

Congress of the United States
Washington, DC 20515

September 19, 2014

The Honorable Richard Cordray
Director
Consumer Financial Protection Bureau
1700 G Street, NW
Washington, D.C. 20552

Re: Consumer Financial Protection Bureau's definition of "underserved areas"

Dear Director Cordray:

The undersigned Illinois members of the United States House of Representatives are writing you with respect to the Consumer Financial Protection Bureau's (CFPB) proposed definition of "underserved" in the final rulemaking for the Ability-to-Repay and Qualified Mortgage standards under the Truth in Lending Act (Reg Z).

We urge the CFPB to consider more than the number of competitors in a county for the definition of "underserved areas." We support the CFPB's special accommodation to small creditors, including community financial institutions, in the current Rules, which provide these lenders with greater flexibility to address the needs of "underserved areas."

We also agree with the Bureau that further study of the existing definition of "underserved area" is warranted. We urge the CFPB to expand the definition of "underserved areas" to encompass existing definitions of economically challenged areas, such as those in the state of Illinois.

As you know, financial regulators and federal agencies use a number of definitions to identify economically challenged areas and "rural areas." Our understanding is that community financial institutions are most familiar with low-and moderate-income census tracts for purposes of the Community Reinvestment Act, and distressed and underserved nonmetropolitan middle-income geographies for Federal Financial Institutions Examination Council purposes.

Other criteria we request that you consider include, but are not limited to, counties with high poverty rates; qualified, distressed or highly distressed census tracts for New Market Tax Credit programs; high migration rural counties; and designated distressed areas by the Delta Regional Authority.

Revising the definition of underserved areas to include the criteria identified above would provide a reasonable exception to portions of the Ability-to-Repay and Qualified Mortgage standards under Reg Z. As Congress intended, authority to make this adjustment falls within the discretion of the CFPB, and would provide additional lending opportunities for community financial institutions in the communities they serve.

Thank you for your consideration of this important issue.

Sincerely,



Randy Hultgren
Member of Congress



Rodney Davis
Member of Congress



Aaron Schock
Member of Congress



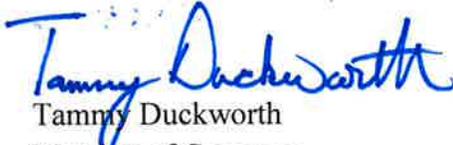
Peter J. Roskam
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John Shimkus
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Bill Foster
Member of Congress



Tammy Duckworth
Member of Congress



Mike Quigley
Member of Congress



Bradley S. Schneider
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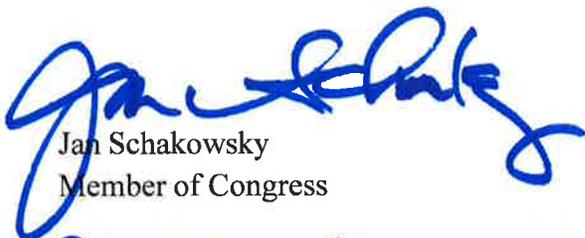
William Enyart
Member of Congress



Adam Kinzinger
Member of Congress



Bobby Rush
Member of Congress



Jan Schakowsky
Member of Congress



Robin Kelly
Member of Congress



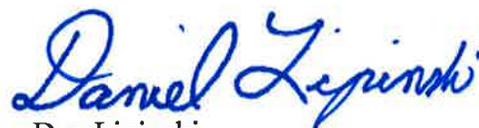
Danny Davis
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