

Innovation and Responsiveness in the Financial Services Sector

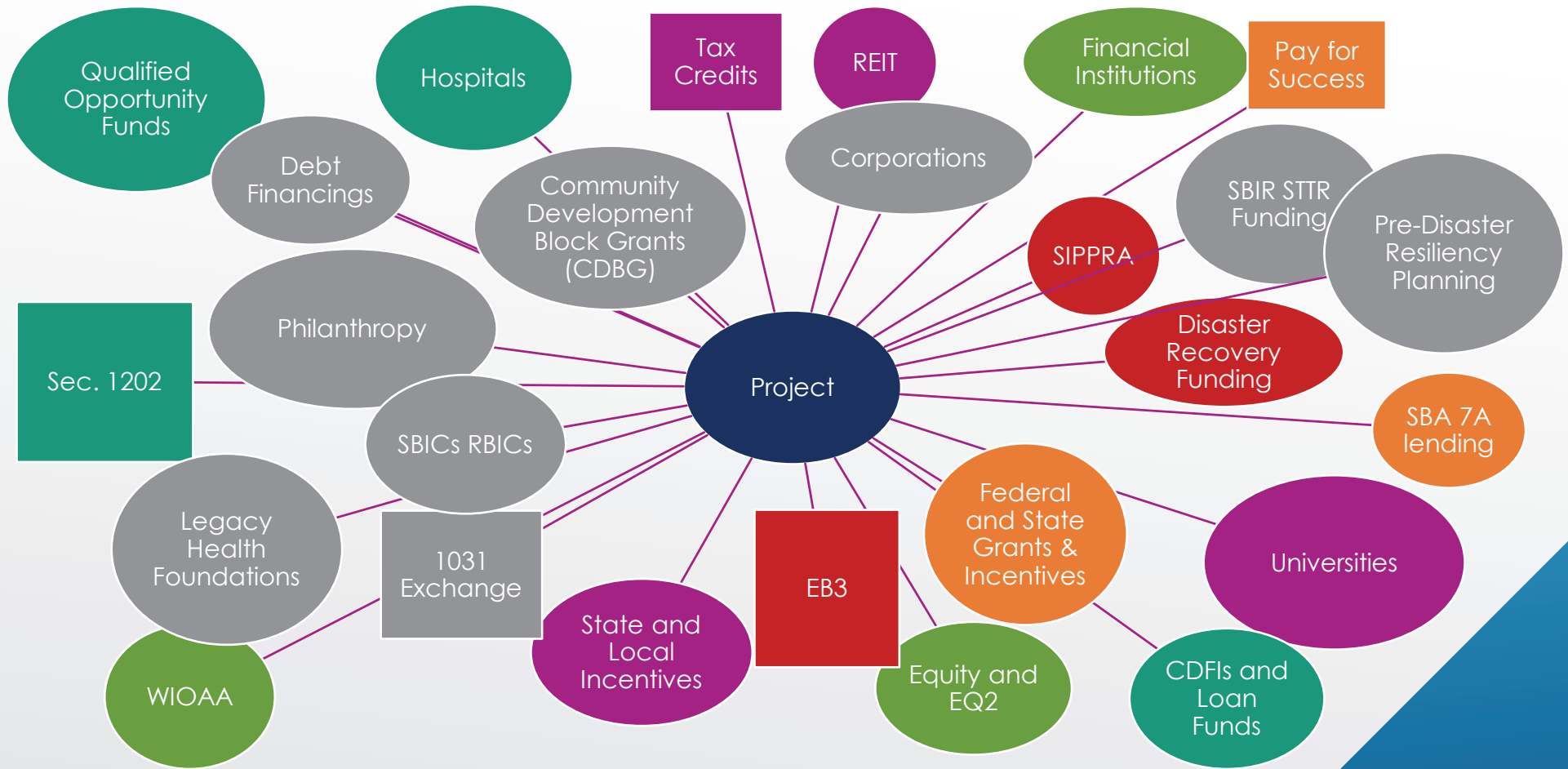
Jeanne Milliken Bonds

Jeanne_Bonds@Kenan-Flagler.UNC.edu

Professor of the Practice, Social Impact Investment and Sustainable Finance



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LAYER AND LEVERAGE THE CAPITAL STACK

Banks can play a role in the recovery, rebuilding and resilience of a designated disaster area (DDA) and receive favorable CRA consideration

- Activity considered “community development” if related to disaster recovery and if it helps to attract new or retain existing businesses or residents within DDA.
- Must provide long-term benefit to area.
- Activity is presumed to revitalize or stabilize if consistent with a bona fide government revitalization, stabilization, or disaster recovery plan.
- CRA consideration for up to 36 months after disaster designation date.

CRA: From Post-Disaster Recovery to Pre-Disaster Resilience

“Planning Presumption Clause:” important and underutilized provision of the Disaster Clause in the Interagency Q&As

- An activity “will be presumed to revitalize or stabilize such a geography or area if the activity is consistent with a bona fide government revitalization or stabilization plan or disaster recovery plan.”
- Post-event recovery and pre-event: **Investments and Lending**
- Local planning efforts: **Service Test**
- Pre-determined post-disaster options: integrated into housing, infrastructural and programmatic investments that seek to advance not only short-term recovery but the long-term adaptive capacity for the community resilience of impacted communities