



Financial Research
Opportunities Group

Financial Inclusion Tool: Quality Indicators for Financial Institutions

INDICATOR	Yes	Future	No	Guidance Needed
Strategy and Internal Leadership				
1. The financial institution has designated employees within the company who can provide leadership and make decisions about disability sensitive policy, product and service development, and implementation.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Multimethod market research is conducted with customers with disabilities to inform products (e.g., their development, fee structure, and customer support and service) on an annual basis.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. An annual marketing and outreach strategy is established and implemented to grow and sustain customer base with disabilities.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. The marketing and outreach strategy uses multiple communication methods to creatively reach, serve, and meet the target audiences' needs with a relevant and responsive suite of products and services.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. The financial institution has an internal Disability Relations Group (or other affinity group) representing and including employees with disabilities (or with family members who have a disability) which operates companywide, meeting regularly to develop and implement an action agenda for community engagement.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. Financial inclusion metrics (internal and external) for performance are identified and measurement approach is defined for engaging and growing customer base with disabilities that builds trust and promotes positive consumer financial behavior that improves opportunity for financial stability and security.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7. Written policy is developed and disseminated to support financial inclusion for people with disabilities with identified measures and a measurement approach.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8. Policies state clearly that the financial institution will not discriminate against any individual on the basis of disability in the full and equal enjoyment of any of its products, services, and facilities.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9. Policies indicate clearly the financial institution will provide appropriate auxiliary aids and services to persons with disabilities when necessary to ensure effective communication throughout its financial services and programs.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10. An annual statement and/or report is published on actions and results to improve financial inclusion for people with disabilities.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11. Philanthropic commitment to disability nonprofit organizations advances:				
a. financial capability for youth and/or adults with disabilities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. workforce development and employment for youth and/or adults with disabilities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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Accessibility in Customer Support and Communications				
12. There is a method established for customers with disabilities to have an easy method to communicate concerns about disability-related problems accessing products, services, and facilities.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
13. Customer support staff receive sensitivity training in communicating effectively with people with disabilities.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
14. Physical locations are evaluated and meet 2010 ADA Title III Standards for Accessible Design for facility access and ADA Title III regulations for communication accessibility including:				
a. Opening an account	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Account statements	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Finding a bank location	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Comparing banking products	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Applying for a loan or credit card	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. ATM modifications (e.g., braille lettering, headphone port, audible accessible features, high contrast)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g. Teller window height	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h. Communication services	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
i. Reader services	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
15. Account statements are available in alternative formats, including braille, large print, and accessible electronic documents.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
16. Websites are evaluated and meet standards for accessibility by:				
a. complying with Section 508 standards	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. complying with W3C standards	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. ensuring all videos are captioned and have video descriptions	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. all graphics have alternative tags that can be read by a screen reader	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
17. Mobile banking applications are evaluated for meeting or exceeding current access standards and guidelines.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
18. Security policies and procedures are in place to ensure customer phone communications are adapted to meet needs of individuals with communication support such as video relay services (VRS) or speech to speech relay.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
19. A report is posted annually from a third-party, subject matter expert that indicates an outside audit and compliance review has resulted in accessibility to meet all federal standards.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Physical Accessibility and Customer Support				
20. Branches are located on public transportation routes (e.g., via bus, train, or paratransit).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
21. Branches are located on an accessible route for people who walk or use wheelchairs.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
22. Branches meet the FIT-QIFI subset of ADA Standards for Accessible Design (modified checklist) for physical accessibility.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
23. The choice to use accessible ATMs located inside the bank branch is available to alleviate concerns about safety.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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24. ATMs are located in multiple locations to increase access without increasing cost to customers.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Traditionally Delivered Banking Products and Financial Services				
25. Universal design principles are evident in products and services.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
26. Bank On national account standards for product features, functionality, and no or limited fees, as well as customer service choices, have been adopted to increase financial access for customers with disabilities.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
27. The financial institution develops collaborative relationships with state ABLE programs to discuss benefits of ABLE accounts, and possible relationship with a savings or checking account.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
28. The bank applies a fiduciary standard to all advice and options presented to customers.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Financial Education and Counseling				
29. Financial education services in accessible formats are offered for individuals with disabilities in a variety of ways, including:				
a. on site,	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. at non-bank locations, and/or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. online	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
30. Partnerships with disability groups exist to offer financial education and/or counseling integrated with social and human service programs.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
31. Employees volunteer to offer customers with disabilities:				
a. financial education	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. mentoring	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
32. Employees with disabilities are targeted for:				
a. financial education	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. mentoring	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
33. The financial education and training opportunities increase understanding of available financial products and services, including the use of mobile banking and Fintech applications.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inclusion and Disability and Relations Group				
34. The financial institution actively recruits, hires, and promotes qualified employees who have disabilities.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
35. The financial institution establishes and supports career pathways for Disability Relations Group members (if there is such a group) and/or employees with disabilities, including professional development and mentorship opportunities.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
36. The financial institution promotes disability sensitivity through presentations by Disability Relations Group members to Human Resource, Marketing, and Product Development teams.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
37. Disability Relations Group members engage in community engagement activities to volunteer in delivery of financial education and counseling activities with individuals with disabilities.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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Inclusive Community Development				
38. The financial institution collaborates with community groups to create affordable accessible housing that includes people with disabilities.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
39. The financial institution collaborates with disability nonprofit organizations and/or disability-owned small businesses to increase inclusive workforce development and employment opportunities for people with disabilities in the local community.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
40. Credit builder loans are provided through partnerships with:				
a. disability nonprofit organizations and/or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Community Development Financial Institutions (CDFIs)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
41. Community development projects are enhanced by partnerships with disability nonprofit organizations through:				
a. participation on non-profit boards of directors and/or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. providing financial guidance to organizations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
42. Community Reinvestment Act reporting details community development activities including:				
a. engagement with low and moderate income (LMI) individuals with disabilities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. impact regarding financing affordable housing	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. impact on small disability-owned businesses	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. the provision of affordable and accessible financial services	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. financial education and counseling services	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
43. The financial institution provides grants and/or loans to organizations that assist people with disabilities.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
44. The financial institution's Community Reinvestment Act strategic plan includes steps to meet the financial needs of low-income people with disabilities.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
45. The financial institution meets annually with representatives of the disability community to identify and address unmet needs.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative Credit Scoring and Lending				
46. The financial institution develops alternative strategies to consider lending for customers with disabilities related to:				
a. housing	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. small business lending	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. consumer loans				
d. meeting assistive technology needs	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
47. The financial institution provides credit counseling and other resources to support review of credit worthiness of potential borrowers with disabilities.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
48. The financial institution accepts rent and utility regular payments to adapt credit score with credit bureaus and/or improve credit scoring.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>