Prepaid Cards & Financial Services in Low Income Communities

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FDIC Advisory Committee on Economic Inclusion December 1, 2011



NEDAP

NEDAP is a resource and advocacy center that works with hundreds of NYC groups to:

- Promote community economic justice
- Eliminate discriminatory economic practices that harm communities and perpetuate inequality and poverty

HIGH-COST & FRINGE SERVICES













NEDAP OUTREACH & EDUCATION



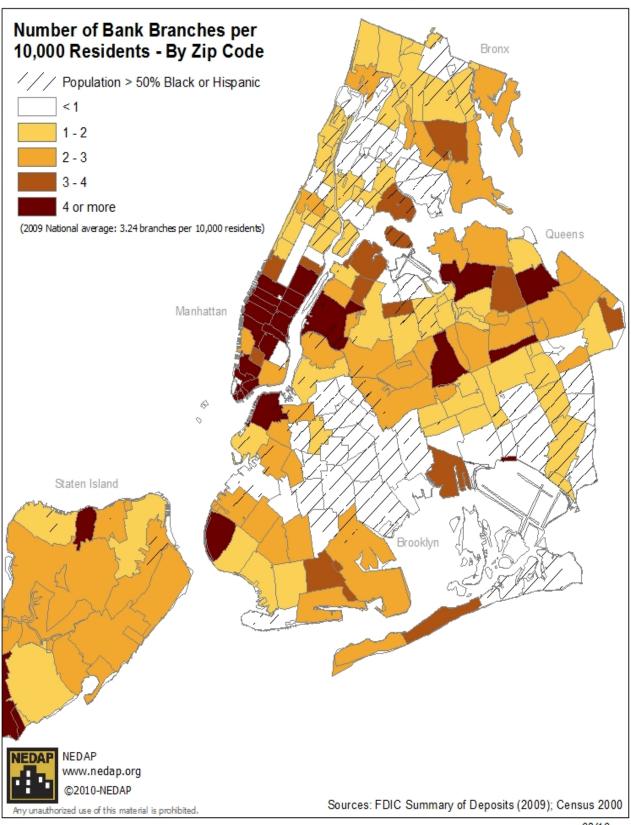




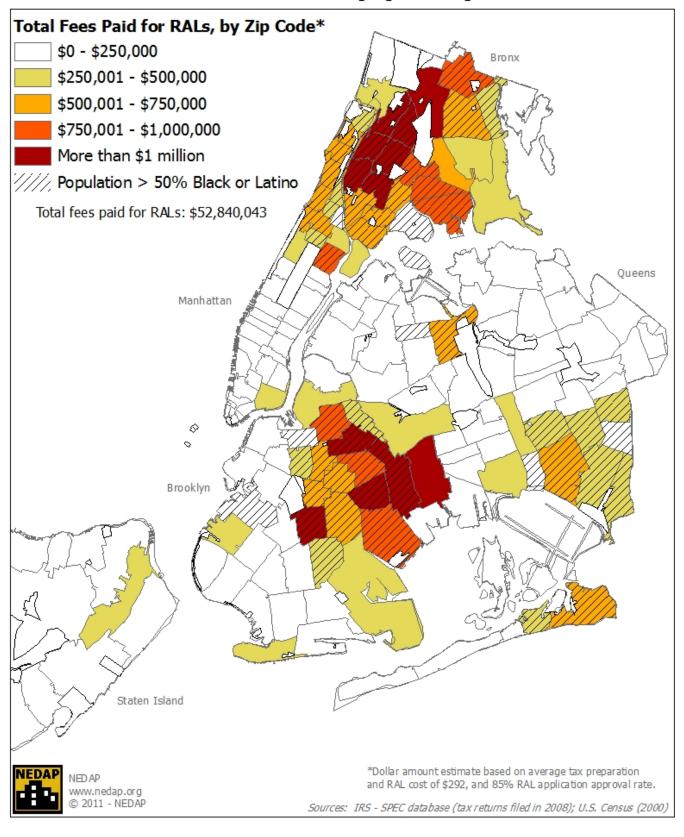


Absence of Bank Branches in Communities of Color

New York City (2009)

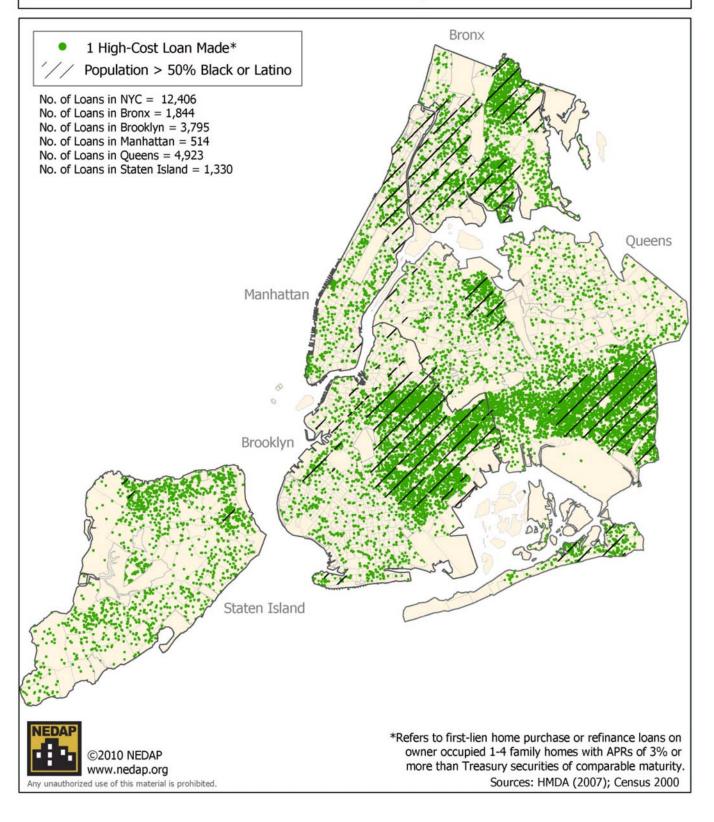


Fees Paid for Refund Anticipation Loans New York City (2008)



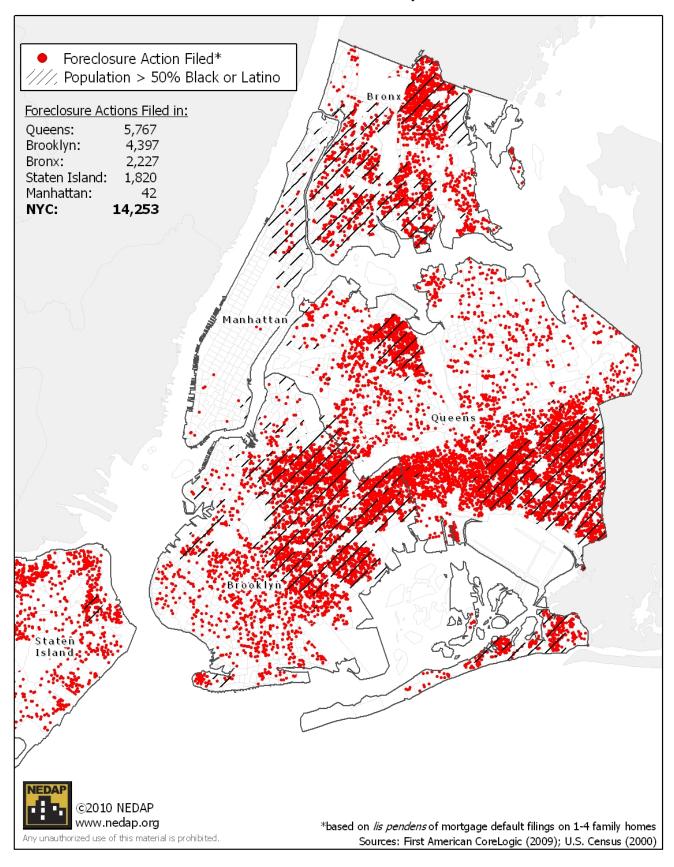
HIGH-COST LOANS MADE - 2007

New York City



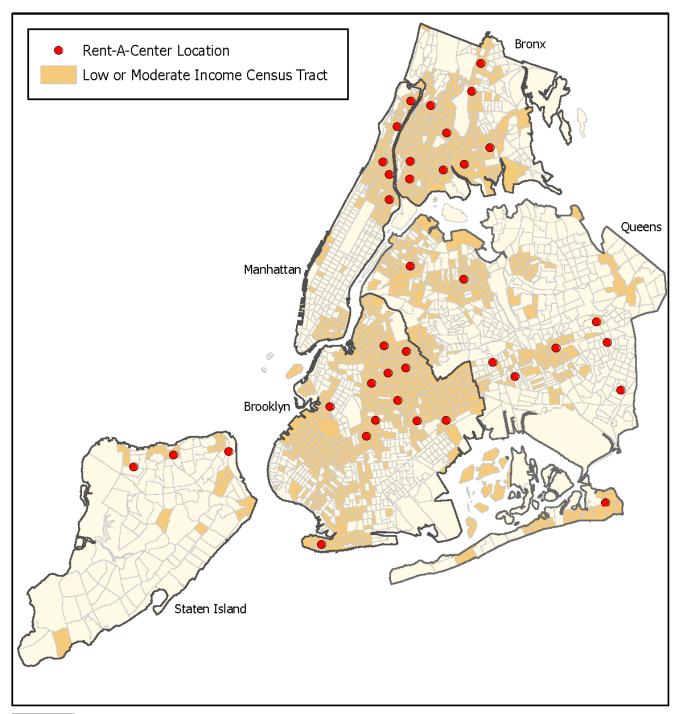
Foreclosure Patterns - 2009

New York City



Rent-A-Center Store Locations

New York City



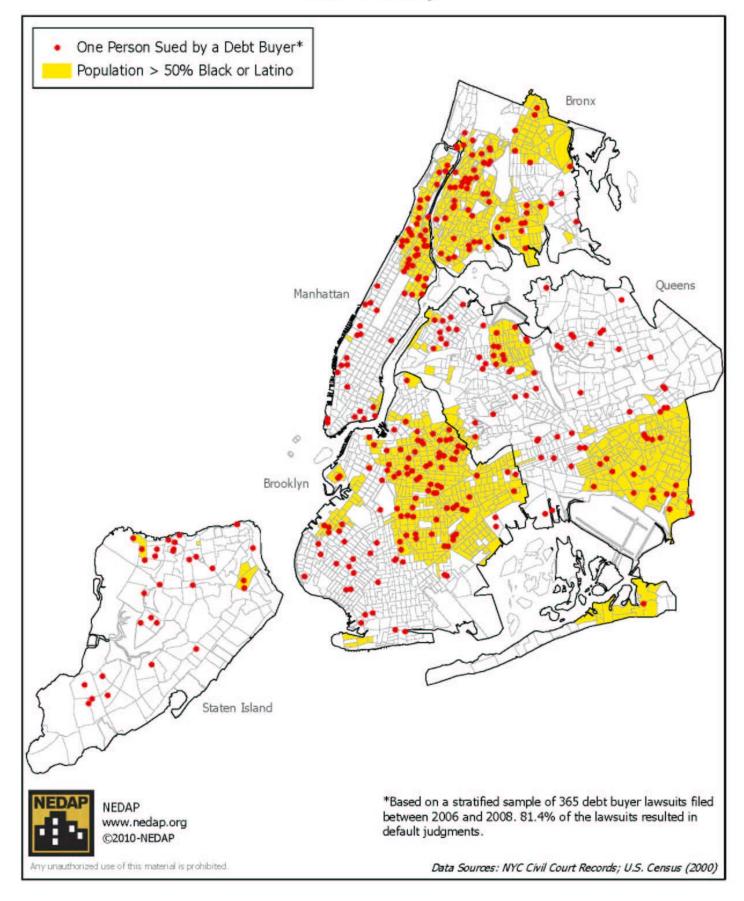


Prepared by the Neighborhood Economic Development Advocacy Project (NEDAP) (212) 680-5100 | www.nedap.org Sources: U.S. Census (2000); Rent-A Center. 14 Jan 2009 <www.rentacenter.com>.

Low or Moderate Income (LMI): Census tract median income = 0-80% of all metropolitan area median income.

Debt Buyer Lawsuits in Communities of Color

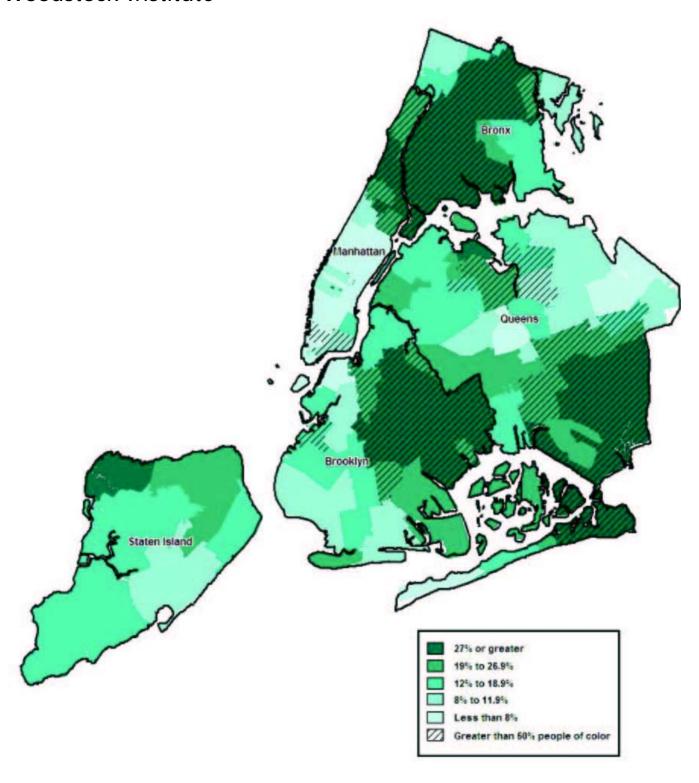
New York City



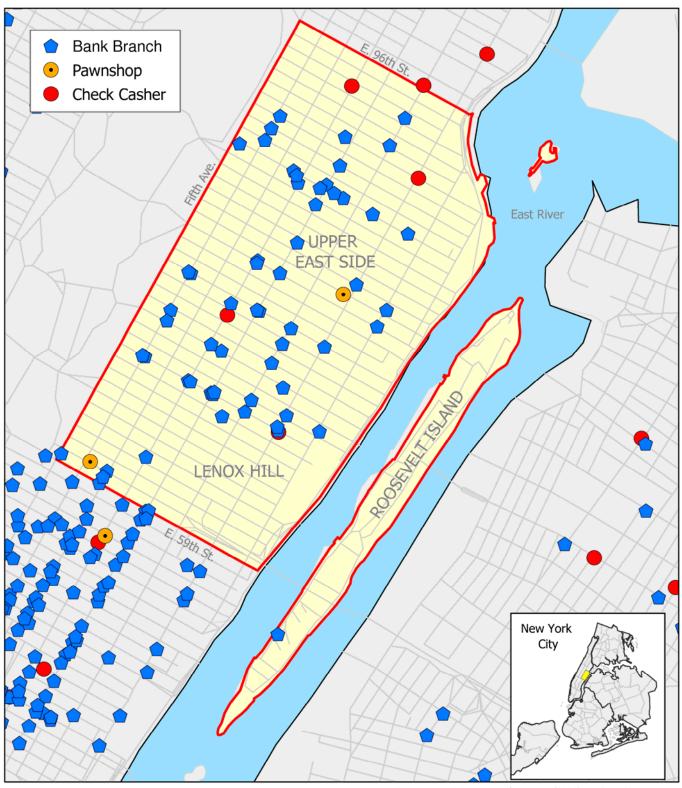
Percent of Individuals in New York City Zip Codes with a Credit Score Below 620

(June 30, 2009)

- Woodstock Institute



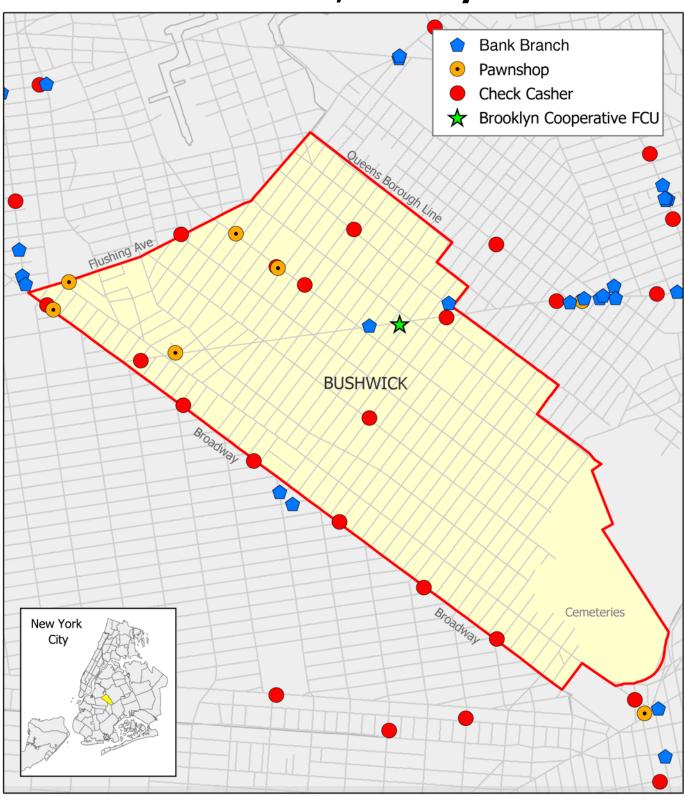
Financial Institutions Upper East Side, Manhattan





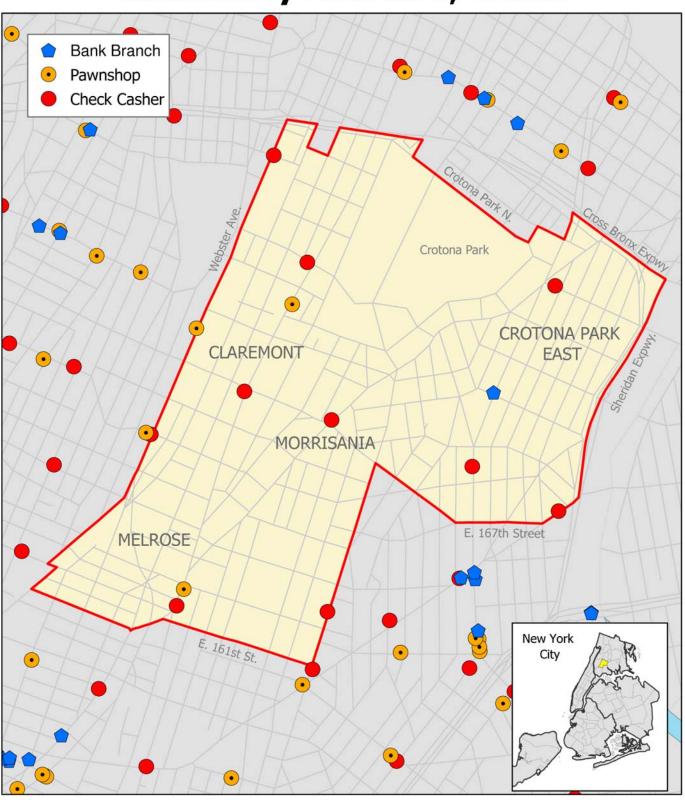
Sources: FDIC Summary of Deposits (2008); NYS Banking Department (July 2009); NYC Dept. of Consumer Affairs (June 2009)

Financial Institutions Bushwick, Brooklyn





Financial Institutions Community District 3, Bronx





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Sources: FDIC Summary of Deposits (2008); NYS Banking Department (July 2009); NYC Dept. of Consumer Affairs (June 2009)

Concerns about Prepaid Debit Cards

- Consumer Protection Reg E, FDIC Insurance
- High, Hidden, Unfair Costs
- Transparency
- Poor customer service
- Equity
- Choice
- Steering young people, immigrants, poor
- Payday lending through cards
- No continuum of needed services, information
- Bank Accountability
- Community Reinvestment
- Shifting costs to workers, benefits recipients

Concerns about Prepaid Debit Cards (cont'd)

- Are prepaid cards a payment tool, or an equitable substitute for bank/credit union accounts?
- Are prepaid cards bringing people into a mainstream, regulated system, or reflecting and reinforcing inequities?
- What is the starting point: How to reform a flawed product or how to best meet people's needs?
- Is it ok for banks to offer prepaid cards to low income customers and traditional accounts to others?
- How many of us are ready to close our accounts and switch to prepaid cards?
- Have we given up on holding banks accountable to low income people and communities?