>> Steve Bartlett: Hello I'm Steve Bartlett. I'm chairman of the board of RespectAbility and I'm here with Michael Morris, the founder, brains, motivator former executive director, but now acting executive director of the disability institute. And he's quite storied in these parts. And so we're going to have a seminar -- webinar, I'm sorry -- on CRA, on the changes that are being proposed for CRA, what you can do about it to improve CRA, and to, at long last, include persons with disabilities in CRA activities officially. I think we've been included for a lot by many banks, but it hasn't been official, so we're proposing to make it official. So with that I'm going to Michael, do you have any opening words before we go on to the deck or -- you're going to drive the deck. So we'll turn it over to Michael.

>> Michael Morris: Yes. Steve, thank you and thank everyone at RespectAbility for your work and your efforts to really improve understanding, awareness of what a world of possibilities can look like for people with disabilities, whether it's a family raising children with disabilities, working age adults and and even people in retirement. This topic is of the most greatest importance to me, and I am hopefully going to take my passion and bring my passion to you that takes us from passion to really a sense of activism about a topic that just simply most people in the disability community have not heard a lot about, have not spent a lot of time on. So over the next half hour, 45 minutes, I want to explain to you the Community Reinvestment Act and why it matters for people with disabilities. This is both a conversation, and really, I hope, a call to action. Next slide please. So a little bit about the organization I started 15 years ago: National Disability Institute. Next slide please. The mission of the organization is to drive social impact to build a better economic future for people with disabilities and their families. We do that through research, advocacy work, policy development, public education, and probably most importantly of all, we have built very important bridges between the financial community and the disability community. Next slide please. In 2000, there really was not another disability organization that really was tackling what are fundamental issues to people with disabilities and their families in this country and that are issues of poverty. Millions of people with disabilities are confronted by poverty every day, whether it's challenges related to simply having a meal, a roof over your head, the wide scale unemployment, the lack of ability to pay for just basic life necessities. Poverty has been too much a part of the lives of millions of people with disabilities in this country. I started an organization to try to look at what we can do in policy, what we can do in terms of collaboration between government, the financial community and the disability community to change that picture. NDI today has about 35 staff. Staff are located around the country. We're headquartered here in Washington, D.C. And in any given year, we're typically in some stage of development of about 15 different projects. Next slide please. I wanted to also share with you, before we dive into the subject today around Community Reinvestment Act, to let you know that about a year ago -- a little over a year ago, I started a new center at National Disability Institute called the Center for Disability Inclusive Community Development. You know, every field, every community has its own language. In the disability community we have acronyms like ADA. In the banking community they have the acronym CRA, and we're going to be talking about that today. It's important for all of us to understand that CRA can be and will be over the next 10 years, I believe as important as the ADA has been in the lives of millions of Americans with disabilities. Next slide please. This center that we created, the Center for Disability-Inclusive Community Development, you can find more material on the NDI website. If you want to learn more about the subject and about the meaning of the words financial inclusion, we started a podcast series, had some really interesting leaders in the financial and disability community sit down with me, and we have 30-minute podcasts that can help you learn about this topic. And then really the seminal article that I did, now about a year and a half ago, and was published in the Georgetown Journal on Poverty Law and Policy, journal of their law school, is called Closing the Disability Gap: Reforming the Community Reinvestment Act. And I'd urge you to take a look at that. You'll find it also on the NDI website where we have our material related to inclusive community development. Next slide please. So let's get to the subject at hand. 40 years ago, I know for some of you, you weren't even born 40 years ago. For Steve and I, we were around. We were there at that point in time. 40 years ago, Congress passed CRA to encourage banks to serve low and moderate income neighborhoods and people as a response to a documented practice of redlining. So here's another one of those those words, maybe not familiar to a lot of us. What redlining is or was about was banks drawing a circle around certain neighborhoods, and basically saying if you're going to live in that neighborhood, we're not so sure you're a risk we want to take on in terms of offering you a mortgage so you can buy a home in that neighborhood. So literally, they drew a red line around those neighborhoods. Those neighborhoods were predominantly neighborhoods where low moderate income people were living, and they were predominantly neighborhoods where people of color were living. So Congress reacted to that and passed the Community Reinvestment Act, and I'm going to tell you a little bit more about what that is. And then we'll move on to understanding how that should influence and impact all of us in the future. In 2019 more than 27 percent of working age people with disabilities were below the poverty level. That's 2019, that's pre-COVID, so that's before the the horrific set of events that have transpired this year. And what you see too is that the majority -- not the majority but almost majority of people with disabilities are a great percentage of people living in long-term poverty in this country. Although people with disabilities make up a significant portion of low and moderate income people who have always for 40 years been the target of the Community Reinvestment Act, they have not been a target of financial investment lending and service activities under CRA. There have been isolated examples, but they have not been a focus of the regulators in their evaluating bank performance. They have not been a focus of the community development officers at banks thinking about, "well what should we do to meet CRA obligations?" And so I don't think by any means it was intentional. It wasn't intentional it was simply "out of sight, out of mind, " not in the focus of the financial community. Next slide please. Let's put this in a historical context. Again, many of you may not have been around back in 1977 when CRA was signed into law by Congress, but let's think back to 1977 in terms of where were people with disabilities in this country at that time. Well -- I will still think of you as Congressman Bartlett because that's the way back in those years -- we would deal with the notion that children didn't have the opportunity even to attend their neighborhood schools, the law first came into being in 1975. And so it was for the first time, when CRA was signed into law, that families could take their child with a disability with their child without a disability and they could go to their same neighborhood school. If you go back 40 years, hundreds of thousands of people with disabilities were still being segregated in public hospitals, sometimes called institutions, public state institutions. The people with disabilities hadn't committed a crime, these were not prisons. But they might as well have been prisons in terms of the type of care that was not being provided, the lack of treatment that led to a whole series and flurry of litigation and court decisions, well before the ADA was passed in 1990. And then of course in 1977 we didn't have a civil rights law like the ADA defining protection against discrimination in all that anyone does, in a community, in the workplace, in the classroom, there was no right to equal opportunity. So that's a context of where CRA came into being. It wasn't about disability, it really was about low moderate income people being discriminated against and getting access to a mortgage so that they could buy a home in particular neighborhoods. Next slide please. Well, I think we all recognize each in our own way, whether you're a person with a disability, whether you're an employer, whether you're a brother, a sister, a grandparent, whoever you are -- societal norms really have changed related to people with disabilities. I think most people would certainly point to the Americans with Disabilities Act as singularly what brought about the most momentum for change. But what we now see -- and I'll look at this pre-COVID, because this year of course has brought so much hardship to so many millions of people with and without disabilities. But pre-COVID, students with disabilities in record numbers were graduating from high school. They were going into the workforce and many types of new jobs. state education agencies required under IDEA, Individuals with Disabilities Education Act, have to report on the graduation rate of students with disabilities. It was going up every year, percentage was going on to higher education or becoming employed -- all good, very positive things. And then in terms of the ABLE Act - Achieving a Better Life Experience Act -- we now have today almost 100,000 individuals with disabilities and their families have opened these tax advantaged savings accounts. They have right now I believe over 500 million dollars growing in these investment accounts that can cover for individuals and their families the extra cost of living with a disability. And I think we would all recognize pre-COVID people with disabilities are no longer bystanders, are no longer irrelevant. They're participants in the growth of the economy, as consumers, as savers, as investors, as borrowers, and in growing numbers even becoming small business owners, becoming entrepreneurs, and also working as independent contractors. I know, for those of us who live in Washington D.C., pre-COVID, how many times I've gotten into a Lyft or an Uber in Washington, D.C. to find that my driver is deaf because there's a sizable deaf community, and so that was a great new means of employment for individuals from the deaf community, often who are here because of Gallaudet University. Next slide please. So what does all this mean? Context, 40 years ago this law passed, not a lot happened related to people with disabilities, but a lot happened in our society related to continued understanding of the right to protect against discrimination, the right for equal opportunity, the right to participate in our economy. And so that brings us into focus CRA. So CRA is actually something that has three different types of financial regulators, three different federal agencies: the Office of Control of the Currency, the Federal Reserve Board of Governors, and the FDIC - Federal Depositors Insurance Corporation. On this slide what you'll see is actually a link that will take you to the list of banks that each of these federal regulators has ahead over the next quarter, over the next six months. It's also a place where you can find more information about what has happened in the past year or two years, in terms of evaluating bank performance. Next slide please. CRA performance evaluations: the reason there are three different regulators has to do with the size of banks and each regulator has a different portfolio of banks. But I'm going to stay first with the large banks, because they are much larger than most of the other banks, the top 20, top 30 banks in this country. And they're regulated by the Office of Control of the Currency, and subject to three tests under CRA. They look at lending, investment and service. Next slide please. So what are we talking about with lending? So what the bank examiner from OCC who's going to come to that community where one of these major large banks are -- and they're going to look at the number and amount of loans in that bank's assessment area, where the bank's physical presence is, where their branches are. They're going to look at a record of lending to borrowers, not just of moderate and high wealth. They're going to look across all income levels as part of the CRA test, because it was supposed to be about increased activity for low and moderate income people. They're going to look at the number and amount, complexity and innovativeness of community development loans. That could be for housing. That could be for starting businesses. It could be for a lot of different types of activity. Next slide please. Under the investment test, a pretty similar area, dollar amount, complexity and responsiveness of qualified community development investments. And here again, every year each bank in your local community and across the country has to make very hard decisions on how much money they're going to spend to meet CRA obligations and what are they going to spend it on. And there - I can assure you - are a lot more good ideas and good projects and unmet needs in every local community across this country. But there are also a lot of banks, and each bank is making decisions every year about what they're going to do to meet CRA obligations. Next slide please. And then of course the third part of this testing by OCC is about the availability and effectiveness of retail banking services in that local assessment area -- where that physical footprint, those retail branches are. Next slide please. So what's the purpose of this performance evaluation? For large banks it typically is happening every three years. The purpose of OCC looking at large banks' performance is to assess whether that bank is serving the convenience and needs of the community where they're located, with a particular focus on low and moderate income populations. Now, remember my earlier slide. Disproportionately represented in low and moderate income populations -- some 40 percent in virtually every community in this country-- are going to be people with disabilities who are poor but also disabled, and in many cases are also people of color. Next slide please. So there's a four-tiered rating system. There's a written evaluation the bank examiners provide a bank every three years. The ratings are outstanding, satisfactory, needs to improve or substantial non-compliance. Over the past more than 10 years, 90 percent of banks have received the top two ratings. And that's really led to many community advocates for years pushing for tougher evaluations, more comprehensive reviews, getting more into the data and into the details. Are they really serving -- is this bank really serving low and moderate income people? Next slide please. Why does all this matter to the disability community? So, if I've bored you with details and complexity of another three-letter acronym -- you know ADA, Americans with Disabilities Act, but I want you in the future to know CRA, Community Reinvestment Act. Here's why all this matters. In 2018, federally regulated banks spent over 480 billion dollars -- that's with a b, that's not million, that's billion dollars -- meeting CRA obligations. CRA investments in local communities were responding to diverse needs, including housing and small business development, workforce development, financial counseling and financial education, even expansion of broadband and technology access and many other types of economic development activities. So do the simple math with me. If just one percent of what banks spent in 2018 -- I use 2018 because I don't have more current figures yet available for 2019, and obviously we don't know yet for 2020 -- but if one percent -- you can do the math -- of 480 billion dollars were dedicated to economic activities that benefited low and moderate income people with disabilities, you get a figure of 4 billion dollars. Think about what 4 billion dollars buys. In workforce development, getting people the skills and training they need to be in the workforce. Good paying jobs with career pathways. What does it mean in terms of accessible and affordable housing for people with disabilities? What does it mean for all those who want to be business owners -- entrepreneurs starting their own small businesses. Whether it's seed money to start up or it's money to grow their business and hire other people with and without disabilities, four billion dollars buys a lot of things. One percent -- one percent change gets you four billion dollars of economic development activity targeted to people with disabilities. Next slide please. So, despite disproportionate high poverty rates among people with disabilities, it wasn't until just a few months ago -- and the first regulations of CRA came out in 1978, no subsequent regulations, no policy interpretations until about two months ago ever said anything about low moderate income people with disabilities. And the bible, the pace setter for financial institutions, the Federal Financial Institutions Examinations Council, which provides banks data on the LMI neighborhoods in their footprint, includes data on gender, on race, but it does not yet include information on disability. Next slide please. So just a few data points to help banks think about this is -- some of the comparison when we look at this intersectionality of race, ethnicity and disability, you see that the higher poverty rates for people who are black versus people who are black with disabilities. Again, you begin to see the differential statistics. And you -- here, the next bullet is really the one that is the most overwhelming. Across all racial and ethnic groups, households with a disabled working age householder have lower net worth compared to households without a disability member. And it's 14,000 versus 83,000. But look what happens when it's a household with the persons are black and also there's a person with a disability. It drops all the way down to 1,282 dollars. For Latinx households, 13,000 dollars. So what you see is some really dramatic statistics, important statistics that should help drive bank decision making in the future, particularly right now. I'll tell you, banks I work with -- JPMorgan Chase, Wells Fargo, Bank of America -- they all in recent months have announced billion-dollar commitments to people of color, as they should, to try to promote greater equality and equity in terms of economic -- you know, overcome economic disparity. But they're missing the point of this intersectionality of race, ethnicity and disability. Next slide please. So what's our challenge, and why are we all listening today and trying to figure this out? Without identifying people with disabilities as part of the LMI population, banks will continue to overlook the specific needs of this population. What we know is banks could be -- starting this year and every year in the future -- be spending money to help people with disabilities develop affordable and accessible housing, start up capital for entrepreneurs, expand financial education and counseling programs, improve access to technology. How many people with disabilities are sitting in a place where they live without broadband access? That could be changed -- or without the hardware and software that they need? That could be changed. And here's a really interesting one. It's projected that maybe as many as half the states in this country will not be able to pull down their full federal share of dollars, because they don't have either a public or a private match to pull that money down. So here's what's amazing. For every dollar the state can put up towards VR services they can pull down 3.75 dollars of federal dollars towards VR, workforce development, skills development, anything related to helping people achieve an employment outcome. So if a bank put up a million bucks it would come with it -- if its purpose was to help a state who needed a match -- its 1 million could bring 3.75 million federal dollars with it. Quite an advantage. Next slide please. So I just want you to be aware, on June 5th, OCC published its final rule which -- its goal was to strengthen and modernize CRA. The rule took effect on October 1st of this year. For the first time in 40 years, the rule makes specific reference to LMI individuals with disabilities, and includes for the first time specific list of CRA qualifying activities for bank investment and lending related to targeting of people with disabilities. Over 1500 commenters were submitted -- comments submitted to OCC. NDI and about 90 other groups, including some banks, supported us in getting disability added for the first time. And OCC listened and did it. Next slide please. The final rule keeps CRA a relevant and powerful tool for supporting communities, promoting civil rights through greater economic opportunity. Next slide please. So here's three of the examples of what the new rule -- OCC rule has. A way a bank could spend money that would qualify for CRA credit. Financial capability training by bank employees for people with disabilities. Consumer loans for households that need assistive technology products or vehicle modifications to improve accessibility. And then third, the one I was talking about related to vocational rehabilitation, funding for workforce development programs designed to improve employment opportunities for LMI people with disabilities. Next slide please. And here are some examples not specific to disability but also people with disabilities could benefit. Consumer loans to fund unexpected medical expenses. Grants to nonprofit to increase digital literacy training to increase use of online banking services. Loans to non-profits to develop affordable and accessible housing. In-kind donation of computer equipment. So here's just a short list of some of the things that could be done under CRA that would benefit people with disabilities. Next slide please. What can you do as an individual, an organization? Think about unmet needs of LMI people that would match qualifying CRA activity. Sit down and talk with where you bank. Learn about what are they doing in the CRA planning process. Find out when their next CRA bank examination is going to take place. Find out whether you and they can sit down together and talk about there might be some joint activities that would actually engage CRA funding in the future. You can contact the Center for Disability Inclusive Development to learn more about training and technical assistance activities. Next slide please. So that was OCC. On October 19th, just a few -- really just a week ago -- the Federal Reserve System put out their own CRA rule in the federal register. Why are they seeking change? To more effectively meet the needs of low moderate income communities, increase clarity and consistency and transparency of bank examinations, promote community engagement, take into account in banking what banks are doing beyond just their physical footprint, as many people do their banking online across the country, and meet the wide range of low market income banking needs, and address inequities in financial services and credit access. There can't be any greater inequities than what goes on in terms of people with disabilities and their lack of access to financial services. Next slide please. What the proposed comments offer people with disabilities. So I went through hundreds of pages of this proposed rule, seeing did they replicate what OCC had done. And unfortunately they hadn't. They had only one thing: for large banks, they should evaluate branch-based services including what is necessary in terms of disability accommodations. Now, we want to support that in their final rule writing, but they need to do a lot more. Next slide please. So I've pointed out in this next set of slides, they ask in the proposed rule a set of questions. The first question is "how should the Federal Reserve define community services?" And you could propose ways community services could actually include services that benefit low moderate income people with disabilities. They also ask "how can a bank determine whether an activity meets the needs of lower moderate income people?" And here again you could say in agents the activity is targeted to recipients of federal disability programs, such as benefits counseling, vocational rehabilitation, I could add here special education, youth and transition services, housing assistance and others. Next slide please. "Should workforce development be included as a separate prong of the economic development definition?" So they asked this question in the proposed rule and again, you want to respond by saying yes. And define it in a way that it definitely includes people with disabilities. They also ask "what are ways a bank should encourage access to credit for underserved or economically distressed minority communities?" And here again is a way that we can put in language to say when a bank's performance is being evaluated, please look at the level and type of efforts to improve credit and access to other community service activities to meet the needs of low moderate income individuals with disabilities. One more slide please. And "should FRB, like OCC, publish a list that would not be the only list but at least a starting point?" And again, I think we should answer back of course, because we want to get in the kinds of activities that could support people with disabilities. Next slide please. And then finally, "how can the public be more engaged in a bank's strategic plan development?" And again, they could indicate that the bank must show in its strategic plan development that they engage the disability community. Community non-profits that are serving or advocating on behalf of people with disabilities should be a part of what is in this bank strategic plan development. Next slide please. "What data should a bank collect and share with bank examiners?" And again, that one shouldn't just look at LMI as one homogeneous group of people, because they're really many subgroups defined by race, ethnicity, gender and of course disability. And so really we'd like to see the kind of data be collected that we really could evaluate a bank's performance: what are they doing for LMI people with disabilities? Next slide please. So here is the information that I hope you'll take to mind. You can find the actual full notice of proposed rulemaking in the federal register from the Federal Reserve Bank system. Comments are due February 21, so you have months to think of this, think about this, work at this. This slide tells you where you can mail in your comments or email in your comments. And then, if you really want to understand this more, I'd urge you to take a look at an article -- actually, it was a speech made by Governor Lael Brainard, who's a member of the Federal Reserve Board of Governors, on why we need to strengthen CRA. Next slide please. I've covered a lot of ground. At times I've gone pretty deep. I know RespectAbility will make these slides available to you. Next slide please. Visit the keys to financial inclusion podcast series. Here's a list of people that were the first set of guests. Next slide. And I leave you with this closing quote from Zadie Smith. I think for all of us in the disability community, progress is never permanent. It's always being threatened. We as a community must be redoubled, restated and reimagined in our efforts if we are going to survive. So I'll close there and turn it back to you, Steve and others. And just --

>> Steve Bartlett: Michael, that was brilliant and you gave us an exact blueprint on what to do. I might say -- and I should have said this even more fully at the beginning. Michael Morris is regarded as an icon in the disability community, in particular for promoting financial inclusion for persons with disabilities -- empowerment, banking services, financial services and entrepreneurs. So he's opened the door for us and now that we have the proposal from the OCC and hopefully the Federal Reserve, we can add the additional tool of CRA. I'm not going to summarize everything Michael said, these suggestions will be on our website at RespectAbility and also at the National Disability Institute, but if I could sort of close down with what he said and that is everyone on this call, and everyone you know, and everyone in all of the disability organizations are called upon to take two steps. And don't wait until February 21st, do it now. First is send your comment to the OCC supporting their proposed regulation. It was a major step to get the OCC to include the disability community in the regulations. And then second is send to the Federal Reserve your comment and be explicit to basically say to the Federal Reserve, you know, get with the program guys, get on the stick. They will be jealous that their colleagues at the OCC have gotten ahead of them, so use that jealousy a bit to say get with the program and suggest specific things that the disability -- that the banks could do to provide financial support, financial help to persons with disabilities who are also low-moderate income. I might say that there are several areas -- employment is a big one, and there are barriers to employment, as everyone knows. I would parenthetically -- I must acknowledge that one of the barriers to employment is contained in federal law, just as redlining was originally a feature of federal law, which the banks implemented it but the FHA were the ones that drew the red line around the maps that gave them to the banks. So there was a certain complicity there. But now, federal law has this asset cap which is excruciatingly painful and unfair and stupid. Basically it says that if you're on -- if you're eligible for SSI or SSDI, you are required by law to always be poor. You can never have more than two thousand dollars in assets. And it's probably the stupidest most counterproductive thing in federal law that we could imagine, but there it sits. So that's the subject, by the way, for congressional action next year. But right now, the banks, by providing financial services to help employment, to provide sometimes technology, sometimes hardware, sometimes accessibility, sometimes financial entrepreneurship, sometimes financial literacy counseling, open that to the world of persons with disabilities. So one thing is send your comment letters right now to the Federal Reserve and the OCC. OCC is "attaboy" and Federal Reserve is "get with the program." Second - everybody in the disability community has a bank, either a banking relationship -- hopefully you should, or if not at least a bank in your neighborhood. So the organizations do and the individuals do. So pick up the phone, go online and ask to speak with the CRA director for that bank. You might be the first one that week or that year to ask for that, but they will contact you. They will say, "what do you want?" Say "I want to know how can we work together to improve access to banking services for people with disabilities, because that is now required in the CRA." And when you say CRA, that's like holding up a hatchet over their heads, or a baseball bat over their heads to be less gory -- a baseball bat, to say you have to do this to comply with CRA. And then say "and let me and our organization and other disability advocates help you in complying with CRA" and you'll get their attention. Michael is that -- by the way if you can't meet the CRA officer, ask to speak with the branch manager. Go in and say "you're the branch manager. What are you doing to comply with CRA for people with disabilities? Because Mr./Mrs. branch manager, it is now required, congratulations." Michael is that what you want them to do?

>> Michael Morris: I think you summarized it very very well. And I guess maybe be forewarned. Banks - whether it's the branch manager or otherwise - are not going to be enthusiastic about your meeting. They may be a little put off, but be persistent but not argumentative. Be -- I mean, you have -- you're entitled to be a part of the process. Every bank needs to seek public input in their development of -- if they do develop a strategic plan it's not absolutely required, but they really are there to serve their community. That's how banks succeed.

>> Hon. Steve Bartlett: And be polite but persistent. The banks are not your enemies, you want to make them your more active friends, but they're not your enemies. And then offer to help. Say -- at the end of your meeting, say "what can I do to help you, the bank, comply with CRA for people with disabilities?" And "I think I can help you." So it doesn't take a big movement it takes -- obviously if you can bring five people with you instead of just one, that's better, but if you just bring one that's enough. And be helpful, but helpful towards achieving the result. And the numbers are staggering-- the banking industry finances everything that moves. And so they may as well finance people with disabilities. And they'll want to do it. I don't think you'll find hostility if you're not hostile. I think you'll find a friendly reception and then send back what you find out, send it back to RespectAbility, to me, Steve Bartlett, or to Disability:In with Michael. And then tell us what you found out and we'll back you up.

>> Philip Kahn-Pauli: And this is Philip Kahn-Pauli, the Policy and Practices Director for RespectAbility. just jumping in here because we've got some time for questions. We have some questions that we want to cover, but we did get two questions from our chat box. So if you, our audience members, if you have a question you'd like to ask, just type it away in the chat box put in the Q&A option. And so the two questions that we have for Michael and for Steve is, first of all, is it more helpful to have groups sign on to comments or just people submit individual testimony? So that's the first question. And the second question is that we have an election coming up, which means there's going to be a lot of new political appointments coming in down the line. And so how can we as a disability community get more of our people into positions of decision-making authority on these and other critical issues?

>> Steve Bartlett: Michael, let me start off and then turn it to you. The answer to "is it better to have groups or individuals comment" the answer is yes. It's better to have groups and it's better to have individuals. But just because you commented as a group doesn't mean you shouldn't comment as an individual. So they both count. Now, I was in Congress, as you all know, some time ago, but I could absolutely guarantee that the Federal Reserve and the OCC, they read every comment. And I mean they actually read it and underline what was said. And sometimes it takes a year to read all the comments, if there are a lot of them but -- and then they count them up. So if we got no comments supporting the disability inclusion then we won't get disability inclusion. If we got 200,000, then we will. So let's aim for 200,000 or more. But they do read the comments. Michael?

>> Michael Morris: Yeah, I love your answer because the answer is yes. Both matter and it's amazing -- I know OCC got 1500 comments, and as Steve said, they read every single one. They have to put them into different categories, because there'll be people with different views, opposite views on the same issue. So numbers matter here. And I would tell you I never thought that OCC would follow our comments, but I then didn't expect 90 different organizations, as they shared with me, had come in and backed up comments National Disability Institute had initially written. And that mattered. And it's it's so -- talk to others, you know, as individuals. Talk to your local bank. Sell them on this as a comment. I was very surprised, I think still the largest bank in the United States is JPMorgan Chase. And I was on a call with some of their staff, lead people who work on community reinvestment, community development. And they told me for the first time they had taken some of my disability comments and included it in their comments. And when the largest bank in the country tells -- on top of a lot of disability groups -- says you know, we have overlooked people with disabilities too long and it's time -- they should be a part of what we're investing in and improving services for. So do not think you are powerless. You have tremendous power. But there is power in numbers and we got to get the word out.

>> Steve Bartlett: JPMorgan Chase has been very responsive on this issue, and they followed the leadership of the National Disability Institute, but they actually stepped up to the plate and issued their own comments. Let me move over to the next question, and that is that how to get a political appointment. So we at RespectAbility, and I don't know if -- I suspect National Disability Institute -- we are actually gathering resumes of persons with disabilities and submitting them -- we'll submit them to the new administration. I think we'll wait until after the polls close next Tuesday, but then we're going to be submitting them, and we will get them into the flow of work and then see what comes out and push them. So you can send your resume to RespectAbility or to Michael, to National Disability Institute -- send it to both! Send it to both.

>> Michael Morris: Yeah, I love that question, because it's a recognition that until people with disabilities are in decision-making positions it's really hard to be heard. I think "nothing about us without us" and so whether it's running for Congress, or it's being a political appointee and they'll -- whether Trump gets reelected or Biden gets elected, they're -- Trump will be making huge changes, Biden will obviously be putting together a new administration, there'll be a lot of open positions. But what I love about this question is it's not just about who heads up, like, Office of Disability Employment Policy or Office of Special Education, where we know disability is the primary focus. You want to be over in areas like this, where -- I guess I would say where the money is, where decisions are being made about how money is used. That's where we want to be. And so there is -- someday, someone with a disability will become a Federal Reserve Board-- on the Federal Reserve Board of Governors. Someday they'll become a member of the key decision makers at FDIC. And someday, maybe someone with a disability will head up OCC. But we just got to keep pushing forward because you see the kind of changes that are taking place in corporate America in terms of diversity and inclusion. In the money side, in the regulatory side of banks, we've-- there's only one way to go and that's to get better basically.

>> Philip Kahn-Pauli: Absolutely, I'm just going to jump in and --

>> Steve Bartlett: Philip, before you move on I do want to back up to the National Disability Institute was just magnificent in opening this door to get included in the regulations for CRA, but I should single out an individual congressman, Brad Sherman from California, who was the lead congressional sponsor to provide the congressional support for making it happen also. So National Disability Institute and Congressman Brad Sherman, the chairman of the relevant subcommittee, had a lot to do with getting this done. Unfortunately the Federal Reserve didn't read his comments as much as the OCC. Philip, I'm sorry, go ahead.

>> Philip Kahn-Pauli: What I was just going to jump in on and share is talking about how the regulatory environment is changing. And something that is really important to think about is there's a cross-section here of banking institutions that have CRA obligations who are also federal contractors. And that is really important, because under section 503 of the rehabilitation act as amended, those contractors have agoal to hire more people with disabilities, to the point of having seven percent of their workforce be people with disabilities. And so, obviously we want to push on the CRA front, but these are institutions that are already, by regulatory intervention, trying to promote greater inclusion of people with disabilities in their workforce. And so I think there's a lot of synergies to be brought across both the CRA space as well as the 503 space, especially with how many contractors areout there.

>> Hon. Steve Bartlett: Philip and Michael, let me apologize. I just got an emergency phone call. I'm being pulled away for another zoom briefing of course, so I'm going to leave, turn it back over to Michael and to Philip to close it out. And thank you all for being on the call.

>> Michael Morris: Thanks.

>> Philip Kahn-Pauli: Well, Michael, we have a few more moments, and you know, you and I are both policy wonks. We've written lots of public comments, and we're obviously encouraging members of the disability community to draft and submit their own comments. And I would ask you the question of what do you think makes for good public comments? What are the kinds of things that people should share, should link to, should include when they actually take the active step of writing out something and submitting it to the Federal Reserve or OCC?

>> Michael Morris: Yeah. First, of course, submit comments. Right? We got that message clearly from -- I still call him Congressman Bartlett. But to your question is the more specific you can be, with recommended language. So it's not like "include people with disabilities in your next round when you write your final regulation, in terms of the Federal Reserve Board of Governors, is actually, as I've shared in the PowerPoint, very specific language. And that makes it -- you want to make it easy for the regulation writers. You don't want -- yes, we want to get their attention on disability, but then make it easy for -- "well, how do we do that?" So give them actual language, again, specific to when you read and I'm glad you put in the chat box, Philip, where you can send your comments as well as see the full document, because you'll see they ask very specific questions. I didn't even number them in my PowerPoint but it will be -- so question 27. In your comments put "question 27" and then put your proposed answer. The more specific, the better.

>> Philip Kahn-Pauli: Gotcha. Thank you very much. Well, seeing no other questions from our audience, I am going to exercise my convening authority and say Michael, do you have any final words?

>> Michael Morris: No, I just think this has been a great opportunity. It did a wonderful thing for me -- it forced me to get this PowerPoint ready, which I will now use multiple times with many other audiences across the country. But I think that the power is in our numbers. We have the numbers --millions of people are part of the disability community. We've really got to figure out how to mobilize this enormous, very diverse community, on very powerful opportunities like this. So I hope in the future you ask a person with a disability today "what is the ADA?" They know it's the Americans with Disabilities Act. In the future when we ask people with disabilities "what's CRA?" They're going to say, "oh that's the Community Reinvestment Act that's what finally began to give us economic opportunity in this country.”

>> Philip Kahn-Pauli: All right, we will leave it there. Thank you so much Michael, thank you so much to our audience, Eric, our sign language interpreter Bill, as well as our captionist Christine. Thank you all. And thank you all for joining us and we hope that you have a great day.