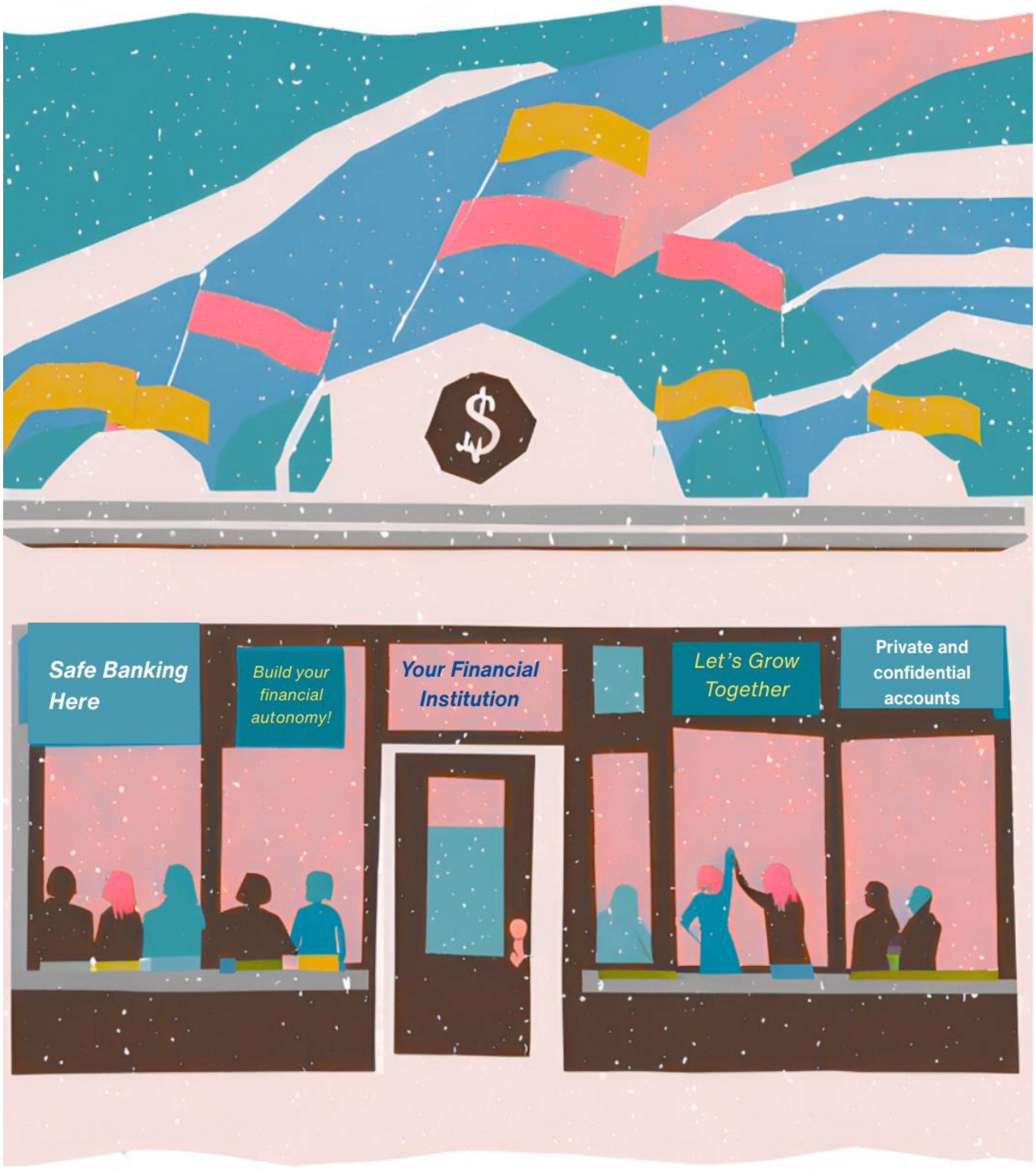
Playbook: The Role of Financial Institutions in Responding to Domestic Financial Abuse



GRAMEEN FOUNDATION

BAN KI-MOON Foundation

Foreword

When we launched the Ban Ki-moon Foundation in 2022, we knew that our mission to accelerate impact toward the 2030 Agenda would require a few key ingredients - including bold investments in the leadership of women and other historically marginalized communities; intersectional, systemic change efforts across industries; and innovative cross-sector partnerships.

As we have advanced our work, we have particularly sought to amplify forward-thinking ideas that accelerate progress toward the Sustainable Development Goals (SDGs), as well as promote transformational changes within public discourse and collective action that will lay the foundation for a more equitable post-2030 world. One such critical issue that needs our urgent attention is financial abuse—a pervasive yet often overlooked form of economic coercion affecting nearly 99% of domestic violence cases.

As a key driver of intergenerational cycles of poverty and inequality within the U.S. and globally for women and children, there are clear intersections with multiple current SDGs, including SDG 1 (No Poverty) and SDG 5 (Gender Equality). Additionally, when financial inequities such as unfair wages and inadequate protections are allowed in the workplace, SDG 8's vision (Decent Work and Economic Growth) is obstructed. Meanwhile, SDG 16 (Peace, Justice, and Strong Institutions) is compromised when financial systems are manipulated to suppress dissent or when weak legal frameworks fail to protect individuals from economic coercion. It is clear that without significant intervention, these interlinked issues of financial abuse and gender-based violence will continue to undermine the economic security of women and children, as well as global development efforts.

That is why *The Playbook on the Role of Financial Institutions in Responding to Domestic Financial Abuse* is so timely and essential. It provides actionable strategies for policymakers, financial institutions, and advocates to address financial abuse, while building inclusive financial systems that align with the SDGs. We are also heartened by the potential for cross-regional learning and collaboration on these topics, with growing examples of progress in Australia, Canada and France that actors in the United States can learn from.

We are deeply grateful to leaders in the field, including Grameen Foundation and all those on the frontlines dedicated to addressing financial abuse and fostering inclusive economic systems. The time has never been more urgent to dismantle systemic barriers that perpetuate such financial inequities and cycles of violence. It is imperative that we ensure that financial systems work for, rather than against, the most vulnerable.

Together, we can take meaningful steps toward a more just and equitable future that truly leaves no one behind.

Kate Landon, Executive Director, Ban Ki-moon Foundation

Preface

Grameen Foundation USA (Grameen) is a global nonprofit dedicated to creating economic opportunities for women through financial inclusion, entrepreneurship, and climate resilience in low-and-middle income countries (LMICs). Our **Invest in HER Power** strategy focuses on dismantling systemic barriers and ensuring women have access to the resources, capital, and support they need to thrive.

For six years, Grameen explored how to incorporate domestic violence prevention and response into women's economic security programming. Most of Grameen's efforts have come in the form of helping financial institutions (FIs, including microfinance institutions, credit unions, and non-profit banking institutions, etc.) understand how to raise awareness among staff and clients about domestic abuse, design training or interventions to help prevent domestic abuse (such as including spouses in trainings or facilitated dialogues), and link clients to domestic abuse support services.

Financial abuse, a form of domestic abuse, has a direct link to our work in women's economic security, even though it was not immediately apparent how to make attention to it an imperative for FIs. First, financial abuse is rarely acknowledged as a form of domestic abuse, even among people who experience it, and not all laws include it as a form of domestic abuse. Second, there is no standard way to measure it, which results in it not being well-understood nor are experiences of financial abuse well-documented. Third, experience is slowly growing in places like the United States, Australia, the United Kingdom, France and elsewhere…meaning, this is a nascent effort globally, not just in LMICs where most of Grameen's work takes place.

This playbook outlines the context and opportunities for FIs in the United States (US) to address financial abuse but its intent is to describe emerging best practices and inspire innovation among FIs located anywhere in the world, especially among those serving the most vulnerable. As the review of this playbook ended, a retail banker, who wished to remain anonymous, shared with us, "**I have sat across the desk from many victims, I have been in many difficult and oftentimes scary conversations, I have been threatened by abusers, my customers were physically shaking and scared without hope, I did not have "approved" tools to provide and help the conversation. I wish I had these resources available to support the many victims I have encountered."** We hope this playbook is just the beginning for inspiring FIs to respond to financial abuse in the United States, and beyond.

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Executive Summary

Financial abuse, a form of domestic abuse, involves controlling or restricting an individual's access to economic resources, which can severely impact financial stability and overall well-being, even after leaving an abusive relationship.

The rates and costs of domestic financial abuse in the US are not well-documented; however, research suggests one in three women and one in ten men experience domestic abuse (sexual or physical abuse, stalking, or psychological aggression) at some point in their lifetime, affecting 12 million people every year. The first incidents of abuse often occur before the age of 18. Almost all (~99%) victim-survivors who report domestic abuse, experience financial abuse.

Financial institutions (FIs) play a crucial role in supporting victim-survivors of domestic financial abuse by leveraging their unique position as trusted entities in individuals' financial lives. Victim-survivors may be more likely to reveal financial abuse to FIs than to the police or other support services. To effectively respond to domestic financial abuse, this playbook outlines four key workflows that FIs can pursue:

1. **Foster a supportive internal culture** by developing internal policies and procedures that support employees who themselves are victim-survivors or perpetrators of all forms of domestic abuse. This includes providing safe leave and financial support for victim-survivor employees and establishing clear protocols for responding to threats of violence.

2. **Prepare FI employees to support clients** by conducting research to understand how abusers weaponize the FI's financial services to harm clients, incorporating explicit definitions of domestic financial abuse as misconduct an FI will watch for and respond to, developing clear procedures for responding to disclosures of abuse, and training employees on financial abuse and related procedures.

3. **Educate and support clients** by building client awareness of financial abuse through public awareness campaigns (reaching youth and adults) or private communication as well as how the FI is equipped to support them if financial abuse is suspected or disclosed.

4. **Deepen protection and support for clients** by improving product designs that expose clients to financial abuse (including coerced debt), developing innovative account management products and/or product features, and engaging FI employees as advocates for victim-survivors through collaborations with domestic abuse survivor advocacy organizations.

In conclusion, the playbook aims to inspire FIs to take a leading role in combating domestic financial abuse, ultimately supporting victim-survivors' abilities to regain control over their financial futures and contributing to their economic security and financial inclusion.

Introduction

This playbook on the role that FIs can play in responding to domestic financial abuse is the culmination of desk research, interviews with representatives from FIs and related associations, think tanks, experts in the elder financial exploitation and fraud space, domestic violence survivor advocacy organizations, experts on financial abuse, and consumer protection advocates. This playbook also draws on conversations from roundtable discussions held between February and March 2025 and subsequent consultations as individuals reviewed the playbook draft. It focuses on the United States (US) but where there are gaps in resources and experiences, it uses experiences from Australia, the United Kingdom (UK), Canada, France and elsewhere to highlight resources that can inspire action.

Section 1 lays out the definition of financial abuse and estimates rates and costs of financial abuse to victim-survivors and the broader economy.

Section 2 articulates the case for FI engagement in responding to financial abuse, lays out the foundation for FI response with existing legal, policy and programmatic foundations, and describes the anticipated challenges.

Section 3 describes four workflows that FIs can consider for responding to financial abuse.

This playbook is designed to inspire a) cross-sectoral conversations among FIs, domestic violence survivor advocacy organizations, policy makers and legal experts, b) simple—yet meaningful—actions that FIs can take to protect and respond to domestic financial abuse, and c) inform discussions and decisions on more difficult issues, such as coerced debt.

Each section outlines actions that FIs in the US could take, based on frameworks that already exist for fraud and elder financial exploitation, or based on actions taken by FIs in other countries and includes resources that could be used to support those actions. While some ideas may not work in the US—or in specific states in the US—due to variations in regulatory or legal environments, we have left them as they might spur ideas for related actions.

Section 1: Understanding Financial Abuse

Defining Financial Abuse

According to the US Department of Justice, financial abuse, a form of domestic abuse, is: "Controlling or restraining a person's ability to acquire, use, or maintain economic resources to which they are entitled." Financial abuse "includes using coercion, fraud, or manipulation to restrict a person's access to money, assets, credit, or financial information; unfairly using a person's personal economic resources, including money, assets, and credit, or exerting undue influence over a person's financial and economic behavior or decisions, including forcing default on joint or other financial obligations, exploiting powers of attorney, guardianship, or conservatorship, or failing or neglecting to act in the best interests of a person to whom one has a fiduciary duty."[1]

There are three forms of financial abuse: financial exploitation, financial control and financial sabotage.[2] See Box 1 for full descriptions.

Box 1: Form of Financial Abuse

- **Financial exploitation** can come in the form of coerced or fraudulent debt, forcing the victim-survivor[a] to take out credit in his/her own name or their partner's name, stealing the victim-survivor's identity, property or inheritance, refusing to pay bills and ruining the victim-survivor's credit score, forcing the sale of assets or liquidating accounts against their will, spending large amounts of jointly-held money without consent, damaging or neglecting assets to depreciate their value or cause financial strain.
- **Financial control** includes exclusion from financial decisions, restricting access to bank accounts held in the victim-survivor's name, enforcing strict and monitored budgets, using language barriers to misrepresent financial decisions, transactions, and documents.
- **Financial sabotage** includes filing false insurance or benefits claims, digital stalking using the memo or references fields in digital payments (such as through Venmo, Zelle, CashApp or a bank-to-bank transfer) to send threatening messages, limiting access to technology in order to control access to financial accounts and limiting access to information, training or education.

While financial abuse and financial exploitation are terms often used interchangeably in the US, financial exploitation is also used as an umbrella term which includes fraud, where a perpetrator is often unknown (such as through well-known phishing, spoofing, skimming activities often perpetrated by criminals), and financial abuse, where the perpetrator is a known family member or within a relationship of confidence or trust (such as the financial abuse examples shared above and can include elder financial exploitation or victim-survivors of domestic abuse) (See Figure 1). In the middle of this spectrum are romance scams which carry both the nature of financial abuse and scams as the victim believes they know the person who is financially exploiting them. Identity theft occurs all along the spectrum as an individual's identity is used to access financial accounts or credit without their effective consent. "Effective consent" is considered consent that is not induced by "force, threat or fraud".[3] One form of financial exploitation, coerced debt, involves credit transactions conducted without an individual's effective consent, including fraudulent debt (when an abuser takes out credit without the knowledge of the victim-abuser) and coerced debt (debt incurred through intimidation, threat, or force). Proving fraud may be easier than proving intimidation, threat, force or coercion.[4] In either case, as with elder financial exploitation, many incidents of financial abuse go unreported out of fear, embarrassment or lack of resources.[5]

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[a] This report will use the term "victim-survivors" as "victim" is a term often used within the criminal justice system and "survivor" conveys that a person who has experienced domestic abuse has started a healing process and is gaining financial peace and autonomy. See: Sexual Assault Kit Initiative. Victim or Survivor: Terminology from Investigation through Prosecution. We will often prioritize the use of "domestic abuse" instead of "domestic violence" to avoid the impression that victim-survivors' experiences have to appear "violent" and but can still be considered "abusive".

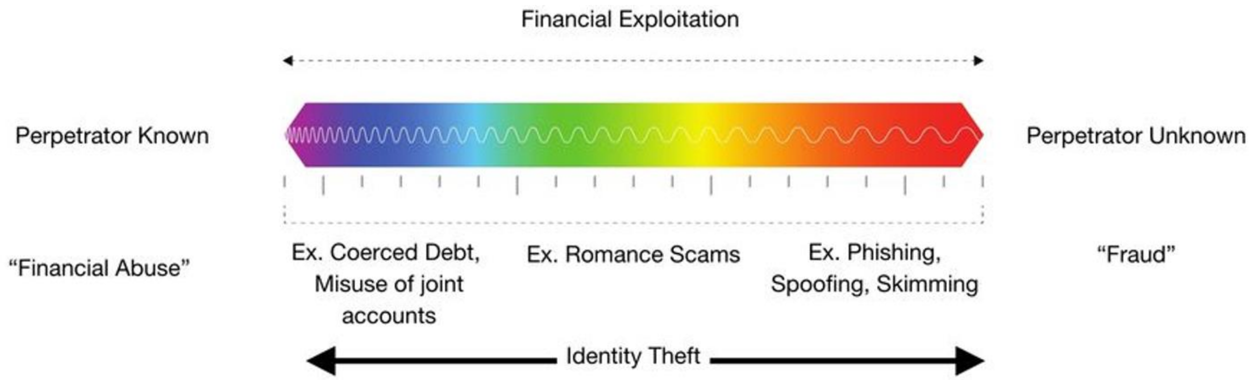


Figure 1: Financial Exploitation Spectrum

This report will focus on domestic abuse-related financial abuse as it is less protected by national laws and financial regulations.[b] While elder financial exploitation and domestic financial abuse are similar, they are also distinctly different. With elder financial exploitation, the motive is often to gain access to someone else's financial resources whereas for domestic financial abuse, it is often about coercive control, or a pattern of subordinating a victim-survivor through intimidation, isolation, degradation, denying them access to resources, and controlling behaviors that create unequal power dynamics in a relationship.[6] Financial abuse is a form of economic abuse; economic abuse is financial abuse plus the ways an abuser may control someone's economic situation, including their access to employment, housing, transport, and food.[7] This paper will focus on financial abuse in order to focus on the forms of abuse to which most financial institutions can most directly address.

Estimating Rates of Financial Abuse

The scale of financial abuse is unknown in the US due to a lack of standard measures and research on the topic (especially behaviors related to interactions that FIs might find related to their mandate and capacities) and due to the sensitivity of asking questions about experiences with domestic abuse broadly. However, it is so prevalent that it has been recognized by federal law (Violence Against Women Act Reauthorized in 2022)[8].

Moreover, financial abuse was not commonly included in domestic abuse definitions until recently as it has often been included as a form of psychological abuse.[9] For this reason, we have to rely on our understanding of how financial abuse correlates with other forms of domestic abuse. While financial abuse can happen to anyone, women are more likely to experience it at all points of their life, intersecting with elder financial exploitation.[10] Statistics on domestic abuse suggests that almost 30% of women and

[b] We will use "domestic abuse", "domestic financial abuse" as terminology throughout this report to signal the type of abuse that happens within domestic situations, and can include not only a spouse or partner (same sex or opposite sex), but also siblings, parents, aunts, uncles, cousins, etc. We are very often referring to intimate partner abuse which is domestic abuse perpetrated by a partner in a romantic or dating relationship. These terms are nuanced but domestic abuse seems to be the more widely accepted terminology used and understood across the United States. While we focus on the use cases for those experiencing intimate partner abuse in this report, we believe actions that financial institutions take can encompass many domestic relationships.

10% of men experience physical or sexual violence or stalking, affecting 12 million people every year;[11] the first incidence often will occur before the age of 18.[12c]

Younger women are nearly three times more likely than older women to experience domestic abuse; women living in poverty are nearly twice as likely than non-poor women to experience domestic abuse.[13] Social norms that elevate men as household breadwinners and financial decision-makers can put a woman at a disadvantage in financial decision-making from the start of her intimate relationships.[14] In fact, only as recently as 1974, women, married or not, were granted the right through the Equal Credit Opportunity Act (ECOA) to open a bank or credit account in their own name.[15] The ECOA outlawed discrimination by both sex and race in banking. It wasn't until 1988 that the Women's Business Ownership Act prohibited the requirement of male relative cosigners—which could range from a husband to a son—for women's business loans.[16]

Figure 2: Rates of Domestic Abuse in the United States

While women are more likely to experience domestic abuse, men are less likely to seek support.[17] LGBTQ individuals experience rates of domestic abuse that are as high or higher than the general U.S. population but are often the least protected under state laws as their relationships are not recognized.[18]

Studies have shown that among those who report domestic abuse, 99% of them have experienced some form of financial abuse.[19] This means that estimates of domestic abuse, of any form, are likely a strong measure of financial abuse but they very likely underestimate the experiences of people experiencing financial abuse alone because it is a distinct form of abuse.[20] In other countries, financial abuse estimates are more developed. For example, in the UK, it is estimated that 1 in 6 women experienced financial abuse in a prior

[c] Depending on the source and research methods used, rates of domestic violence can vary. For example, a recent, national-level, random-digit-dial survey conducted by the CDC between 2016 and 2017 found that 1 in 2 women and more than 2 in 5 men reported experiencing domestic abuse (sexual or physical violence, stalking, or psychological aggression) at some point in their lifetime; approximately 7% of both men and women experienced it annually, affecting 17 million people every year.

relationship[21]; in Australia, approximately 1 in 30 women and 1 in 50 men were subjected to financial abuse in 2020[22].

Costs of Financial Abuse

Experiencing domestic abuse is incredibly expensive; the number one reason why victim-survivors stay in abusive relationships or return to abuse is because they cannot afford to leave or stay safe.[23] Safety of victim-survivors hinges on access to economic resources; **"there is no safety without economic security."**[24] Unlike other forms of domestic abuse (such as physical and sexual abuse), financial abuse can impact victim-survivors long after they have left an abusive relationship; some victim-survivors may not be aware of the financial abuse they have experienced until they have ended the relationship as they discover debts, ruined credit histories and other adverse financial transactions.[25] Given creditors, employers and landlords often use credit and other consumer reports, victim-survivors can face difficulties obtaining housing, employment, utilities, their own credit and insurance.[26] Moreover, women, in particular, may not even be aware they are experiencing financial abuse because they associate their experiences with the range of sacrifices they are expected to make in their roles as homemakers, parents and sexual partners and they may be financially dependent on their partner.[27] Technology also enables abusers to continue abusive behaviors without physical contact[28], such as through spyware and GPS tracking, monitoring digital financial accounts, and sending threatening messages while sending digital payments.[29]

> **"The number one reason survivors stay in abusive relationships or return to abuse is because they cannot afford to leave or stay safe...The reality is, safety often means completely starting over — and starting over is expensive."** *- Making Safety Affordable: Intimate Partner Violence Is an Asset-Building Issue*

While there is little data available in the US to estimate the financial costs of domestic financial abuse, the estimated costs incurred by domestic violence victim-survivors and victims of financial exploitation (including elder financial exploitation, fraud and scams) clearly suggest that financial exploitation for anyone is costly in the short-term and can have long-lasting impacts on individuals and their families, even when a victim-survivor has left an abusive relationship.[30]

- The estimated domestic abuse lifetime cost is $103,767 per female victim-survivor in the US and $23,414 per male victim-survivor.[31] The Bureau of National Affairs has estimated that domestic abuse costs US employers $3 billion to $5 billion annually in lost time and productivity.[32] Among victim-survivors, more than 83% of victim-survivors experience interference at work and 52% experience coerced debt, with 46% reporting damaged credit as a result.[33] An abuser on average incurs approximately $15,900 of debt for a victim-survivor annually;[34] 60% of victim-survivors will lose their job as a result of the abuse.[35] A 2019 study found that 46% of victim-survivors reported that their credit report or score was hurt by the actions of an abusive partner.[36]

- AARP estimates that victims of elder financial exploitation in the US lose $28.3 billion annually: $20.3 billion of the $28.3 billion is stolen by family, caregivers and friends (financial abuse) and $8 billion by unknown perpetrators (fraud).[37]

- The Federal Trade Commission received fraud reports from 2.6 million consumers in 2023, accounting for more than $10 billion in losses.[38] Approximately 64,000 people reported a romance scam, accounting for approximately $1.14 billion in losses, with the median loss per person of $2,000.[39] FIs lose money as well; among all Suspicious Activity Reports (SARs) filings on elder financial exploitation in 2019, for example, FI's themselves lost money on 9 percent of them, equating to approximately $17,000 in losses per case.[40]

- A recent analysis of the Consumer Financial Protection Bureau (CFPB) Complaint Database conducted by the Consumer Bankers Association found that the number of fraud and scam complaints is likely five times larger than what the data shows because of the reliance on pre-coded complaints and not including open-ended narratives in prior analyses.[41]

- In Australia, where the costs of domestic financial abuse have been measured, victims incur approximately $5.7 billion in direct costs and the broader economy incurs $5.2 billion in costs. This is estimated to be almost $3 billion more in direct costs to victims than the total amount lost to fraud and financial scams in Australia in 2023.[42]

These data points indicate that the costs of domestic financial abuse to victim-survivors, FIs, businesses and the wider economy are likely significant and noteworthy. Research to estimate rates and the costs of domestic financial abuse are clearly needed.

Box 2: More Information on Financial Abuse

- The Allstate Foundation: The True Cost of Financial Abuse
- The Allstate Foundation Recognizing Financial Abuse, Together (includes stories of financial abuse)
- National Network to End Domestic Violence: Financial Abuse
- Center for Survivor Agency and Justice: Understanding Coerced Debt
- Center for Survivor Agency and Justice: Safety Landscape Dashboard (including Economic Security)
- FreeFrom The National Survivor Financial Security Policy Map and Scorecard

Section 2: The Role of Financial Institutions (FIs) in Responding to Financial Abuse within Intimate Partner Relationships

The Vital Importance of Financial Institutions

Financial abuse is a complex social issue that neither FIs, nor any other type of entity, can solve alone, but FIs carry vital importance for victim-survivors of financial abuse because they are entrusted with individuals' financial resources and ensure their economic and social participation.[43] FIs taking steps to address financial abuse also provides them with a valuable opportunity to deepen their understanding of the challenges their clients face with accessing, using, and fully benefiting from the use of their financial services.[44]

Research in the UK and Australia has found that **victim-survivors were more likely to disclose financial abuse to an FI than to the police or domestic violence survivor advocacy organizations**[45]; however, in the United States and in Canada, FIs have been found to be the least helpful or least trusted entities for victim-survivors[46]. A study by the Center for Survivor Agency and Justice found that among victim-survivors, 71% didn't know where to go or whom to call for help with financial issues; 53% desired to learn more about managing finances; 44% needed help fighting debt collection and 33% needed help dealing with debt their partners incurred in their name.[47]

Existing Legal, Policy, and Regulatory Frameworks to Respond to Financial Abuse

To support FIs in taking action, there are some legal, policy and regulatory frameworks for defining and responding to financial abuse.

- The US' inaugural National Strategy for Financial Inclusion (NSFI) highlights the important role that the financial sector plays as it is a "foundation for household financial resilience, wellbeing, and the opportunity to build wealth" and clearly invites FIs to consider domestic abuse victim-survivors as individuals for whom the financial sector could serve better (See Annex A).[48]
- Although financial abuse has not yet seen the same level of regulatory scrutiny as elder financial exploitation and/or general fraud prevention, it should be noted that there are laws and regulations that set precedent for FIs on this issue. See Annex A. For example, US federal law recognizes "economic abuse" as a form of domestic violence, which is considered a felony.[49] The myriad of state and federal laws combined with the regulatory environment as well as corporate strategy can heavily influence FI's priorities.
- The state of Tennessee has included a definition of financial abuse in their domestic abuse laws and serves as a model for other states (see Annex B for full definition). Some states have expansive

definitions of elder financial exploitation that clearly provide scope for broad protections for anyone experiencing financial abuse and could be used to protect others beyond elderly people from financial abuse. For example, the Texas Penal code asserts that financial abuse is the "wrongful taking, appropriation, obtaining, retention, or use of, or assisting in the wrongful taking, appropriation, obtaining, retention, or use of, money or other property of another person by any means, including by exerting undue influence" and is based on "unequal power dynamics that exist within relationships of confidence or trust" which could include "a parent, spouse, adult child, or other relative by blood or marriage of the other person" (see Annex B for full definition).

- Most FIs already have policies, procedures and programs in place to address elder financial exploitation and to detect fraud (i.e. unauthorized access to personal information without the victim's knowledge or consent) and scams (i.e. tricking someone into providing authorized access to money or personal information). FI's could build on these efforts by expanding definitions and practices to include domestic financial abuse.

International Models to Consider

Momentum is gaining to see FIs as the frontline for addressing financial abuse. As articulated in *Designed to Disrupt: Reimagining banking products to improve financial safety*, Catherine Fitzpatrick asserts that, "Financial products are designed as if relationships are healthy, couples make joint decisions, people don't exploit others." The reality is that not all relationships are healthy and abusers exploit the system as a tactic of coercive control, causing harm to clients of FIs and the FIs themselves when they face the impacts of unpaid loans or consumer protection lawsuits.

FIs in several other countries are already taking action:

"Financial products are designed as if relationships are healthy, couples make joint decisions, people don't exploit others." – *Designed to Disrupt: Reimagining banking products to improve financial safety.*

- **Australia,** such as through the pioneering work of the Commonwealth Bank of Australia in research, programs, podcasts on financial abuse and product revisions that take into account the possible weaponization of their products and services to perpetrate financial abuse;
- **United Kingdom,** such as through the development of a financial abuse code developed by UK Finance with members such as Lloyds Banking Group developing guidance on financial abuse across their brands, all with support from the non-profit Surviving Economic Abuse;
- **France,** such as through BNP Paribas' domestic economic violence program and public awareness campaigns; and
- **Canada,** such as through the Canadian Bankers Association inclusion of financial abuse content on their website.

Challenges to Acknowledge

While these are examples to inspire action, they do not overlook the difficulty of FIs taking action given that financial abuse is often unseen and can go undetected by victim-survivors of financial abuse themselves, especially in the early stages of their relationships. However, the red flags of domestic financial abuse[50] look very similar to the red flags of elder financial exploitation[51]: clients who seem nervous and fearful, who avoid eye contact, who remain silent while another party does all the talking, who seem to be taking instruction from their partner. In addition, domestic financial abuse victim-survivors might voice concerns about protecting their personal privacy or safety, or the security of their account/s, might 'spoil' credit or account information forms, tell you about a court order or have safety concerns, or share that their mail is no longer being delivered to a particular address.[52]

Branch and relationship banking has generally been on the decline. This means FIs may have limited in-person interactions to detect the signs of financial abuse as described above. However, in 2023, there was a net increase in branch banking as FIs announced expansions.[53] As FI clients leverage more digital banking tools, new risks increase for financial abuse. For example, an abuser could more easily monitor someone else's financial transactions digitally or take out credit in someone else's name given current or previous access to personal information. At the same time, FIs can leverage digital tools to detect and mitigate financial abuse. For example, FIs can increase the ways and the frequency of communication with a client, using artificial intelligence (AI) and machine learning to detect fraud and slow financial transactions, or implement simple product tweaks such as two-factor authentication for credit applications.

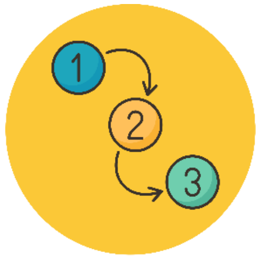
Whether financial abuse can be detected during in-person visits or through digital technology, a significant concern is how to balance a client's autonomy with protection from the FI. No matter the means of communication, engaging with a client regarding suspected financial abuse could put a victim-survivor in greater danger and equally be perceived as over-reach on behalf of the FI unless the client actively seeks support. FIs may also fear this could increase risks to employees and other clients.

Instead, like a submarine, FIs may only be able to support clients when they come up for air—or disclose financial abuse to the FI, are leaving or have left their abusers and are actively seeking the support of an FI.

The following four workflows outline actions that FIs can take, whether they know clients are facing financial abuse or not. These workflows are simply recommendations and build on best practices documented elsewhere. FIs can review the workflows and the proposed activities and design their own approach depending on their internal mandates, skills, and community resources.

Section 3: Proposed Workflows to Respond to Financial Abuse

1: Foster a supportive internal culture



2: Prepare FI employees to support clients

3. Educate and support clients

4. Deepen protections and support for clients

Workflow 1: Foster a Supportive Internal Culture

Experiences in Australia show addressing domestic abuse within the workplace is important to fostering an environment that is safe and empathetic towards employees and clients alike.[54]

FIs can foster a workplace environment that supports employees who themselves are victim-survivors or perpetrators of abuse (whether known or unknown) by developing a workplace violence prevention program or enhancing employee assistance or wellness programs. Workplace violence includes all forms of violence and represents a broad spectrum of behaviors ranging from threats of violence toward self or others to harassment, intimidation, stalking all the way to assault and deadly force. Workplace violence prevention programs should also encompass threats and concerns of violence that spill over into the workplace, such as domestic violence. Domestic violence experienced at work could appear as an abuser messaging and contacting a victim-survivor throughout the day, showing up at their workplace, making them late to work, consequently risking their employment status of the victim-survivor. Employees may be afraid to seek support if they fear their job is at risk. Supportive work environments help employees to feel safe in reporting these threats and seeking support and protection. Under the General Duty Clause, Section 5(a)(1) of the Occupational Safety and Health Act (OSHA) of 1970, employers are required to provide their employees with a place of employment that is “free from recognized hazards that are causing or are likely to cause death or serious physical harm."[55] Some US states, such as California, are passing legislation requiring employees, including FIs, to create and maintain comprehensive workplace violence prevention programs.[56]

Case Study A: Victim-Survivor Paid Leave Program

In partnership with FreeFrom, Berkshire Bank is piloting a survivor paid leave policy for all its employees and includes 15 days of additional paid leave to deal with consequences of abuse and will not deplete vacation or sick leave. - *Making Safety Affordable: Intimate Partner Violence Is an Asset-Building Issue*

There are already strong examples of FIs doing this through their workplace violence prevention programs, such as:

1. Implementing an **anonymous internal employee survey regarding their** experiences with domestic abuse to develop an internal understanding of employee experiences to inform policies or additional support. Where employees have openly revealed their lived experiences with

domestic violence, an FI could create an internal working group of victim-survivors to innovate resources and revise problematic policies.

2. Developing **domestic abuse policies, representing both victim-survivors and perpetrators of abuse.** FIs can consider providing **employee safe leave** that allows victim-survivor employees paid time off to seek support, attend court hearings, move residences or address other needs related to domestic abuse. FI policies can also articulate how the FI will respond to threats of violence directed against its employees or perpetrated by its employees towards others. Such a policy should communicate that violence and abuse is unacceptable in any relationship—at home and in the workplace.[57] These policies can also articulate how employees can seek support internally and externally.
3. **Educating employees about domestic abuse**.
    a. **Place information about domestic abuse survivor advocacy centers, shelters or hotlines** in private locations such as restrooms, office kitchens or lunchrooms. This provides employees with discrete channels for accessing this information.
    b. Design **internal training** to learn about the forms of domestic abuse and how the FI is set up to recognize (or how employees can share their experience with a trusted supervisor or colleague, if they feel safe to do so), respond and refer employees to domestic violence survivor advocacy, legal or other support organizations' services, when needed.
4. Utilizing **behavioral threat assessment and management processes** by gathering information, assessing for lethality, putting safety/security plans in place, and re-assessing anytime new information comes to light. This should be done by a cross-functional team knowledgeable in targeted violence prevention. Addressing domestic violence among employees is often managed and re-assessed for many years.
5. Considering how internal resources, such as internal employee-driven **emergency funds, grants or "flee funds"**, can support victim-survivor employees in addressing costs associated with domestic violence, including experienced economic/financial abuse.

Box 3: Toolkits or Resources for Developing Employee Domestic Abuse and Workplace Programs

- OSHA Workplace Violence Resources
- ASIS International Workplace Violence and Active Assailant - Prevention, Intervention, and Response Standard
- Association of Threat Assessment Professionals
- Cornell Law School Toolkit
- US Department of Labor Workplace Violence Program
- Vodafone Toolkit on domestic violence and abuse at work: Recognise, respond and refer

- STANDING FIRM: The DV Workplace Toolkit
- Business Fights Poverty -- Safer Workplaces: How companies can support survivors of domestic violence and abuse
- FreeFrom Creating a Survivor Supportive Workplace: A How-To Guide for Employers
- Male Champions of Change: Employees who use domestic & family violence: A workplace response
- FreeFrom Model Safe Leave Policy in the Workplace[d]

Workflow 2: Prepare FI Employees to Support Clients

This workflow considers the actions that are considered "low hanging fruit" or "quick wins" that can initiate a longer-term approach to responding to domestic financial abuse experienced by FI clients. An FI can approach these ideas based on what it already has in place, what state laws and regulations might influence priorities, and its own capacities and partnerships to decide on where it wants to focus its efforts.

1. **Conduct research to understand how abusers can weaponize financial services to harm clients.** This research can take two forms:
    a. **Engage staff from across departments** (frontline staff, call center staff, etc.) **to share any experiences** they've had working with clients who revealed their experiences with domestic or financial abuse and/or that they suspected were domestic abuse victim-survivors. Use this as initial research to consider implications for developing policies, training, and procedures for responding to financial abuse, focusing on where the line should be drawn between supporting a client with their financial services and therapeutic support (which is better provided by domestic abuse survivor advocacy organizations, counselors and other social support). For example, drawing on an experience from the International Finance Corporation's Empower Finance program, a recent study conducted in collaboration with University of New South Wales with bank employees in Papua New Guinea, Sri Lanka, Nepal, and Vanuatu found that 46% of employees reported knowing someone in their community who has experienced financial abuse, 1 in 5 observe clients experiencing it at least once per month, and 84% said they would like to learn more about how to support clients.[58] This data is currently being used to develop action plans for how the banks can respond to financial abuse and product misuse.

    b. **Engage or collaborate with domestic abuse survivor advocacy organizations and those with lived experiences of financial abuse to understand the nuances of financial abuse, product misuse behaviors and responses needed from FIs.** For example, in Australia,

[d] As a result of FreeFrom's advocacy, approximately 300,000 employees throughout the U.S. gained access to employee safe leave at the time of this Playbook's publication. FreeFrom. Our Impact. https://www.freefrom.org/

they have Lived Experience Advisory Panels of people who self-identify as victim-survivors of financial abuse and participate publicly or privately. The US benefits from quite a bit of documentation on domestic abuse victim-survivors' experiences with financial abuse which may not require a lot of additional high-level research; however, research on the experiences that clients have with a specific FI's products, services, and programs might be needed to guide action. The resources in Box 2 provide some lived experiences of financial abuse as a starting point.

2. Expand **existing definitions to include an explicit definition of financial exploitation of vulnerable clients as misconduct that the institution will actively watch for and respond to**. Existing definitions related to security, fraud, identity theft, money laundering, customer service, terms and conditions could be expanded to include domestic financial abuse. Vulnerable clients could include older adults, dependent adults, victim-survivors of domestic abuse, human trafficking victim-survivors, and foster children. For example, a definition might include: "Financial exploitation—the misuse of a client's funds or credit access by a family member, caregiver, or other individual in a position of trust—is considered a form of fraud and will trigger appropriate intervention and reporting." Client deposit agreements, for example, could include some of this language. Recently, there has been a push to expand the definitions of identity theft to include coercion or "without effective consent" to acknowledge that identity theft can be committed by a trusted individual.[59] Obviously, some of these definitions would require engaging trade groups, regulators and/or other self-regulatory bodies given they are not always FI specific. Advocates of this change propose that victim-survivors should be entitled to the same relief and protections from fraudulent and coerced debt by their abuser as those who have been victims of fraud by a stranger.[60] The debate on this is covered in Box 5.

   While unclear whether relevant for the US, FIs in Australia have updated their **Terms & Conditions** to articulate when a client can be expelled if they weaponize the FI's financial products to harm another individual, such as sending abusive and threatening language using references/memos in a transaction, etc. Terms and Conditions can also describe when a person might be removed from a jointly held account, even without their consent, if a victim-survivor seeks support for such an action. See the examples of the Terms and Conditions of the Australian Bankers Association members that include provisions for financial abuse. Some FIs interviewed noted they intentionally keep their language broad to allow them the right to close an account at any time; however, this issue of "debanking" in the United States is highly debated, suggesting that changing terms and conditions and procedures relate to this may be a difficult avenue to pursue.[61] There has recently been a move within the US government to disallow an FI from debanking someone due to reputational risk. See the 'Financial Integrity and Regulation Management Act'' or the ''FIRM Act'' bill under consideration in the Senate.

3. **Develop procedures for responding to financial abuse when staff spot signs of financial abuse or it has been voluntarily disclosed by clients and they are seeking support** (drawing on ideas from staff as articulated in point 1 above). FIs can work with domestic violence survivor advocacy organizations to understand signs of financial abuse and consult on developing the procedures.

For elder financial exploitation, the American Bankers Association (ABA) promotes a "Recognize, Respond, and Report" framework, which could be adapted for domestic financial abuse.[62] This should detail procedures for when abuse is identified, when to escalate a case internally, how to report externally, and how to document incidents. By embedding this in institutions' risk management frameworks, it becomes part of normal business practice. Articulating a strong governance element may include forming a cross-department committee or task force that meets regularly to discuss complex cases and to effect change to policies and procedures. While responding to coerced debt is a procedure relevant for some FIs, this has been included in Workflow 4 given its complexity and interplay with multiple actors; however, it would be assumed that a procedure should be developed, if one is not already, to address this issue. Other procedures to consider include:

a. **Encourage staff to flag internal accounts when they suspect financial abuse or when a victim-survivor has disclosed financial abuse.** Staff could be encouraged to document interactions in accounts where something "felt off", such as the individual seemed coached or afraid or accompanied by someone who was speaking on the client's behalf despite not being on the account. This could also flag client accounts that require special treatment (such as the extra privacy and confidentiality protections described below). This flag can also help a victim-survivor avoid having to repeat their story to multiple people within the FI. Moreover, this will help the FI anticipate the support needed by the client and/or better document the prevalence of domestic financial abuse as experienced by the FI's clients. This information can help inform future actions by the FI.
b. In cases where a victim-survivor is physically visiting a branch, employees should **follow their normal processes and procedures if they observe suspicious behavior**. For example, if an elder or vulnerable adult seems nervous, scared, or confused and/or is attempting an uncharacteristic transaction, FIs are encouraged to attempt to separate the client from the potential abuser to talk privately with the client if they deem it safe. For both phone- and online-based communications with the victim-survivors, FI's should lead the conversation with empathy and let the victim-survivor guide the conversation. Believe them and ask 'How can I help you?'[63] The American Bankers Association also encourages similar empathy with those who report elder financial exploitation: "I'm sorry this happened to you, but I'm here to help you move forward from this awful situation." "I'm here to listen." "It took a lot of courage to tell me about this experience." "Thank you for sharing. I know this is not easy to talk about."[64] The FI could also propose ways to express concerns in a non-threatening manner: "Mrs. Jones, our FI looks out for our clients. Is there anything about

this transaction or your experience as a client that makes you uncomfortable or that you have questions about?" or "We can place a temporary hold just to ensure everything is ok?". It is important to note, however, that abusers mostly rely on means to exploit another's accounts and credit access that minimize or avoid direct contact with the FI, such as using current or previously compromised personal identification information, passwords or guessing passwords.[65]

c. **Enhance victim-survivor management of their accounts and information**.[66]

   i. **Enhance fraud protections**, and with the permission of the client, increase "friction" on account transactions, such as multi-factor authentication, additional steps to online processes to verify or confirm if an application "is authentic and without coercion, including safe notification of abuse that triggers auto decline".[67] Some state laws permit FIs to temporarily hold a transaction or delay a disbursement if they suspect financial exploitation of a vulnerable or older adult and these laws provide immunity for FIs and its employees if they meet specific requirements.[68] These same permissions or design features could be extended to victim-survivors of domestic financial abuse. In a FreeFrom study, 76% of victim-survivors said that enhanced fraud protections on their accounts would help them reach their financial security.[69] Victim-survivors of domestic financial abuse may need to weigh in on whether these additional protections could also be used to harm them or make it difficult for them to manage their money. This would be an area that an FI could further investigate when considering these design revisions.

   ii. **Increase account privacy and confidentiality / allow clients extra preventive measures** such as:

      - Ability of client to transact only in an FI office or branch (no online account interface that could be hacked by family with access to personal information such as social security number, driver's license number, birthdate, passwords, PINs). In a FreeFrom study, 76% of victim-survivors said that the ability to transact only in-person would help them reach their financial security.[70]
      - When changing contact information, do not send communication to old phone numbers, mailing or email addresses to verify changes (as this could provide the new address of a victim-survivor to his/her abuser). FI procedures requiring mailing a welcome kit, for example, should be suppressed to not inadvertently tip off an abuser if a victim-survivor is in hiding. In a FreeFrom study, 71% of victim-survivors said that keeping their contact information confidential and secure would help them reach their financial security.[71]
      - Accept alternative addresses for account management. For example, a residential or business street address of next of kin or of another contact individual is acceptable.[72] Moreover, some states and FIs participate in

Address Confidentiality Programs (ACPs), also known as "Safe at Home" programs. These are often government-administered programs (and in some states, they are laws, such as in Washington, Minnesota, Iowa, Indiana, Wisconsin and Maryland) designed for victims of crime and provide a victim-survivor with a designated substitute address that they can use instead of their actual physical address. The National Association of Confidential Address Programs provides a list of the ACPs by state. The American Financial Services Association has a webinar on ACPs that can also be consulted; this webinar covers the operational and compliance challenges that an FI may confront when implementing an ACP. See WellsFargo's ACP webpage as an example.

- **Inform clients of all accounts in their name** as they may not be aware of all their accounts, particularly if the accounts were not opened with their consent or complete awareness (especially if there are language barriers).

d. Consider **alternate forms of identification** as victim-survivors may have left behind or had their identification stolen. If a client cannot provide an unexpired, government-issued ID (such as driver's license or passport), FIs can use non-document verification such as "independently verifying the customer's identity through the comparison of information provided by the customer with information obtained from a consumer reporting agency, public database, or other source; checking references with other financial institutions; and obtaining a financial statement."[73] FIs are encouraged to use multiple forms of verification if government-issued identification cannot be presented.[74] Victim-survivors who have lodged complaints with the CFPB describe a lack of transparency among FIs as to the types of identity documents that are acceptable (and that have been refused) when names and addresses have changed.[e] Additionally, victim-survivors have noted their inability to dispute transactions due to living at a domestic abuse shelter for which they cannot share an address.

e. **Separate joint accounts**, with support of court orders/divorce decrees, **without requiring the victim-survivor to engage directly with the abuser to do so**. This means engaging the abuser on behalf of the victim-survivor to separate joint accounts.

4. **Expand staff trainings on elder financial exploitation[75] to include domestic financial abuse.** As with elder financial exploitation trainings, trainings on domestic financial abuse should be scenario-based learning to help employees work through sample situations of financial abuse and be victim-survivor-centered (i.e. non-judgmental listening, validation and empathy, reducing self-blame and shame, ensures confidentiality, safety, security, respect, non-discrimination and non-

[e] Clients can report complaints directly to the CFPB for which CFPB will forward to FIs to help resolve complaints. The CFPB database is publicly available to research complaints (for this paper, we searched for "domestic violence"). One example of a complaint regarding a name change dispute and identity verification can be found here.

stigmatization)[76]. Training is effective, as one study from the AARP found that bank staff trained in elder financial exploitation saved 16 times more money than untrained staff.[77] Training is also highly desired by victim-survivors: a study by FreeFrom found that 80% of victim-survivors said FI staff trained to detect, prevent, and respond to financial abuse would help them reach their financial security.[78] A key distinction of the domestic violence training is that FIs are not required to report the abuse to police, unlike in the elder financial exploitation training. In fact, many victim-survivors don't want police to be contacted for various reasons, including fear of the police, lack of trust in the police, previous negative interactions with the police, etc.[79] FIs should follow the lead of the client and contact the police only if they request the FI to do so, as the victim-survivor is the expert in their own safety.[80]

Box 4: Toolkits or Resources for Developing Internal Policies and Procedures

- Consumer Financial Protection Bureau Resources for Financial Institutions on Elder Abuse
- UK Finance Financial Abuse Code
- Australian Bankers Association Members' Terms and Conditions
- Respect and Protect: How Australian Banks are Raising Awareness about Financial Abuse
- Financial Abuse: What Financial Advisors Need to Know by Battered Women's Justice Project
- Grameen Foundation's Financial Abuse Compendium

Workflow 3: Educate and Support Clients

Workflow 3 builds upon the previous two workflows and discusses how FIs can support victim-survivors and build client awareness of financial abuse through public awareness campaigns or features or through private communication.

Public awareness includes leveraging channels and vehicles that generate awareness of your FI's focus on financial abuse. This could include your institution's website, in-branch advertisements, flyers and posters posted in physical branch offices about financial abuse (with information on how a client can seek support as well as information about domestic abuse support hotlines or locally available services), financial fairs/workshops, or app notifications to customers. See examples of the Bank of Scotland (Lloyds Banking Group), Westpac Australia, and BNP Paribas, Commonwealth Bank of Australia. The UK Finance Financial Abuse code requires member FIs to make an accessible, industry wide information leaflet available to consumers, providing consistent guidance on how FIs can help victim-survivors and what they can expect. Box 5 also highlights resources that can help inspire public awareness approaches.

Mass market campaigns could also be conducted in collaboration with local or national-level nonprofits/charities or domestic abuse survivor advocacy organizations to raise awareness about financial abuse. For example, HSBC in the UK developed an awareness campaign on financial abuse and this led to a 1,400% increase in visits to its financial abuse webpage over the campaign period.[81] Canadian Centre for Women's Empowerment (CCFWE) started Economic Abuse Awareness Day in Canada in 2019 on November 26th of each year, which has been joined by the Women's Centre for Economic Safety (CWES) in Australia, Surviving Economic Abuse in the UK, and Good Shepherd in New Zealand.

Reaching youth, through school-based programs or other youth service organizations, before they form serious intimate relationships would also be critical. In fact, a study conducted by Junior Achievement and The Allstate Foundation found "that nearly one-in-three U.S. teenagers aged 13-18 (31%) have experienced warning signs of financial abuse in a romantic relationship. Both teen girls and boys are reported being prevented from going to school or work or being told what they could or could not purchase by a partner."[82] As part of their JA Personal Finance curriculum, youth learn about healthy and unhealthy financial relationships.[83]

Things for your FI to consider with public awareness communication:

- Use plain language.
- Adress accessibility (multiple languages, accommodate disabilities).
- Provide "Exit Now" or "Quick Exit" buttons on the FI website, especially for any webpages that may address financial abuse, that allows people to quickly leave the website and the ability to browse without recording their browsing history. Such website features will immensely help people if their internet use is being monitored by abusers. See this resource from Tech Safety Canada to explain how this can be coded into your FI website.
- Partner with domestic abuse survivor advocacy organizations to help share information directly with victim-survivors.

Private communication includes efforts and initiatives that FIs can take to directly support clients and educate them on financial abuse (inclusive of sharing information on local domestic abuse survivor advocacy organizations and resources, contacting the police if requested, etc.). This may leverage an existing fraud prevention/detection team or result in developing a team of subject matter experts focused on this topic as well as direct client support. In a FreeFrom study, 77% of victim-survivors said that a designated team to handle victim-survivors' accounts would help them reach their financial security.[84] This could also build on Workflow 2 and involve enhancing education and staff knowledge on this topic to continue to deepen client relationships and build trust. It may also involve developing a full life cycle process to support a client from the moment they disclose financial abuse through ongoing account management that improves the client's safety and financial security.

Box 5: Resources to Support Clients

- National Domestic Abuse Hotline Awareness Materials
- Domestic Violence Awareness Project: Materials
- Commonwealth Bank of Australia: Recognize and Recover
- Commonwealth Bank of Australia and Future Women: There's No Place Like Home podcast on lived experiences of economic abuse
- BNP Paribas (France) awareness raising videos on economic abuse
- The Allstate Foundation Moving Ahead: A Financial Empowerment Resource
- Junior Achievement Personal Finance course
- Surviving Economic Abuse: Are you experiencing economic abuse?
- Canadian Center for Women's Empowerment: 6 Step Checklist for Domestic Abuse Survivors
- Canadian Center for Women's Empowerment: STEAR (Support Tool for Economic Abuse Recovery) app
- MiFICO: Relationships and Money Forum
- FICO's Credit Empowerment Program
- National Network to End Domestic Violence (NNDEV): Independence Program

Workflow 4: Deepen Protections and Support for Clients

Workflow 4 deepens an FI's approach to financial abuse by addressing product or procedure flaws that may be more complicated.

1. **Develop policies and procedures that define how and when to refinance or erase coerced debt or fraud**. The Center for Survivor Agency and Justice's (CSAJ) compendium on coerced debt outlines the laws that already provide some support for addressing coerced debt (such as the The Fair Credit Reporting Act, CRA Responsibilities, The Truth-In-Lending Act).[85] FreeFrom's National Survivor Financial Security Policy Map and Scorecard provides a state-by-state map of coerced and fraudulent debt protections. Based on victim-survivors' experiences with coerced debt, recommendations by CSAJ and FreeFrom also include refraining from reporting defaults on coerced or fraudulent debt to credit reporting agencies, disregarding coerced debts when making new loan decisions, ceasing debt collections on coerced debts and establishing special debt collection programs that would relieve coerced debt.[86] The NFSI also encourages FIs to use short-term loan forbearance as it helps consumers recover from financial shocks (such as those associated with coerced debt or leaving an abusive relationship) and avoid default and foreclosure (as was demonstrated during the COVID-19 pandemic).[87] One avenue pursued in Connecticut regarding coerced debt relief is a proposed law that makes someone who knowingly coerces another into debt civilly liable for that debt and possibly liable for attorney's fees and costs incurred by the debtor in establishing the debt was coerced. Otherwise, a key assumption

regarding coerced debt is that the victim-survivor must pay the debt, refinance it, or default on it (resulting in the FI writing it off). Please see the special note on coerced debt in Box 7.

As part of a procedure related to addressing coerced debt is the need to **co-create—and honor—a list of legally permissible evidence of financial abuse/domestic abuse that FIs can accept,** if such evidence is required, in collaboration with domestic abuse survivor advocacy organizations, regulators, law enforcement and lawyers. This evidence can vary depending on the action or outcome a client is seeking from an FI and the bar of proof that is required for an FI to take an action that is out of the ordinary. For example, client requests to change their contact information, open a new bank account the abuser wouldn't know about, block a coerced or fraudulent transaction from going through, etc. would not require such evidence. Client requests to separate joint accounts before a divorce is finalized or when a divorce is not possible could require such evidence in lieu of a divorce decree.

For fraud, the standard for evidence has been a police report and a self-attestation to the Federal Trade Commission (FTC).[88] Both of these reports are subject to criminal penalties related to the filing of false information.[89] Official divorce decrees or other court orders, where available, may spell out specific divisions of assets that financial institutions can use to act on behalf of a client. As related to coerced debt, domestic abuse survivor advocacy organizations advocate for use of the FTC report and/or qualified third-party certifications as alternatives, such as form letters signed by licensed medical doctors, social workers, therapists, intimate partner violence counselors, or accountants to establish that an individual has experienced domestic abuse since victim-survivors may be afraid to engage the police because they fear retaliation by their abuser or found the police to be unhelpful.[90] Additional evidence could include copies of protection orders and other criminal complaints. Self-attestation is also a strongly recommended approach by those working on coerced debt.[91] Such certifications are already being used in California as an alternative to police reports in other areas of the law, such as terminating a lease early because of domestic abuse.[92]

Box 6: Evidence that could be provided to an FI to prove financial abuse:

- Police Report
- FTC Identity Theft Report
- Attestation made by domestic violence shelter or marriage/personal counselor
- Attestation / communication from debt relief organization
- Official Divorce decrees or court orders
- Self-attestation
- Economic Abuse Evidence Form (see UK example)

Twenty members of UK Finance, the equivalent of the American Bankers Association, are now using an Economic Abuse Evidence Form developed by Money Advice Plus.[93] This form provides a single mechanism through which qualified and regulated money/debt advisers trained in economic abuse by Money Advice Plus and Surviving Economic Abuse can tell an FI that an individual has experienced and was impacted by economic abuse, limiting the number of times the victim-survivor has to tell and retell their story. The form is shared alongside a request letter asking for a particular outcome (i.e. debt cancellation, refinancing debt, lower payments, etc.).

While also a UK context example, Hogan Lovells, an international law firm, developed a report for Surviving Economic Abuse on how the civil and criminal justice systems in England and Wales could provide remedies to victims of economic abuse.[94] This is not written for FIs nor may be contextually appropriate for the US, but it provides an example of documentation that could be developed to guide thinking within the financial sector.

Box 7: Special Note on Coerced Debt

In the US, while coerced debt obtained through fraud may be disputed, blocked by an FI and removed from a consumer report because it already meets the current definition of identity theft under the Fair Credit Reporting Act (FCRA), coerced debt obtained through force, threat, and intimidation does not.[95]

Recently (December 2024), the Center for Survivor Agency and Justice (CSAJ) and the National Coerced Debt Working Group[96] worked with Consumer Financial Protection Bureau (CFPB) to seek FCRA Rulemaking on Coerced Debt to protect victim-survivors with coerced debt. In comments to the CFPB regarding the Advanced Notice of Proposed Rulemaking (ANPR), the National Consumer Law Center (NCLC) and CSAJ proposed revisions to the FCRA that[97]:

a. modify the definition of identity theft to include "without effective consent"; effective consent is not given if an individual is "induced by force, threat, fraud or coercion". This modification would cover all forms of coerced debt, not only that which was obtained through fraud. Some states, like Texas[98], have already included the concept of effective consent in their identity theft laws.
b. expand the types of documentation accepted that will constitute an identity theft report, including accepting the FTC identity theft report as evidence and that evidence need NOT be a police report but could also take the form of a self-attestation, third-party documentation (as the examples provided in the section above) or Language Access (the ability of a non-English speaker to submit to the FTC in their language of origin),
c. a victim-survivor can block debt information on a consumer report even when an item was in their shared home and they derived "benefit."

In comments[99] to the CFPB regarding the ANPR, NCLC and CSAJ documented findings from a national survey conducted in 2025 that revealed that few victim-survivors (1-3%) received relief of coerced debt being reported by consumer reporting agencies (CRAs) despite victim-survivors submitting a police report and/or an FTC identity theft report regarding coerced debt. Few FIs honored this evidence resulting in few individuals receiving any support. Victim-survivors also found the dispute process complex (79-83%) and experienced difficulty gathering additional evidence (68%). Furthermore, an FI refusing to accept documentation of identity theft, such as the FTC identity theft report, may violate the FCRA.[100]

In response to the ANPR, some have advocated to expand the language so that coerced debt includes "all non-consensual, credit-related transactions in which one person has used coercive control to dominate another person" so as to include people not necessarily in a personal relationship, such as forced labor situations or employers coercing employees.[101]

CRA associations, such as the Consumer Data Industry Association (CDIA) who represents Experian, TransUnion, Equifax, and others, disagree with the proposed changes to the FCRA because the FIs reporting the debt to the CRAs are responsible for clearing the debts and because CRAs "are not in a position to adjudicate these claims and that they lack both the knowledge and the expertise to be able to do so"[102]. CDIA argues that blocking a transaction on a credit report but not relieving it at the FI level does not provide a clear picture of an individual's creditworthiness and capacity to pay new debts and could cause harm to the client in the long run. In short, CDIA recommends working with the FIs to block the debt and the debt will be removed from a consumer report upon the completion of an investigation.[103] Similarly, the US Chamber of Commerce suggests that expanding options to self-attestation "reduce the threshold for verification [and] could destabilize" the FCRA framework and could result in bad actors engaging in "credit washing".[104] The Chamber and CDIA indicate that bad actors have taken advantage of the revision to the Debt Bondage Repair Act, which provides protections for human trafficking victims who request debts to be removed from their credit reports if the debt was incurred while they were trafficked; such bad actors have exploited this to "illegitimately remove valid debts from credit reports".[105] Credit unions who also submitted comments to the ANPR voice concern about being forced to "adjudicate complex personal situations" to judge whether a debt was incurred by coercion which would require a lot more training, staff, and costs; among the credit unions who submitted comments, they recommended a stronger focus on consumer education on this topic.[106] CDIA also recommends that if an establishment of "effective consent" is imposed, it should be imposed at the start of a transaction which would require lenders to ensure consumers entering a transaction are providing consent voluntarily. If this cannot be established at the beginning, only courts are in the best position to determine whether consent was effective.[107] Furthermore, given the experiences with the human trafficking provision for debt removal from credit reports, there is concern that if the ANPR advances, credit will become "less available and more expensive, especially for those consumers already on the margin."[108]

The issue of coerced debt is complex and requires intentional and thoughtful collaboration between domestic abuse survivor advocacy organizations, FIs, law makers, regulators and legal aid. It continues to be and will be an important future area of work. While many argue that the ANPR exceeds CFPB's authority as established under the FCRA, the question will still remain as to the practical steps FIs can take and procedures they can develop when a client is seeking support for coerced debt.

2. **Assess existing products for possible financial abuse risks they create for clients.** Please see Designed to Disrupt, a publication that addresses design considerations for financial abuse and example product flaws and product improvements.
    a. For example, a threat found in Australia, the UK and Canada is abusers' use of "memos/references" in digital payments—often for child support—to send abusive messages and threats to a victim-survivor. A product revision allows a client the ability to "hide memos/references" to limit the threats and verbal abuse. The messages are not erased in case they are needed for legal support. Access the AI model developed by Commonwealth Bank of Australia to detect and block harmful messages. Starling Bank in the UK developed a 'Hide Reference' feature which enables a customer to hide references for the payments they receive."[109] FIs can also consider how to use two-factor authentication for credit applications to prevent or slow coerced debt or prevent fraudulent use of a client's identity to take out debt in their name without their knowledge.[110]
    b. Any joint account can be weaponized, even after a victim-survivor has left an abusive relationship. While some research shows joint account ownership is good for a relationship (and people spend their money differently than if they had individual accounts)[111], it also creates openings for abuse[112]. In Australia, one bank developed an innovative rethinking of joint accounts with a product called "2Up" that allows a customer to create a shared account while retaining individual accounts.[113]

c. A study in the UK found that 1 in 8 women (750,000 women) who held a joint mortgage in the prior two years experienced joint mortgage economic abuse (such as an abuser refusing to sell a jointly owned home after a divorce, not following court orders related to the mortgage, etc.) from a current or former partner.[114] As described in Designed to Disrupt regarding joint mortgage accounts, it is important at origination to notify clients of their loan liability and options available to them should separation occur. It is recommended that FIs consider giving clients a choice about the type of liability contract they sign– joint and several liability, 50:50 liability or another percentage and to include terms and conditions relating to recognition of property settlement orders.[115] A recent study by CFPB documented complaints related to mortgage companies after divorce or domestic abuse.[116] The top complaints related to pressures to refinance, delays in processing requests and/or refusal to release an original borrower from liability, and safety risks to victim-survivors (where mortgage companies continue to send account information to their abusers while failing to send it to them, require consent of the abuser for decisions related to the loan or require abusers' consent for account changes). CFPB recommends that mortgage companies:
   i. ensure they comply with applicable law and guidance (particularly, ensure their policies do not unnecessarily push for refinancing mortgages when removing a co-borrower; See for example Fannie Mae Servicing Guide; See also Regulation X in Annex A),
   ii. examine whether underwriting requirements pose undue obstacles to mortgage assumptions (making it difficult for a victim-survivor to stay in their home even when they've established capacity to pay), and
   iii. develop policies and procedures to assist domestic abuse victim-survivors. For example, companies should review the policies and procedures related to communication with the home owner that might prevent a victim-survivor from accessing mortgage information (which might increase risks of delinquency or physical safety risks).

Case study B: CFPB Complaint Examples Related to Mortgages

The following is a complaint submitted to CFPB from a homeowner in Texas:

"I divorced due to domestic violence, the process was lengthy as my ex-husband sought to sabotage the process and my finances…I was/am living in the home with our children. Final orders awarded the house to me. At this time I was able to communicate with [mortgage company] and began making payments towards a trial period to avoid foreclosure…When I called to make the 2nd payment on the new loan I was informed they'd put it into foreclosure. ALL COMMUNICATION was being directed to my violent ex-husband. I asked them to please send copies of communication to the home on the loan and they would not. They would not add my phone number for contact for months. They would not communicate with me about modification. They sent that information to my ex-husband as well. I've been trying to save this loan since I was allowed to make my first payment…they've refused to cooperate, communicate, or accept any payment from me…"[117]

3. Develop **innovative account management products and/or product features** with victim-survivors' needs in mind.
    a. **Affordable checking and savings accounts:** FreeFrom estimates that there are approximately 48.8 million victim-survivors who don't have access to a safe and protected bank account.[118] In a study by FreeFrom, 74.1% of surveyed domestic abuse victim-survivors did not have access to a safe, protected bank account: a combination of 57.9% who said an abuser monitored, accessed, withdrawn from, or otherwise controlled their bank account and 16.3% who said they do not have a bank account.[119] US-based BankOn accounts were designed to support un- or under-banked individuals with low cost accounts. SaverLife is another innovative savings account option in the US (Case study C below). CapitalOne allows individuals to open a fee-free account from their mobile phone with no minimum balances, no overdraft fees and no monthly balances. BNP Paribas Nickel accounts (in France) allow people to open an account in a *Tabac* store (a local convenience store in France), which might not draw attention from an abuser as it is a common place to frequent.

Case study C: SaverLife Matching Savings Program[120]

SaverLife helps users start to save and matches savings even if the saver has accumulated $1 a month. It has been successful in helping low-income earners start to save and its 115,000 members have saved $9 million. While it was not designed specifically for victim-survivors (still requires a bank account), it provides an accessible alternative to traditional asset-building programs.

    b. Broaden existing **"share with us"/"report to us" features** to allow clients to securely disclose financial abuse to a FI when seeking support. For example, monzo.com, a digital banking application based in the UK, allows customers to speak with them confidentially about domestic or financial abuse without the chat history appearing in the app afterward.
    c. Develop a **temporary lock on one's account** via the mobile app (much like you can lock a credit card) if the individual thinks their account is being compromised by a family member, which stops new transactions until unlocked.
    d. **Develop a "safe" or digital storage vault within a money management** or financial account that allows a victim-survivor to save copies of their financial information or personal data (passport photos, driver's license, insurance policies, social security card, etc.). This could be hidden behind a disguised icon on the phone. This would allow a victim-survivor to securely store and access their important files during and after an emergency (such as when a victim-survivor flees an abusive partner and leaved behind all their belongings). See example digital storage vaults with FirstBank & Trust Company, FidSafe, Trustworthy.

4. Design **safe credit-building products** that evaluate credit worthiness using alternative data sources, such as the methods described in a publication by the Federal Reserve Bank of Kansas[121] and/or allow low amounts and short repayment periods to build credit history. The NSFI proposes alternative data sources already being tested and invites FIs to leverage Special Purpose Credit Programs that "can benefit groups who may otherwise be denied credit or receive it on less favorable terms."[122]

   CFPB issued an Advisory Opinion on Special Purpose Credit Programs as implemented by for-profit organizations to clarify that such programs require a written plan, which should include the class of persons the program should benefit, the procedures and standards for extending the credit, how long the program should last or when it will be re-evaluated, and a description of the analysis the organization conducted to determine the need for the program.[123] It is important, however, to note that credit-building products might harm victim-survivors if they are not yet capable of managing even a $35 loan if they have no to little income and/or if they are managing many expenses on their own.[124] See lessons from a pilot project with Michigan State University Credit Union (Case study D below). This does not mean it is not a worthy cause to pursue but it does require patience and commitment on behalf of the FI to find the right design, which may require more of a "graduation" approach that starts with a grant/financial support from the FI or through partnership with a non-profit organization that helps a client progress to a credit product. Also in Michigan, see Community Financial Credit Union "Choose the Bear initiative[f]", which includes a domestic abuse loan accessed through referral. The National Network to End Domestic Violence (NNDEV) also runs the Independence Program which provides credit-building microloans to victim-survivors of financial abuse in all U.S. states, territories, and the District of Columbia to help them build or establish credit. See Annex C for an in-depth description as to how the credit-building product works. Since 2017, NNDEV has supported more than 1,000 borrowers with their First Step microloan, resulting in an average credit score increase of 18 points among the borrowers and an average credit score upon completion of 648.[125]

[f] In a viral TikTok survey by YouGov, when asked if they were stuck in a forest whether they would prefer to meet a man or a bear if stuck in a forest, women were more likely than men to say "the bear". See: Man Or Bear? Many Women Say They'd Rather Be Stuck In The Woods With A Bear In Latest Viral TikTok Debate

Case study D: Domestic Violence Recovery Loan Program[126]

The Michigan State University Federal Credit Union piloted a domestic violence recovery loan program from which 14 loans to domestic violence survivors were given with a maximum amount of $1,250 with a 30-month term (Phase 1 design included a maximum loan amount of $2,500 and a 60-month term) drawing on lessons from Phase 1. Borrowers received a 6-week financial education curriculum on a fixed schedule and were required to complete a 4-week spending tracker. Most used the funds to cover auto expenses, followed by housing, medical bills and legal fees. Repayment rates were low with only 43% in good standing on loan repayment rates, most likely due to the precarious situation victim-survivors face when building financial autonomy and in some cases working/earning an income for the first time. While the program provided borrowers with an opportunity to build their credit, borrowers who experienced reductions or loss of income often found the loans difficult to repay. Phase 3 of the pilot will build in a loan-loss fund, offer a savings incentive and pre-delivering emergency savings upfront at the start of repayment (this was an incentive paid on complete loan repayment—on the backend of Phase 2)

5. Research how **machine learning/AI can also be used to identify populations at risk of financial abuse or to develop abuse pattern recognition**, building off existing fraud detection systems used by the FI. As noted earlier, Commonwealth Bank of Australia developed an AI model to detect and block harmful messages sent through digital payments. FIs can also explore how local data on domestic abuse (such as low-income individuals, certain racial/ ethnic/ religious backgrounds) can be used to develop a risk profile of an individual and tested against real financial abuse victim-survivors for validation. This risk profile could result in an FI offering extra security and confidentiality to flagged clients. Please note there is a real concern this data could be misused if used for establishing creditworthiness, preferable interest rates, etc.[127] There are also concerns of perpetrators using AI systems "to coerce, manipulate, fabricate consent or exert control, ie. a perpetrator uses real or synthetic biometric authentication (such as Face ID or fingerprint scanning) to approve fraudulent transactions on a victim's banking app".[128] In this research phase, the FI should focus on whether there are any strong predictors of financial abuse within financial transactional behaviors or client characteristics or not and whether there are safe actions an FI could take with this data. This research has yet to be done but has been proposed by UK Finance.[129] Publications developed regarding the role of the financial sector in preventing and detecting human trafficking could provide additional inspiration and frameworks for developing a similar framework for financial abuse.[130]

6. Provide clients with **emergency fund "flee accounts"**: TSB Bank in the UK launched the Emergency Flee Fund offering clients up to £500 to flee an abuser. 445 clients have accessed the fund since

2022 when it first launched.[131] The average fund request is £368 per customer; a third of all claims have received the full amount available; 45% of all individuals who accessed the fund fled with children.[132] While unclear whether feasible in the US, FIs in the UK also provide domestic abuse victim-survivors with use of a room to seek support from family, police, etc. See the Safe Spaces promoted by UK Says No More.

7. **Empower employees as advocates for domestic abuse victim-survivors:** Develop employee volunteer programs to support victim-survivors at local domestic abuse shelters or similar programs on financial literacy and crisis financial management skills. FreeFrom's research conducted with staff from domestic violence survivor advocacy organizations, who themselves may be victim-survivors, found that they find it difficult to talk about money with other victim-survivors because of the financial worry and literacy issues they may face in their own lives.[133] Therefore, support by FI staff to domestic violence survivor advocacy organizations could occur at two levels: at the staff and victim-survivor level.

Box 8: Toolkits or Resources for Deepening Protections and Support for Clients

- Contact Surviving Economic Abuse or Money Advise Plus (both UK) regarding their Economic Abuse Evidence Form being used by UK Finance banks
- Center for Survivor Agency and Justice: Understanding Coerced Debt and Compendium on Coerced Debt
- Designed to Disrupt: Reimagining banking products to improve financial safety

Conclusion

This playbook illustrates the role that FIs can play in responding to domestic financial abuse. In some cases, financial abuse can be prevented if FIs can anticipate how their financial products and procedures can be misused to harm another person and develop procedures and product designs that help in this prevention. FI staff and client education on financial abuse are clearly paramount to raise awareness; clients need to be able to recognize financial abuse within their own relationships to take steps—where possible—to protect themselves and understand how they can seek support once it has occurred. A special focus on youth, before they formulate long-term intimate relationships, is also one avenue to explore through existing financial literacy outreach efforts.

What can FIs do to help support a client—and where can they not—to achieve a particular financial outcome related to financial abuse? This is the question each FI has to answer; however, the aspiration is to have a sector-wide approach so that clients know what to expect from any FI. Until a sector-wide approach is possible, this playbook proposes some ideas as to how FIs can answer this question, drawing on examples from within the United States and abroad.

This playbook also highlights the legal and regulatory building blocks for domestic financial abuse that already exist to address elder financial exploitation and fraud prevention. There are clearly challenges for

FIs to address domestic financial abuse because of the difficulty of credibly establishing whether financial transactions were incurred through force, threat, fraud or coercion, but there are procedures to build upon and that can be communicated to clients—and their abusers.

By positioning FIs as key allies in the fight against financial abuse (and domestic abuse more broadly), they not only reduce their own risks and protect their clients' assets but also their dignity and trust—serving as a beacon of trust and security for all.

Annexes

Annex A: Policy and Regulatory Precedents

National Strategy for Financial Inclusion in the United States	Mentions domestic violence survivors as being negatively impacted by identification requirements: "For example, institutions that require applicants to have a state issued ID, such as a driver's license, may exclude consumers who find it difficult to access or maintain a state-issued ID but who may have access to other documents or means of verifying identity that are compliant with regulatory requirements. Consumers particularly impacted by such policies can include victims of crime and domestic violence survivors, those experiencing homelessness, individuals involved with the justice system, immigrants and refugees, or transgender and nonbinary consumers. Some financial institutions offer additional pathways for identity verification by accepting municipal ID, consular ID, student ID, identity attestation letters, or other methods, which may be more effective at serving those consumers."
Violence Against Women Act	Recognizes economic abuse as a form of domestic violence that is deserving of remedies. "The term 'economic abuse', in the context of domestic violence, dating violence, and abuse in later life, means behavior that is coercive, deceptive, or unreasonably controls or restrains a person's ability to acquire, use, or maintain economic resources."
Joint Consolidation Loan Act	Enables survivors of domestic violence and economic abuse to separate their joint student loans without their partner's cooperation and by self-certification. "Under the terms of the JCLSA, a separate application is permitted only if the individual co-borrower who is applying certifies that they have been a victim of domestic violence by the other borrower, have experienced economic abuse from the other borrower, or are unable to reasonably access the other borrower's loan information, or if we otherwise determine that it would be in the best fiscal interest of the federal government to permit separate application."
HUD Guidance on Tenant Screening	Directs housing authorities to refrain from performing credit checks, because damaged credit is a result of abuse and not a predictor of creditworthiness. "Minimal or poor credit history that was due to domestic violence. . . is not the fault of the survivor and does not bear upon the likelihood that the survivor will pay their rent on time in the future."
IRS Innocent Spouse Relief	Relieves individuals from underreported tax debt on a joint return, when they did not know about the error OR if they are victims of domestic abuse.

	"Exception for victims of domestic abuse: You may be eligible for relief even if you knew about errors if: ● You were the victim of spousal abuse or domestic violence before signing the return ● You didn't challenge the items on the return because of fear ● You signed the joint return because you were pressured or threatened"
Fair Credit Reporting Act	"Companies that provide information to consumer reporting agencies also have specific legal obligations, including the duty to investigate disputed information." "Each financial institution or creditor that offers or maintains one or more covered accounts must develop and implement a written Identity Theft Prevention Program (Program) that is designed to detect, prevent, and mitigate identity theft in connection with the opening of a covered account or any existing covered account." Also "establishes a method for a victim of trafficking to submit documentation to consumer reporting agencies, including information identifying any adverse item of information about the consumer that resulted from certain types of human trafficking, and prohibits the consumer reporting agencies from furnishing a consumer report containing the adverse item(s) of information."[134] Recently (December 2024), the Center for Survivor Agency and Justice and the National Coerced Debt Working Group[135] worked with Consumer Financial Protection Bureau to seek FCRA Rulemaking on Coerced Debt to protect victim-survivors with coerced debt. The Intent for Rulemaking establishes that a) coercion is a type of fraud (modify "identity theft" to include "without effective consent"); b) a victim-survivor could submit evidence of such coercion and that evidence need NOT be a police report but could take the form of a Federal Trade Commission report, a Self-attestation, or Language Access (the ability of a non-English speaker to submit to the FTC in their language of origin); c) a victim-survivor can block debt information even when an item was in their shared home and they derived "benefit."
SECURE 2.0 Act of 2022	Secure 2.0 Act is a law that aims to strengthen retirement security and savings. "Section 314, Penalty-free withdrawal from retirement plans for individual case of domestic abuse. A domestic abuse survivor may need to access his or her money in their retirement account for various reasons, such as escaping an unsafe situation. Section 314 allows retirement plans to permit participants that self-certify that they experienced domestic abuse to withdraw a small amount of money (the

	lesser of $10,000, indexed for inflation, or 50 percent of the participant's account). A distribution made under Section 314 is not subject to the 10 percent tax on early distributions. Additionally, a participant has the opportunity to repay the withdrawn money from the retirement plan over 3 years and will be refunded for income taxes on money that is repaid. Section 318 is effective for distributions made after December 31, 2023. Section 314 of the SECURE 2.0 Act adds section 72(t)(2)(K) to the Code, which permits a distribution from an applicable eligible retirement plan to a domestic abuse victim if made during the 1-year period beginning on the date on which the individual is a victim of domestic abuse by a spouse or domestic partner."
Bank Secrecy Act	Financial institutions, including banks, casinos, money services businesses, brokers or dealers, insurance companies, mutual funds, futures commissions merchants, loan or finance companies and household government-sponsored enterprises, are required to report to the federal government suspicious activity that might indicate money laundering, tax evasion, or other criminal activities. It is also referred to as the anti-money laundering law. Elder financial exploitation is one criminal activity for which a bank is required to submit a suspicious activity report (SAR).
FinCEN Suspicious Activity Report (FinCEN SAR) Electronic Filing Instructions	Types of categories of suspicious activities as they relate to domestic financial abuse: "35. Other suspicious activities a. Account takeover b. Bribery or gratuity c. Counterfeit instruments d. Elder financial exploitation e. Embezzlement/theft/disappearance of funds f. Forgeries g. Identity theft h. Little or no concern for product performance penalties, fees, or tax consequences i. Misuse of "free look"/cooling off/right of rescission j. Misuse of position or self-dealing k. Suspected public/private corruption (domestic) l. Suspected public/private corruption (foreign) m. Suspicious use of informal value transfer system n. Suspicious use of multiple transaction locations o. Transaction with no apparent economic, business, or lawful purpose p. Two or more individuals working together q. Unauthorized electronic intrusion r. Unlicensed or unregistered MSB

	s. Other (*specify type of suspicious activity in space provided*)”
Regulation Z, *also known as the Truth in Lending Act (TILA)*	A federal law that protects consumers from unfair credit practices. It applies to many types of loans, including mortgages, credit cards, and student loans. Established “unauthorized use” as “the use of a credit card by a person, other than the cardholder, who does not have actual, implied, or apparent authority for such use, and from which the cardholder receives no benefit.”
Regulation E, also known as the *Electronic Fund Transfer Act (EFTA)*	A set of rules that protect consumers who use electronic fund transfers (EFTs). This includes transactions made with checking accounts, debit cards, and other electronic methods. Established an **unauthorized electronic fund transfer (EFT)** as “an EFT from a consumer’s account initiated by a person other than the consumer without actual authority to initiate the transfer and from which the consumer receives no benefit. 12 CFR 1005.2(m). Unauthorized EFTs include transfers initiated by a person who obtained a consumer’s access device through fraud or robbery and consumer transfers at an ATM that were induced by force.”
Regulation X , also known as the *Real Estate Settlement Procedures Act*	A federal law that offers protection to consumers who possess or apply for federally related mortgages. This establishes the rights consumers have to continue servicing their mortgage after divorce, supported by a court order or divorce decree. “iii. **Divorce or legal separation.** Assume that a potential successor in interest indicates that an ownership interest in the property transferred to the potential successor in interest from a spouse who is a borrower as a result of a property agreement incident to a divorce proceeding. Assume further that the applicable law of the relevant jurisdiction does not require a deed conveying the interest in the property but accepts a final divorce decree and accompanying separation agreement executed by both spouses to evidence transfer of title. Under these circumstances, it would be reasonable for the servicer to require the potential successor in interest to provide documentation of the final divorce decree and an executed separation agreement. Because the applicable law of the relevant jurisdiction does not require a deed, it generally would not be reasonable for the servicer to require a deed.”
Address Confidentiality Program Law Example, Iowa Confidentiality Law	An Iowan state law that allows a victim-survivor to use an address designated by the secretary of state as a substitute mailing address. “9E.5 Use of designated address.

	1. When a program participant presents the program participant's designated address to any person, that designated address shall be accepted as the address of the program participant. The person shall not require the program participant to submit any other address that could be used to physically locate the program participant either as a substitute address or in addition to the designated address, or as a condition of receiving a service or benefit, unless the service or benefit would be impossible to provide without knowledge of the program participant's physical location. 2. A program participant may use the designated address as the program participant's work address. 3. The secretary shall forward all mail sent to the designated address to the program participant." IA Code § 9E.5 (2024)
Other	The Interagency Statement on Elder Financial Exploitation also states that a number of laws and regulations related to consumer protection and safety and soundness may be applicable to instances of elder financial exploitation.[136] These same laws may provide guidance for financial abuse of other families. These additional laws and regulations include: Electronic Fund Transfer Act, the Expedited Funds Availability Act, the Fair Debt Collection Practices Act, Section 5 of the FTC Act, the Dodd-Frank Wall Street Reform and Consumer Protection Act, the Equal Credit Opportunity Act (ECOA).

Annex B: Financial Abuse Definitions from Texas and Tennessee

Financial Abuse as Defined in Tennessee Code Title 36. Domestic Relations § 36-3-601[137]

(1) "Abuse" means:
(A) Inflicting, or attempting to inflict, physical injury on an adult or minor by other than accidental means;
(B) Placing an adult or minor in fear of, or in, physical harm or physical restraint;
(C) Causing malicious damage to the personal property of the abused party; or
(D) Intentionally engaging in behavior that amounts to financial abuse;

….

(6) "Financial abuse" means behavior that is coercive, that is deceptive, or that unreasonably controls or restrains a person's ability to acquire, use, or maintain economic resources to which the person is entitled, including using coercion, fraud, or manipulation to:
(A) Restrict a person's access to money, assets, credit, or financial information;
(B) Unfairly use a person's economic resources, including money, assets, and credit, to gain an advantage; or

(C) Exert undue influence over a person's financial behavior or decisions, including forcing default on joint or other financial obligations; exploiting powers of attorney, guardianship, or conservatorship; or failing or neglecting to act in the best interest of the person to whom a fiduciary duty is owed.

Financial Abuse Definition from the Texas Penal Code[138]:

"Financial abuse" means the **wrongful taking, appropriation, obtaining, retention, or use of, or assisting in the wrongful taking, appropriation, obtaining, retention, or use of, money or other property of another person by any means, including by exerting undue influence**. The term includes financial exploitation.

"Financial exploitation" means the **wrongful taking, appropriation, obtaining, retention, or use of money or other property of another person by a person who has a relationship of confidence or trust with the other person**. Financial exploitation may involve **coercion, manipulation, threats, intimidation, misrepresentation, or the exerting of undue influence**. The term includes:

a) the breach of a fiduciary relationship, including the misuse of a durable power of attorney or the abuse of guardianship powers, that results in the unauthorized appropriation, sale, or transfer of another person's property;
b) the unauthorized taking of personal assets;
c) the misappropriation, misuse, or unauthorized transfer of another person's money from a personal or a joint account; and
d) the knowing or intentional failure to effectively use another person's income and assets for the necessities required for the person's support and maintenance.

Financial abuse can occur to anyone, but is based on unequal power dynamics that exist within relationships of confidence or trust.
According to the Texas Penal Code, a person has a relationship of confidence or trust with another person if the person:

1) **is a parent, spouse, adult child, or other relative by blood or marriage of the other person;**
2) is a joint tenant or tenant in common with the other person;
3) has a legal or fiduciary relationship with the other person;
4) is a financial planner or investment professional who provides services to the other person; or
5) is a paid or unpaid caregiver of the other person.
6) A person commits an offense if the person knowingly engages in the financial abuse of an elderly individual.

Annex C: National Network to End Domestic Violence – The Independence Program

The Independence Program

A program of the National Network to End Domestic Violence (NNEDV) that offers survivor-centered lending products to survivors of domestic violence in all states and U.S. territories.

NNEDV NATIONAL NETWORK TO END DOMESTIC VIOLENCE

First Step Loan (FSL)

(formerly Independence Project loan)

Credit-building loan for survivors to rebuild or establish credit

Terms:

- Amount: $100
- Interest: 0%
- Fees: $0
- $10/month for 10 months

Qualifications:

- Met with a DV advocate at least three times
- Provide a monthly budget that shows ability to repay $10/month

Borrowers must first successfully complete a First Step Loan to qualify for a Next Step Loan.

15 — *Average **credit score increase** with First Step Loans: 15 points*

*Average **ending credit score**: 646*

NEW!

Next Step Loan 500 (NSL500)

Asset-building loan for survivors to continue toward financial goals

Terms:

- Amount: $500
- Interest: 0%
- Fees: $0
- $27.78/month for 18 months

Qualifications:

- Successfully complete a First Step Loan
- Provide a monthly budget that shows ability to repay $27.78/month

NEW!

Next Step Loans 1000 (NSL1000)

Asset-building loan for survivors to continue toward financial goals

Terms:

- Amount: $1,000
- Interest: 0%
- Fees: $0
- $41.67/month for 24 months

Qualifications:

- Successfully complete a First Step Loan
- Provide a monthly budget that shows ability to repay $41.67/month

While NNEDV is unable to guarantee or promise exact credit score improvement upon completion of the loan, it is imperative that you fulfill your responsibility of repayment to the best of your ability, so that NNEDV can report repayment in a timely and accurate manner.

*Scan this QR code to apply for an Independence Program Loan (or visit **NNEDV.org/IP**).*

*NNEDV is grateful to **Bread Financial**, the **Kering Foundation**, and **The Allstate Foundation** for their Independence Program support and partnership.*

Source: National Network to End Domestic Violence: Independence Program

Annex D: Acronyms

ABA	American Bankers Association
ACP	Address Confidentiality Programs
AI	Artificial Intelligence
ANPR	Advanced Notice of Proposed Rulemaking
CDIA	Consumer Data Industry Association
CFPB	Consumer Financial Protection Bureau
CRA	Consumer Reporting Agency
CSAJ	Center for Survivor Agency and Justice
FI	Financial Institution
FCRA	Fair Credit Reporting Act
FTC	Federal Trade Commission
LGBTQ	Lesbian, Gay, Bisexual, Transgender or Queer
LMICs	Low-and-Middle Income Countries
NCLC	National Consumer Law Center
NNDEV	National Network to End Domestic Violence
NSFI	National Strategy for Financial Inclusion
SAR	Suspicious Activity Report
UK	United Kingdom
US	United States

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