

# Center for Disability-Inclusive Community Development

## Status Report

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## Center Purpose

**Goal:** To improve the financial well-being of low and moderate income (LMI) persons with disabilities and their families by increasing awareness and usage of the opportunities and resources available pursuant to the Community Reinvestment Act.

## Target Audiences

- *Financial Institutions:* The Center will increase access to a growing market share that is more likely to be unbanked or underbanked or have access to a savings account. Technical assistance will be available to support financial institutions in identifying and developing their Performance Context in primary assessment areas and connections to nonprofits that support LMI persons with disabilities and their families.
- *LMI Persons with Disabilities:* Access to mainstream financial services that will allow individuals to advance up the economic ladder will be enhanced by Center activities.
- *Community-Based Organizations Serving LMI Persons with Disabilities and Their Families:* Technical assistance from the Center will result in support of CRA projects that increase funding and capacity to build the financial well-being of LMI persons with disabilities and their families.
- *Community-Based Organizations Serving LMI Populations Generally:* Technical assistance from the Center will support community-based organizations serving LMI populations to expand their programs to include persons with disabilities and their families.
- *Financial Institution Regulators:* Assist banks to meet their CRA obligations and support the local LMI communities that serve persons with disabilities.

## Primary Activities

- To assist banks and other financial institutions in developing a rich understanding of the intersectionality of low and moderate income populations and people with disabilities and the national trends in unmet needs experienced by people with disabilities in their local communities. The result will be informing investment, lending and service decision making.
- To foster greater connectivity between financial institutions and community-based disability organizations well suited to collaborate on CRA-related initiatives.
- To achieve and effectively articulate a broad consensus with the regulatory agencies to inform investment, lending and service activities, which will meet CRA obligations and address identified unmet financial and community development needs in the targeted geographic area.

- To raise broad awareness within the disability community about the opportunities for capacity building available through investment, lending and service offered by financial institutions.
- To train disability service provider organizations, individuals with disabilities and others how to most successfully develop proposals to be supported by financial institutions as part of CRA obligations.
- To remove any existing ambiguities and otherwise affirm and strengthen, through the federal regulatory framework, the inclusion of disability within federal community reinvestment obligations.

### Phase One Work Plan

The first phase of the project is intended to provide both the disability and banking communities with new access to training and resources that will accelerate the support of inclusive community development activities.

NDI has secured the involvement of Tom Stokes, current FDIC regional director of community affairs activities in the Southeast Region, and Janet Hamer, retired community development specialist from the Federal Reserve Bank of Atlanta, to serve as co-chairs of a newly created workgroup to guide the future direction of the Center for Disability-Inclusive Community Development. Other members of the workgroup to be invited will represent financial institutions of varying size and geographic reach, as well as leaders in the disability community. An advisor from each of the three banks regulators will also provide support to NDI and the workgroup.

The work product and activities in Phase One (commencing in June 2019 and executed over the succeeding six months) include the following:

#### June

- Publish in the *Georgetown Journal on Poverty Law and Policy*, Vol. 26, an article entitled “Closing the Disability Gap” describing the intersectionality of LMI and disability and the role of the Community Reinvestment Act in addressing the needs of LMI people with disabilities.

#### July-October

- Conduct an “all are welcome” national introductory webinar targeted to banks and the disability service community that will feature the federal regulators and CRA experts to discuss the importance of targeting low and moderate income individuals with disabilities in LMI neighborhoods to be the focus of investment, lending and service activities.
- Develop at least four case studies, each involving direct interviews and showcases of a financial institution, a community-based disability organization or other

nonprofit and a regulator to describe the targeted CRA-related activity and its impacts on LMI people with disabilities. These case studies will be used in trainings to be offered by the Center and be widely distributed to all relevant audiences.

### July-December

- Offer a monthly brief “quick fact” or “did you know” tip in a new purpose-built section of the Real Economic Impact (REI) Network newsletter (circulation over 4,000 organizations in all 50 states) to educate readers about opportunities to work with banks. The materials will be archived on a section of the NDI website to be dedicated to the new Center.
- Prepare and disseminate at least two quick reference guides (modeled on NDI’s popular guides) focusing on a discrete “how to” topic (e.g., preparing successful approaches and proposals to secure CRA-related support).
- Prepare and file formal written comments responding to the anticipated issuance of proposed federal rules reconfiguring the Community Reinvestment Act (CRA) regulatory framework to enhance disability inclusion therein, and pursue the issuance of sub-regulatory guidance affirming financial institutions’ compliance with CRA when supporting LMI disability-related activities.

### September

- Convene an ongoing national workgroup (comprised of leading stakeholder representatives) who will provide key subject matter expertise. The workgroup will help inform the direction and design of targeted activities by the Center.
- Conduct a by-invitation webinar targeted at the senior leadership of major national disability service provider and consumer groups for the purpose of educating attendees about the potential wealth of opportunities afforded through community reinvestment, to enlist their formal support in encouraging their networks to take part in future training opportunities, and to showcase real world examples of successful achievement of community reinvestment support.

### October-December

- Conduct a webinar targeted at the senior leadership of community-based disability service provider organizations to train attendees, through direct instruction and case examples, how to successfully secure support.
- Conduct a webinar targeted at community development and/or CRA-focused staff of financial institutions to provide an in-depth analysis of the relationship between disability and poverty and how to focus lending, investment and service activities to target this population and meet CRA obligations.
- Complete an additional four case studies that describe best practice collaboration between a financial institution and the disability community that meet CRA obligations.

### December

- Evaluate formally gathered written feedback from Phase One webinar participants, consumers of Phase One case studies and other materials, financial regulators and other significant stakeholders who have interacted with the Center to inform future content development and to address the most significant knowledge gaps in the advancement of disability-inclusive community development.