



December 20, 2023

Douglas Godard
Bonzy Charities, Inc.
doug.godard@bonzy.org
1817 Lake Shore Drive
Columbus, OH 43204

Dear Douglas Godard:

RE: Determination for CRA Qualifying Activity #2322600070

The Office of the Comptroller of the Currency (OCC) is responding to your request, received on August 14, 2023, for a determination whether the activity submitted is consistent with the qualifying activities under the Community Reinvestment Act (CRA). The OCC has determined that the activity is consistent with the qualifying activities and qualifies for CRA credit.

The submitter asks that OCC confirm whether the following activity would be considered to support community development under the CRA: A bank donation or grant to support a nonprofit organization that provides books for children from low- and moderate-income (LMI) families.

The CRA regulation under 12 CFR 25.12(t) states that a qualified investment means a lawful investment, deposit, membership share, or grant that has a primary purpose of community development; 12 CFR 25.12(g)(2) further states that community development means community services targeted to low- and moderate-income (LMI) individuals. In this case, a nonprofit organization provides books to children of LMI families from schools at which the majority of students qualify for free or reduced-price meals based on data from the United States Department of Education's National Center for Education Statistics. The interagency Questions and Answers on Community Reinvestment (Q&As) at [12\(g\)\(2\)-1](#) recognize activities related to schools where a majority of students receive free and reduced priced meals under the U.S. Department of Agriculture's National School Lunch Program as activities that target LMI individuals. Therefore, a bank donation or grant to a nonprofit organization whose primary purpose is providing a community service targeted to children of LMI families (i.e., providing books) would be considered to support community development under the CRA.

The form included with this letter contains the information you provided in the original request as well as information that will be published. The form also indicates whether the description of the activity will be added to the CRA Illustrative List of Qualifying Activities (<https://occ.gov/topics/consumers-and-communities/cra/cra-illustrativelist-of-qualifying-activities.pdf>) as an example of an activity that qualifies for CRA credit.

Please retain this correspondence as evidence of the determination, with all relevant documentation, whether submitted or not, to support qualification of the activity. You may use this form to substantiate that the activity qualifies for CRA credit. This decision is based on the information and representations made in the request. Any change to the activity may result in a different determination on whether the activity is qualified.

Thank you for using the OCC's Qualifying Activities Confirmation process. If you have questions regarding this letter, please contact us by the following methods. Please reference your request number (2322600070) in all communications.

Telephone: (202) 649-5470

Email: QAConfirmationRequest@occ.treas.gov

Mail: Office of the Comptroller of the Currency
Attention: Compliance Risk Policy, QA Submission Processing Unit
400 7th St. SW
Washington, DC 20219

Sincerely,
QA Submission Processing Unit
Compliance Risk Policy
Office of the Comptroller of the Currency