



**Community Bankers
Association of Illinois**
One Mission. **Community Banks.**

CBAI Supports the CFPB Amending the Harmful Disparate Impact Rule

In a comment letter dated December 9, 2025, CBAI urged the CFPB to amend the harmful disparate impact rule. Our letter correctly stated that community banks support equal access to credit, and that community banks have an exemplary record of meeting their customers' banking needs and treating their customers and communities fairly and with respect.

However, we have consistently opposed legislation, rulemaking and court rulings that would hold community banks liable for making facially neutral, safe and sound lending decisions that have a disparate impact on certain classes of borrowers or demographics without the finding of intentional discrimination. This liability is wrong, unnecessary and unduly burdensome, particularly for community banks on which the cost of regulatory compliance and frivolous litigation falls hardest.

[Read CBAI Comment Letter to the CFPB »](#)

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