What is the national functional illiteracy rate?
The National Adult Literacy Survey (NALS) done in the 1990's (and endorsed by the National Assessment of Adult Literacy (NAAL) of 2003) found a total of 21-23 percent - or 40-44 million - of the 191 million American adults functioning at the lowest literacy level.

What is the functional illiteracy rate in Michigan?
About 18 percent.

What is the functional illiteracy rate in Detroit?
47% of metro Detroitors are reportedly functional illiterate.

If you consider that most of your target audience will be functioning at a very low literacy level, I would place the following paragraph at the bottom, rather than the top of your form. You are going to lose a lot of people the moment they read, and don't understand what this means. Give them the basic information first.

Eligibility:

When opening an account, consideration could be given to apply latitude and flexibility (as permitted by law) when forming a reasonable belief about each customer’s identify and when assessing the risk of opening a new account.

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