

# ADA@25: 25 Recommendations to “Advance Economic Self-Sufficiency” of People with Disabilities



## Public Sector: Congress, Federal and State Government

1. Raise asset limits for public benefits eligibility for SSI, Medicaid, and housing assistance to \$10,000 and exempt from resource testing any type of retirement account (IRA, ROTH, MyRA, 401k) to encourage saving and planning for a better economic future for individuals with disabilities.
2. Expand participation in the ABLE Act to include eligibility for individuals who incurred their disability prior to age 36, and allow eligible individuals to have flexible access to ABLE accounts and investment choices with any state nationwide. Remove annual contribution cap for contributions made by the beneficiary related to his/her earned income as a result of integrated competitive employment.
3. Eliminate the “income cliff” for SSDI beneficiaries by instituting a gradual reduction of benefits as they return to work and earn more income.
4. Amend the Earned Income Tax Credit (EITC) to make low-income workers age 18 and older eligible, and create greater parity in the amount of credit for single individuals without spouse or children.
5. Change the Fair Labor Standards Act to phase out 14(c) certificates that allows below minimum wage compensation to workers with disabilities, and prohibit federal, state, and city laws that raise the minimum wage from exempting people with disabilities.
6. Add financial education and financial counseling/coaching as a fundable service, group, individual, online and on-site, through American Job Centers (AJCs), Vocational Rehabilitation (VR), Medicaid Home and Community Based Services (HCBS), and youth in transition (IDEA).
7. Integrate a financial health assessment to inform services provided through American Job Centers (AJCs), Vocational Rehabilitation (VR), Medicaid Home and Community-Based Services (HCBS), youth in transition (IDEA), and Ticket to Work Employment Networks, and make financial coaching services available that replicates Broward County, Florida model and other promising practices.
8. Add a financial education component to Common Core standards for education system K-12.

9. Provide new guidance concerning the Community Reinvestment Act to require documentation by financial institutions of individual and community development activities that benefit low- and moderate-income (LMI) individuals with disabilities.
10. Target LMI individuals with disabilities and their families for access to Internet and low-cost smartphones for mobile and Internet-based banking services, through FCC and FDIC collaboration, as part of expansion of FDIC's Lifeline program.
11. Coordinate a new financial capability campaign to improve informed financial decision-making and target LMI individuals, with and without disabilities, with the engagement of Consumer Financial Protection Bureau (CFPB), Federal Deposit Insurance Corporation (FDIC), Employee Benefits Security Administration (EBSA) at U.S. Department of Labor (DOL), Internal Revenue Service (IRS) and Treasury, including the Community Development Financial Institutions (CDFI) Fund and Social Security Administration (SSA).

### **Private Sector: Financial Services Community**

12. Set targets within the financial services industries to be model employers for recruiting, hiring, and advancing workers with disabilities in diverse job roles with career paths.
13. Conduct focus groups with people across the spectrum of disabilities to learn more about unmet financial product and service needs, including challenges with customer service at physical locations and by phone or online. Use the feedback to improve products and customer service. Utilize marketing resources to include people across the spectrum of disability and their families as targeted priority for outreach and recruitment as customers in printed materials and media spots.
14. Improve accessibility of financial institution tools providing online banking, including website and security procedures that are disability sensitive.
15. Create and/or identify and market existing products and services that will meet the needs of future ABLE account owners.
16. Expand adoption of FDIC's template for a basic checking account (Safe Accounts) and small dollar loans to improve financial stability for individuals with disabilities by more FDIC-insured financial institutions.

### **Public and Private Sector**

17. Adopt the recommendations from the NDI Report on "Banking Status and Financial Behaviors of Adults with Disabilities" to create an ADA@25 Financial Product and Service Toolkit to help financial institutions bring people with disabilities into the economic mainstream. The Toolkit development would be a collaboration between FDIC and NDI and engage financial institutions to share promising strategies that improve the banking status and financial behaviors of adults with disabilities. FDIC

and NDI would manage distribution of the Toolkit that explains proven strategies to increase access and deepening of relationships.

18. Conduct a Credit Roundtable that engages relevant public and private sector stakeholders including federally-insured depository institutions, the credit bureaus, FDIC, CFPB, and Treasury to identify and commit to improved access to credit and enhanced credit reporting for individuals with disabilities. Improve access to credit for individuals with disabilities by changing and expanding data sources to calculate credit worthiness including regular on time rent and utility payments, as well as differentiating challenges resulting from healthcare/medical debt.
19. Develop the business case for financial institutions to reduce the unbanked and underbanked status of households headed by a person with a disability, and the benefit to the bottom line in terms of increased confidence in the public banking system, an expanded customer base for revenue generation, and community reinvestment gains.
20. Convene ABLE Program Implementation Forum under the sponsorship of Treasury, IRS, the CDFI Fund, NDI, the ABLE National Resource Center, and the College Savings Plan Network to engage the financial services industry to become better informed on (a) the needs of the disability community, (B) product development, marketing and outreach; and (c) reporting and program administration. Fund the ABLE National Resource Center as an objective clearinghouse of information resources and for comprehensive education, outreach, and technical assistance activities with the disability and financial communities.
21. Replicate Bank On Louisville inclusive financial capability community partners model in Bank On cities nationwide.
22. Fund demonstrations with public and private sector engagement that test and evaluate the impact of integrating financial education coaching into human and social service delivery systems to improve the financial stability and mobility of individuals with disabilities.
23. Identify and test various options to reduce and eliminate communication access challenges for individuals with disabilities seeking mainstream financial institution relationships that engages public and private relevant stakeholders.
24. Collaborate with CFPB and NDI to support ROADS to Financial Independence model sustainability in six cities and expand to additional cities nationwide.
25. Assist the Federal Reserve and FINRA Investor Education Foundation to expand the questions in their Financial Well-Being and Capability Household surveys to capture and analyze additional data about financial status and behavior of people with disabilities. Examine financial capability disparities across disability subgroups, including racial and ethnic minorities, and variations by age, gender, and sexual orientation.