

Via Email

Louisa Quittman  
Director of Community Programs  
Office of Financial Education and Financial Access  
U.S. Department of Treasury  
1500 Pennsylvania Ave, NW  
Washington, DC 20220

November 14, 2011

Re: Financial Education and Counseling for low to moderate income individuals

File Number: FR Doc 2011-23235

Dear Louisa Quittman:

The Financial Services Roundtable (the “Roundtable”) appreciates the opportunity to respond to the request for Comment (the “Comment Request”) from the U.S. Department of Treasury Office of Financial Education and Financial Access (“OFEFA”) regarding the establishment of programs, grant funding, financial counseling, and the creation of collaborative partnerships to encourage low to moderate income individuals to utilize federally insured depository institutions.

The Financial Services Roundtable (the “Roundtable”) and its member companies are strongly committed to being good corporate citizens to our communities and our country. Our member companies have a year-round commitment to American communities, and have as a particular focus delivering financial literacy programs in the communities they serve. For example, as of August 3, 2011, Roundtable member companies completed a record number of 1,689,900 community service projects, including over 42,000 financial education programs, through the efforts of over 292,406 member company volunteers, helping over 42 million consumers.

The Roundtable collaborates with 16 not-for-profit partners. Seven of these partners specialize in financial education: Jump\$tart Coalition for Personal Financial Literacy, Junior Achievement, Operation HOPE, Society for Financial Education and Professional Development, Women in Housing and Finance Foundation, Women’s Institute for a Secure Retirement, and Working in Support of Education

#### Section 1: Program Focus

The Roundtable supports the OFEFA’s overall attempt to establish and disburse grant funding to organizations providing counseling to low to moderate income individuals promoting the advantages of utilizing FDIC depository institutions. The Roundtable supports Section 1204 (2) which suggest that low to moderate income individuals should have greater access to FDIC depository institutions.

The Roundtable is of the opinion that OFEFA should work closely with the Roundtable's membership and other reputable organizations to identify previously established effective programs promoting financial education for low to moderate income individuals. Additionally, expanding the program that the FDIC already has created through the Alliance of Economic Inclusion is one way that Treasury can encourage activities that enable low-and moderate-income individuals to establish one or more accounts in a federally insured depository institution and to improve access to the provision of such accounts. Appropriate incentive programs could be used to encourage additional financial institutions to participate. OFEFA should attempt to market these efforts to the general public in a comprehensive manner via additional appropriate marketing and communications technique.

The Roundtable believes the best way to demonstrate examples of high quality education is to establish a database for grantee organizations, financial institutions and individuals to report successful collaborations on a quarterly basis. Additionally, the requirement of a metric or electronic scorecard demonstrating the completion of successful objectives for grantees should accompany any grant funding provided by the OFEFA.

## Section 2 General Comments

Several Roundtable's member companies partner with community-based organizations and non-profit partners to improve access to financial services. Below are some examples of such programs:

- **Banco Popular: *Safe Start Savings***

The Safe Start Savings program in New York City was initiated to create new opportunities via partnerships with local community organizations to reach out to the unbanked/underbanked community in LMI areas. Through joint financial literacy sessions bankers in their communities educate and facilitate the opening of no and low cost savings accounts.
- **BBVA Compass: *Financial Inclusion***

At BBVA Compass, financial inclusion is a pillar of its corporate responsibility and community reinvestment programs. Initiatives to improve access to financial services for the unbanked and underbanked are implemented through BBVA Compass' participation in "Bank On" initiatives throughout the bank's seven-state footprint. BBVA Compass also promotes accessibility to products and services with the SafeSpend Card—a reloadable prepaid Visa debit card.
- **The Charles Schwab Corporation: *San Francisco Smart Money Network and Regional Partnerships Initiatives***

Charles Schwab and the San Francisco Office of Financial Empowerment co-founded and co-chair the San Francisco Smart Money Network (SF-SMN), a collaborative group of non-profit service providers, philanthropic institutions, and local public sector representatives dedicated to improving the provision of

financial education services in San Francisco. Financial empowerment services and products are centralized through an online directory.

○ **TD Bank: *Serving the Unbanked***

TD Bank provides services and programs specifically to low-to-moderate income households and unbanked consumers. One of the ways TD Bank meets the needs of the community is by partnering with Community Development Organizations and offering a savings program that helps low-to-moderate income individuals and families save for a specific purpose. TD Bank's Individual Development Accounts and Family Development Accounts were designed to help the unbanked and underbanked meet their financial goals.

○ **M&T Bank Corporation: *Regionally Specific Responses***

As a community bank, M&T Bank strives to support regionally specific responses to the needs of the unbanked in the communities in which they do business. This is accomplished by partnering with national and local non-profits to deliver programs designed to meet the specific needs of the local population.

Roundtable member companies are also active in delivering financial literacy programs and specific products to address the needs of underserved communities. The following is a sample of these resources:

○ **The PNC Financial Services Group, Inc.: *Foundation Checking Program***

To help address the unbanked segment of the population, the Foundation Checking product was created to address the fact that individuals on ChexSystems were not eligible for banking accounts. To assist many of the people on ChexSystems who have had minor infractions, PNC developed Foundation Checking to offer a second chance to get back into the "banking mainstream". The program is also an attractive starter account for those with no banking experience. A key element of the Foundation Checking Program is the companion financial education component.

○ **Regions Financial Corporation: *Products for Outreach***

In addition to providing financial literacy materials and instructors to schools and not-for-profits throughout its 16-state footprint, Regions Financial Corporation also has created a suite of low-cost products that will help consumers avoid high fees charged by alternative financing companies.

○ **KeyBank Plus® *Banking that Saves Money and Builds Credit***

Through KeyBank Plus® branches, customers who are new to or unfamiliar with banking are offered financial services and discounts designed especially for their situations.

○ **Fifth Third Bank: *Financial Empowerment Mobile (eBus)***

Fifth Third's Empowerment Mobile (eBus), a mobile classroom offering credit counseling, financial education, foreclosure prevention, and financial products and services to people where they live, work and worship. The eBus provides a unique

and innovative solution to the financial challenges facing underserved areas. Since 2004, the eBus has operated in over 125 cities and reached a diverse population of over 3.5 million. In response to major market requests, Fifth Third Bank acquired and deployed a second Financial Empowerment Mobile (eBus II) representing another significant technology investment in community outreach and service. The operation of two eBuses enables Fifth Third to develop deeper, stronger community relationships with financial and homeownership education agencies.

A comprehensive list of Roundtable member companies' financial education programs for servicemembers, older Americans, women and the unbanked/underbanked can found on the Roundtable's [Financial Literacy Corner](#).

The Roundtable agrees with OFEFA that there is a need to acknowledge successful financial education programs. The Roundtable suggests that OFEFA create a Treasury recognition program in addition to monetary grants for effective efforts. Finally, OFEFA should renew or provide grant funding supporting effective innovative financial education programs to broaden the program's reach. Finally, the Roundtable agrees that an effective Public Service Campaign promoting innovative financial education programs will assist with creating greater awareness.

#### Conclusion

We conclude by reiterating our support for the Comment request. We believe the establishment and promotion of effective financial education programs is a worthwhile initiative for OFEFA and encourage OFEFA to continue its efforts.

Finally, we thank OFEFA for the opportunity to comment. If you have any questions, please feel free to contact me at [Rich@fsround.org](mailto:Rich@fsround.org) or (202) 589-2413; or Judy Chapa at [Judy@fsround.org](mailto:Judy@fsround.org) or (202) 589-2419.

Sincerely,

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The Financial Services Roundtable