

October 13, 2026

Office of the Comptroller of the Currency
Docket ID OCC-2026-0694

Federal Deposit Insurance Corporation
RIN 3064-AG31

Re: Community Reinvestment Act Regulations—Military Banks, Veterans, and Military Families

To the Office of the Comptroller of the Currency and the Federal Deposit Insurance Corporation:

The Association of Military Banks of America (AMBA) appreciates the opportunity to comment on the proposed revisions to the Community Reinvestment Act (CRA) regulations. AMBA represents banks serving servicemembers, veterans, and their families, including institutions operating on military installations and banks serving these communities nationwide.

AMBA supports retaining provisions that recognize the distinctive customers and operating circumstances of military banks. We are concerned, however, that the proposed exclusion of deposit products from retail banking services consideration could undermine recognition of activities that bring unbanked and underbanked veterans into the banking system. We urge the agencies to preserve meaningful consideration of these activities and clarify how banks can receive consistent recognition for serving military and veteran communities.

In his September 28, 2026 remarks at AMBA's Military Banking Summit, Comptroller Gould recognized the needs of servicemembers relocating on military orders, military families purchasing homes, and veterans transitioning to civilian life. He also invited feedback on the CRA proposal and remaining regulatory obstacles. AMBA welcomes that invitation. The recommendations below seek to advance those objectives by preserving recognition of banking access and clarifying how qualifying services to military and veteran communities receive CRA consideration.

1. Preserve CRA consideration for banking access through programs such as the Veterans Benefits Banking Program.

Through the Veterans Benefits Banking Program (VBBP), AMBA works with the Department of Veterans Affairs and participating financial institutions to help veterans and other eligible VA beneficiaries obtain banking services and receive their benefits through direct deposit.

For an unbanked or underbanked veteran, opening an accessible, affordable transaction account can be an essential first step toward financial stability. It provides a means to receive benefits, pay bills, manage household finances, and establish a banking relationship. These services also support access to appropriate credit over time.

AMBA has worked with agency staff to understand how participating banks may document VBBP activities for CRA consideration under the existing framework. Our published guidance identifies retail banking services as a potential basis for that consideration, subject to applicable requirements and supervisory evaluation.

The proposal would exclude deposit products from the retail services evaluation and supersede related guidance. This creates uncertainty about whether and how banks would receive recognition for helping unbanked and underbanked veterans establish and maintain accounts.

We request that the final rule retain CRA consideration of responsive deposit products and account-access services, including qualifying activities conducted through programs such as VBBP. If the agencies proceed with the proposed exclusion, they should establish an explicit alternative pathway that preserves meaningful consideration of these activities.

Financial education can complement account access, but recognition of education alone would not adequately address the distinct work involved in bringing an unbanked or underbanked individual into the banking system.

If the agencies conclude that CRA does not permit consideration of these activities, AMBA requests that the final rule explain the specific statutory limitation, distinguish deposit products from related credit-access and financial capability services, and identify which components of programs such as VBBP remain eligible and under which evaluation criteria.

2. Retain and harmonize the military-bank provisions.

AMBA supports recognition of current and former members of the armed forces and their dependents within the military-bank definition. We also support the nationwide assessment-area option and related institution-level evaluation provisions, which recognize the dispersed and mobile nature of military communities.

These provisions reflect priorities AMBA has raised in earlier rulemaking comments. Military customers frequently relocate, transition between military and civilian employment, and maintain banking relationships across state and national boundaries.

We request that OCC and FDIC adopt identical language defining when an institution predominantly serves military customers. The OCC proposal uses "most important customer group," while the FDIC proposal uses "primary customer group." A uniform qualitative standard would reduce uncertainty and support consistent examinations.

The final rule or accompanying guidance should also clarify the treatment of services provided to eligible military customers stationed overseas, including those using APO or FPO addresses which complicate assessment area calculations.

3. Distinguish military-bank status from eligibility of military-serving activities.

Many banks that serve veterans and military families, including VBBP participants, may not satisfy the definition of a military bank. Their activities should nevertheless be evaluated under clear and consistent standards inasmuch as roughly six (6) percent of our current adult population are veterans.

We request guidance explaining how qualifying military- and veteran-serving activities may receive consideration regardless of whether the participating institution qualifies as a military bank.

That guidance should address account access, financial counseling and education, affordable housing, responsible lending, small-business development, and assistance during military-to-civilian transitions. It should explain applicable income-targeting, geographic, and documentation requirements rather than leaving banks to infer eligibility from the military-bank definition.

The agencies should also clarify the treatment of spouses, dependents, survivors, caregivers, and other eligible VA beneficiaries. These categories are not necessarily interchangeable, and references to dependents alone may not encompass the populations served by relevant programs.

4. Provide practical documentation and transition guidance.

Banks need predictable standards for documenting participation and demonstrating responsiveness to community needs. The final rule should explain what evidence is appropriate for activities such as opening and maintaining accounts, facilitating benefits deposits, providing counseling, and supporting qualifying community organizations.

For nationwide programs, the agencies should explain how participating banks should identify eligible beneficiaries, document their own contributions, and demonstrate the required relationship to applicable assessment areas.

Where relevant information is already available to an agency, the agency should make it accessible to the examination team and avoid requiring banks to submit it again. Guidance should distinguish information supplied by the agency from documentation the bank must maintain.

Any change affecting previously recognized activities should include clear prospective implementation guidance. Banks should understand how activities conducted under the existing framework will be evaluated during the transition.

5. Address the remaining policy gap.

AMBA continues to pursue targeted legislation to provide clearer CRA recognition for financial services benefiting veterans, servicemembers, and their families. The proposed military-bank provisions are valuable, but they do not independently establish eligibility for the full range of activities or participating institutions that this effort seeks to address.

We encourage the agencies to use their existing authority to provide the clearest available recognition and to coordinate with the Federal Reserve to reduce inconsistent treatment across supervisory agencies.

AMBA would welcome continued engagement on regulatory language and practical examples that preserve appropriate supervisory discretion while giving banks greater certainty. We respectfully urge the agencies to retain military-bank protections and ensure that the final rule continues to encourage meaningful banking access for veterans and military families.

Sincerely,



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