Introduction

People with disabilities face persistent barriers to economic security, as reflected in their dramatically higher rates of poverty and under-employment compared to people without disabilities. In 2023, an estimated 24.2% of non-institutionalized adults with disabilities lived in poverty – substantially higher than the percentage among those without disabilities. This economic disadvantage is further compounded by lower employment rates: only 37.4% of people with disabilities (ages 16–64) are employed, compared to 75.1% of those without disabilities. In addition, people with disabilities typically earn less — median annual earnings are nearly $10,000 lower – and are much more likely to experience prolonged periods of poverty and bear higher costs for essentials such as housing.

The disability service system provides supports aimed at helping individuals with disabilities gain greater economic independence. State vocational rehabilitation agencies (SVRAs), in particular, play a vital role by helping people with disabilities obtain and maintain employment. Their impact is amplified by federal matching funds; for every $1 a SVRA receives, it can draw down an additional $3.69 in federal resources to support employment initiatives.

Yet, there are additional programs with untapped potential to further advance economic opportunities – such as the Community Reinvestment Act (CRA). The CRA is a federal regulation designed to encourage banks to meet the credit needs of low- to moderate-income (LMI) households. Banks can fulfill these obligations through investments (e.g., grants), service activities (e.g., financial education), or loans (e.g., small business loans or funding for training centers). The disability community represents a key target population for banks seeking to meet Community Reinvestment Act (CRA) criteria, as research shows that approximately 65% of individuals with disabilities receive one or more needs-based public benefits – underscoring their alignment with low- to moderate-income (LMI) designations and the importance of targeted community investment. The intersection of the CRA and SVRA funding holds tremendous, yet underutilized opportunity for advancing one of the core goals of the Americans with Disabilities Act (ADA): economic self-sufficiency. By leveraging CRA investments as matching funds, SVRA have the potential to unlock additional federal resources to support employment initiatives for people with disabilities.

This innovative and transformative approach was piloted by National Disability Institute (NDI) with support from VRTAC-QM. In Florida, a $10,000 bank investment generated an additional $36,900 in federal funds, while in North Carolina, a $20,000 investment unlocked $73,800 – empowering agencies to address local employment barriers for individuals who are blind.

The following case examples further illustrate the profound impact that community investment partnerships can have in expanding employment opportunities for people with disabilities. These examples reflect more than financial outcomes; they showcase how strategic collaboration can move communities from disparities toward inclusion and empowerment.

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Case Study #1 – Building Digital Literacy Through Innovative Bank Partnership – A North Carolina Division of Services for the Blind Pilot

Background and Challenge

The Division of Services for the Blind (DSB), part of North Carolina Department of Health and Human Services (NCDHHS) faced a common barrier for SVRAs of not having enough funding for the agency to fully utilize its federal match grant.

In 2024, DSB was approached by National Disability Institute (NDI) to participate in a pioneering pilot project to test the hypothesis that leveraging Community Reinvestment Act (CRA) investment from banks could increase employment opportunities for people with disabilities by increasing the federal match a VR agency could receive. This collaboration created an unprecedented opportunity for both innovation and expanded service delivery.

National Disability Institute leveraged an existing relationship with SouthState Bank to test the hypothesis with DSB. SouthState Bank agreed to provide a $20,000 CRA investment to DSB that would then allow DSB to draw down an additional $73,800 of funds, providing a total of $93,800 to support the employment needs of individuals.

Program Overview

DSB began to evaluate the best opportunity for these resources. Data from a 2023 National Skills Coalition report showed that up to 92% of jobs required some level of digital literacy. DSB's own experience echoed these findings — many consumers lacked the fundamental digital skills required for modern employment, such as keyboarding, navigating mobile apps, and using Microsoft Office. This led to the creation of Building Digital Literacy Through Partnership.

Three Phases of Project

- Phase one allowed for the training of community college instruction staff on visual impairment basics, keyboarding instruction using simulators, creating accessible documents, orientation and mobility fundamentals and student panel discussions.
- Phase two included the actual training for seven individuals with visual impairments on digital literacy.
- Phase three included identifying resources and next steps for the individuals trained.

Key Findings

Internal Buy-in and Education

- Early involvement of the Chief Financial Officer (CFO), budget officers, and executive leadership ensured internal understanding and support.
- Agency staff, including VR counselors and fiscal teams, were educated about CRA and the specific requirements for these matched funds.
- Generated enthusiasm and motivation among the team members involved in building the program.

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Compliance and Transparency

- All participants met low- and moderate-income (LMI) requirements under the CRA.
- Procedures were set up for tracking and coding all expenditures. Internal meetings reinforced eligibility, referral, and documentation processes.

Relationship and Partnership Development

- Multi-sector partners — state, nonprofit, higher education, and private bank — were all actively engaged, demonstrating to the bank a broad impact and sustainability.

Ease of Administration

- Funds were released and deployed with unprecedented speed and no major barrier s— “the easiest money we have ever received.”

Outcomes and Impacts

Programmatic and Organizational

- **Expanded Service Reach**: Agency delivered digital skills training to consumers who would not otherwise have been served.
- **Team Innovation**: The project fostered strong collaboration and creative problem-solving among staff.
- **Scalability**: The pilot demonstrated potential for future expansion and interest by the agency staff.

Participants

- **Skill Development**: Participants gained essential technology skills, increasing their employability. Training in new skills sparked excitement and engagement among participants involved in the program.
- **Personal Growth**: Participants experienced increased social confidence, engagement, and peer support. Training allowed participants to not only grow in their technological skills but also socially and emotionally. The training fostered a sense of community, and individuals who initially reported social anxiety gained the confidence to step up and offer support.
- **Community Building**: The classroom fostered intergenerational community and new peer networks.
- **Leadership Opportunities**: Participants with strong assistive technology skills served as classroom aides, gaining work experience.

Agency Learning

- The project surfaced additional needs and support gaps among consumers, which will inform future programming.
- Strong communication with fiscal and program teams ensured smooth administration, helping set a best-practice template for future bank partnerships.
- Engagement of team was key and enhanced teaming environment.

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Best Practices for Duplication in Other Agencies

- **Secure buy-in across all levels**, including state fiscal staff, before launching innovative funding models and programs.
- **Educate internal teams** and external partners about CRA and compliance requirements.
- **Track and communicate impact** – share stories and outcomes with funders and other partners.
- **Build robust back-office systems** for tracking, coding, and compliance.
- **Engage multi-sector partners** to strengthen program design, impact, and appeal to bank partners.
- **Replicate and scale**: DSB now has additional project ideas and plans to pursue more partnerships.

Conclusion

This pilot demonstrated that collaboration among SVRA, educational institutions, nonprofit organizations, and financial institutions can unlock new resources, overcome funding barriers, and deliver life-changing outcomes for individuals with disabilities. With CRA-aligned partnerships and careful planning, agencies can both expand their impact and create scalable, replicable models for service delivery.

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Case Study #2 - South State Bank's Innovative Approach to CRA Partnerships Advancing Opportunities for People with Disabilities

Background and Challenge

SouthState Bank, a $65 billion financial institution and the 25th largest bank in the U.S., operates 389 branches across eight states including Colorado, Texas, the Carolinas, Florida, Alabama, Georgia, and Virginia.

Financial institutions like SouthState Bank have regulatory obligations to advance the credit needs of communities particularly under the Community Reinvestment Act (CRA). Banks are regulated by one of three federal regulatory agencies (Office of the Comptroller of the Currency, Federal Deposit Insurance Corporation or Federal Reserve Bank) to assure they are meeting their duties under CRA. A key factor in CRA compliance is that activities serve low to moderate income communities through a variety of activities that include workforce development.

Key Considerations in Selecting CRA-Eligible Partnerships

- **Geographic Alignment**
    - The opportunity must fit within the bank's physical footprint, known as the assessment area. For example, programs benefiting Orlando, Florida, fit if the bank has operations there.
- **Low- and Moderate-Income (LMI) Impact**
    - Activities must primarily benefit LMI individuals or communities, defined as those earning 80% or less of the area median income.
    - Both the direct beneficiaries and the geography served are included in this determination.
- **Alignment with Core Values**
    - The partnership aligns with the bank's core values, such as "greater purpose" and commitment to long-term, reciprocal relationships — ensuring cultural and strategic fit.

The Pilot and Proof of Concept

Based on these considerations, SouthState Bank partnered with state agencies and disability advocacy organizations – including the Division of Blind Services and National Disability Institute — to pilot the use of CRA investments in supporting workforce development for people with disabilities.

Key Innovations and Success Factors

- **Positive CRA Consideration**
    - The pilot investment was recognized by regulators as a qualified CRA activity, demonstrating its alignment with CRA goals.
- **Demonstrable Return On Investment (ROI)**
    - The $20,000 investment generated nearly 4.7 times the original amount in community impact. This return on investment became a compelling example of the initiative's impact.
- **Storytelling and Measuring Impact**
    - Success was attributed not just to the capital invested but to the ability to clearly measure and share the resulting impact, aligning with the CRA "performance context" requirement which considers the economic, demographic, and other local conditions affecting community needs and bank performance.

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Bank Perspective: Building Effective Partnerships - What Banks Look For

- **Reciprocity and Long-Term Engagement**
  - Effective partnerships are not “one-and-done,” but span multiple cycles and include active communication and shared goals.
- **Multi-Pronged Involvement**
  - Ideal relationships hit all three activities of CRA:
    - *Investment*: Grants
    - *Service*: Volunteering, board participation, and financial education
    - *Lending*: Providing capital or credit lines for operations or capital projects
- **Deep Organizational Involvement**
  - Engaging with the nonprofit beyond financial support – including staff volunteering, client engagement, and strategic advice – strengthens understanding and trust.

Lessons Learned & Best Practices

- **Timing Matters**
  - The best time to approach banks for CRA-based investments or volunteer partnerships is typically between March and June, before budget planning cycles begin in August.
- **Contact Approach**
  - While relationship-building is paramount, initial outreach often starts via email — ideally through the bank's investor relations page. However, preferences vary: some stakeholders are more responsive to other forms of communication.
- **Regulatory Communication**
  - Sharing positive regulatory feedback (such as OCC performance evaluations) about pilot investments reassures potential bank partners and accelerates engagement.
- **Patient Relationship Development**
  - Immediate requests for funding without relationship-building are less effective; trust is built through mutual understanding and repeated collaboration.
- **Replicability**
  - The proven ROI and positive regulatory outcomes serve as a compelling narrative for expanding similar partnerships – incentivizing other banks to invest.

Conclusion

SouthState Bank’s partnership demonstrates that strategic, value-aligned bank partnerships can effectively accelerate economic advancement for people with disabilities while delivering compelling returns and regulatory approval. The combination of geographic alignment, LMI focus, robust impact measurement, and authentic relationship-building makes this partnership a replicable model for institutions seeking innovative approaches to CRA compliance and social impact.

Note: This document was created by National Disability Institute (NDI) on behalf of the VRTAC-QM, a project funded by the U.S. Department of Education.

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