



Financial Research
Opportunities Group

Inclusion for All: Improving Banking Practices for Customers with Disabilities

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Summary

Fundamental to the four aspirational goals of the Americans with Disabilities Act (ADA), equality of opportunity, full participation, independent living, and economic self-sufficiency, is for banks and credit unions to offer affordable financial services with intentional financial inclusion of customers with disabilities. Under the Americans with Disabilities Act (ADA), banks and credit unions are considered Title III entities, or places of public accommodation.

Title III of the ADA requires banks and credit unions to ensure physical accessibility of locations and to make reasonable modifications to policies and procedures to ensure equal access to banking services. Banks also have obligations under the Community Reinvestment Act to meet the credit needs of low- and moderate-income individuals, many of whom are people with disabilities.

Thirty-two years after the enactment of the ADA, the Federal Deposit Insurance Corporation (FDIC) finds that people with disabilities are three times more likely to be unbanked compared to adults without disabilities. Additionally, even if people with disabilities are banked, they are less likely to use the full array of bank services.¹

Building on the FDIC findings, the Southeast ADA Center, a project of the Burton Blatt Institute at Syracuse University, surveyed 260 people with disabilities to understand why these disparities exist and developed a self-assessment tool for banks to measure their progress toward full inclusion for customers with disabilities.

The study revealed that many people with disabilities, although they were regular bank customers, felt unwelcomed or disrespected by bank employees. More than half of the participants reported that their bank branch building was physically inaccessible. Additionally, participants believed their bank's mobile, or internet banking apps, ATMs, and telephone banking options were not accessible to them. Most respondents contacted the bank when they encountered accessibility challenges. However, respondents did not feel that banks were receptive to their concerns, and almost one-quarter either changed banks or chose not to use the inaccessible service. It should be noted that people with higher levels of financial skill were more likely to feel respected and welcomed at their bank and more likely to regularly use online banking options.

The findings highlight not only gaps in accessibility features but also the need for banks to commit to training their staff on disability etiquette and enhanced customer service to customers with disabilities. In describing their experiences, many respondents provided comments on how the actions of front-line bank staff made them feel unwelcomed, judged, or dismissed. Findings also suggest that banks should assess their physical locations and electronic banking technology to ensure that they are ADA compliant.

The findings of this study present an opportunity for banks and credit unions to develop a culture of inclusion where all customers are welcomed and valued. The study also illustrates the need for financial education initiatives that result in enhanced financial skills and higher levels of customer satisfaction for customers with disabilities.

¹ Federal Deposit Insurance Corporation (FDIC), How America Banks: Household Use of Banking and Financial Services, 2019 FDIC Survey (October 2020).

Responsibility of Banks under the Americans with Disabilities Act

The four foundational pillars of the Americans with Disabilities Act (ADA) are to (1) assure equality of opportunity, (2) full participation, (3) independent living, and (4) economic self-sufficiency for people who have disabilities.² Access to affordable and inclusive financial services is an important aspect in reaching these goals. However, research shows that Americans with disabilities are three times more likely to be unbanked than those without disabilities.³ Even if they use a traditional bank, they are less likely to use ATMs or mobile apps and more likely to prefer to use cash rather than electronic bill payment methods. They are also more likely to combine traditional bank services with alternative banking such as pay day lending or pawn shops. Additionally, they are less likely to use credit or establish savings accounts that protect them from unforeseen expenses.⁴

Under Title III of the ADA, banks are considered “places of public accommodation”.⁵ Title III of the ADA prohibits discrimination based on disability in businesses that offer goods or services to the public. Banks have a responsibility to ensure buildings are fully accessible and without barriers to people with disabilities. Banks have obligations to make reasonable modifications to policies and practices so that people with disabilities have equality of opportunity when using banking services.

Banks must also consider the method of communication preferred by customers with sensory disabilities. For example, simple bank services like making a deposit can be accomplished by simply passing notes between the customer and bank employee, if staff training includes disability awareness and etiquette. More complex services, like home mortgages and car loans, require customers with disabilities to fully understand the terms and conditions of the loan and requires effective communication in the preferred method of the customer such as a sign language interpreter, and provided at no cost to the

² Legal Information Institute. (n.d.). *42 U.S. Code § 12101 - findings and purpose*. Legal Information Institute. Retrieved March 14, 2022, from <https://www.law.cornell.edu/uscode/text/42/12101>

³ Raja, D. S., Narasimhan, N., D’Intino, P., Maheshwari, V., & Montenegro, V. (2015). Inclusive financial services for seniors and persons with disabilities: global trends in accessibility requirements. Global Initiative for Inclusive Information and Communication Technologies.

⁴ Goodman, N., & Morris, M. (2019). *Banking status and financial behaviors of adults with disabilities: Findings from the 2017 FDIC National Survey of Unbanked and Underbanked Households and Focus Group Research*. Washington, DC: National Disability Institute. Retrieved March 14, 2022 from <https://www.nationaldisabilityinstitute.org/reports/banking-status-and-financial-behaviors-2019/>

⁵ U.S. Department of Justice. (2017, January 17). *Americans with disabilities act title III regulations*. Nondiscrimination on the Basis of Disability in Public Accommodations and Commercial Facilities. Retrieved March 14, 2022, from https://www.ada.gov/regs2010/titleIII_2010/titleIII_2010_regulations.htm

customer. The ability of loan officers to communicate more effectively with their customers with disabilities may also be enhanced by staff disability awareness training.

The ADA was signed into law before the emergence of the internet as a means of e-commerce. However, the Department of Justice (DOJ), for the past 20 years, has upheld that under the ADA Title III requirements that goods, services, privileges, or activities provided by “places of public accommodation” must be fully accessible and applies to websites.⁶ The DOJ reiterated this guidance on March 18, 2022, that Title II (state and local governments) and Title III (businesses open to the public) entities must make sure their websites are fully accessible to people with disabilities in line with the ADA’s requirements. The DOJ has consistently taken the position that the ADA requirements apply to all the goods, services, privileges, or activities offered by public accommodations, including those offered on the web, as illustrated by the following cases.⁷

- In 2021, in the case *Gil v. Winn-Dixie* the Eleventh Circuit Court reversed a lower court ruling claiming that website accessibility was not a violation of the ADA, in opposition to guidance from the U.S. Department of Justice. This case will likely be appealed to the United States Supreme Court.⁸ To learn more about [Gil v. Winn-Dixie](#), listen to the [Disability Rights Today podcast](#) available at disabilityrightstoday.org/gil-winn-dixie-podcast/.
- In 2017, the Ninth Circuit Court of Appeals ruled in *Robles v. Domino’s Pizza* that Domino’s website and mobile app were not accessible to a customer who was blind. On June 23, 2021, the Central District of California ordered Domino’s to make its website accessible in accordance with the Web Content Accessibility Guidelines (WCAG), version 2.0.⁹
- Other notable cases include the Bank of America structured negotiation settlement in 2000¹⁰ and the Charles Schwab accessibility agreement in 2012.¹¹

⁶ U.S. Department of Justice. (2018, September 25). [Letter to The Honorable Ted Budd, U.S. House of Representatives](#). Retrieved March 14, 2022, from <https://www.adatitleiii.com/wp-content/uploads/sites/121/2018/10/DOJ-letter-to-congress.pdf>

⁷ U.S. Department of Justice. (2022, March 18) [Guidance on Web Accessibility and the ADA](#). <https://beta.ada.gov/web-guidance/>

⁸ Southeast ADA Center. (2022, February 3). [Gil v. Winn-Dixie \(2021\)](#). Southeast ADA Center. Retrieved March 14, 2022, from <https://adasoutheast.org/court/gil-v-winn-dixie-2021/>

⁹ Southeast ADA Center. (2021, October 10). [Robles v. Domino’s Pizza LLC](#). Southeast ADA Center. Retrieved March 14, 2022, from <https://adasoutheast.org/court/robles-v-dominos-pizza-llc/>

¹⁰ Feingold, L. (2018, April 3). [Bank of America California and Florida Agreement](#). Law Office of Lainey Feingold. Retrieved March 14, 2022, from <https://www.lflegal.com/2000/03/bank-of-america-initial-agreement/>

¹¹ Feingold, L. (2012, May 2). [Charles Schwab Web Accessibility Agreement](#). Law Office of Lainey Feingold. Retrieved March 14, 2022, from <https://www.lflegal.com/2012/05/schwab-agreement/>

Purpose of Study

The most recent biannual FDIC survey “How America Banks,” shows that 13% of people with disabilities in the Southeast region were unbanked compared with 5% of those with no disability. Additionally, the study found that only 43% of people with disabilities had bank credit (credit card or personal loan) compared with 71% of those without disabilities. Many unbanked people with disabilities turn to predatory financial services for their financial needs. In fact, compared to people without disabilities, the FDIC data shows people with disabilities in the Southeast are twice as likely people in other regions to use alternative financial services such as check cashers, payday loans, pawn shops and rent-to-own shops.¹²

To understand why these disparities exist, document the types of barriers people with disabilities face while trying to use the banking system, and recommend strategies to close the gap, the Southeast ADA Center is working with local disability organizations in each of the eight states in the region (Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, South Carolina, and Tennessee).

On-line Survey: The partnership recruited 260 people with disabilities to respond to an on-line survey. The sample was diverse in terms of race, ethnicity, types of disability, income, education, and geography (urban, suburban, small town, rural). The survey included open-ended questions that gave respondents the opportunity to describe their banking experience. See below for methodology.

Self-Assessment Tool: To help banks close the type of gaps identified in the survey, the Southeast ADA Center developed and tested an assessment tool, the Quality Indicators Financial Inclusion Tool (QI-FIT)- The QI-FIT was developed in collaboration with representatives from banks and people with disabilities using a participatory action research (PAR) method to ensure that all views were represented. The QI-FIT assesses the strategy and internal leadership of banks, the accessibility of customer support and communication, physical accessibility of banks, the delivery of traditional banking products and financial services, and the financial education and counseling offered by the bank. The QI-FIT also evaluates inclusion and disability relations groups internal to the bank, inclusive community development partnerships the bank engages in, and the alternative credit scoring and lending practices of the bank. The QI-FIT relies on forty-eight indicators to assess bank performance in accessibility and customer service to the disability community. Banks may use part, or all, of the instrument to conduct a self-evaluation. The tool may be

¹² Federal Deposit Insurance Corporation (FDIC). (2021, December 17). [*How America Banks: Household Use of Banking and Financial Services, 2019 FDIC Survey*](#). [Data set]. Author’s analysis of raw survey datasets.

downloaded at: <https://adasoutheast.org/wp-content/uploads/2022/03/FROG-FIT-QIFI-checklist.pdf>.

Findings from Survey

Feeling Unwelcomed

In the study, more than one-third of respondents reported that they felt unwelcomed when they visited their bank branch. Many of the responses we collected illustrate that banks do not adequately train their staff on basic disability etiquette. Participants in the study remarked:

- *The banker spoke to my dad instead of addressing/talking to me. It was like I wasn't even there. I was a nobody.*
- *They talk over me while I am in my wheelchair. They literally do not address me.*
- *I have a learning disability that affects math ability. I often feel like people in the banking industry think I'm stupid.*
- *[The bank staff] were concerned about my service animal. They asked if he could wait outside. I told him "No," that he was a service animal and [I] had to show [them] the law. Finally, they agreed that he could stay inside. But that was after I showed them the law.*

Lack of Respect

27% of respondents "often" or "sometimes" did not feel respected in their banking encounters. Eighty percent attributed this disrespect to their disability or their disability along with other personal characteristics such as income, race, gender, or gender identity.

- *I think my experience with feeling mistreated has more to do with class than disability, but likely it's both. My financial history has a lot of student debt, and this is often viewed as "irresponsible" by financial institutions, and often seen as indicative of future behavior. Combined with disability, this produces some preconceived notions about a person's ability to maintain income [or] have a steady job.*
- *I am short in stature; therefore, the bank employees mistake me for a child. I have been asked if I wanted candy or if I am lost and looking for my parents. Other times I was ignored because the employees couldn't see me over the countertops.*

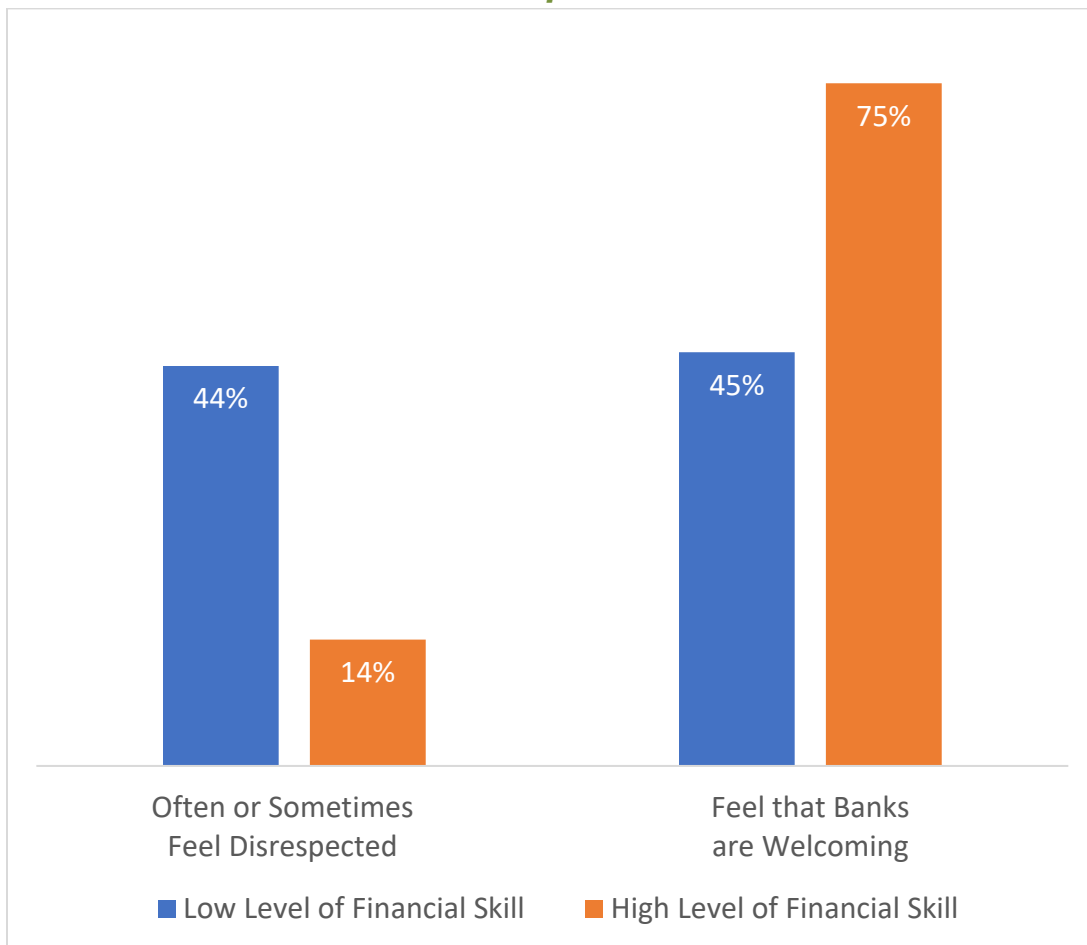
The study included a series of seven items developed by the Consumer Financial Protection Bureau (CFPB) to measure Financial Skill.¹³ Respondents were asked on a five-point scale

¹³ Consumer Financial Protection Bureau. (2018). Measuring financial skill: a guide to using the Bureau of Consumer Financial Protection's Financial Skill Scale, 2018.

how statements such as “I know how to get myself to follow through on financial intentions” describe their situation.

Controlling for other characteristics, people with disabilities who had higher levels of financial skill were significantly more likely to feel the banks were welcoming and less likely to feel they had been disrespected. This may indicate that bank staff were more liable to have a positive bias toward people with higher levels of financial awareness and have a negative bias toward those customers with less financial awareness, irrespective of their disabilities. This illustrates the need for banks to make financial awareness classes available to all their customers. When asked if they would use bank financial education classes or counseling, 44% of study respondents said “yes”, 37% said “maybe”, and only 16% said “no.”

Chart 1: Financial Skill and Respect



Offering and providing financial education and counseling are an opportunity to reach groups who are often overlooked within the disability community and among other

minority groups. The survey found African Americans were much more likely to say they would use the financial education program than White respondents (66% of African Americans would “definitely use” the service compared with 37% of White respondents) and 75% of veterans with service-connected disabilities said they would use the service.

It is critical that these services are designed to accommodate a range of cognitive and sensory differences as people with hearing, seeing and cognitive disabilities were more like than others to use financial education and counseling.

Bank Branch Accessibility

Eighty percent of respondents used the bank at least once in the past year and 35% used a bank branch at least once per month. Many chose this banking option because they needed cash. Others report that they prefer banking in person rather than using online or mobile apps or feel they need to develop a personal relationship with bank employees in case they need help. African American respondents were almost twice as likely to use the bank branch regularly than White respondents.

Fifty-three percent of deaf respondents sometimes or often had difficulty communicating because there was no sign language interpreter.

- *You tell the person you have a hearing loss & they immediately start screaming. This does not work. It just makes me tense. Find another way. Write it down. I do have Google Transcribe, which works very well, but internet access is needed to use [it].*
- *My friend who communicates with an augmented speaking device kept being ignored and they instead kept trying to talk through me.*

Fifty-two percent of people with mobility disabilities reported issues with the physical accessibility of bank branches.

- *My previous bank's local branch was extremely inaccessible. On more than one occasion, I had to argue with them about trying to get any sort of service in the lobby. I ended up moving to a different bank with online service available.*
- *They put plants on the lower teller counter.*
- *I used to use a bank that required me to stand in long lines in a retail store. As a person with back problems where standing causes pain or worsens pain, this was unacceptable to me.*

Twenty-four percent of respondents felt like bank staff did not want to take extra time to help them or answer their questions.

- *I am blind and a cane traveler. Sometimes bank tellers will take everyone else in line, skipping me, and only address my needs when all other customers have been*

assisted. I see me and other people with disabilities being talked to like we are stupid children.

- *Requested to make a deposit and let them know I needed help filling out deposit slip. Was told I would need to bring someone with me.*

Twenty-four percent of respondents felt the bank staff judge them.

- *I felt like I was being judged because I did not understand why certain fees happened.*
- *I really hate getting that "poor you" look when I have had to ask for assistance. Assistance like seeing where the card goes in and seeing which door to leave out of.*

Challenges with Mobile and Internet Banking

FinTech applications like mobile internet banking and banking apps have dramatically changed how we bank in the past five years. As a result, the integration of mobile internet platforms and financial instruments has generated innovation in financial products.¹⁴ But is the mobile banking experience equal for customers with and without disabilities?

Almost 80% of respondents used mobile or internet banking at least at least once per month. Respondents who were higher income, rural residents, or people with mobility disabilities were most likely to use the service regularly. Most people report using it because it is more convenient than other options (86%) or because it has helpful features (46%).

For those who do not use mobile or internet banking, 45% report not having access to a smart phone or computer, 36% find it easier to use another banking method, and 12% feel they do not have the required technical skills.

- *I am not a computer savvy person. I find online banking confusing and not secure.*
- *I do not trust mobile apps as the data is transmitted often either in whole or in part over unsecured WIFI connections both to and from the apps data center.*

Screen reader technology allows people who are blind or have low vision to use digital content. Among the 48 respondents who used a screen reader or other assistive technology to access a bank's website or mobile apps, 85% reported having "a little problem" or "a major problem" with site accessibility. Well-designed accessible websites and apps are also important to people with other disabilities including people with cognitive differences or challenges with fine motor skills.

Seventy percent had difficulty with CAPTCHAs.

¹⁴ Chen, Z., Li, Y., Wu, Y. et al. *The transition from traditional banking to mobile internet finance: an organizational innovation perspective - a comparative study of Citibank and ICBC*. *Financ Innov* 3, 12 (2017).
<https://doi.org/10.1186/s40854-017-0062-0>

- *Audio captchas are difficult to hear and understand. They need to be slower and clearly stated.*
- *Please use more blind friendly CAPTCHAs, where the speaker button is easier to find by adaptive software.*

Sixty-four percent cited difficulty using the camera to take a picture of a check.

- *I need to be able to deposit checks into my account using the features of the banking app and the camera on my phone. Unfortunately, no app that I have used indicates to me when my check is in the frame and whether I would be sending the image upside-down. It would also be helpful if the apps could indicate where I need to endorse the check I am depositing. For now, depositing checks is something much easier to do at a branch, as the teller can indicate to me where I need to endorse my check and can deposit it for me. There are many apps that can recognize text and other objects in images in real time, so it should be possible to integrate these features into the mobile deposit portion of a banking app, something that could be turned on or detect that a screen reader is running.*
- *I always have to have sighted assistance to deposit a check.*

Sixty-one percent reported poor link information.

- *Mobile app does not work with any screen reading software on the market. I have had to move banks to access my finances.*
- *Drop-down menus seem to always be a problem on my mobile phone. I use an Apple iPhone SE 2020 with the most updated iOS.*
- *More detailed instructions would be helpful. When it comes to transferring money, for example.*

Fifty-one percent had difficulty with passwords.

- *I understand that is not very secure, but people with cognitive disabilities or memory loss struggle to remember their passwords each time.*
- *Most online banks don't use standard website accessibility standards. Plus, some [features] time out and it takes me longer to go through the site due to my disability. It would be easier if they can use facial recognition or some other secure method for account access.*

Fifty-nine percent cited poor legibility because of color contrast or text layout.

- *They could make the web pages less confusing. The items feel all jumbled up and not always in a logical sequence.*
- *The icons need to be more spread out, so you only hit the one you want.*
- *[Bank] website: Pages are "busy". If I enlarge the fonts (control+) then some key icons (like "Pay") are no longer visible on the screen (without scrolling).*

- *Editing recurring money transfers is confusing ("Edit Next" vs "Edit Schedule" when [I] just want to adjust the amount). Search is terrible.*

Customers with disabilities reported other challenges, from difficult to fill-in forms (55%) to distracting moving images and graphics on the page (51%). Respondents identified multiple ways to make the apps more useful including improving the appearance and layout of the website or app, simplifying the log-in process, including more assistive technology features, and enhancing safety and security.

Some respondents said they were not familiar with different ways the bank app interacts with the accessibility features on their device, or they used older devices. For example, several respondents mentioned challenges with enlarging the display or having voice over. This highlights an opportunity for banks to provide training and one-on-one support to help bank customers use all available mobile or internet banking features.

ATM Challenges

Despite improvements in ATM accessibility in the past 30 years, ATMs continue to present accessibility issues for people with disabilities. Seventy three percent of our respondents used an ATM at least once during the past year and 42% use ATMs at least once per month. The study reflected that people in large cities and those with hearing impairments were more likely to regularly use an ATM.

Fifty-five percent of blind respondents reported often having difficulty finding an ATM with audio output and 59% of all respondents had difficulty finding an ATM in a safe location.

People with mobility limitations (59%) had difficulty finding an ATM that is accessible for wheelchair users.

- *When ATM machines are not accessible for a wheelchair, I occasionally use the drive-thru teller and can't use the remote. Plus the teller lane is reserved for business banking only.*

Telephone Banking

Sixty percent of respondents used telephone banking at least once during the year and 25% relied on telephone banking at least once per month. People who are blind or have low vision and veterans with service-connected disabilities are most likely to use the service regularly. Also, African Americans were much more like to use the service than White respondents.

Seventy-six percent of respondents with hearing impairments reported that the bank would not accept a call from the video relay service, claiming they could not verify the identity of the caller.

- *Video relay interpreters are always problematic because of confidentiality “concerns”. This has caused me to have to go in the bank which has been inconvenient, especially during COVID. My husband, who is hearing, also tried to help by calling directly for me and it was a mess.*
- *Sometimes on the phone they are not patient with me when I don't have my account numbers and I can't read numbers back to them very easily because of my vision.*

Positive Experiences

Although many people experienced negative experiences, some respondents had positive experiences with their bank. Most of the positive comments centered on the ease of use of their bank's digital technology.

- *I can enlarge the font and see it very clearly and I don't have to worry about time.*
- *I use an iPhone with Voiceover, and I do not experience accessibility problems with my bank's app.*
- *During use, staff will ask you for feedback, and the service attitude is very good.*
- *My checking can be transferred directly between individual users. For example, when a group of people are traveling, one person books a hotel. Then, if all the others have the same bank checking, they can directly pay the money back to the person who paid first. Unlike Bill-pay, instant payment is convenient.*
- *I love my banking app!*
- *I use a small-town branch and their website does everything I need it to do.*
- *My bank recently added mobile check deposit. That was really helpful because going to the bank is difficult for me. My only issue now is depositing or withdrawing cash.*
- *My bank website is user friendly for me. The type is large, and the directions or prompts are easy for me to follow.*
- *I am proficient in using the services available in my banking app; it is easy to understand and use daily.*

How Banks Can Improve the Customer Experience for People with Disabilities.

Based on what we learned from survey respondents with disabilities, there is an opportunity for banks not only to improve their customer services for people with disabilities but also to consider a variety of actions that are responsive to ADA requirements and promote economic self-sufficiency, independent living, equal opportunity, and full participation of people with disabilities. Actions include:

1. **Conduct Self-Assessment:** Regularly conduct a top-down assessment of all products and services to gauge the accessibility of the bank's physical and on-line services for customers with disabilities using the Quality Indicators-Financial Inclusion Tool (QI-FIT).
2. **Consider creating a Disability Customer Advisory Group:** This group could provide ongoing identification of challenges and solutions.
3. **Leverage Community Reinvestment Act (CRA) activities to invest in the disability community:** The Community Reinvestment Act (CRA), as its purpose, can revitalize low-income neighborhoods through services, investments, and lending. Banks may receive CRA credit for providing financial literacy education and counseling to improve the financial knowledge and skills of customers that inform to sound financial decisions. As our study illustrated, individuals who reported higher levels of financial skill were significantly more likely to feel the banks were welcoming to people with disabilities. Other CRA activities could include expanding affordable credit for small business development and homeownership for low to moderate income (LMI) individuals with disabilities and encouraging bank staff to sit on non-profit boards or volunteer at community organizations that serve people with disabilities.
4. **Make reasonable accommodations to banking policies and practices:** Survey respondents identified multiple areas for improvement. For example:
 - Modify website to ensure it is fully accessible and responsive to the needs of customers with different types of disabilities.
 - Provide products and services in alternate formats such as Braille, large print, and audio formats for customers who are blind or have low vision.
 - Offer accessible credit cards and bank statements.
 - Maintain a contact list of Sign Language interpreters for Deaf or hard of hearing customers who request interpreting for more complex processes such as loans and mortgages.
5. **Train Staff:** Banks should be welcoming to people with disabilities by first raising staff awareness on how to better serve customers with diverse disabilities and modifying bank practices to meet their individual needs. This also requires training of all bank staff to improve customer service to people with disabilities, including customers with acquired disabilities as the result of aging or accident.
6. **Include Disability in Diversity Initiatives:** Hire people with disabilities at all levels and ensure that advertising and messaging is inclusive of people with disabilities.

To firmly secure the four foundational pillars of the ADA – economic self-sufficiency, independent living, equal opportunity, and full participation - banks should be the model for accessibility and go above and beyond the minimal requirements set by the ADA. These four pillars must be at the forefront of a bank’s commitment in its policies and procedures as we build inclusion for all.

Recommended Citation

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