

Minutes
of
The Meeting of the FDIC Advisory Committee on Economic Inclusion
of the
Federal Deposit Insurance Corporation
Held in the Board Room
Federal Deposit Insurance Corporation Building
Washington, D.C.
Open to Public Observation
May 25, 2016 – 9:00 A.M.

The meeting of the FDIC Advisory Committee on Economic Inclusion (“ComE-IN” or “Committee”) was called to order by Martin J. Gruenberg, Chairman of the Board of Directors of the Federal Deposit Insurance Corporation (“Corporation” or “FDIC”).

The members of ComE-IN present at the meeting were Robert A. Annibale, Global Director, Citi Microfinance and Community Development; Michael S. Barr, Professor of Law, University of Michigan Law School; Janie Barrera, Founding President and Chief Executive Officer (“CEO”) of LiftFund, Inc.; Ted Beck, President and CEO, National Endowment for Financial Education; Kelvin Boston, Executive Producer and Host of PBS’ *Moneywise with Kelvin Boston*; Jose Cisneros, Treasurer, City and County of San Francisco, California; Martin Eakes, CEO, Self-Help/Center for Responsible Lending; Rev. Dr. Floyd H. Flake, Senior Pastor, Greater Allen A.M.E. Cathedral of New York; Ester R. Fuchs, Professor, School of International and Public Affairs, Columbia University; Wade Henderson, President and CEO, Leadership Conference on Civil Rights, and Counselor to the Leadership Conference on Civil Rights Education Fund; Andrea Levere, President, Corporation for Enterprise Development; Patricia A. McCoy, Liberty Mutual Professor of Law, Boston College Law School; Alden J. McDonald, Jr., President and CEO, Liberty Bank and Trust Company; Bruce D. Murphy, Executive Vice President and President, Community Development Banking, KeyBank National Association; Mark W. Olson, Chairman, Treliant Risk Advisors; Manuel Orozco, Senior Associate at the Inter-American Dialogue and Senior Researcher, Institute for the Study of International Migration, Georgetown University; J. Michael Shepherd, Chairman and CEO, Bank of the West and BancWest Corporation; Phillip L. Swagel, Professor in International

Economic Policy, University of Maryland; and John C. Weicher, Director, Center for Housing and Financial Markets, Hudson Institute.

John W. Ryan, Executive Vice President, Conference of State Bank Supervisors was absent from the meeting.

Members of the Corporation's Board of Directors present at the meeting were Martin J. Gruenberg, Chairman.

Corporation staff who attended the meeting included Willa M. Allen, David Barr, Martin W. Becker, Julianne F. Breitbeil, Michael W. Briggs, Lariece M. Brown, Luke H. Brown, Susan Burhouse, Karyen Chu, Bruce L. Currie, Christine M. Davis, Debra A. Decker, Patricia B. Devoti, Dianne E. Dixon, Willie B. Donaldson, Keith S. Ernst, Lessie P. Evans, Richard Foley, David J. Friedman, Pegggi J. Gill, Janet R. Gordon, Maisha Goss-Johns, Shannon N. Greco, Lawrence Gross, Jr., Shamara L. Humbles, Nicholas S. Kazmerski, Cheh Kim, Christopher Lucas, Jonathan N. Miller, Phoebe D. Morse, Benjamin Navarro, Janet V. Norcom, Elizabeth Ortiz, Yazmin E. Osaki, Lee Price, Kristopher Rengert, Sherrie Rhine, Paul Robin, Barbara Ryan, Richard M. Schwartz, Kayce M. Seifert, Deborah Shaw, Patience R. Singleton, Kimberly Stock, Lori Thompson, Rachel A. Ursery, Jeffrey Weinstein, and Angela A. Wu.

Chairman Gruenberg opened and presided at the meeting. He began by introducing a new member of the Advisory Committee, Janine Barrera. Chairman Gruenberg then provided a brief overview of the meeting agenda, advising that the first panel would resume the Committee's discussion from prior meetings on the use and future delivery of mobile financial services with a presentation by FDIC staff of research on the subject and a discussion of strategies banks may be able to use to expand engagement in such services by the underserved; that the second panel would include representatives from Federal Reserve Board task forces on payment systems and their review of upcoming payment system infrastructure modernization efforts; that the third panel, following lunch, would review results from a qualitative research project conducted by FDIC staff to better understand bank efforts to develop sustainable relationships with unbanked, underbanked, and low-to-moderate income ("LMI") consumers; and that the fourth and final panel would explore initiatives to increase economic inclusion for persons with disabilities, with a specific focus on Achieving Better Life Experience ("ABLE") accounts and related efforts by the FDIC and partnering organizations. Chairman Gruenberg then introduced Keith Ernst, Associate Director of Consumer Research, Division of Depositor and Consumer Protection ("DCP"), who would serve as moderator for the panel discussion on "Mobile Financial Services Report and Next Steps."

Mr. Ernst first provided the Committee with a general overview of the research findings within the Mobile Financial Services Report and reminded the Committee of the results from 18 consumer focus groups which were discussed at the Committee's last meeting. Mr. Ernst noted that the results from the focus groups were shared with industry executives for the purpose of formulating strategies banks could pursue to help recognize the economic inclusion potential of mobile financial

services (“MFS”); the strategies developed were to be discussed by the panel with request for comments and criticisms from the Committee in hopes of moving forward with research and, ultimately, implementation of such strategies for the benefit of both consumers and financial institutions alike. Mr. Ernst then introduced panel members Susan Burhouse, Senior Financial Economist; Benjamin Navarro, Policy Analyst, Consumer Policy group; and Yazmin Osaki, Senior Consumer Research Associate, who would review the report’s findings and discuss possible demonstration projects identified in the research.

Ms. Burhouse began the review by highlighting specific consumers’ needs with respect to MFS, as identified in the research: control over account activity, security, access to funds, affordability of account services, convenience, and resources related to long-term financial management. Ms. Burhouse then reviewed with the Committee research findings comparing consumers’ perceptions as to whether these needs were satisfied in traditional banking versus when utilizing MFS. Ms. Burhouse indicated a common finding that consumers perceived traditional banking as falling short in meeting their needs for control, convenience, and affordability; the research indicates that MFS could offer significant improvement to consumers’ concerns as to each of these needs, ultimately leading to more sustainable banking relationships for both the provider and consumer.

Ms. Osaki then discussed opportunities to make MFS a more effective economic inclusion tool and presented to the Committee the report’s suggested strategies for stakeholders to consider when evaluating whether to implement MFS as a means to improve banking engagement with underserved consumers. Some of the strategies discussed included: (1) posting transactions in real-time to improve consumers’ understanding of when payments and deposits are expected to clear their accounts; (2) identification of pending transactions and their impact on account balances; (3) use of low balance alerts and/or monitoring tools to assist consumers in understanding account activity and possible related fees; (4) inclusion of MSF in financial education curricula to enhance consumers’ understanding of the product as well as address concerns regarding the overall security of MFS in comparison to traditional banking; and (5) targeted efforts to expand the pool of MFS users to consumers whom it would most benefit.

Mr. Navarro followed Ms. Osaki with a discussion of three specific demonstration projects set forth in a financial institution letter related to the report. Mr. Navarro invited the Committee’s input and feedback and requested responses to the letter from the Committee and other members of the industry by or before June 15, 2016. The first demonstration project would involve identifying the extent to which the frequency, intensity, and/or form of MFS usage impacts the sustainability of banking relationships; the second demonstration project would focus on utilization of mobile Remote Deposit Capture (“mRDC”) to compel underbanked consumers to deposit checks to their bank rather than through non-bank check cashing services; and the third demonstration project would aim to improve consumer awareness of and education on the availability and utility of MFS through various promotion and outreach initiatives. Mr. Navarro then offered Mr. Ernst the opportunity to open up discussion with the Committee on the report, its findings, and the demonstration projects.

In the discussion that followed, Committee members offered a number of comments and suggestions. Mr. Beck commended the panel for providing a presentation that could be easily incorporated into financial education programs. Mr. Murphy echoed these comments, suggesting that banks work toward engaging community groups on the benefits of MFS to the underserved. Ms. Levere commented on certain shared characteristics between the report's findings regarding consumer needs and the Consumer Financial Protection Bureau ("CFPB") definition of "financial well-being." She suggested that financial coaches be involved in expanding the use of MFS and may be able to do so in part by educating consumers on the relation of MFS to overall personal financial well-being. Ms. McCoy then suggested that future research address whether consumer perceptions related to security shortfalls in MFS are accurate. Mr. Annibale informed the panel that Citi gathers data on its MFS usage and noted that other institutions may do the same; he noted that the data of which he is aware reflects trends similar to those in the report's supporting research.

Mr. Boston opined as to the utility of MFS to aid consumers in financial planning and management. Specifically, he noted that MFS could be used by consumers to budget and plan on an ongoing basis due to the convenience of accessing MFS from a handheld device. In response, the full panel noted that the research reflected consumer interest in this feature and agreed that efforts to increase consumers' awareness of MFS as a financial management tool should be further explored. Mr. Shepherd and Mr. Henderson added their opinions that many institutions could benefit from reviewing the research and should consider using the Report to guide future efforts to engage more customers in MFS. Mr. Orozco then shared his concerns with the panel regarding limitations of MFS, specifically with respect to the types of transactions that can be executed and hurdles to integrating MFS from a merchant's perspective. Mr. Ernst responded to Mr. Orozco noting that the first and third demonstration projects and related educational outreach efforts could assist in bridging any gaps and promote progress toward technological advances.

Chairman Gruenberg then commended the Committee for the robust nature of the conversation as it pertained to the educational and outreach aspect of promoting MFS to the underserved. Additionally, Chairman Gruenberg noted that the FDIC and the Committee should play a constructive role in bringing together institutions, consumers, and technology firms and focus on making such partnerships a key element in the demonstration projects. Mr. Eakes followed by asking the panel to highlight one key issue from the report and research that the Committee might focus on addressing moving forward. He suggested the Committee consider making the goal of improving the longevity of banking relationships a key element in future endeavors. Mr. Ernst responded that the white paper associated with the research identified MFS as a means to help better sustain banking relationships which in turn, will provide benefits to institutions and consumers alike.

Mr. Henderson suggested to the panel that future analysis and focus group activity include an inquiry into whether the elimination of overdraft and similar fees could enhance the consumer experience in terms of sustainability and effectiveness. Mr. McDonald then asked the panel if the research conducted involved an analysis of whether MFS enabled banks to approve or open more

accounts for the unbanked or underbanked, thereby bringing more consumers into the banking system. Ms. Burhouse responded stating that the consumer focus groups were probed specifically on the prospect of opening a bank account via MFS. She noted that the focus groups expressed concerns as to whether account opening via MFS could be as secure as they perceived it to be when done in person at a branch or on a home computer rather than through a mobile device; the groups also shared general concerns related to fraud and cyber-hacking and seemed to share a common interest and strong desire to talk a person, one-on-one, at the account opening stage. Mr. McDonald followed Ms. Burhouse's reply by asking whether the issue of account opening via MFS was explored by the panel from the perspective of the financial institutions. Mr. Ernst replied that the research did not have any data that specifically reached Mr. McDonald's question, but that it should and would be considered moving forward.

Mr. Murphy shared with the panel his organization's experience with MFS outreach and product development. Mr. Ernst replied to these comments with an inquiry as to the key issues that drove the development at Mr. Murphy's organization; in response, he stated that choice and control were the primary drivers. Mr. Annibale added a final comment to the discussion with his suggestion that the panel work with banks on gathering additional data based on tracking of MFS usage and functionality that is likely already taking place internally at the institutions.

Mr. Ernst then concluded the discussion by thanking Chairman Gruenberg, at which time the Chairman announced that the meeting would briefly recess. Accordingly, at 10:12 a.m., the meeting stood in recess.

* * * * *

The meeting reconvened at 10:32 a.m. with Jonathan Miller, Deputy Director for Policy and Research, DCP, moderating a panel on payment system modernization. Mr. Miller began by noting that the second panel was an outgrowth of the Committee's initial discussion of MFS qualitative research at the October 2015 meeting. Mr. Miller opined that changes to the payment system may enhance consumers' experiences with the banking system both generally and with respect to MFS, emphasizing in particular those needs identified in the earlier-discussed MFS research such as convenience, accessibility, affordability, and security in banking products. Mr. Miller noted that shortcomings in traditional banking services, whether as a matter of individual consumer perception or reality, have driven many underserved consumers to non-bank services such as check cashers or money order services; he commented that modernization of the payment system and enhancement of and education about MFS could serve to meet consumer demands through financial institutions instead. Mr. Miller then introduced panel members Deborah Shaw, Senior Technology Specialist and FDIC Representative on the Federal Reserve Board's Faster Payments Task Force ("FPTF"), and Christina Tetreault, Staff Attorney (Consumers Union), Member of the FPTF's Steering Committee and the Federal Reserve's Secure Payments Task Force ("SPTF").

Ms. Shaw began with a general review of the trends in traditional retail payment types, including trends in check processing, ACH payments, card payments, and wires. Ms. Shaw reminded the Committee that even though payment channels are evolving (i.e., MFS, mobile wallet services, online transactions), consumers, merchants, and institutions alike still must rely on traditional payment mechanisms. Ms. Shaw then began to lead the Committee through a slide presentation diagramming the existing payment system process as well as proposed changes as part of the modernization efforts. Ms. Shaw noted that several factors—such as bank policies, private sector ACH network rules, merchant policies, and regulations—impact the clearing and settlement of payments and funds availability. She highlighted three key points related to modernization efforts: (1) an infrastructure change to the ACH network that will allow for same-day processing and settlement of ACH transactions; (2) the FPTF’s efforts to develop faster payments capability in the United States; and (3) real-time payment efforts currently existing or soon-to-emerge in the marketplace.

With ACH transactions, Ms. Shaw informed the Committee that the current system involves a one-to-two day timeframe for the processing and settlement of ACH transactions. The advent of same-day ACH would allow for these transactions to be both processed and settled within the same business day, provided certain cut-off times were met by the originator of the transaction. Ms. Shaw explained that same-day ACH will be rolled out in three phases, starting first in September of 2016 with a transition to same-day ACH for credit payments; the second phase will begin in September of 2017 with same-day ACH for debit transactions; and the third phase, beginning in September of 2018, will impose requirements on funds availability to customers by the receiving banks, ultimately resulting in customers have the ability to withdraw funds directly from an ATM or teller on the same day the ACH transaction was initiated. Ms. Shaw concluded her overview of the same-day ACH process by noting that certain ACH transactions will not be eligible for this expedited processing; international ACH transactions and ACH transactions over \$25,000 will not be eligible, at any of the three phases of implementation.

Mr. Henderson then asked Ms. Shaw whether there will be any additional costs to consumers in association with same-day ACH. Ms. Shaw responded that she was unsure of how institutions may elect to absorb new costs associated with the expedited system. Mr. Annibale commented that presently in the Great Britain, consumers have the option upon initiating a domestic transaction to request an immediate transfer; additionally, there are no cut-off times that must be met to trigger the immediacy nor are there any charges associated with such a request. In reply to Mr. Annibale’s comment, Ms. Shaw stated that it would likely be up to the individual banks, when functioning as the originating bank in an ACH transaction, as to whether they will charge a fee for the same-day service as well as whether they will offer it to all of their customers.

Mr. Cisneros asked whether Ms. Shaw was aware of any reason why a bank would choose not to engage in the faster option of same-day ACH, such as an additional cost to the originator bank or lack of capacity to handle a large volume of same-day transactions. Ms. Shaw stated that the likelihood of banks selecting not to utilize same-day ACH for specific categories of transactions had

been reviewed by the National Automated Clearinghouse Association (“NACHA”, the administrator of private sector rules for ACH payments) and continues to be considered. Ms. Fuchs then stated her opinion that an increase in costs to consumers as a result of same-day ACH seemed inevitable and suggested that the implementation of same-day ACH be monitored closely. Mr. Eakes followed up by asking if ACH transactions could ever evolve into real-time processing and settlement. Ms. Shaw responded with her opinion that real-time ACH would be difficult to accomplish, in large part because ACH is a batch processing system and real-time processing would likely require transactions to be processed on an individual, rather than batch, basis. Following these questions from Committee members, Ms. Shaw provided a series of diagrams to demonstrate examples of how same-day ACH implementation would impact multiple hypothetical scenarios. She then moved on to discussing the FPTF’s efforts to support the implementation of safe, ubiquitous, faster payments capability in the United States.

Ms. Shaw informed the Committee that the FPTF is composed of approximately 320 organizations including financial institutions, individuals, regulatory agencies, consumer groups, and business end users, among others. The work of the FPTF has been approached through three phases; the group is currently in the second phase. Ms. Shaw explained that the first phase, completed earlier this year, involved the FPTF’s development of effectiveness criteria for a faster payment system. The criteria establish 36 qualities for an effective payment system and include, but are not limited to, safety and security, legal issues, governance issues, and system speed. Ms. Shaw reminded the Committee that the criteria are not to be construed as official rules or regulations, but rather as guidelines based on the FPTF’s work. The second phase involves outreach to the industry for requests for proposals for faster payments capability. Ms. Shaw informed the Committee that industry proposals will be reviewed by a qualified independent assessment group working on the FPTF’s behalf to assess the proposals against the effectiveness criteria established in phase one. The FPTF’s efforts will culminate in phase three with the release of a publication discussing its findings.

To conclude her portion of the presentation, Ms. Shaw provided the Committee with an overview of existing real-time payment efforts currently existing or soon-to-emerge in the marketplace. Ms. Shaw discussed private industry efforts to expedite payments and funds availability to consumers and concluded by commenting that an evolution of payment systems is underway and enhancements to traditional payment networks will likely continue to emerge, both in the private sector as well as through implementation of same-day ACH rules.

Ms. Tertreault then began her portion of the presentation on the consumer interests and concerns implicated by payment system modernization. Her discussion of payment system modernization focused primarily on two inquiries: (1) Why does improving the payment system matter? and (2) How can payment system modernization increase financial inclusion? She noted that, in general, the key overlapping concerns between payment system improvements and consumer needs are safety and control. Ms. Tertreault opined that payment system modernization could provide consumers with the ability to better manage their finances as a result of faster access to funds, ability to pay bills in a more immediate fashion, and a decrease in the need to utilize non-bank services like

pay-day lenders while awaiting processing of compensation from “gig economy” employers (i.e., rideshare companies). She also noted that payment system modernization could cause a decrease in a consumer’s likelihood of incurring overdraft fees or, potentially result in elimination of overdraft fees as a whole.

Ms. Tetreault also discussed the potential that faster payment systems may result in faster, more frequent fraud. She stated that while there does not appear to be anything inherent in a faster payment system that could lead to greater fraud, the concern still remains that effective consumer remedies be developed alongside modernization efforts in order to prevent an increase in fraud in the future. Ms. Tetreault offered, as examples, the imposition of systemic controls and consumer alerts in the United Kingdom after its introduction of a more modern payment system rail. Ms. Tetreault opined that questions remain as to how error resolution would be handled in a faster payment system. She noted that the FPTF and SPTF as well as the private sector (independent of the task forces) are actively considering consumer concerns, generally and as they relate to fraud and security, as part of the conversation about modernization.

With respect to the work of the FPTF, Ms. Tetreault then reviewed with the Committee portions of the effectiveness criteria established in phase one of the FPTF’s efforts, as previously discussed by Ms. Shaw. She noted that the effectiveness criteria included some of the following inquiries which relate directly to consumer concerns: (1) whether a payment system solution effectively addressed the needs of the unbanked or underserved to affordably send or receive payments; (2) the level of usability of a system by consumers with varying skill levels, educational backgrounds, physical abilities, etc.; (3) review of the legal framework that would (or should) apply to a new payment system, including an analysis of any gaps in the existing law that should be addressed before a new system becomes publicly available; (4) whether there is competition in the marketplace for payment system solutions that will result in more choices for consumers; and (5) how potential costs associated with a new payment system will be disclosed to consumers. Ms. Tetreault then concluded her remarks by adding that the development of the consumer perspective on modernization is ongoing. Thereafter, Mr. Miller opened the floor for comments and questions from Committee members.

Several Committee members thanked the panel for the informative discussion on the current and future functions of the payment system and agreed that modernization efforts could potentially enhance the consumer experience and present an opportunity for more effective financial management among the unbanked and underserved. Mr. Henderson asked Ms. Tetreault whether the absence of a regulatory scheme specifically governing payment system modernization would result in an inability to meet the Committee’s goal of delivering cost savings to LMI consumers. She responded by stating that although she believes it may be too early to offer a firm answer to Mr. Henderson’s inquiry, consumer groups are extremely focused on the issue. She also noted that the CFPB’s recently published payment principles as well as the FPTF’s effectiveness criteria both include reference to consumer concerns and protection. Mr. Orozco then asked the panel whether there is empirical evidence showing that faster processing of funds actually results in better money

management, noting than in his experience the discipline and patience involved in waiting for a direct deposit to clear can encourage more responsible spending and budgeting habits. Mr. Miller responded that consumers have self-reported the desire for faster funds availability, directing the Committee to the qualitative research presented by the prior panel. Mr. Orozco also asked the panel to comment on the level of innovation of real-time payment systems among non-bank institutions. Ms. Shaw responded that there appears to be a healthy level of competition as to what will work in the marketplace between bank-centric and non-bank-centric solutions. Mr. Olson asked the panel whether risk management and consumer security will be considered at the same priority as the advances in payment system technology. Ms. Shaw responded that the FPTF effectiveness criteria expressly reference safety and security as necessary elements in payment system solutions. Ms. Tetreault added that the SPTF will be involved in evaluating proposals for payment system solutions submitted to the FPTF and, in doing so, would be mindful of security concerns.

Multiple Committee members asked the panel for their opinions (as well as provided their own) on lessons learned from payment system modernization efforts in the United Kingdom and elsewhere. The general consensus from the discussion on modernization abroad was that although the demographic of unbanked and underserved consumers differs from country to country, payment system modernization regardless of geographical location provides consumers with a greater level of control over their individual finances.

Mr. Miller then requested that, in concluding the second panel, Ms. Shaw and Ms. Tetreault provide the Committee with an overview of the FPTF's next steps. Chairman Gruenberg added a request that the panel provide further comment on the time frame associated with the FPTF's efforts. Ms. Tetreault responded by saying that the FPTF is currently in the process of assessing proposals from the industry; more than 20 proposals were submitted by the FPTF's April 30, 2016 deadline. The qualified independent assessment team reviewing the proposals is scheduled to conclude its review in the fall of 2016, at which point the FPTF will have the opportunity to review the proposals and the related assessments before giving feedback directly to the proposers and publishing a document summarizing findings. Ms. Tetreault explained that there will likely be several iterations of the summary document published throughout 2017.

Following Ms. Tetreault's comments, Chairman Gruenberg announce the meeting would recess for lunch. Accordingly, at 11:50 a.m., the meeting stood in recess.

* * * * *

The meeting reconvened at 1:28 p.m. that same day, with Karyen Chu who is Chief, Consumer Research & Examination Support Branch of DCP moderating a panel on the results from the FDIC's qualitative research on banks' efforts to serve the unbanked and underbanked. Ms. Chu began the discussion by offering a general overview of the purpose of the research to be presented by the panel, stating that the primary goal to be achieved with the research is to supplement prior surveys of bank efforts and better inform banks moving forward on effectively serving the financial

needs of unbanked, underbanked, and LMI consumers. Ms. Chu explained that the research used interviews and focus group conversations to develop a greater understanding of the strategies banks are using to engage and develop sustainable relationships with underserved consumers as well as uncover the diversity and breadth of perceptions, motivations, and experiences of banks, bank partners, and consumers. She provided a review of the information to be covered by the panel, starting first with a description of the methods and findings from the project and ending with a discussion of the implications for banks that were drawn from the findings. Before passing the discussion on to the panelists, Ms. Chu also noted that hardcopies of the resulting report were available for meeting attendees and that the report could also be accessed online at on the FDIC's website.

Kristopher Rengert, Senior Consumer Researcher, DCP, began the discussion by explaining the methodology used to select the products and strategies reviewed in the research. He informed the Committee that the banks selected for the research were included because they used what DCP identified as leading practices. Mr. Rengert noted the branch footprint of the 11 banks included in the report collectively spanned 42 states and represented all regions of the United States. The research also included interviews with executives from eight non-profits organizations which partner with the subject banks in their initiatives as well as feedback from 16 focus groups, half of which were comprised of consumer counselors and the other half, consumers. Mr. Rengert added that the focus groups were dispersed among five different cities and included consumer participants screened on a number of characteristics, such as demographic background, employment status, financial experiences, and financial behaviors. Additionally, two of the focus groups—one in Los Angeles and another in New York—were conducted in Spanish. Mr. Rengert reminded the Committee that because of the characteristics used to select the banks and consumers, the report should not be understood to represent the overall population of banks nor a broader set of consumers in the marketplace.

Mr. Rengert began his review of the report with a discussion of research findings on the limited trust many unbanked or underbanked consumers have for banks. He noted that this trust barrier was recognized by bank executives, counselors, and consumers alike. Mr. Rengert also addressed the concern prevalent among consumers regarding their familiarity with banking institutions, explaining that many unbanked and underbanked consumers simply do not view banks as being relevant in their daily lives or believe that banks do not want them as customers because of the consumers' perceptions that banks focus more on consumers with more money. He also reviewed the report's finding that many consumers find interactions with bank employees to be intimidating, further deterring the consumer from initiating a banking relationship. Mr. Rengert added that, in contrast, many consumers feel a greater level of comfort and familiarity with non-bank financial service providers such as check cashers and, at times, did not recognize that many services offered by non-bank providers are also regularly provided by banks. Throughout his discussion of the research findings, Mr. Rengert played for the Committee several audio recordings of interviews conducted as a part of the research; voices of the interviewees were distorted for purposes of

maintaining anonymity. Mr. Rengert then discussed specific strategies banks pursued to address the aforementioned challenges.

The strategies Mr. Rengert discussed included banks establishing local partnerships with existing trusted entities already working in the community served by the bank; participation by bank staff in community events to educate residents on the bank's products and services; addressing branch staffing and advertising with the cultural affinity of the community to be served in mind (particularly with respect to language barriers); adjusting branch hours to include evening and weekend availability to increase convenience for local residents; and offering non-traditional products and services like check cashing in branches in communities with a heavy presence of non-bank financial service providers. Similar to his discussion of the research findings, Mr. Rengert also played audio recordings of interviews conducted as a part of the research when reviewing the aforementioned strategies. At the conclusion of his review of the strategies addressed in the report, Mr. Rengert introduced Sherrie Rhine, Senior Economist, DCP, who would review with the Committee the specific strategies identified in the research that are used by banks to offer a range of products and services.

Ms. Rhine stated that banks reviewed in the research aimed to meet the diverse needs of the communities which they serve. She explained that some of the products and services offered serve as a gateway for consumers to have certain financial needs met through working with banks rather than non-bank providers, while others are offered with the goal of assisting the consumers in engaging in full participation in the banking system by meeting core financial needs such as receiving income and making payments. Ms. Rhine added another strategy identified in the research is the practice of making products (ex., second chance accounts) available to give previously banked consumers an opportunity to reenter the banking system. Ms. Rhine pointed out to the Committee that among the banks interviewed, the range of products offered by was similar in size and breadth—smaller banks did not present a more limited offering than their larger counterparts.

Ms. Rhine then began discussing the products and services offered in greater detail, beginning with banks' provision of gateway products like check cashing and money orders to engage the unbanked and underbanked and begin working toward a long-term banking relationship. She next discussed the strategy of offering low and no fee transaction accounts, stating that approximately one-third of the banks interviewed in the research pursued such a strategy and that most of the products offered are consistent with the core principles of the FDIC SAFE accounts template. Ms. Rhine noted that some of the bankers interviewed recognized that low and no fee transaction accounts are less profitable than others in the banks' suites of products, but they made the decision to make such a product available because they believed doing so would aid in establishing a relationship with consumers and allow the consumer to gain a foothold into the banking system. Ms. Rhine then discussed the offering of second chance accounts for consumers who would otherwise experience difficulty in opening a traditional account because of past account information in databases used in account screening. She added that some banks interviewed provided consumers with second chance accounts to later transition into a more traditional type of account after

maintaining the former in good standing for a predetermined time period. The next product Ms. Rhine reviewed was general purpose reloadable prepaid cards. She noted that more than half of the banks in the study offer this type of product. She also said that, in general, banks offered these prepaid cards with one of three strategies in mind: (1) as a low or no fee transaction account option; (2) as a second chance account option; or (3) as one of several transaction products in a suite available to any consumer. The final product strategy Ms. Rhine discussed was that of offering small-dollar loans as an effort to provide consumers with an alternative to payday lenders. Ms. Rhine added that many banks view this product strategy as a means to educate consumers on responsible credit use and how to build creditworthiness via participation in financial education classes, maintenance of timely payments, and development of savings habits. As to all of the products and services offered, Ms. Rhine explained that the banks and bank executives in the study recognize that simply offering a suite of products is not enough to meet the needs of the diverse communities served; rather, effective marketing and communication strategies in conjunction with the suite of products were acknowledged as necessary to properly inform consumers. Like Mr. Rengert, Ms. Rhine played audio recordings of interviews conducted as a part of the research when reviewing the aforementioned strategies. At the conclusion of her comments, Ms. Rhine returned to Mr. Rengert to continue the conversation with the Committee.

Mr. Rengert then discussed with the Committee the strategies identified in the research that banks are using to sustain banking relationships with consumers beyond initial outreach and product development. Mr. Rengert explained that bank executives and consumer counselors interviewed in the study recognize the importance of bank staff as front line representatives for the institution, which means staff needs to be well-trained about the bank's products, programs, and serves and be able to effectively communicate with members of the community served by the bank. He added that the research shows that it is important for bank staff and consumer counselors to have an identical understanding of the bank's programs so consumers do not experience confusion or feel misinformed when visiting the bank after learning of a program from a counselor. Mr. Rengert noted that employee retention was also important to sustaining banking relationships because of the added comfort to a consumer when he or she can interact with a familiar face when visiting the branch. Additionally, Mr. Rengert explained to the Committee that partnerships with non-profits in the community, particularly through programs allowing non-profit organizations to remotely open accounts on behalf of the consumers they serve, can aid in laying the foundation for a long-term banking relationship. Another strategy he shared was the banks' provision of text message or other electronic alerts to inform consumers of low balances, possible fees, etc. as a means of encouraging a stronger, more sustainable banking relationship with LMI consumers. Mr. Rengert again played audio recordings of interviews conducted as a part of the research when reviewing the aforementioned strategies.

Ms. Rhine then discussed with the Committee specific bank strategies to ensure business objectives are met. She explained that during the research, it was identified that certain challenges often arise when pursuing strategies to engage unbanked and underbanked customers; bank and non-profit executives and consumer counselors interview in the study offered descriptions of the actions

either being taken or that need to be taken to make improvements and overcome the hurdles identified. The actions described centered around three themes: (1) communicating internally the institution's commitment to serving the unbanked or underserved; (2) assessing and resolving issues in implementation of strategies to meet consumers' needs; and (3) investment in technology, staffing, and training to achieve strategic goals in support of efforts to better serve the community. In support of this discussion, Ms. Rhine again played audio recordings of interviews.

Mr. Rengert next began to present the final section of the report which offered an overview of implications from the research that should be shared with and considered by banks and other organizations working to develop sustainable relationships with unbanked and underserved consumers. He stated that the first implication requires the adoption of strategies specifically aimed at building or increased unbanked and LMI consumers' trust in banks. Ms. Rhine followed by explaining that the second implication is for organizations to adopt a multi-pronged approach to serving LMI consumers. She elaborated by stating that banks are likely to be most successful in their outreach when they simultaneously implement multiple approaches to engaging unbanked and underbanked consumers; efforts to build trust and familiarity, offer a wider range of products and services, market to and educate consumers, establish accessible branches, and other strategies discussed within the report should run concurrently in order to achieve the highest level of success. Mr. Rengert stated that the third implication is for banks to adopt longer term relationships with community partners, involving, in particular, open communication between the parties to ensure that the institutions share common or at least complementary goals and that such goals are being effectively addressed. He added that building these relationships requires active participation by personnel at higher levels in the banks and non-bank partners alike. Ms. Rhine then stated that the fourth implication relates to using technology to increase efficiencies for the bank, its community partners, and the consumer. She also noted, addressing Chairman Gruenberg, that the bank executives interviewed in the study appeared to understand completely that there is a real and present need for technology-related training for bank and partner organization staff. Mr. Rengert then concluded by adding that the panel would encourage banks and their partners to realize the diversity amongst their target consumers, each of whom have wide-ranging perceptions about banks and their products and services. Ms. Chu then opened the floor to the Committee for questions and comments.

Chairman Gruenberg began the Committee's discussion by requesting that bankers on the Committee opine, based on personal experience, whether it is realistic for institutions to incorporate the strategies reviewed by the panel. Multiple members of the Committee shared their appreciation to the panel and to the FDIC, generally, for the breadth and quality of the research and the resulting report. Several Committee members agreed that the strategies discussed were realistic and that banks with which they were familiar were engaging in the same or similar efforts. Common among the Committee members' remarks was reiteration of the importance of training to staff, the helpfulness of technology, and the value of strong relationships with community partners. Ms. McCoy noted that some of the comments shared a theme of expressing issues with maintaining brick and mortar branches where the needs of the community made it difficult for the branch to engage in a profitable business. In response, other members added that stronger community partnerships and the

use of technology may be workable solutions to assist in keeping branches open. Mr. Murphy added that institutions should make an effort to focus on developing a clear strategy on how to go to market with a product that considers pricing, community engagement, and other issues ordinarily at stake when facing any form of business problem. Ms. Barrera commented that banks may also experience greater success in their strategies if they were to engage in projects to educate LMI consumers on how to use MFS or other technology products. Mr. Eakes added that a major deterrent to participation in the banking system is the imposition of overdraft fees; he suggested that efforts to reduce or eliminate such fees be continually pursued.

Mr. Henderson then asked the panel whether the FDIC would consider publication of a list of best practices. Ms. Chu responded that the report itself details the strategies it recommends banks and their partners pursue, but nonetheless maintains anonymity of the specific institutions studied. Chairman Gruenberg added to Ms. Chu's response noting that the FDIC is currently engaged in assisting financial institutions of varying sizes with technological assistance through the provision of online video series tutorials and would also be able to provide more hands-on assistance through community affairs representatives and bank examiners. Committee members thereafter engaged in a discussion of whether individual banks should be highlighted for their best practices. Chairman Gruenberg thereafter announced that the meeting would briefly recess. Accordingly, at 3:04 p.m., the meeting stood in recess.

* * * * *

The meeting reconvened at 3:12 p.m. with Janet Gordon, Associate Director, Community Affairs, moderating a panel on Achieving Better Life Experience ("ABLE") accounts and economic inclusion for persons with disabilities. Ms. Gordon explained that the panel would provide an update on three important developments: (1) introduction of ABLE accounts as a savings tool for disabled persons; (2) collaborative work between the CFPB and FDIC on tailoring financial capability tools to better serve disabled persons; and (3) an overview of broader FDIC plans and initiatives on economic inclusion for disabled persons. Ms. Gordon then introduced the three panelists to address the first development, each selected to speak based on their work to create and implement ABLE accounts: Catherine Hughes, Attorney Advisor, Office of Tax Policy, U.S. Department of Treasury; Deborah Goodkin, Managing Director, First National Bank of Omaha; and Juliana Crist, STABLE Account Director, Office of Ohio Treasurer Josh Mandel. Ms. Gordon next introduced Daniel Dodd-Ramirez, Assistant Director of Financial Empowerment, CFPB, who discussed the CFPB and FDIC joint efforts. Ms. Gordon explained that she would conclude the discussion personally with a discussion of broader FDIC initiatives. She then turned the floor to Ms. Hughes to provide a general overview of the ABLE Act, enacted in December 2014, and the resulting regulatory framework applicable to ABLE accounts.

Ms. Hughes explained to the Committee that the purpose of the ABLE Act is to allow for tax advantaged savings that will provide for disability-related expenses of disabled individuals without jeopardizing those individuals' eligibility for or the amount of their public benefits. Ms. Hughes

reviewed some of the primary tax benefits of ABLE accounts, such as the ability for the undistributed earnings in ABLE accounts to accrue tax-free; and partial exclusion of an ABLE account's balance or any amounts withdrawn therefrom to be used on eligible expenses from calculation of a disable person's income and/or resources for the purpose of determining that person's eligibility for public benefits. She then explained primary requirements for an ABLE account and/or qualified ABLE program. The requirements Ms. Hughes reviewed include, but are not limited to: (1) the designated beneficiary ("DB") of an ABLE account must be an "eligible individual"—generally speaking, Ms. Hughes explained that a DB is a person who has a certain level of disability that occurred before age 26, in accordance with applicable statutes; (2) only one ABLE account is permitted per DB, though the account does not have to be opened in the jurisdiction of the DB's residence; (3) the DB must be recognized as the owner of the ABLE account's assets—if another individual has signature authority on the account, this individual must not have a beneficial interest in the account and must manage the account for the DB's benefit; (4) limitations on contributions, which are currently set at an annual contribution cap of \$14,000.00 (commensurate to the current per done gift tax exclusion under the gift tax rules) and a cumulative cap set on a state level that is equal to the state's existing cap on 529 qualified tuition program accounts; (5) investment direction for the ABLE account may only be changed up to twice per year; (6) prohibition on pledging an ABLE account as security for a loan; and (7) an allowance for Medicaid to make a claim on any money remaining in an ABLE account upon the DB's death for the amount Medicaid has paid out for medical benefits subsequent to the creation of the ABLE account, less any Medicaid premiums paid by the DB.

Ms. Hughes informed the Committee that "qualified disability expenses" for the purpose of ABLE account regulations are those expenses related to the disability of the DB and for the DB's benefit in maintaining or improving health, independence, or quality of life. She added that the proposed regulations published by Treasury make clear that the definition of these expenses is intended to be broad and allow for determination of a person-by-person basis. Ms. Hughes also explained that the structure of ABLE accounts are created and maintained at the state level, but for these state programs to be considered qualified ABLE programs with qualified ABLE accounts the program must comply with Section 529(a) of the Internal Revenue Code and the federal tax regulations promulgated thereunder by the IRS and Treasury. Ms. Hughes stated that Treasury published its proposed regulations for ABLE accounts in June of 2015 and received over 200 comments in response. She said a hearing has since been held and Treasury is actively working toward finalizing those regulations, adding that states opening programs and accounts this summer prior to publication of the final regulations would not be disqualified for their efforts in the interim due to a transition period in which states with existing programs will be allowed to bring those programs and related ABLE accounts into compliance with the final regulations. Ms. Hughes added, in conclusion, that the regulations to be issued seek to strike a balance between allowing states flexibility in the administration and creation of their ABLE programs and compliance with broader based federal regulations based on the ABLE Act.

Ms. Gordon thanked Ms. Hughes for her presentation and then offered the floor to Ms. Goodkin, to be followed by remarks from Ms. Crist. Ms. Goodkin provided the Committee with a slide deck detailing the specifics of the ABLE program to be launched by First National Bank of Omaha (“FNOB”) on June 30, 2016. Ms. Goodkin explained the FNOB, as a private institution sought to provide through its ABLE program self-sufficiency and financial independence for members of the disabled community. She emphasized to the Committee efforts made by FNOB to work directly with the community to design FNOB’s ABLE program. Additionally, Ms. Goodkin noted that FNOB is actively engaging in grassroots efforts in partnership with existing networks to disseminate information about the ABLE program and train representatives for community organizations on how to assist their members in enrolling and participating.

Ms. Goodkin then explained the process for opening an account, selecting the account’s investment direction based on risk preferences of the DB, offerings for contribution to the account via a checking account option starting in September, online gift certificate contribution programs, and mechanisms in place to inform account holders as they approach the relevant federally and state mandated contribution caps. She also explained FNOB’s processes for withdrawing from its ABLE accounts, implementation of a website that is fully compliant with the Americans with Disabilities Act, social media platforms for the ABLE program, and an overall commitment to a comprehensive financial literacy program for disabled individuals to promote self-sufficiency and independence. At the conclusion of Ms. Goodkin’s review of FNOB’s ABLE program, Ms. Crist began her presentation to the Committee on the ABLE program being implemented by the State of Ohio.

Ms. Crist explained that Ohio’s ABLE program is a direct-sold plan with all of its account enrollment and functionality facilitated online. Ohio’s ABLE pilot program was launched in April of 2016 with invitations for enrollment extended to individuals who assisted in the initial build of the program; she added that the pilot phase was intended to test the program before offering it nationwide. Ms. Crist then provided the Committee with an overview of the behaviors witnessed by account holders during the pilot program period, offering the caveat that the pilot program pool features a small number of enrollees and may not necessarily be indicative of patterns that may emerge once the program is fully launched. In soliciting feedback from pilot participants, Ms. Crist noted that a common concern arose with respect to selecting the account’s investment direction at enrollment. Ms. Crist explained that because a large portion of the disabled community may be unbanked, the task of selecting an investment portfolio could be challenging. She stated that Ohio intends to include information on this point in the education component of its ABLE program moving forward, providing enrollees with more details as to the risk level and composition of the choices to enable them to be better informed in the selection process. Ms. Crist also reviewed the trends in the pilot program group with respect to contribution amounts at the time of account opening. The Ohio ABLE program requires a minimum contribution of \$50.00 to open an account; only 10% of the pilot program participants put in the minimum amount, whereas 20% contributed over \$3,500. Ms. Crist noted that the pilot program participant pool reflected an average contribution of approximately \$1,300.00.

Ms. Crist then reviewed the Ohio ABLE program's functionality for spending account funds. She explained that the Ohio program offers two options; the first allows for ACH transfers from the ABLE account to an external checking or savings account outside of the ABLE program and the second was referred to by Ms. Crist as an "in-house spending solution." Ms. Crist stated that the overall goal of the in-house solution was to provide a banking product that is free (or as close to free as possible) which also allows for customization and a high level of consumer protection. The in-house solution provides the ABLE program participant with a prepaid debit card associated with his or her ABLE account; the card does not pull directly from the account, which she explained is designed to meet the dual aims of empowering the DB and providing management or oversight capabilities to DB's parents and/or guardians. The prepaid card is free to obtain and involves no fees for transactions, with the exception of a \$0.49 fee for PIN transactions in lieu of signature. Ms. Crist explained some of the consumer protection aspects of the in-house solution, such as: the provision of text alerts to remind customers of the fees associated with PIN transactions; the inability for the DB to overdraw the ABLE account by using the prepaid card; built-in online functionality to assist account holders in reporting ABLE account-related expenditures to the Social Security Administration and IRS, when necessary, through full access to spending records and the ability to annotate those records as you go; and, among others, the ability to turn off certain merchant category codes to prevent the cardholder from using funds on categories of goods that the program administrators can practically definitively determine would not be classified as "qualified disability expenses." Ms. Crist concluded by noting that challenges remain on the horizon as the Ohio ABLE program awaits the finalization of federal regulations. Ms. Gordon then turned the floor over to Mr. Dodd-Ramirez to discuss the CFPB and FDIC joint efforts.

Mr. Dodd-Ramirez provided the Committee with a description of the goal of the CFPB's Office of Financial Empowerment ("OPE"). He explained that the OPE works to empower low-income and economically vulnerable consumers by providing them with information and skills to make informed decisions to reach their life goals through the OPE's promotion of a more inclusive and fair financial marketplace. Mr. Dodd-Ramirez stated that Americans with disabilities disproportionately live in poverty, adding that approximately 80% of disabled Americans have no emergency funds that they can turn to in a time of crisis. For this reason, in addition to the fact that many disabled persons are unbanked, Mr. Dodd-Ramirez opined that there is great potential in the new savings opportunities provided through ABLE accounts. He explained that the OPE works closely with other federal agencies, social service providers, financial educators, community-based organizations, and other public and private stakeholders to create financial products for disabled individuals and reach consumers to get information when and how they need it most. To accomplish its outreach goals, he added that three years ago the OPE developed a toolkit, "Your Money, Your Goals", to be utilized by social service organizations to assist the individuals they serve in growing skills in financial activities like ordering a credit card or understanding and managing debt. Mr. Dodd-Ramirez added that that Your Money, Your Goals toolkit has since been adapted for use by work organizations and legal aid groups; the toolkit is often used to assist individuals in certifying or recertifying for benefits, obtaining employment, or getting placed in housing. Mr. Dodd-Ramirez shared with the Committee that the Your Money, Your Goals toolkit is a suitable accompaniment to

the FDIC Money Smart program used in classrooms across the United States. In the future, Mr. Dodd-Ramirez explained that the CFPB will be engaging with the FDIC to leverage resources to identify, develop, and provide tools and information to financially empower consumers with disabilities as they work to manage issues in their financial lives, including savings, credit, debt, and other matters impacting their financial well-being.

Mr. Dodd-Ramirez explained that the CFPB and FDIC intend to convene a group of experts from the disability community to provide recommendations and guidance that both agencies can use to tailor Your Money, Your Goals and Money Smart to better serve disabled persons. He added that other activities are also being explored as part of the joint efforts and will have more to report at a future time.

Ms. Gordon then began the final portion of the panel's presentation by speaking briefly on the FDIC's efforts to improve economic inclusion of persons with disabilities over the coming months. She explained to the Committee that the FDIC's efforts involve three parts: (1) collaboration with partners, including the CFPB; (2) enhancement of the FDIC's suite of educational resources, including Money Smart; and (3) pursuit of initiatives to identify and help disseminate information about inclusive products and practices. As to the collaboration effort, Ms. Gordon informed the Committee that the FDIC recently participated in a webinar sponsored by the National Center on Employment and Economic Advancement of Persons with Disabilities ("LEAD") Center, which is a group of disability workforce and economic empowerment organizations funded by the Department of Labor and managed by the National Disability Institute. Additionally, on this front, the FDIC is also working to incorporate disability organizations into the work of Bank On initiatives in major cities. Regarding the enhancement of the FDIC's suite of resources, Ms. Gordon explained that ongoing efforts are being made to provide more consultative guidance and support related to ABLÉ accounts. She informed the Committee that many FDIC resources are currently available in Braille and large print and that the FDIC already incorporates tips for inclusion of disabled persons within the FDIC's guides for those presenting Money Smart. As to the FDIC's pursuit of initiatives to identify and disseminate information about inclusive products and services, Ms. Gordon added that the FDIC continues to expand its Money Smart Alliance partner network and engages in roundtable discussion with the industry to address issues of economic inclusion and will continue on with these efforts in the future. Additionally, she stated that the FDIC has identified other areas for collaboration on initiatives related to assistive technology, community development financial institutions and housing resources, among other items.

In conclusion, Ms. Gordon shared with the Committee questions that the FDIC explores when working with partners in collaboration on economic inclusion initiatives for disabled persons: What are the key factors for the FDIC to consider as it prioritizes specific opportunities in this arena? How will any particular opportunity help serve the needs of disabled persons? What financial topics need to be included in Money Smart to specifically assist the disability community? How can the strengths of various organizations be combined to better serve people with disabilities? Ms. Gordon

then thanked the Committee for their ongoing support and welcomed comments and questions from its members.

Ms. McCoy started by commending Ms. Goodkin and Ms. Crist for their respective organization's efforts in establishing an ABLE program. She then asked whether legal liability concerns related to education on investment direction alternatives might deter a sponsor from offering input on which investment portfolio to choose in assisting an ABLE account enrollee. Ms. Crist responded noting that because the program providers are not allowed to directly advise an enrollee on which direction would suit he or she best; instead, education can only be offered as to portfolio contents and that Ohio is working on better developing these materials on an ongoing basis. Ms. Goodkin added she is hopeful many enrollees will have caretakers or other individuals assisting them with account opening that will be able to convey information from generalized educational materials to help the DB make a decision that best suits their needs.

Mr. Henderson commended the panel for their work on ABLE programs, both in their regulatory capacities from the various agencies and through their roles in developing specific ABLE programs. He then posed the question to the panel as to whether there is a total limit to the amount an ABLE account can hold, in total. Ms. Hughes responded by noting that the federal statute designated a program as a qualified ABLE program under the Act only if the annual contributions are limited to the \$14,000 gift tax limit and the state-provided 529 program limit, which varies from state to state but is generally in the range of \$300,000 – \$350,000. Ms. Goodkin and Ms. Crist added that the 529 program limit in Nebraska and Ohio is \$360,000 and \$426,000, respectively. Ms. Hughes clarified that while the statute references the 529 program limit amount as a cap on total contributions, the proposed federal regulation provides a safe harbor that allows an ABLE account to be in compliance with this requirement so long as the *balance* does not exceed the 529 limit at any given time.

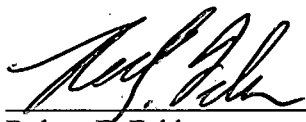
Mr. Boston next asked Ms. Goodkin why it may be advantageous for other financial institutions and states to partner with FNOB to implement an ABLE program rather than trying to do so on their own. Ms. Goodkin explained that FNOB is the largest privately owned bank in the United States and is pursuing its ABLE program with the broader primary motivation of serving the community rather than pursuing profits from the program. Because of the work FNOB has already done, banks that lacked the necessary financial appropriations to start their own ABLE programs could benefit from the lessons learned and initiatives developed during FNOB's creation of its national ABLE program. She elaborated on the advantages of partnering with FNOB by explaining that FNOB has developed a training infrastructure to enable its branch employees to effectively assist with the opening and operating of ABLE accounts.

Following Mr. Boston's question, many members of the Committee applauded the work of Ms. Goodkin and Ms. Crist in implementing their respective ABLE programs and wished them well in future endeavors. Mr. Eakes asked Ms. Goodkin whether she explored the possibility of specializing in a segment within the disability community with products tailored to disability-specific

needs. Ms. Goodkin opined that FNOB's goal was to serve the entire disability community and that she believes, in part due to different segments of the community competing for funding resources, the most effective program will be one that treats all disabilities in a similar fashion. Ms. Gordon followed Ms. Goodkin's comments by adding that the FDIC's future development of its educational resources and tools will aim to suit as many different disabilities and situations as possible. Ms. Gordon then thanked the panelists as well as Bruce Currie, a member of her staff, who assisted in preparing the presentation and Christopher Rodriguez of the National Disability Institute, who helped in identifying and recruiting panel participants.

Chairman Gruenberg thanked the panel for their presentation and stated that the Committee would follow up on all of the issues discussed. Chairman Gruenberg thanked the Committee for their participation and attendance. Thereafter, he called the meeting adjourned.

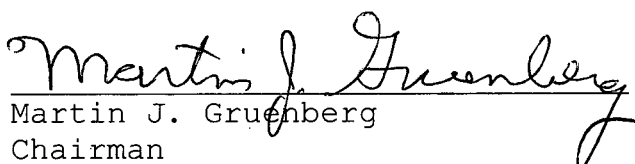
There being no further business, the meeting was adjourned at 4:07 p.m.



Robert E. Feldman
Executive Secretary
Federal Deposit Insurance Corporation
And Committee Management Officer
FDIC Advisory Committee on Economic Inclusion

Minutes
of
The Meeting of the FDIC Advisory Committee on Economic Inclusion
of the
Federal Deposit Insurance Corporation
Held in the Board Room
Federal Deposit Insurance Corporation Building
Washington, D.C.
Open to Public Observation
May 25, 2016 - 9:00 A.M.

I hereby certify that, to the best of my knowledge, the attached minutes are accurate and complete.


Martin J. Gruenberg
Chairman
Board of Directors
Federal Deposit Insurance Corporation