

Working Together to Build Wealth in Lower-Income Communities

Strategies for Financial Institutions,
Community-Based Organizations and Public
Programs to Expand Access to Financial
Services, Financial Education and
Asset Development

A Report by the
Massachusetts Community & Banking Council

March 2008

INTRODUCTION

In December 2007, the Massachusetts Community & Banking Council (MCBC) helped to organize “Working Together to Build Wealth in Lower-Income Communities,” a forum on strategies for financial institutions, community-based organizations and public programs to expand access to financial services, financial education and asset development. In addition to MCBC, the program was sponsored by:

Boston Alliance for Economic Inclusion
Boston EITC Coalition
Federal Reserve Bank of Boston
Institute on Assets and Social Policy, Brandeis University
Massachusetts Association for Community Action
Massachusetts Association of Community Development Corporations
Massachusetts Bankers Association
Massachusetts Credit Union League
Massachusetts Fair Lending Coordinating Committee
The Midas Collaborative

The forum included panel presentations by bankers, trade association officials, representatives from a wide range of community-based organizations, city, state and federal agency officials and academics (See Appendix A).¹ The purpose of the forum was to help identify barriers to the use of mainstream financial products and services, to share information on collaborative program models and to encourage and promote increased program coordination to help build wealth in lower-income communities.

This report is intended to share the experience and findings of that meeting with other financial institutions, community organizations and public officials.

BACKGROUND

The Massachusetts Community & Banking Council (MCBC) was established in 1990 to bring together community organizations and financial institutions to affect positive change in the availability of credit and financial services across Massachusetts by encouraging community investment in low- and moderate-income and minority group neighborhoods; promoting fair and equitable access to financial products and services for minority group populations; providing research, other information and direction in understanding and addressing the credit and financial

¹ A copy of the December 3rd program agenda and PowerPoint presentations of the panelists are available on the Federal Reserve Bank of Boston’s website at www.bos.frb.org/commdev/conf/caevent.htm.

needs of low- and moderate-income neighborhoods and developing collaborative and timely responses to important community investment issues.

MCBC's Banking Services Committee, with the active support of the Massachusetts Division of Banks and the Massachusetts Bankers Association, manages and promotes ***Basic Banking for Massachusetts***, a unique, voluntary effort to provide low-cost accounts to customers with limited banking needs. In 2008, 115 Massachusetts banks qualified for participation under the ***Basic Banking for Massachusetts*** guidelines, representing 66 percent of all bank branches in the state. The Committee also continues to work to expand access to consumer education programs, especially for residents currently utilizing check cashing establishments. Committee members also actively participate in the Boston Alliance for Economic Inclusion and the Massachusetts Fair Lending Coordinating Committee.

MCBC's Banking Services Committee recognized that there are a growing number of organizations and institutions working to expand access to financial services, financial education and asset development. The Committee also recognized that the pressures of day-to-day operations and a general disconnect between academic research, financial institutions, community-based organizations and public programs limited opportunities to share information, to collaborate on program development and implementation and to make better use of existing resources. The December 2007 forum and this report are intended to help promote and expand dialogue and to encourage new working relationships between all of those working to build wealth in lower-income communities.

THE ISSUES

What are the barriers that lower-income residents face in saving and/or in better utilizing mainstream financial products and services?

- **Insufficient Income.** Workers in low-wage jobs often find themselves with insufficient wages to cover basic family needs and typically cannot access job-related benefits (e.g. health care and/or paid sick days) to supplement family earnings. Most low-income workers earn too much to qualify for public support and, even among those who do qualify, many are unable to access these programs. Close to 900,000 people in Massachusetts families with earnings – one out of every four – are unable to meet the basic costs of living in Massachusetts, even with government support.² While many families want to save, there is simply not enough money available.

² *Bridging the Gaps Between Earnings and Basic Needs in Massachusetts*, October 2007. Randy Albelda and Jennifer Shear, Center for Social Policy, University of Massachusetts, Boston. www.umb.edu/bridgingthegaps

- **Debt.** Among lower-income residents who qualify for the Earned Income Tax Credit (EITC) and who owe money, 39 percent owe \$1-5,000 and 16 percent owe \$10,000 or more. Of those who owe \$5,000 or more and do not own a home, 89 percent owe on credit cards and 52 percent owe for utilities. Among those receiving a tax refund, planned savings is frequently deferred to pay off bills or purchase or repair a vehicle.³ Many people are living off credit cards
- **Convenience of Check Cashing Establishments.** Check cashers offer convenient, no-hassle, comprehensive services (check cashing, utility bill payments, money orders, taxes, loans). Unlike banks, identification must only be provided once (photos and signatures are scanned and kept on file). Although more expensive than using a bank or credit union, many residents choose to use check cashing establishments because they are convenient and comfortable.
- **Personal Behavior.** People who are patient, who think about the future and who can delay instant gratification are more likely to enroll in financial counseling programs. Among Volunteer Income Tax Assistance (VITA) clients⁴, only 55 percent opted into a free credit repair program.⁵
- **Bank Regulations.** Financial institutions are subject to strict regulatory requirements on customer identification. Banks often require two forms of identification each time a check is cashed which some bank customers see as impersonal and embarrassing.

PRODUCTS AND SERVICES

What are financial institutions and community-based organizations doing to address the needs of lower-income residents and to help them move into mainstream financial products and services?

- **Information for Financial Institutions.** The Products and Services Workgroup of the Boston Alliance for Economic Inclusion, a public/private program targeted to unbanked and underserved residents, developed a reference guide of products and services available here and across the country that are targeted to serve lower-income and immigrant populations. An educational series, co-sponsored by the Massachusetts Bankers Association and the Massachusetts Credit Union league provided programs on tapping

³ From “Preliminary Results of MASSACP Asset Formation Initiative” survey of EITC recipients conducted at ten sites across the state by the Institute on Assets and Social Policy at Brandeis University, available at <http://iasp.brandeis.edu/const/Masscap.html>.

⁴ The VITA program offers free tax help to low- and moderate-income people who cannot prepare their own tax returns. Information on the nearest VITA site is available at 1-800-829-1040.

⁵ From Federal Reserve Bank of Boston Center for Behavioral Economics and Decision Making.

into emerging markets, staffing, and products for the future (deposit/electronic remittances and residential and small credit lending). A Toolkit Report that captures the information in the reference guide and the education programs will be available on-line later this year.⁶

- **Special Loan Programs.** Credit unions in Massachusetts and New Hampshire have developed micro-lending programs for emergency loans, auto loans, StretchPay loans (an alternative to expensive payday loans) and mortgages, often in collaboration with local social service or community organizations.⁷
- **Community-Based Programs.** Local asset development programs help residents access financial education and other resources through flexible, culturally-sensitive programs that can include savings programs for home ownership, small business and education. Partnerships with local churches, schools and other programs help to expand outreach.⁸
- **Earned Income Tax Credit (EITC) Programs.** EITC is the most effective anti-poverty program in the country. Over the last four years, free tax preparation services in Boston have served over 32,000 taxpayers, resulting in refunds of more than \$50 million. In 2007, the program has been expanded to include credit counseling, on-site bank account openings, screening for health care and food stamps and purchases of savings bonds.⁹
- **Individual Development Account (IDA) Programs.** Local IDA programs provide federal, state and/or local funds to match participant's own savings. Programs can include financial literacy training, asset-specific training, savings clubs meetings, case management and post-purchase follow-up. Partnerships with local community development corporations (CDCs), community action agencies (CAA) and other organizations can help to expand access to resources.¹⁰

⁶ Available at www.massbankers.org and www.maleague.org.

⁷ The Credit Union Home Loan Payment Relief (HLMR) Program was developed by HarborOne Credit Union in Brockton and is now available nationwide. Over \$1 billion in HLMR loans have been committed in Massachusetts.

⁸ For information on Chelsea Neighborhood Developers Resident Asset Development Program, see www.chelseand.org.

⁹ For information on Boston's EITC program, see www.bostontaxhelp.org.

¹⁰ For information on Massachusetts IDA programs, see www.massassets.org.

FINANCIAL EDUCATION PROGRAM MODELS

What can we learn from current financial education programs?

- Programs need to be **flexible** and **sensitive** to the needs and personal goals of students. The United Way's Financial Education Community Toolkit provides an evaluation of the strengths and gaps of various curricula.¹¹ Later this year, MCBC will publish a new report on how lessons from adult education can help financial education instructors be more effective.¹²
- **Financial education that is linked with other programs** can help increase outreach, build on trusting relationships and provide additional services. Among CAA clients, 36 percent found out about the financial education program through their local agency, 70 percent said that there is someone in the agency they trust to talk about financial issues and 45 percent already seek community organizations for financial advice. Financial education clients also move to other services after financial education (36 percent use fuel assistance, 36 percent use housing assistance, 28 percent use WIC).¹³ By the end of 2009, all CAAs in Massachusetts will offer EITC services, financial education and IDA programs.¹⁴
- **Taking advantage of existing resources** can build capacity and increase efficiency. For IDA programs, the Midas Collaborative provides train-the-trainer programs, a resource library, peer mentoring and back-office support. A new website (www.masssaves.org) provides news, resources, a calendar of trainings and a list of collaborating partners. Curricula, consumer brochures and handouts and instruction materials are available on-line.
- **Exploring new partnership opportunities** can tap into new resources. Example: Simmons College has joined with the International Learning Center (a program in the Education and Training Branch of the YMCA of Greater Boston) to develop and implement a financial literacy, service-learning project that serves 25-50 English as a Second Language (ESL) students. Simmons has also recently started a personal finance course for students.

¹¹ See www.financialtoolkit.org.

¹² See www.masscommunityandbanking.org

¹³ From "Preliminary Results of MASSCAP Asset Formation Initiative" survey of financial education participants conducted at eight sites across the state by the Institute on Assets and Social Policy at Brandeis University, available at <http://iasp.brandeis.edu/const/Masscap.html>.

¹⁴ For information on Massachusetts community action agencies, see www.masscap.org.

BUILDING PARTNERSHIPS, INCREASING COLLABORATION

What can financial institutions, community-based organizations and others do to build partnerships and increase collaboration among those working to build wealth in lower-income communities?

- **Better utilize existing resources and networks.** Information on current programs, free curricula and consumer education materials, best practices and opportunities for collaboration are all available on-line. For example:
 - ✓ The United way of Massachusetts Bay and Merrimack Valley, in partnership with Bank of America, has created a **Financial Education Community Toolkit** that provides information on core competencies, curricula, evaluative instruments and key resources (www.financialtoolkit.org).
 - ✓ The FDIC's **Money Smart** program offers free multi-language curriculum, student handouts and train-the-trainer classes, along with on-line training (www.fdic.gov/consumers/consumer/moneysmart/). The FDIC's Money Smart Newsletter provides information on current participants and programs (www.fdic.gov/consumers/consumer/moneysmart/newsletter).
 - ✓ The **Mass Saves** website provides information on Massachusetts financial education programs, including news, resources, a calendar of trainings and a list of collaborating partners (www.masssaves.org).
 - ✓ The **Federal Reserve Bank of Boston** offers consumer education materials (www.bos.frb.org/consumer/pfe).
 - ✓ The **Midas Collaborative** provides information and assistance in starting or expanding asset development programs, such as IDAs, housing, EITC and small business (www.massassets.org).
 - ✓ The report and recommendations of the **Massachusetts Fair Lending Task Force** includes a listing of financial, credit and homebuyer education information and resources (www.masscommunityandbanking.org/PDFs/FairLendingTaskReport_web.pdf).

Information on reports, articles and other resources related to financial education and asset development are included in the December forum resource list (see Appendix B).

- **Look for new partners.** Financial institutions have traditionally been the biggest supporter of financial education programs. To be effective and to reach the broadest numbers of people, financial education needs to be provided where people live, work and

learn and support for financial education and asset development needs to be expanded. For example:

- ✓ Investment firms should be encouraged to support and participate in financial education and asset development programs.
 - ✓ Colleges and universities should provide financial education to all in-coming students, with special emphasis on the proper use of credit.
 - ✓ Companies employing large numbers of youth and lower-income workers should be encouraged to provide financial education at work.
 - ✓ Community-based youth programs should provide and expand financial education opportunities.
 - ✓ Adult education, ESL, immigrant and job training programs should incorporate financial education into their life skills programs.
 - ✓ Financial institutions should seek out local community development, social service and other community programs as partners in financial education.
- **Support public programs to expand financial education and asset development programs.** The state's new Asset Development Commission is charged with reviewing asset development programs in the Commonwealth to evaluate their effectiveness and their relationship to the labor market, education and training and family support programs and policies. It is expected that the Commission will establish working groups on specific issues. In addition to participating in the Commission's work, individuals and organizations can support specific legislative and regulatory initiatives on financial education and asset development. For example:
 - ✓ Increasing federal and state financial support for financial education
 - ✓ Supporting and expanding the state match for IDA programs
 - ✓ Supporting legislation to make financial education mandatory in the public schools (House Bill No. 498)
 - ✓ Increasing the state EITC refund (House Bill Nos. 3036 and 2989) and expanding information on state and federal EITC programs (House Bill No. 2828)
 - **Pick up the phone.** One purpose of the December forum was to identify and help connect individuals and organizations interested in financial education and asset development and to encourage new working relationships. Individuals can contact

organizations looking for volunteers, organizations such as the Boston EITC Campaign (www.bostontaxhelp.org) or the United Way (www.volunteersolutions.org). Financial institutions can identify financial education training organizations in their communities and offer their financial support and/or their expertise (www.masssaves.org). People can network through organizations such as the Boston Alliance for Economic Inclusion (www.fdic.gov/consumers/consumer/AEI). Or, simply check the list of attendees at the December forum (see Appendix C) and make a call.

APPENDIX A

Working Together to Build Wealth in Lower-Income Communities

December 3, 2007
Federal Reserve Bank of Boston

Speakers/Moderators List

Randy Albelda, Professor of Economics, UMass Boston
Jessica Andors, Deputy Director, Lawrence Community Works
Dynell Andrews-Blake, Former Store Manager, All Checks Cashed
Marques Benton, Assistant Vice President, Federal Reserve Bank of Boston
Tina Brooks, Undersecretary, Department of Housing and Community Development, Commonwealth of Massachusetts
Kip Child, Community Affairs Specialist, FDIC
Mary Ann Clancy, Senior Vice President and General Counsel, Massachusetts Credit Union League
Professor Patricia Clark, Simmons College
Timothy DeLessio, Community Affairs Officer, FDIC
Joe Diamond, Executive Director, Massachusetts Association for Community Action
David Floreen, Senior Vice President, Massachusetts Bankers Association
Aida Franquiz, Assistant Vice President, Boston Private Bank & Trust Company
Marissa Guananja, Director of Resident Asset Development, Chelsea Neighborhood Developers
Kevin Kiley, Executive Vice President, Massachusetts Bankers Association
Kathleen McDermott, Executive Director, Montachusett Opportunity Council
Stephan Meier, Senior Economist, Center for Behavioral Economics and Decision Making, Federal Reserve Bank of Boston
Cynthia Merkle, Chair, Massachusetts Community & Banking Council
Margaret Miley, Executive Director, The Midas Collaborative
Thomas Shapiro, Director, Institute on Assets and Social Policy, The Heller School for Social Policy and Management, Brandeis University
Anna Steiger, Senior Research Associate, Federal Reserve Bank of Boston
Donna Stiglmeier, Director, Community Impact, United Way of Massachusetts Bay & Merrimack Valley
Doreen Treacy, Director, Civic Health Institute, DotWell
Kathleen Tullberg, Manager, Massachusetts Community & Banking Council
Mimi Turchinetz, Esq., Campaign Director, Boston EITC Campaign
Sandra Venner, Program Director, Institute on Assets and Social Policy, Brandeis University

APPENDIX B

Working Together to Build Wealth in Lower-Income Communities

December 3, 2007
Federal Reserve Bank of Boston

Resource List

Reports and Articles:

Asset Building Policies in Massachusetts, November 2006, Sandra Venner, Institute on Assets and Social Policy.

<http://iasp.brandeis.edu/pdfs/Asset%20Building%20Policies%20in%20MA%20Nov%202006.pdf>

This report presents the current status of numerous policies in Massachusetts that can positively impact asset building for low-income people and working families, and compares each policy to action taken in other states in New England and across the nation.

Bank on San Francisco, Anne Stuhldreher, Fellow, New America Foundation.

www.sfgov.org/site/uploadedfiles/BankonSF/BankonSFCaseStudy.pdf

In September 2006, San Francisco launched Bank on San Francisco, a comprehensive initiative to bring its "un-banked" residents into the financial mainstream. This case study describes who and how Bank on San Francisco was started.

"Barriers to Saving," Zoe Neuberger, Robert Greenstein and Peter Orszag for the Summer 2006 edition of Communities & Banking, Federal Reserve Bank of Boston.

www.bos.frb.org/commdev/c&b/2006/summer/barrierstosaving.pdf

An article on how existing asset rules for means-tested assistance programs discourage savings and recommendations for federal and state action that could facilitate savings by low-income families.

Black Wealth, White Wealth: A New Perspective on Racial Inequality - Tenth Anniversary Edition, January 2007, Melvin L. Oliver and Thomas M. Shapiro.

http://www.amazon.com/Black-Wealth-White-Perspective-inequality/dp/0415951674/ref=si3_rdr_bb_product/105-6138410-9836456

The 10th Anniversary Edition contains two new chapters that look at the increase in racial wealth inequality in the past ten years and the new policies that have been launched to address it.

Bridging the Gaps Between Earnings and Basic Needs in Massachusetts, October 2007. Randy Albelda and Jennifer Shea, Center for Social Policy, University of Massachusetts, Boston.

www.umb.edu/bridgingthegaps

Building a Better Refund Anticipation Check: Options for VITA Sites, November 2004, National Consumer Law Center <http://www.responsiblelending.org/pdfs/RALs-BetterRAC-1104.pdf>

Report proposes refund anticipation checks (RACs) for tax filers through a partnership with a bank or credit union. The program would provide an opportunity to open a savings account to deposit a split tax refund with a partial cash withdrawal for a modest fee.

“Business, Poverty, and Corporate Citizenship: Naming the Issues and Framing Solutions”, in The Journal of Corporate Citizenship, Issue 26, Summer 2007, Mary-Ellen Boyle, Clark University, and Janet Boguslaw, Institute on Assets and Social Policy.

<http://www.greenleaf-publishing.com/page17/Journals/ViewBuyIssues>

Emerging business practices and contributions to poverty reduction require an emphasis on asset development and wealth creation as well as on income growth. Rather than stressing poverty reduction so as to increase consumption, it identifies business’ role in supporting financial literacy, expanding savings, and building productive asset wealth.

By a Thread: The New Experience of America’s Middle Class, November 2007, Jennifer Wheary and Tamara Draut, Demos Thomas Shapiro, Institute on Assets and Social Policy, Brandeis University.

http://iasp.brandeis.edu/pdfs/byathread_web.pdf

This study is based on a new “Middle Class Security Index” developed by IASP and Demos which rates household stability across five core economic factors: assets, educational achievement, housing costs, budget, and health care. Key finding: Fewer than one in three middle-class families in America are financially secure, and the remaining majority are either borderline or at high risk of falling out of the middle class altogether. The report recommends a set of policies that will help open access to, and strengthen, America’s middle class.

Does It Pay to Save?, June 2007, Laurence J. Kotlikoff and David S. Rapson, National Center for Policy Analysis. <http://www.scribd.com/doc/98356/Does-it-pay-to-save-money-if-you-are-poor-in-the-US>

Eight Elements of a Successful Financial Education Program, 2004, U.S. Department of the Treasury, Office of Financial Education. http://www.ustreas.gov/offices/domestic-finance/financial-institution/fin-education/successful_program.shtml

Financial education program guidelines that are designed to promote the greatest impact in the community. These guidelines offer assistance in the areas of program content, delivery, impact, and sustainability.

Financial Access for Immigrants: Lessons from Diverse Perspectives, May 2006, Anna Paulson and Audrey Singer, Robin Newberger, Jeremy Smith, Federal Reserve Bank of Chicago (Center for the Study of Financial Access for Immigrants) and The Brookings Institution (Metropolitan Policy Program).

http://www.chicagofed.org/community_development/center_for_the_study_of_financial_access_for_immigrants.cfm

This report discusses financial practices of immigrants and industry as well as community approaches to improve financial access.

"Financial Literacy for an Underserved Market: A Service-Learning Project for the Introductory Finance Course," 2004. Patricia Clarke in Journal of the Academy of Business Education, 2004

Proceedings Issue <http://www.abe.sju.edu/proc2004/proceed2004.html>

The paper discusses a financial literacy project for ESL students.

“Foreclosure Prevention and Intervention Efforts in New England” (Issue 4 2007) and **“Innovation in Technical Assistance and Lending for Very Small Businesses”** (Issue 2 2007), in New England Community Developments, Federal Reserve Bank of Boston.

<http://www.bos.frb.org/commdev/necd/index.htm>

“Helping Clients Build Credit” (Fall 2007) and **“Estimating the Cost of Being Unbanked”** (Spring 2007) in Communities & Banking, Federal Reserve Bank of Boston.
<http://www.bos.frb.org/commdev/c&b>

Know Before You Go: A Guide to Mortgage Products and a Glossary of Lending Terms (in Spanish and English), Federal Reserve Bank of Boston.
<http://www.bos.frb.org/consumer/knowbeforeyougo/mortgage>

Massachusetts Fair Lending Task Force Report and Recommendations, October 2006.
www.masscommunityandbanking.org/PDFs/FairLendingTaskReport_web.pdf *The Report shares the Task Force's findings and provides recommendations to help increase lending to minority group members and to ensure that all homebuyers have equal access to credit. The Report's section on "Consumer Education" includes lists of local programs and website resources on financial, credit and homebuyer education (pp. 39-42).*

Overborrowing and Undersaving: Lessons and Policy Implications from Research in Behavioral Economics, 2007, Federal Reserve Bank of Boston.
<http://www.bos.frb.org/commdev/pcadp/2007/pcadp0704.pdf>

Pathways to Getting Ahead, September 2003, Sandra Venner, Institute on Assets and Social Policy.
<http://iasp.brandeis.edu/pdfs/pathways.pdf>
This booklet targets young adults to spur thinking about the importance of asset building in their personal lives and about how larger policy decisions impact the choices they make. It identifies numerous ways to locate important information.

“Reducing Wealth Disparities through Asset Ownership”, in Ending Poverty in America: How to Restore the American Dream, April 2007, Melvin Oliver and Thomas Shapiro.
http://www.amazon.com/Ending-Poverty-America-Restore-american/dp/1595581766/ref=pd_bbs_sr_1/103-1511354-8479866?ie=UTF8&s=books&qid=1194378329&sr=1-1
This chapter puts forth proposals that will help better connect minorities and other poor families to the mainstream credit system and markets and enable them to save and accumulate assets. The racial asset gap threatens to permanently consign large segments of our society to lives with restricted opportunities unless government invests not only in asset building opportunities for the well-off, but also for the less advantaged.

Web Resources:

Adult and Community Learning Services: Resources for Teaching Financial Literacy for ESOL and ABE Students, Massachusetts Department of Education.
www.doe.mass.edu/acls/mailings/2005/1111/financialliteracy.html
The website provides a list of national and local on-going projects that have curriculum materials available on their websites that are designed for a wide range of students.

Basic Banking for Massachusetts

www.masscommunityandbanking.org/Guidelines.htm

Basic Banking for Massachusetts is a statewide voluntary program to provide low-cost checking and savings accounts to customers with limited banking needs. The website includes the Basic Banking guidelines, a list of participating banks and a bank sign-up form.

Financial Education Community Toolkit

United Way of Massachusetts Bay and Merrimack Valley, in partnership with Bank of America

www.financialedtoolkit.org

This web-based Financial Education Toolkit is designed to meet the need for quality and consistency in financial education in order to increase the financial stability of Massachusetts' low-income families. Visit financialedtoolkit.org to explore curricula, core competencies, evaluative instruments, and other supportive tools.

Financial education resources

<http://www.bos.frb.org/consumer/pfe>

FDIC Money Smart Web Page

<http://www.fdic.gov/consumers/consumer/moneysmart/>

FDIC Money Smart Newsletter

<http://www.fdic.gov/consumers/consumer/moneysmart/newsletter/fall2007/index.html>

FDIC Consumer News

<http://www.fdic.gov/consumers/consumer/news/>

FDIC Alliance for Economic Inclusion Web Page

<http://www.fdic.gov/consumers/community/AEI/>

Foreclosures information, including consumer information, data & analysis, and research & articles

<http://www.bos.frb.org/commdev/foreclosures>

Massachusetts State Treasury, including links to state-sponsored financial education programs

<http://www.mass.gov/treasury/financialed.htm>

Mass Saves website, www.MassSaves.org

For financial education resources.

MIDAS website, www.MassAssets.org

For assistance to folks in starting/expanding asset development programs, such as IDAs, housing, EITC, small business

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