

Partnership Opportunity to Respond to Workforce Development Needs of Low- and Moderate-Income Individuals with Disabilities

Across all racial and ethnic groups, 26 percent of individuals with a disability are living below the poverty line compared with 11 percent of individuals without a disability. Banks have a unique opportunity, through CRA investment of funds, to respond to an unprecedented need for workforce development supports for this targeted low- and moderate-income (LMI) population.

Office of Comptroller of the Currency (OCC) and the other bank regulators (FDIC and the Federal Reserve) recognize that CRA investments by banks should support workforce development programs designed to improve employment opportunities for LMI individuals with disabilities.

Community Reinvestment Act Investment Opportunity

State Vocational Rehabilitation Agencies (SVRAs), which are part of the state workforce development system, help people with disabilities gain employment and advance self-sufficiency. However, many states lack the matching dollar amount they need to capture the full federal funding allocated to their delivery of Vocational Rehabilitation (VR) services. (Over \$300 million was relinquished by SVRAs because of a lack of match in 2020.)

A financial institution would have the opportunity to provide Community Reinvestment Act (CRA) support to a state and their SVRA. The financial institution's funds would be used for match to meet the employment service needs of youth and adults with disabilities. For each dollar a bank invests, \$3.69 in federal dollars would be captured for workforce development activity that would allow a state to provide more services and achieve employment outcomes for LMI people with disabilities.

Mutual Benefit

Financial Institutions – CRA

- Meet CRA criteria for qualified CRA investment activities
- Provides multiplier effect of bank's invested dollars: \$3.69 credit per \$1.00 invested by bank
- Receive data that aligns with CRA requirements for documentation of LMI status on an individual level
- Demonstrate impact of CRA investment related to workforce development activities and successful employment outcomes for LMI people with disabilities
- Increase support to the disability community in a bank's footprint of a population previously underserved by CRA activities

State Workforce Development System

- Expand resources to assist individuals with disabilities to benefit from workforce development activities and employment outcomes
- Increase number of individuals with disabilities gaining college education, receiving skills training, participating in apprenticeships and/or starting a business
- Support states reeling from increases in COVID-19-related expenses and unable to draw down their full share of federal dollars for workforce development



To learn more about the pilot opportunity, contact Michael Morris (mmorris@ndi-inc.org). Visit the Center for Disability-Inclusive Community Development website to learn more about its activities.