

Building Bank Support for Asset Building Initiatives

Office of the Comptroller of the Currency U.S. Department of the Treasury

Banks as Partners in Financial Capability

- The Community Reinvestment Act (CRA) encourages banks to participate in activities that promote *community development* (CD) for LMI persons or small businesses.
- Bank support for financial capability programs may receive positive CD consideration under CRA.
- FinCap programs *targeted to low- and moderate-income individuals and families* may receive CRA consideration as retail banking or community development service.
- Workforce or small business FinCap programs *targeted* to LMI workers or small businesses may also receive CRA consideration.

Types of Support

- Loans
- Qualified Investments (includes grants)
- Services
 - Retail Banking Products
 - Community Development Services
 - Certain Bank Volunteer Activities
 - Technical Assistance Activities

Examples of CD Loans

- Loans or Investments in:
 - Financial intermediaries including:
 - Community Development Financial Institutions (CDFIs)
 - Community Development Corporations (CDCs)
 - Community Loan Funds
 - Minority & Women-Owned Financial Institutions
 - Low-Income or Community Development Credit Unions
 - Local, State or Tribal Governments
 - Low-Income Housing Tax Credits
 - New Market Tax Credits

Interagency Questions and Answers Regarding Community Reinvestment (2016)

Examples of Qualified Investments

Financial support to:

- Not-for-profit organizations serving LMI or other community development needs, such as counseling for credit and other financial literacy programs
- Enable a(n) MDI or LI CU to partner with schools or universities to offer financial literacy education to members of its local community

Interagency Questions and Answers Regarding Community Reinvestment (2016)

Examples of CD Services

- Providing credit counseling or other financial services education to promote community development to assist LMI borrowers
- Establishing school savings programs
- Developing or teaching financial education/literacy curricula for LMI individuals

Interagency Questions and Answers Regarding Community Reinvestment (2016)

Retail Banking Services

Examples of retail banking services that improve access to financial services, or decrease costs, for low- or moderate-income individuals include:

- Low-cost deposit accounts
- Individual development accounts
- Free or low-cost check cashing services
- Reasonably priced international remittance services

Individual Development Accounts

Financial institution participation in IDA programs comes in a variety of forms, including providing:

- Retail Banking Services to IDA accountholders
- Matching Dollars or Operating Funds to an IDA program
- Designing or Implementing IDA programs
- Consumer Financial Education to IDA accountholders

VITA

- Offering low-and no-cost accounts in which the tax refund may be directly deposited
- Offer grants to community organizations providing VITA services
- Donate staff resources to coordinate VITA tax preparation sites, expand outreach, and conduct financial education and literacy programs

BankOn

- Savings incentive programs targeted to low- and moderate-income individuals and families may be deemed responsive to community needs and may receive positive consideration under CRA
- For example, a bank may offer financial services, including low-cost savings and checking accounts that have a primary purpose of benefiting LMI families

OCC Fact Sheet: Bank Savings Incentive Programs

Youth Programs

- Supporting Youth Employment Programs
 - Summer Jobs Connect
 - CFE & Citi Foundation
- Establishing School-Based Savings Programs
- Establishing School-Based Bank Branches



Work & Small Business Programs

- Direct deposit an amount of wages via payroll deduction into bank savings accounts
- Seminars conducted in partnership with employers or job training programs that target LMI workers
- Providing asset-building programs, financial education or technical assistance to business development centers and small business incubators

Disaster Recovery Asset Building & Financial Resilience

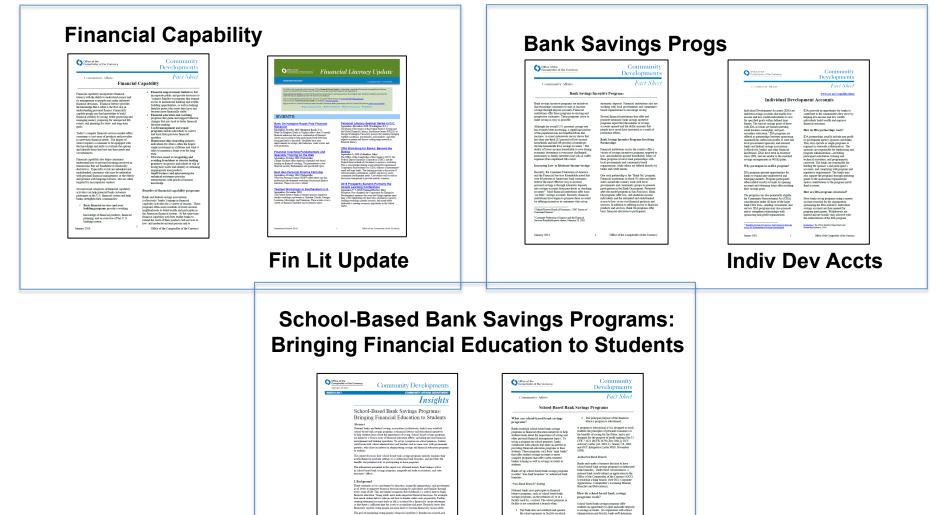
Banks and other partners, supported a United Way matched savings program, that encouraged financial capability and resilience

- Displaced residents could take advantage of the programs to help them rebuild and return to hard-hit neighborhoods.
- Funds could used for homeownership, to start certain businesses or to purchase a car.





OCC Publications



www.occ.gov/communityaffairs "Community Affairs Publications" "Community Affairs Resource Directory"

Lisa Mifflin Lisa.Mifflin@occ.treas.gov 202.230.4664