the evaluation of digital banking products and platforms that would also indicate an awareness and sensitivity to consumers with disabilities who would benefit from online banking.

It is also not helpful to allow banks, under the proposed rule, to get credit for financial literacy activities for individuals and families without regard to income levels of the beneficiaries. Banks have been significant collaborators with NDI and other disability nonprofit groups to provide funding and staff time for financial literacy activities. This proposed change away from a focus on LMI individuals could result in a reduction of effort, if credit was given for financial literacy activities for all regardless of income levels.

For revised CRA regulations to be more responsive to LMI individuals with disabilities, please consider incorporating these nine essential elements of a **disability framework**.

1. Regulator published examples of CRA qualifying activities for banks that respond to the financial needs of LMI individuals with disabilities with products and services that are accessible and affordable and investment and lending that advances inclusive community development (affordable and accessible housing, workforce and small business development, technology infrastructure and financial and digital literacy).
2. Use of participation of individuals with disabilities in means-tested public benefits and services as an acceptable proxy to meet documentation requirements to prove inclusion of LMI individuals with disabilities in community development financing and services and retail lending and service activities.
3. Add to the list of impact review factors under the community development financing and services tests whether there is evidence of benefitting LMI individuals with disabilities.
4. Required outreach to community groups in the disability community to be part of identification of community need and performance context analysis.
5. CRA exam requirements that banks provide baseline information on investment, lending and financial services that are responsive to the LMI disability population in their geographic physical footprint and outside service areas.
6. Training and technical assistance be offered by regulators with disability subject matter experts to increase awareness and knowledge about LMI individuals with disabilities, their inclusion in LMI neighborhoods, potential partnership opportunities with nonprofits focused on this population and examples of CRA qualifying activities and documentation needed.
7. Performance scores and future bank reporting establish quantitative and qualitative metrics to be measured and weighted to support this target audience.

8. Recognize banks for their efforts with additional credit when an initiative they support meets disability-related objectives. For example, a bank may provide an investment in a Community Development Financial Institution (CDFI) to support lending for affordable housing development. The bank and CDFI should also focus on the accessibility of a number of units beyond minimum federal standards. An investment in financial education and counseling should require outreach and partnerships with the disability community. Any new regulatory framework should make it clear to banks that a disability lens is going to be used to assess the full CRA-related worth of a given project.
9. To help banks achieve greater understanding and translate new knowledge about the LMI disability population and their financial needs to impactful investments, lending and services, they should be assisted with easy access to the best possible available data and analysis. At a national and a community level, expert and consumer input directly from the financial and disability community should be encouraged to produce available and new data and analysis to increase bank support across retail products and services and community development activities of the LMI disability population in and outside their assessment areas.

IV. Specific Comments

There are 19 areas of comment from a disability lens we ask you to consider.

1. Affordable and accessible housing (Q3) – Expand affordable housing so that rents do not exceed 30% of 80% of median income should be the standard for defining affordable housing for a government program that has the stated intent of providing affordable housing for LMI individuals. Number of accessible units exceeding federal, state or local standards, whichever is higher, should favorably impact performance scores when also occupied by LMI individuals with disabilities. For the impact review part of the community development test, financing that supports a higher percentage of units for the lowest income tenants should receive the most favorable consideration for geographical areas in which housing cost burdens and vacancy rates are particularly unfavorable for the lowest income tenants.
2. Responsiveness to LMI individuals with disabilities – "The proposed approach would produce performance scores for each applicable test, at the state, multistate MSA, and institution levels based on a weighted average of assessment area conclusions, as well as consideration of additional test-specific factors at the state, multistate MSA, or institution level." An additional factor to consider is increasing bank attention to and responsiveness to LMI individuals with disabilities. For example, ratings on subtest and overall ratings could be increased if there is specific documentation of engagement with and expanded direct support of housing and/or small business lending to applicants with disabilities. Other positive examples of justification for increasing performance scores would be support of community development

financial institutions (CDFIs) that then customize products responsive to the disability community, such as consumer lending for assistive technology products and/or home and vehicle modifications, small business lending to owners with disabilities with annual revenues under one million dollars annually and expanded development of affordable and accessible housing for LMI individuals with disabilities.

3. Community Supportive Services – The [definition of the new term, "community supportive services](#)," are those that assist LMI individuals in such general welfare activities as "childcare, education, workforce development and job training programs, health services and housing service programs" and elevates the importance of these opportunities for expanded bank CRA activities and support of LMI populations including individuals with disabilities. By adding workforce development and job training programs here, coverage is expanded beyond workforce development being tied to financing and supporting small businesses and farms.

   It would be helpful if, in the impact reviews in community development tests, there were specific inquiries about support of workforce development activities for youth and/or adults with disabilities as a population with high unemployment. An additional area to consider adding to the definition of community supportive services would be entrepreneurship as an alternative path to economic advancement for LMI individuals. Also, support of creative partnerships between public agencies and community nonprofit organizations and financial institutions should be encouraged to leverage resources and expand return on investment.

4. LMI homeownership (Q8) – NDI supports the inclusion of activities that support LMI homeownership to be a part of community development with an emphasis on activities that expand homeownership for first-time buyers who are individuals with disabilities and/or represent other underserved populations. Bank down payment assistance is a good example of a qualifying activity that makes purchasing more affordable.

5. Job creation and retention (Q13) – NDI supports the separate component for job creation, retention and improvement for LMI individuals under the economic development definition. To protect against credit for low-wage jobs and to allow flexibility for support of larger businesses beyond the five-million-dollar limit, consider support of apprenticeship and skills development programs that have career pathways to economic advancement and higher wage potential that are targeted to individuals with disabilities and other underserved populations. Support of CDFIs with bank financing to support small businesses with revenues of less than five million dollars annually, including technical assistance, would also help create jobs.

6. Disaster Preparedness and Recovery (Q19) – Impact review of the community development finance test should consider data provided by a bank to the extent LMI

individuals with disabilities benefit from bank financing of disaster preparedness and recovery activities. Individuals with disabilities have an unfortunate history of being inadequately supported in natural disaster situations.[14]

7. Financial Literacy for All Groups (Q27) – NDI and the disability community strongly opposes CRA credit for financial literacy activities including education and counseling services for individuals without regard to income levels. People with disabilities have benefitted from collaborations with banks of all sizes offering financial education and counseling services both through funding and staff volunteer activities. CRA must remain focused on original intent to support LMI populations. This expansion of who will be eligible will most likely diminish the extent of current and potential future efforts that have been growing with LMI individuals with disabilities and other underserved populations defined by race and/or ethnicity.
8. CRA Illustrative List of Activities (Q31) – NDI supports development of a non-exhaustive, but illustrative, list of activities that do qualify for CRA credit. It is important to be clear that activities not on the list do not imply that there are no other activities that would qualify. Although short-lived, the prior OCC list that was a part of the regulations that were withdrawn had multiple examples of qualifying activities that supported individuals with disabilities:
   a. An unsecured consumer loan to a moderate-income individual for household assistive technology products and vehicle modifications to improve accessibility (Section 25.04(b)(I)(i)).
   b. Donations to workforce development programs designed to improve employment opportunities for LMI individuals with disabilities (Section 25.04(c)(3)).
   c. Financial capability training by bank employees to individuals with disabilities (Section 25.04(c)(9)).
   d. Loan to upgrade equipment in a public library to accommodate LMI disabled individual patrons (Section 25.04(c)).

   These examples stimulated discussions and reinforced opportunities for collaboration with banks. Examples included in the first list help reinforce to banks the eligibility and importance of CRA activities that target the disability community. Rather than a list of nonqualifying activities, it might be helpful to offer a framework or set of principles that would likely earn CRA credit for certain types of activities.

   Other examples of qualifying activities that would support individuals with disabilities include, but are not limited to seeding ABLE accounts for eligible LMI individuals, enhanced access to broadband to improve use of accessible digital banking products and services and investing in small business incubators and accelerators that provide support to entrepreneurs and small business owners with disabilities.

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[14] GAO Report to Congressional Requesters DISASTER ASSISTANCE FEMA Action Needed to Better Support Individuals Who Are Older or Have Disabilities

It would also be helpful to reinforce that LMI individuals and families are not a homogenous group, but diverse in terms of race, ethnicity, disability, gender, sexual orientation and other identities that have created barriers to economic advancement and stability. Part of scoring community development financing and services and retail lending and service activities with each of the subtests by bank examiners should look for examples that demonstrated proactive efforts to support these underserved communities.

The support of a publicly accessible database that is updated regularly with examples of community development financing and services and retail lending and service activities that banks put forward for their innovativeness, community responsiveness to underserved segments such as LMI individuals with disabilities, documented impact in response to unmet needs and other factors to be identified through public comment might encourage replication in other markets and with other underserved groups. Each example in the database should have data or impacts that are quantifiable including, but not limited to, small business startups, affordable and accessible housing units created, jobs created and increased broadband access to households. Other examples of innovation might include credit building loan products and support of CDFIs for assistive technology and home modification loans. Public comment should help shape the database organization and frequency of updates. Type of financing should also be captured in data fields. Low-cost financing needed by nonprofits engaged in community development should have some higher weighting in impact review.

9. Accepting Submissions from Community Groups (Q32) – Community groups, as well as banks, should be able to suggest revisions and additions to the list. All stakeholders should have the same opportunity to suggest additions to the list with justifications. Banks should be encouraged to work with community groups and suggest proposals together. The regulators should seek public comment at least twice a year from banks and community groups with specific targeted areas with questions for comment about not only revisions and additions, but the approach to the organization of the list, cross-subject indexes, what improvements could be made and, ultimately, it would be helpful to understand the relationship between the interagency question and answer document and the non-exhaustive list of examples of qualified CRA activities.
10. Asset thresholds (Q50) – The change in asset thresholds may have an adverse impact on meeting community credit needs. The reclassification of over 200 large banks to the intermediate small bank threshold would eliminate the service test and a focus on branch coverage and services in LMI communities as part of the performance evaluation. An even larger number of banks would be reclassified as small banks which would eliminate community development finance responsibilities. The potential loss of community development financing and service provision requires reconsideration of the change in asset thresholds.

11. Small businesses with revenues under $100,000 (Q75) – Support separate evaluation criteria for small businesses with revenues of $100,000 or less, similar to Black-owned and Hispanic-owned small businesses as well as data available about earnings of women-owned small businesses. NDI, in a project funded by the Small Business Administration (SBA) is finding revenues typically under $50,000 in the first year of operation for small businesses owned by individuals with disabilities. NDI supports separately evaluating lending to low-income small business owners from middle-income borrowers and to inquire about small business lending with documentation to the disability market segment. Small business owners and entrepreneurs with disabilities have shared their number one challenge is access to credit. This proposed $250,000 in revenue as the cutoff for evaluating small business lending should not be raised to $500,000 and instead consider separating small businesses with $100,000 or less in revenues from the small businesses with up to $250,000 in revenue with the sharing of demographic data.
12. Rating factors consider mortgage lending to borrowers with disabilities (Q80) – The purpose of performance ratings is to provide meaningful evaluation across subtest categories that reflects distinctions in performance greater than in the past when over 90% of banks received an overall satisfactory rating. LMI borrowers with disabilities is not a targeted market segment and little to no data is collected to make reasonable judgments about level of effort and results. Extra points should be awarded to banks who can document their efforts and positive results in advancing home ownership for LMI individuals with disabilities.
13. Proportioning the weighting of product line conclusions in determining retail lending test conclusion (Q84) – For the disability community, consumer lending is important particularly in access to credit for emergency situations. However, home and small business borrowing are critical means to build wealth and create equity. The proposed approach to weight the product line conclusions by the dollar volume of lending activity may not give appropriate attention to the number of loans in each category.
14. Public written and oral comments should be a factor in retail lending test conclusions (Q86) – The bank examiner should have flexibility to raise a score up or down based on consumer evidence of patterns that document difficulties in accessing credit, but also positive examples of novel underwriting methods or service approaches in home, small business and/or consumer lending. Examiners should make part of their regular routine outreach to historically underserved groups defined by race, ethnicity and/or disability. The examiner should make public the adjustment to the score to encourage transparency and accountability to the public. Banks should be able to respond before such an adjustment is made and finalized.

15. Digital accessibility and affordability (Q103) – Only large banks with assets of more than $10 billion will be evaluated for digital and other delivery systems. The approach of using quantitative measures to evaluate distribution of digital account activity across census tracts of various income levels is a starting point. Large banks with assets below $10 billion, with at least one-third of their deposit activity that is digital, should also have the digital component of the large bank exam. Accessibility and affordability of responsive products and services should be compared and contrasted between LMI and non-LMI neighborhoods at the assessment area level. Branch availability, services offered, branch openings and closings and banking hours and services responsive to LMI customers, including customers with disabilities, should be a part of the bank examiner evaluation in the retail services and products test. It would be even stronger to separately analyze performance in low- versus moderate-income tracts when comparing to census tracts with higher income levels.

    The regulators should qualitatively consider the range of banks' digital and other delivery systems including online, mobile and telephone banking for not just the largest banks. A bank should explain its strategies and initiatives to meet LMI consumer needs through digital and other delivery systems, including marketing and outreach to LMI individuals to increase uptake of the channels as well as partnerships with community-based organizations serving targeted populations including individuals with disabilities. The accessibility of digital channels should be a specific area of examination with a request for consumer comment and feedback by individuals with disabilities.

16. Applicability of the Americans with Disabilities Act (ADA) – As part of the anti-discrimination and consumer protection legal reviews, the agencies added the Military Lending Act in the list of laws to be included in the fair lending review. The addition of the ADA should also be considered and be a part of fair lending reviews.
17. Volunteer Activities Unrelated to Financial Services (Q127) – Whether in urban or rural areas, banks should be encouraged and get credit only for financial-related services including financial education and counseling services, serving on boards of directors of community nonprofits and providing technical assistance related to financial management systems and serving as volunteers at VITA sites managed by nonprofits. Other types of nonfinancial activities benefit communities, but lose focus on the continued intent of CRA to offer financial services to traditionally underserved populations. The CD Services Test should seek to increase talented bank staff participation in providing financial-related services and not lower the bar to embrace all types of volunteer activity.
18. Changes to consider in review of merger applications (Q146) – Merging banks should be expected to describe a public benefit that would be achieved as part of their merger application. A new requirement to be added to a merger application

would be the submission of a community benefits plan that establishes documentable performance measures and goals for increasing loans, investments and services to LMI individuals with disabilities, women and people of color. Input from community groups would be documented and identified to inform performance measures and goals. CRA performance reviews should assess whether the community benefits plan's measures and goals are being met and would impact CRA performance scores.

19. Encourage Public Comments Related to CRA Exam (Q174) – It would be helpful for the agencies to publish certain retail lending and community development financing metrics and branch distribution information in advance of completing an examination to provide additional information to the public. We strongly support the agencies' proposal to make a bank's CRA public file more accessible by allowing any bank with a public website to include its CRA public file on the bank's public website. Organizations that are interested in commenting on bank performance in specific geographies, as well as banks with a nationwide footprint and/or service reach, should be able to sign up with agencies to receive advance notice of the performance examination schedule and where to send comments and the due date. A part of each examination should be agency proactive efforts to talk with disability-led organizations and organizations headed by people of color. Individuals with disabilities and community nonprofit groups should be invited to talk about designed retail and community development products and services responsive to identified needs such as affordable and accessible housing, grants to nonprofits for financial counseling programs and workforce development opportunities with career advancement options.

V. Conclusion

Vibrant communities are best supported when economic opportunities are all inclusive of LMI populations, including people with disabilities.

Unless the challenges of LMI people with disabilities are intentionally addressed, people with disabilities will be unintentionally excluded from the financial system and be overlooked as a target of community development activities.

Financial institutions have not routinely targeted LMI populations with disabilities as part of investments in the development of workforce, technology infrastructure, affordable accessible housing, small business development or financial capability. As a result:

- Housing development for LMI often critically miss the unique challenges of providing housing that is both accessible and affordable.
- FinTech apps lack requirements to meet the accessibility needs of people with different types of functional limitations.

- Financial capability programs rarely have counselors trained to understand the complexities of making informed financial decisions based on the interrelationships between income, assets and limitations imposed by means-tested public benefits.
- Entrepreneurs and small business owners struggle to access credit.

Thirty-two years after the passage of the ADA, and more than 40 years after the passage of the CRA, with the revision of CRA regulations, it is time to relook at the approaches, roles and responsibilities of regulated financial institutions to proactively address the financial access and economic opportunity needs of people with disabilities.

CRA regulatory changes should help financial institutions work cooperatively with the disability community to meet the intent of the Americans with Disabilities Act to "advance economic self-sufficiency, equality of opportunity and community participation" as a natural intersection with the intent of the Community Reinvestment Act to meet the credit needs of low-and moderate-income neighborhoods and individuals who have the greatest financial needs.