

**Department of Defense  
Financial Readiness Network  
Statement of Support**

Offered by:  
**FINRA Investor Education Foundation**

**FINRA Investor Education Foundation (The FINRA Foundation)** is a 501(c)(4) organization that has obtained an exception to the eligibility requirements of the DoD Instruction 1344.07, "Personal Commercial Solicitation on Military Installations", paragraph 6.7.6.3.1., which mirror the requirements set forth in the bullets below (see attached Deputy Assistant Secretary of Defense, Force Education and Training, Department of Defense letter, Aug. 31, 2018). **The FINRA Foundation** aims to empower underserved Americans with the knowledge, skills and tools to make sound financial decisions throughout life. It accomplishes this mission through educational programs and research that help consumers achieve their financial goals and protect them in a complex and dynamic world.

Military financial readiness has been a strategic area of focus for **The FINRA Foundation** for more than 12 years. Using fine money levied against firms for misleading sales practices targeting military personnel, **The FINRA Foundation** launched our Military Financial Readiness Project in February 2006. We deliver free, unbiased financial education tools and training to service members, their spouses and on-base financial educators through a variety of outreach efforts, professional development programs and public awareness initiatives.

Since 2006, we have reached more than 47,500 members of the military community face-to-face at over 500 Military Financial Education Forums at 309 installations worldwide. We have also provided no-cost access to an advertising-free version of myFICO, an online credit management tool, to help more than 285,000 service members and spouses understand and improve their credit scores. We have distributed more than 1.1 million copies of *Money and Mobility*, a guide for managing money during duty station changes and deployments. Moreover, we have awarded fellowships to 1,537 military spouses, empowering them to earn the Accredited Financial Counselor certificate. These FINRA Foundation Fellows have logged more than 480,000 hours of service to the military community. **The FINRA Foundation** remains committed to advancing the financial readiness of service members and their families.

**The FINRA Foundation** recognizes that the financial readiness of Service members and their families is essential to the Department of Defense's (DoD) Total Force readiness.

**The FINRA Foundation** possesses valuable resources which align with the financial readiness needs of Service members and their families. **The FINRA Foundation** may enhance training and counseling offered by DoD to ensure Service members and their families are financially ready and possess the skills and resources to make informed financial decisions across the military lifecycle. Such resources may include access to financial education programs and materials, research, best practices in financial literacy, and emerging trends affecting the financial readiness of Service members and families.

**Therefore, The FINRA Foundation, offers this Statement of Support** as our commitment to improving and sustaining the financial literacy and preparedness of Service members and their families.

**The FINRA Foundation**, in offering its support, understands and affirms that it will abide by the federal statutes and regulations and DoD regulations and policies that serve as the basis for the Standards of Conduct, detailed below. By pledging our support, we:

- Will only provide financial education programs and materials if our organization is one of the following types of entities:
  - A qualified tax-exempt organization under sections 501(c)(3) or 501(c)(23) of title 26, United States Code.
  - A financial institution operating on a DoD installation under a valid operating agreement with educational program support limited to that installation.
  - An accredited non-profit academic institution.
- Will only conduct financial education on DoD installations at the express request of the installation commander and with the required Military Department approvals.
- Will, when delivering approved financial education programs and materials:



- Not use, under any circumstances, commercial agents, including representatives of loan, finance, insurance, or investment companies, to develop and disseminate information or provide educational programs for Service members on their personal financial affairs.
  - Include the appropriate disclaimers in all presentations and other educational materials that clearly indicate that we and the DoD do not endorse or favor any commercial supplier, product, or service, or promote the services of a specific financial institution.
  - Not solicit or otherwise collect personal information of Service members and their families, including email addresses.
  - Not use the seals, logos, insignia of the DoD or any DoD Component, DoD organizational unit, or DoD installation on our organization letterhead, with our activities, and other branding or products, or in any other way imply endorsement by or partnership with the DoD.
- Only use the name or abbreviation of the DoD, a DoD Component, DoD organizational unit, or DoD installation with prior approval from the appropriate DoD organization provided that our status as a non-Federal entity is apparent and unambiguous and there is no appearance of official sanction or support by DoD.
  - Not mislead members of the public to assume we are a part of the DoD nor prejudice or discredit a Federal Government Agency.

**The FINRA Foundation**, if requested by the Government, enter into a gratuitous service agreement with the DoD or DoD Component to properly facilitate the Government's acceptance of financial literacy programs, materials, or related services offered in support.

**The FINRA Foundation** understands participation with the DoD Financial Readiness Network and support provided under this Statement of Support is voluntary and does not create a contractual relationship or any financial obligation between the U.S. Government and the offering organization.

**The FINRA Foundation** accepts and will fulfill, our obligation to read and understand the appropriate statutes, regulations, and policies<sup>1</sup> governing the financial literacy and preparedness of Service members and their families. We agree to abide by all applicable laws, policies, and regulations not explicitly detailed here. Failure to do so may result in revocation of any agreements with the DoD.



JUN 26 2019

Signature  
Deputy Assistant Secretary of Defense  
(Force Education and Training)  
Department of Defense



19 June 2019

Signature  
President  
FINRA Investor Education Foundation

<sup>1</sup> Section 992 of title 10, United States Code, Financial literacy training: financial services  
Part 231 of Title 32 Code of Federal Regulations – Procedures Governing Banks, Credit Unions and Other Financial Institutions on DoD Installations  
DoD Instruction 1000.15, Procedures and Support for Non-Federal Entities Authorized to Operate on DoD Installations  
DoD Instruction 1342.22, Military Family Readiness  
DoD Instruction 1344.07, Personal Commercial Solicitation on DoD Installations





OFFICE OF THE ASSISTANT SECRETARY OF DEFENSE  
4000 DEFENSE PENTAGON  
WASHINGTON, D.C. 20301-4000

AUG 31 2018

Ms. Geraldine M. Walsh, President  
FINRA Investor Education Foundation  
1735 K Street, NW  
Washington, DC 20006-1506

Dear Ms. Walsh:

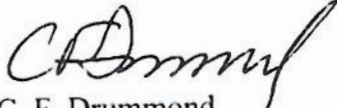
Thank you for your letter of July 17, 2018, in which you requested an exception to the requirement in DoD Instruction 1344.07, "*Personal Commercial Solicitation on Military Installations*", paragraph 6.7.6.3.1 for the Financial Industry Regulatory Authority Investor Education Foundation (FINRA Foundation). Under that policy, in order to provide financial education on military installations, a non-government organization must qualify as a tax-exempt organization under sections 501(c)(3) or 501(c)(23) of title 26, U.S. Code (the Internal Revenue code).

Your request for an exception to the aforementioned policy is approved based upon the following unique attributes of your organization:

- Congress mandated the establishment of FINRA's predecessor, the National Association of Securities Dealers, in 1938.
- Although the FINRA Foundation's parent organization, FINRA, is not a federal entity, federal law, with oversight from the Securities and Exchange Commission, directs FINRA's responsibilities.
- The FINRA Foundation's Military Financial Readiness Project is funded solely by fines levied by FINRA against financial firms for misleading sales practices targeting military personnel.

All other applicable policies and requirements in DoDI 1344.07 will continue to apply. This includes that the FINRA Foundation may only conduct financial education on military installations at the express request of the installation commander and after being approved by a Presidentially-appointed, Senate-confirmed official of the relevant Military Department.

The Department appreciates your commitment to providing financial education and resources to the Armed Forces. Thank you for your continued interest in protecting and supporting our Service members and their families.

  
C. F. Drummond  
Deputy Assistant Secretary of Defense  
(Force Education and Training)