

# Focusing on Reentry:

Justice-Involved Individuals And Their Families



# Disclaimer

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# Today's Presenters

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# Today's Agenda

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Introduction to the CFPB, Office of Community Affairs

January 2022 Report: *Justice-Involved Individuals and the Consumer Financial Marketplace*

Why focus on justice-involved individuals and reentry?

What we can learn from consumer complaints

CFPB tools and resources

*Your Money, Your Goals* Toolkit

*Focus On Reentry* companion guide

- Submitting a complaint, Ask CFPB
- Ordering/downloading materials, submitting questions



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# Before we get started...

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## **What areas do we have represented on today's webinar?**

I work in a prison or jail

I have been directly impacted by the criminal justice system (directly or as a loved one of someone with a system involvement)

I work in community corrections (probation or parole)

I am a community-based service provider (financial counseling, reentry services, etc.)

I am in the legal field (pro bono attorney, prosecutor, defense attorney, etc.)

Other

# Introduction to the CFPB

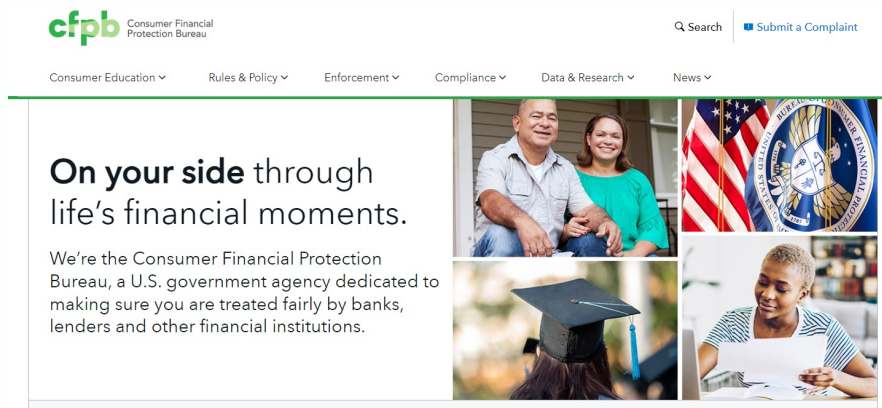
CFPB's mission and overview of the Office of Community Affairs

# Commitment to Supporting Consumers

Works to ensure markets for consumer financial products are fair, transparent, and competitive

Implements and enforces Federal consumer financial law

Provides consumers with up-to-date information and resources to protect and manage their finances



# CFPB's Office of Community Affairs

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## *Market* **Monitoring**

Regularly gather market intelligence through direct stakeholder engagement, interviews, and focus groups to better inform policy and identify potential risks to consumers.

## *Advance* **Competition**

Drive innovation and promote competition in the financial marketplace by expanding research and reports that highlight barriers and policies harmful to consumers.

## *Build* **Capacity**

Support public and non-profit partners providing financial empowerment programming with resources and technical guidance.



# CFPB's January 2022 Report

## *Justice-Involved Individuals and the Consumer Financial Marketplace*

[consumerfinance.gov/data-research/research-reports/justice-involved-individuals-consumer-financial-marketplace](https://consumerfinance.gov/data-research/research-reports/justice-involved-individuals-consumer-financial-marketplace)

Looks at financial products consumers *must* use at each stage in the justice system

Identified numerous market failures – for example, a lack of consumer choice – and their negative consequences for individuals, families, and communities



### At Pretrial

Detained people and their families are under duress to accept any commercial bond agreement, regardless of terms or overall costs.

Courts and bond agents may impose conditions like electronic monitoring that are run by for-profit companies and result in substantial fees.

Private bond companies may not provide information in a language a person understands, making it difficult for the person to assess terms.



### During Incarceration

Incarcerated people and their families are often required to use high cost services to transfer money into a person's jail or prison account.

The challenges of managing finances while incarcerated may result in increased debt, credit delinquencies, and lower credit scores.

Negative credit records limit housing, employment, and access to financial options upon reentry.



### Upon Reentry

Prepaid debit cards used to refund prison or jail account balances and pay release benefits often impose fees for use and inactivity.

Difficulties resolving errors on criminal background checks can lead to challenges in securing safe, stable housing and employment.

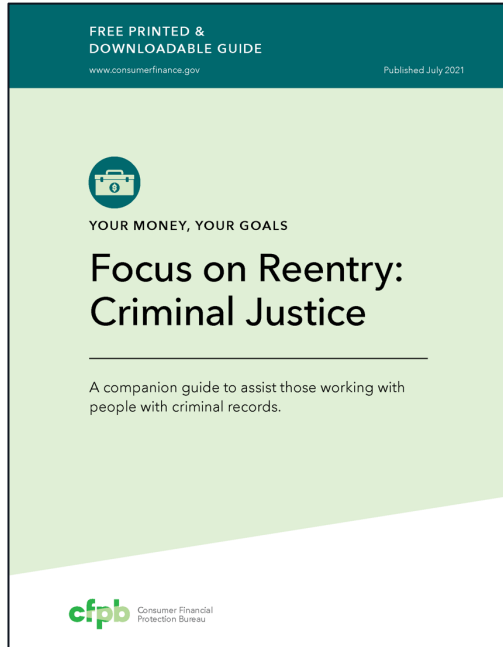
If a lender considers a criminal record in evaluating income stability, access to small business loans or other loans may be affected.



### Criminal Justice Debt

- Many local, state, and federal government agencies impose criminal justice debt on people via fines, fees, and restitution.
- To collect criminal justice debt, states increasingly involve private parties that may tack on additional fees and penalties.
- Criminal justice debt can lead to incarceration, driver's license suspension, and other penalties that perpetuate the cycle of justice involvement.

# Other CFPB Resources and Actions



## CFPB Penalizes JPay for Siphoning Taxpayer-Funded Benefits Intended to Help People Re-enter Society After Incarceration

*JPay will pay \$6 million in consumer redress and penalties*

OCT 19, 2021

## Consumer Financial Protection Bureau and Virginia, Massachusetts, and New York Attorneys General Sue Libre for Predatory Immigrant-Services Scam

Bureau and States Accuse Company of Luring Non-English-Speaking Immigrants into Abusive, English-Only Contracts

FEB 22, 2021

## CFPB Takes Action Against "Bad Check" Debt Collector

MAR 30, 2015

# Why Focus on Justice-Involved Individuals?

What the research says and CFPB's work in this area

# Why Justice-Involved Individuals?

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More than 70 million individuals have a criminal record

One-in-four American adults

Limits access to employment, housing, other basic needs and opportunities

Financial challenges

Background screening reports and employment

High fees for basic products and services

Consumer and criminal justice debt

Impact on families from debt, missed wages



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# Why Justice-Involved Individuals?

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**2.1 million** adults are in jail or prison; **4.4 million** are under community supervision (2019)

People are booked into jail ~**8.7 million** times each year

More than **600,000 people** are released from prison each year

More than **70 million** people have a criminal record

Impacts extend to family members, friends, and communities

People of color are disproportionately impacted



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# Why Justice-Involved Individuals?

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Financial insecurity is a cause and a consequence of justice involvement

Private companies provide financial products and services throughout all parts of the criminal justice system

Consumers often have little or no choice over which products or services to use

Vulnerability to aggressive practices

- Threat of arrest, prosecution, detention, or reincarceration for failure to pay fines and fees

- May be targeted by high-cost financial providers (e.g., high-cost credit)

Justice involvement can create lasting barriers to the financial marketplace

# Consumer Complaints

What we can learn and how they inform our work

# Importance of Submitting a Complaint to the Bureau

[consumerfinance.gov/complaint](https://consumerfinance.gov/complaint)

The screenshot shows the top navigation bar of the Consumer Financial Protection Bureau website. The main heading is 'Submit a complaint'. Below it, a paragraph states: 'Each week we send more than 10,000 complaints about financial products and services to companies for response. If another agency would be better able to assist, we'll send it to them and let you know.' A callout box says 'Most companies respond within 15 days.' To the right is an illustration of three speech bubbles with exclamation marks. Below this is a section titled 'See how the complaint process works' with a video player showing a laptop and a play button. To the right of the video is a section titled 'HAVE A QUESTION? ¿PREGUNTAS?' with contact information: 'If you can't submit online (7-10 minutes), you can submit over the phone (25-30 minutes). More than 180 languages are available. Call: (855) 411-2372 TTY/TTD: (855) 729-2372 8 a.m. to 8 p.m. ET, Monday through Friday (except federal holidays).'

- Submitting online usually takes less than 10 minutes
- If consumers can't submit online, they can submit a complaint over the phone. This usually takes 25-30 minutes
- (855) 411-2372
- TTY/TTD: (855) 729-2372
- 180 languages are available
- 8 a.m. to 8 p.m. ET, Monday through Friday



# View Public Complaints Online

The screenshot shows the 'Consumer Complaint Database' search interface. At the top, it says 'Showing 1,096 matches out of 4,900,305 total complaints'. The search criteria include 'All data' and the keyword 'inmate OR incarcerat\*'. The left sidebar shows filters for 'Date CFPB received the complaint' (ranging from 12/01/2011 to 03/25/2024) and 'Product / sub-product' (with options like 'Credit reporting, credit repair services, or other personal consumer reports'). The main content area displays a list of results for a specific complaint with ID 8481410, including details like 'Company name: BANK OF AMERICA, NATIONAL ASSOCIATION', 'Product: Prepaid card', and 'Issue: Problem with a purchase or transfer'.

[consumerfinance.gov/data-research/consumer-complaints](https://consumerfinance.gov/data-research/consumer-complaints)

- Search by keyword
- Filter by date, product, issue, company name, and many more fields
- Read consumer complaint narratives and company responses (consumers must opt-in to share)
- Ability to create charts and maps
- Data goes back to 2011 and is updated regularly

# Complaints from Justice-Involved Individuals

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Used keyword searches for company names and phrases like “while I was incarcerated”

Why do we have limited complaints from justice-involved individuals?

- Lack of awareness around consumer protection rights

- JII consumers may not feel comfortable submitting complaints

- Greater challenges submitting complaints by phone, online, or by mail

Why do we analyze at JII-related consumer complaints?

- Learn directly from consumers about their experiences

- Track trends and spot emerging issues

# Consumer Complaints

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What have we learned?

From the complaint narratives, we identified four themes:



High fees for basic financial products and services



Debt collection challenges across a range of debts



Identity fraud and unauthorized activity during incarceration



Difficulty disputing incorrect information or fraudulent activity

# High Fees for Basic Financial Products

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## Money Transfers

One consumer described fees including those for money transfers as “exorbitant” and “just plain greedy exploitation.” The consumer reported paying \$9.00 for a money transfer by credit card (Complaint [4652341](#))

## Release Cards

A consumer described being “forced to use” a particular card with high fees when released from prison (Complaint [6509832](#))



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# Identity Fraud and Unauthorized Activity

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- Difficulties monitoring personal finances while incarcerated can leave people blindsided at reentry
- Not just credit records; bank and prepaid debit card activity too

“I recently came home from prison after doing four years and checked my credit report. I have accounts that were created while I was incarcerated. I did not have the ability to apply for anything while incarcerated because I did not have access to anything to do so” [Complaint [5529665](#)].

# Debt Collection

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Spans a wide range of debts

"I never borrowed from them nor anyone else. They say that they had bought this debt from [bank] which I already proved that it was a case of identity theft & that there weren't anyway that this debt was of my own actions. **I was incarcerated for almost 2 decades which started in [sixteen years before the debt was incurred]. They said debt had started in [date] & I didn't get released until [three years after debt was incurred]**. Again, I've already proven this fact to [bank] w/ my release papers" [Complaint [4768938](#)] [emphasis added].

# Disputing Incorrect Information or Fraud

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The company denied my claim on XX/XX/XXXX saying that because my pin was used for some of the transactions, they were not unauthorized and I was responsible for them in full. I fully complied with all requests for information. **They accused me of making the transactions myself and lying about it, even though I was clearly in jail the whole time this was going on.** [Complaint [5134215](#)] [emphasis added].

I was detained at [an adult detention center], remanded to 90 days treatment, and to document the fraud including emails, correspondence indicating an unemployment overpayment of \$5,589, police reports, federal reports (to IC3, FTC and the IRS) and affidavits/sworn statements regarding the identity theft, and to further prove that **I did not and could not have authorized nor initiated the fraudulent transactions that occurred** through my account [Complaint [5420425](#)] [emphasis added].



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# CFPB Tools and Resources

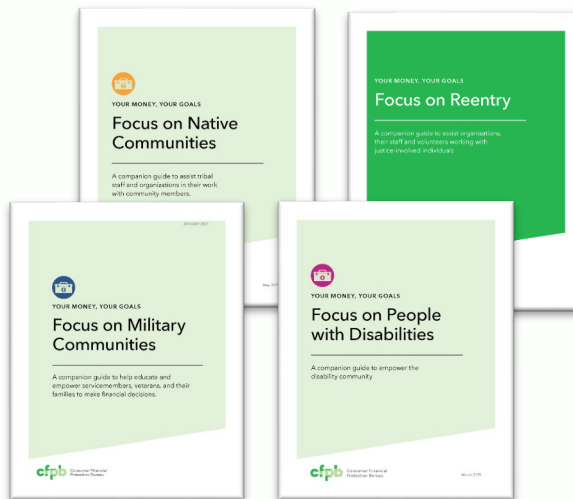
*Your Money, Your Goals* toolkit, reentry companion guide, and more



# Your Money, Your Goals: Resources



One Toolkit  
Comprehensive information  
for practitioners.



Four Companion Guides  
Help practitioners contextualize the money  
conversation to the unique needs of specific  
populations.



Four Booklets  
Actionable, compact booklets on bills,  
credit, debt and saving.  
For in-person use.

# Focus on Reentry

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## Purpose

The guide helps frontline staff and volunteers working with individuals with criminal records address some of the specific financial challenges they may face.

**Available at:** [consumerfinance.gov/consumer-tools/educator-tools/your-money-your-goals/companion-guides/#anchor\\_reentry](https://consumerfinance.gov/consumer-tools/educator-tools/your-money-your-goals/companion-guides/#anchor_reentry)



YOUR MONEY, YOUR GOALS

## Focus on Reentry: Criminal Justice

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A companion guide to assist those working with people with criminal records.

# What's Inside *Focus on Reentry*

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**Module 1:** Setting Goals

**Module 2:** Saving

**Module 3:** Tracking Income and Benefits

**Module 4:** Paying Bills

**Module 5:** Getting through the Month

**Module 6:** Dealing with Debt

**Module 7:** Understanding Credit Reports and Scores

**Module 8:** Choosing Financial Products and Services

**Module 9:** Protecting your Money

**Module 10:** Understanding Background Screening Reports

# Using the Information and Tools

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You can use the information and tools to help people with criminal records:

- Identify financial challenges to successful transition

- Obtain documents related to identification to help ease the transition process

- Develop a cash flow budget by tracking income and spending

- Identify and prioritize debt—both debt arising from involvement in the criminal justice system (criminal justice debt) and consumer debt

- Access and review credit reports

- Understand the background screening process and individual rights when applying for jobs

# Tool: Preparing Your Money Situation Before or During Incarceration

Use this checklist prior to or soon after incarceration to:

Identify any of the issues that apply and take action to address them

Use the websites and the “Additional resources”



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## Get ready by **Preparing your money situation before time of incarceration**

1. Review all the items on the list to see if any apply to you.
2. For those you check, seek out the information by visiting the website or tool, or asking a trusted family member, friend or social services or legal services provider to get the information. If you are already in a correctional facility, you may want to seek out resources from staff in the library, other staff, or social services or legal services provider.

### Child support

If you have child support obligations and will be unable to pay when you are incarcerated, you may want to seek assistance with getting a modification of the child support order. For state-by-state information on how to change a support order, visit: <https://www.acf.hhs.gov/css/parents/how-do-you-get-child-support/changing-order>

### Student loan debts

Private and public student loans may feature a range of alternative repayment plans that may be available to an incarcerated individual. For federal student loans, you may be eligible for an income-driven repayment plan and qualify for reduced or \$0 monthly payments. But it is critical to look into these options as soon as you transition to incarceration to make sure all requirements are met. For more information, see <https://www.consumerfinance.gov/consumer-tools/student-loans/> and Additional resources of this guide. [https://www.consumerfinance.gov/your-money-your-goals/companion-guides/#anchor\\_reentry](https://www.consumerfinance.gov/your-money-your-goals/companion-guides/#anchor_reentry)

### Protecting against identity theft

You may want to put a free credit freeze or fraud alert on your credit to help prevent identity theft when you are incarcerated. See Focus on Reentry guide Handout: How to handle identity theft in Module 9: Protecting your money. [https://www.consumerfinance.gov/your-money-your-goals/companion-guides/#anchor\\_reentry](https://www.consumerfinance.gov/your-money-your-goals/companion-guides/#anchor_reentry)

### Bank or credit union account

If you have an account that you won't be using, you should check with your bank or credit union about the policies for inactive accounts and account closing. If the bank or credit union closes the account due to inactivity, you may incur fees and it may affect your ability to get an

# Tool Example

## Setting SMART Goals

**S**pecific

**M**easurable

**A**chievable

**R**elevant

**T**ime bound

Define the steps to achieve them

These goals may be short term or longer term



## Setting SMART goals based on your values motivates you to achieve them

1. Think about your values and choose which ones are most important to you.
2. List some things you'd like to change about your life and dreams you have.
3. Pick one or two items from your list of brainstormed ideas and create a SMART goal. Make copies of the next page if you want to set more than one goal.

Which values are most important to you?

- |   |                                       |                                       |
|---|---------------------------------------|---------------------------------------|
| <input type="checkbox"/> Family/friends | <input type="checkbox"/> Reputation   | <input type="checkbox"/> Status       |
| <input type="checkbox"/> Freedom        | <input type="checkbox"/> Self-respect | <input type="checkbox"/> Other: _____ |
| <input type="checkbox"/> Happiness      | <input type="checkbox"/> Spirituality | <input type="checkbox"/> Other: _____ |
| <input type="checkbox"/> Health         | <input type="checkbox"/> Stability    | <input type="checkbox"/> Other: _____ |

What are your hopes, wants, and dreams?

Thinking about your values, write a list of things you'd like to change and dreams you have. They can be short term (less than six months to achieve) or long term (more than six months to achieve).

Things I'd like to change	Dreams I have for myself and my family

# Handout Example

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## **Obtaining and understanding your criminal records**

Since background screening reports may include criminal record information, it's important to check criminal records for mistakes

Where to get records:

Local or state police department

State criminal records authority

State or county court records

- Federal court records
- FBI (Federal Bureau of Investigation)

Individuals may need to seek help with criminal records from legal aid, expungement clinics, or other organizations that provide assistance

# Handout Example

## How to Handle Identity Theft

CREDIT PROTECTION AND REQUIREMENTS	SECURITY FREEZE	INITIAL ALERT	EXTENDED ALERT
Lender is required to verify your identity before approving new credit		✓	✓
Completely prevents your report from being shared with most third parties unless lifted	✓		
Triggers heightened verification procedures for the people who use your credit report		✓	✓
Request if you believe you're a victim of ID theft	✓	✓	
Requires an identity theft report			✓
Extra free credit report		✓	✓
Exclusion from prescreening lists			✓
Free in every state	✓	✓	✓



# Ask CFPB (in English and Spanish)

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CFPB offers clear, impartial answers to hundreds of financial questions on Ask CFPB.

Find the information you need to make more informed choices about your money.

Search for your question or browse questions and answers by topics.



Available at: [consumerfinance.gov/ask-cfpb](https://consumerfinance.gov/ask-cfpb)



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# Download / Order *Your Money, Your Goals* Materials

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On the [Your Money, Your Goals materials pages](#), download and look for the “Order a printed copy” links.

The “Order a printed copy” links will take you the Pueblo GPO.gov site where you can order free materials by adding them to your cart and checking out.

Provide a street address, rather than a PO Box for your order.

Plan for a shipping time of 4-6 weeks.

If you need materials faster, email [YourMoneyYourGoals@cfpb.gov](mailto:YourMoneyYourGoals@cfpb.gov). Use “YMYG Materials Order” as your subject line.

# CFPB Prepaid Products Agreement Database

View fee schedules and disclosures for release cards

[consumerfinance.gov/data-research/prepaid-accounts/search-agreements](https://consumerfinance.gov/data-research/prepaid-accounts/search-agreements)

### Prepaid product agreements database

Find prepaid product agreements by issuer name, product name, prepaid product type, and other criteria. All data is refreshed nightly.

You may also choose to [download the entire dataset](#), including all prepaid product agreement files and their supporting metadata.

First-time users may want to see [documentation about the data](#).

Note that we are unable to do a full-text search of agreement files.

Search within

All fields  Clear Search

Showing 50 matches out of 3334 total products

Filters applied: Prison release Clear all filters

**C 10 AF Legacy**

**Issuer name**  
Axiom Bank, National Association [Download most recent agreement files C\\_10\\_AF\\_Legacy\\_01\\_10\\_2020.zip](#)

**Prepaid product type**  
Prison release [View all agreement files](#)  
[View all agreements for C 10 AF Legacy](#)

**Program manager**  
Rapid Financial

**Other relevant parties**  
No information provided

**Current status**  
Active

[Apply filters](#)

C 10 Legacy AF ALDOC

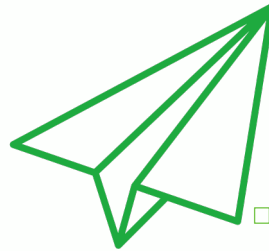
# Questions?

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## Ask us now

About how to use these materials in your work.



## Email us

With ideas for new materials, improvements, and translations:  
[YourMoneyYourGoals@cfpb.gov](mailto:YourMoneyYourGoals@cfpb.gov).



## Visit our website

For additional information on resources and downloadable materials.  
[Consumerfinance.gov/myg](https://Consumerfinance.gov/myg)

# Closing

Thank you for joining our webinar focused on  
Justice Involved Individuals And Their Families

