



July 30, 2025

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 #2519500127

The Office of the Comptroller of the Currency (OCC) is responding to your request, received on July 14, 2025, 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 OCC confirms bank employees conducting interactive read-aloud sessions of books addressing financial literacy with children from low- and moderate-income families is a CRA qualified community development service for the banks under the OCC's 1995/2021 CRA regulatory framework.

Under 12 CFR 25.12(i) a community development service means a service that has community development as its primary purpose and is related to the provision of financial services. The definition of community development, contained in the CRA regulation at 12 CFR 25.12(g), includes community services targeted to low- or moderate-income (LMI) individuals. Interagency Questions and Answers on Community Reinvestment (Q&As) at Section __.12(g) (2)-1 provides an example of a qualified service provided to students or their families from a school where a majority of students qualify for free or reduced-priced meals under the U.S. Department of Agriculture's National School Lunch Program as activities that target LMI individuals. Therefore, bank employees participating in activities that involve reading books to encourage the financial literacy of students from LMI families is determined to be a service supporting community development under the CRA.

The form included with this letter contains the information you provided in the original request.

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 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 (2519500127) 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