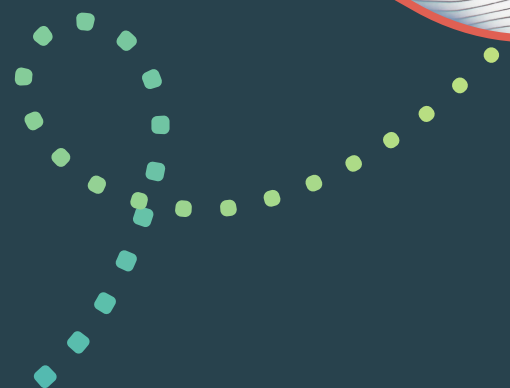




CRA Financial Education Programs: Quick Start Guide for Banks





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Financial education plays a powerful role in strengthening communities, and under the Community Reinvestment Act (CRA), it is also a recognized and encouraged community development activity when targeted to income-qualifying populations.

Everfi partners with financial institutions to deliver scalable, high-impact financial education programs that are intentionally designed to align with CRA requirements. By supporting Everfi's programs, banks can meet regulatory expectations while helping students build real-world financial skills that benefit families, neighborhoods, and local economies.



CRA Primary Purpose

The programs offered by Everfi are structured to meet CRA requirements for the primary purpose standard under community development. The programs and services have a *bona fide* intent to provide financial education and are designed to reasonably achieve this purpose. Furthermore, Everfi's programs are earmarked for low- and moderate-income (LMI) individuals, meeting regulatory requirements for primary purpose based on the fact that the majority of individuals served are within a CRA-qualified income group.





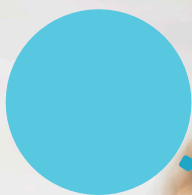
School Populations

Schools are one of the most effective and impactful channels for delivering financial education, especially in communities where students may have limited access to financial resources at home. Under CRA guidance, financial education programs delivered to schools where a majority of students qualify for free or reduced-price lunch are considered targeted to LMI populations.

As outlined within the CRA Q&As, Everfi's K-12 financial education programs are targeted to schools where the majority (i.e., over 50 percent) of students are eligible for USDA free and reduced-price lunch programs. Through the documentation of the free and reduced-price lunch student population, Everfi ensures that financial education aligns with the explicit standards outlined within the CRA Q&As for student populations.

To ensure data accuracy and consistency, Everfi utilizes data published by the U.S. Department of Education's National Center for Education Statistics to document which schools have a majority of students who are eligible for free and reduced-price lunch. This data is updated annually and made available publicly for review, as well.

Many of the schools supported by Everfi are also located in LMI census tracts or Federal Financial Institutions Examination Council (FFIEC) designated underserved or distressed census tracts. These services provide an additional responsive activity in support of community needs but provide financial education to individuals located in these key CRA target geographies. Everfi works with schools nationally and can direct bank investment to schools that meet CRA eligibility requirements.



CRA Investment

Bank investment in Everfi's programs supports an activity with a documented CRA primary purpose of financial education targeted to a CRA-income qualified population—schools where the majority of students are eligible for free or reduced-price lunch. As the bank's investment can be targeted to support financial education directly in these schools within the bank's CRA Assessment Areas, the bank can provide its investment in Everfi for consideration as a qualified investment during CRA examinations.



CRA Service

Where available, bank employees can also participate in the delivery of financial education to students at CRA-qualifying schools. Through this volunteerism, bank employees are representing their banks and also providing financial expertise in the delivery of financial education. As the student population at these schools are income-qualified under CRA, the bank employees' volunteer service can also be submitted for consideration as a community development service during CRA examinations.

Community Needs

Financial education for students has been identified as a critical need nationally. Bank regulatory agencies, government agencies, nonprofits, and other entities have provided a vast number of studies and analyses to support the need for financial education for school-aged children. Within the CRA Q&As, financial education is specifically mentioned as a focus of CRA service and investment, especially when targeted to LMI individuals or students who are eligible for free and reduced-price lunch. By supporting Everfi's deployment of financial education in CRA-qualifying schools, banks can also demonstrate responsiveness to an identified community need within their Assessment Areas.






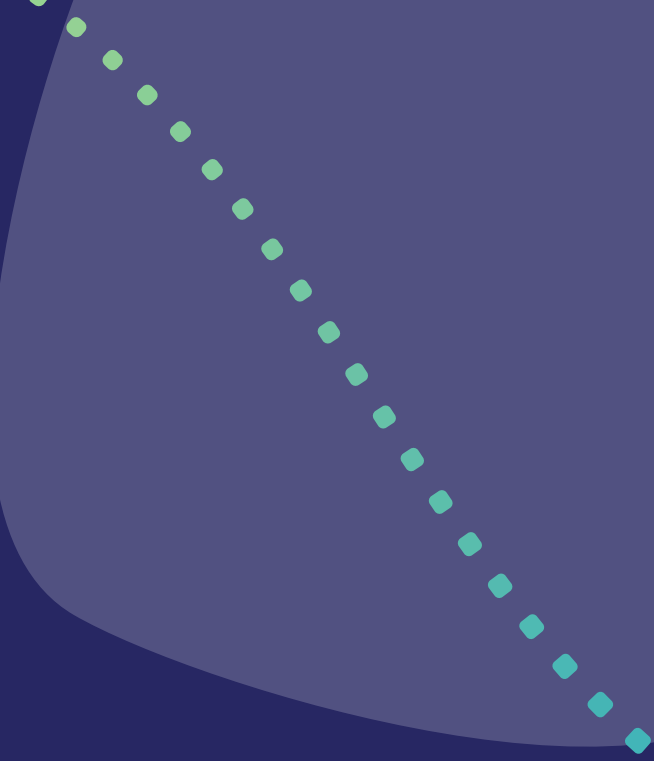
Documenting Financial Education for CRA Examinations

When preparing for a CRA examination, bankers should document their efforts to provide CRA financial education including:

- The date, dollar amount and purpose of any investment
- The school(s) that benefited
- The percentage of students who are eligible for free or reduced-price lunch
- The name and full physical address of the school(s)
- The geocoded address for each school, including the census tract income level
- For employee service activities:
 - * The date of service
 - * Type of service provided
 - * Number of students served
 - * Percentage of those students who are eligible for free or reduced-price lunch
 - * Number of hours provided
 - * Number of instances of service
 - * The location of the service
 - * Financial education topics covered
 - * If available, any documentation on knowledge gain or impact



By integrating Everfi's financial education programs into their CRA strategy, banks can demonstrate a clear commitment to serving low- and moderate-income populations and meeting documented community needs. Everfi's alignment with CRA primary purpose standards, its targeted focus on schools with high free- and reduced-price lunch eligibility, and its ability to support both qualified investments and community development services enable banks to confidently present their efforts during CRA examinations. With accurate documentation and thoughtful deployment, banks can strengthen their CRA performance while contributing meaningful financial knowledge to students and communities that benefit most.



This document and related regulatory analyses were prepared in partnership with findCRA in December 2025, based on findCRA's review of Everfi's offerings in comparison to the CRA and related regulatory guidance published at that time. The content provided is solely for informative and illustrative purposes and should only be construed as the professional opinion of findCRA and does not imply any affiliation or endorsement of Everfi. A bank should review the information presented herein in relation to its own interpretation of the CRA and related requirements regarding Everfi's offerings.

