## Acting Comptroller Rodney E. Hood Remarks at the National Community Reinvestment Coalition Just Economy Conference 2025

"Innovation Fosters Financial Inclusion"

March 27, 2025

Thank you for the invitation to appear at the Just Economy Conference today to address this august membership. I have always had a very endearing relationship with NCRC – starting from my time as a Community Reinvestment Act officer. One of my fondest memories will always be my trip to France with John Taylor, Irv Henderson and Pete Garcia to engage with and educate international organizations on the utility of the CRA and how it supports the flow of capital into underserved communities and results in meaningful community outcomes.

How far we have all come since that time! Today, I am honored to serve as Acting Comptroller of the Currency, a role that represents an extraordinary privilege and solemn opportunity to advance the OCC's historic mission of ensuring a safe, sound and fair federal banking system that serves all Americans. As many in this room are aware, my interest in finance began with an accounting internship during high school. Following my graduation from college, I explored a different path and spent time as a missionary in Zimbabwe, which led me to consider a future as an Episcopal priest.

Ultimately, I transitioned into banking and finance, specializing in commercial lending, community development, and economic development. My career has spanned nearly three decades, including positions at three Wall Street firms as well as another federal regulator.

## The Importance of Financial Inclusion:

In every role, I've focused on the importance of financial inclusion for underserved communities because I know how transformative it can be when people gain access to quality, affordable financial services and credit.

Make no mistake: financial inclusion is the civil rights challenge of our generation. That's why my focus on this has been unwavering, and I encourage innovative thinking among stakeholders in financial services about how we can lead the way to foster greater financial inclusion in economically disadvantaged communities. During my tenure as the NCUA Chairman, I made financial inclusion a priority for the agency and the cooperative credit system. I continue to champion this topic at the OCC because I truly believe national banks and federal savings associations should help all people to access our financial mainstream.

A bank account is a starting point in financial inclusion, not an end point. This first bank account can lead to longer-term savings, access to credit, 401k and other retirement accounts, and wealth building opportunities. Banks can provide this access through small dollar loans that help

consumers meet short-term needs and build their credit history. Inclusion also means providing the much-needed capital for mortgage lending and other lines of retail credit to consumers.

Building banking relationships with consumers through investment into financial literacy and capability training is a start. The number of households that do not have more than \$400 in savings is alarming and more must be done to increase the awareness and importance of personal money management. There are numerous reports that argue for more financial education to help families and workers save and build wealth while avoiding financial traps. Private-sector financial partners should take the lead in expanding financial literacy training, including collaborating with community and faith-based organizations, to make these programs more widely available.

Next, I believe supporting small businesses and entrepreneurship is a key factor towards establishing an economic foundation in any community. Small businesses are the backbone of economic viability. They help to create the opportunities for employment and commerce that attract capital investments. The paycheck protection program (PPP) administered by financial services providers kept many main street businesses afloat during a time of extreme stress. It also proved the use case and significant community value in providing access to affordable business capital. Financial services providers can help businesses build and expand by providing technical assistance and innovative tools, products and services geared toward helping small enterprises get access to the capital they need.

Another approach to increasing financial inclusion is leveraging the potential of financial technology. Fintech has shown great promise for improving efficiency and customer service, especially as convenience drives the increasing numbers of banking customers into a digital world. These same fintech tools can be used to provide banks with analytical tools to explore customer cash flow analysis and spending habits – data that can be used to leverage products that can facilitate bank lending decisions as well as materials to incentivize consumer savings. The pace of financial technology development means that connecting financial providers with economically disadvantaged communities and further increasing access to affordable financial services knows no bounds.

Additionally, building generational wealth is founded in homeownership. Buying a home helps members of economically disadvantaged communities to access the American Dream and own an asset to build equity that can ultimately provide opportunities for starting a small business or paying for an education. However, financial inclusion should not just focus on buying a home. Maintaining and preserving generational assets, such as a family home or farm, is just as crucial to ensuring opportunities for economic mobility.

Over the past few years, housing affordability has deteriorated. Between 2020 and 2024, median family income increased by 24.6 percent. However, during the same period, home prices rose by 45 percent — nearly double the average 5-year home price appreciation since 1980, according to U.S. Department of Housing and Urban Development. Housing price growth has moderated in the last two years, with the year-on-year growth in late 2024 close to long-term averages.

Mortgage interest rates have also climbed from approximately 3 percent in late 2021 to a range of 6–7 percent in recent years, according to Freddie Mac. Higher home prices and increasing interest rates have contributed to affordability challenges, with the share of median household gross income needed to buy an average-priced home increasing to 35%, above the historical average of 24%. According to American Community Survey, 5.6 million households with a mortgage, or 11 percent of all households with a mortgage, spent more than half of their gross income on housing costs in 2023.

We must recognize there's no "silver bullet" to immediately solve the challenges of financial inclusion and affordable homeownership. However, we can carefully consider a comprehensive agenda that firmly roots financial inclusion for underserved and disadvantaged communities at its core.

## The OCC's Project REACh – Successes and Future Work:

That's why I am proud to highlight the financial inclusion efforts of the OCC's Project REACh. Project REACh—which stands for the Roundtable for Economic Access and Change - brings together leaders in banking, civil rights, community development, and technology to identify innovative solutions to financial inclusion for economically disadvantaged communities. It is an initiative that has demonstrated enormous impact.

For example, through REACh convenings, financial institutions developed an affordable credit solution for consumers that were unable to access credit because they lacked a credit file and did not have a credit score. This resulted in more than 100,000 accounts established under this pilot.

Other innovations related to cash flow underwriting are especially promising. Several banks have begun piloting tools that analyze consumers' habits in making deposits and paying bills as a means of determining their ability to manage debt for credit underwriting purposes. This creates a range of opportunities for those who lack a FICO score and are "credit invisible."

Today, several national banks have undertaken a pilot program to expand the use of alternative, non-FICO data – primarily from deposit accounts – to qualify credit-impaired consumers for affordable lines of credit, and bringing them into the regulated financial system.

The success of this pilot shows how outcomes can be accelerated and expanded through future collaboration and engagement.

This leads me to tell you more about how the OCC is re-focusing and dedicating its Project REACh efforts to support financial inclusion. Over the last five years, the OCC provided a forum for industry and community leaders to collaborate on developing innovative solutions, primarily centered on areas that were key to community and economic development topics. As we recognize an evolving financial landscape, we need to ensure that *all* communities are afforded the opportunity for economic inclusion and mobility. This means we need to educate consumers about the opportunities and risks related to digital assets and create technical assistance vehicles that could lead to accessing affordable credit for new entrepreneurs and gig economy workers.

We will focus our work on four key workstreams:

The first is Affordable Homeownership which will address the challenges I highlighted earlier that disadvantaged and underserved consumers face in purchasing homes and encourages the development of innovative products and services that improve access to credit.

The second workstream will encompass a range of opportunities for Small Businesses and work to increase investments and financing to these business owners and entrepreneurs.

Third, the Technology Workstream explores expanding financial inclusion through new technologies or novel uses of existing technologies. Additionally, the participants in this workstream will collaborate to educate consumers about digital assets, so no one is left out of the rapidly expanding digital economy.

And the fourth workstream will focus on Geographic-specific efforts addressing unique economic challenges facing specific neighborhoods, communities, or regions through promoting holistic development strategies for locales along with community lenders, such as MDIs and CDFIs.

## Conclusion:

This work cannot be done in a vacuum and takes collaboration and partnership with organizations like NCRC that play a vital role. So today, I am happy to announce the restructuring of an OCC office that will drive this collaborative effort. Our new Office of External Relations and Strategic Partnerships will be led by Andrew Moss, my Acting Chief of Staff and the agency's National Director for Project REACh. Andrew will be responsible for developing our comprehensive financial inclusion strategy. This office will also engage with critical external stakeholders to identify economic barriers, build partnerships, promote education, and encourage responsible innovation to foster increased inclusion in the federal banking system.

In closing, I know there are many Project REACh participants in the room, and I want to personally thank you for your commitment and contributions to the initiative. There is still much that needs to be done, and we welcome your help in creating solutions that will promote economic opportunity and mobility for all communities.

Thank you.