Standard 3B

The provider's products, services, and delivery channels are designed to benefit clients, in line with the institution's social goals.

> Essential Practice 3B.1 The provider offers products and services that are suited to clients' needs. (Client Protection standard 1.1)

> Essential Practice 3B.2 The provider's products and services are designed to reduce the barriers to financial inclusion for target clients.

> Essential Practice 3B.3 The provider's products and services are designed to reduce client risks.

> Essential Practice 3B.4 The provider creates benefits for clients by enabling them to invest in economic opportunities and address anticipated household needs.

> Essential Practice 3B.5 A process and documented policy are in place to prevent aggressive sales techniques and forced signing of contracts. (Client Protection standard 1.3)

> Essential Practice 3B.6 The provider monitors the risks associated with agents and networks and addresses problems.

The guidance for standards 1b and 3a discusses why and how to *collect data* on clients' needs and preferences. The guidance for standard 3b discusses why and how to *use this information* to design products and services that meet clients' needs and preferences.

3B.1 AND 3B.2 OFFER SUITABLE PRODUCTS THAT REDUCE BARRIERS FOR CLIENTS

Product suitability is one of the most important ways you can protect clients' interests and assist them to make economic progress. Client progress should be a core focus for your institution, and it should be defined in a policy that states how you will offer suitable products and services through appropriate channels, including designing products and monitoring their suitability.

Specifically, the following product/service features should match the needs of target clients:

Size: Maximum and minimum loan sizes and savings requirements should match target clients' income, business type, savings habits, etc.

Price: Prices should be affordable to clients.[78]

Guarantee/collateral requirements: Collateral requirements should match target clients' access to physical collateral and/or guarantors. An institution policy should describe acceptable and unacceptable pledges of collateral and provide clear guidelines for how collateral is registered and valued. Base the policy on local norms, and never accept items that would create severe hardship or affect the client's earning ability. Determine the value of collateral based on a verifiable market price/resale value, verified by a manager or credit committee.

Loan repayment schedules and savings withdrawal conditions: Repayment schedules should match the cash flows of your target clients, and savings withdrawal conditions should be designed to provide target clients with maximum access to their savings when they need it.

Loan/saving/insurance product use requirements: Requirements for product use should be consistent with your target clients' livelihood activities.

Delivery channels: Delivery channels should be affordable, convenient, and reliable for your target clients (e.g., mobile banking, smart cards/prepaid cards, points of sale, ATMs, or agents for remote areas if necessary). They should be adapted to overcome cultural and/or social barriers such as language, literacy levels, gender roles, etc.

In addition to these features, your products/services should consider the **financial capability**[79] of target clients, as this has significant implications for product design. Financial capability refers to a client's capacity to act in his/her own financial best interest and to select and access financial services that suit his/her needs. Financial capability is based on a client's literacy, attitudes, skills and consumer behavior. It is important that you understand your target clients' financial capability and how it affects their use of financial services. The following are examples of how a client's financial capability influences product uptake:

- For group-based financial products, poorer people are often excluded by group members who believe them to be less desirable, or poorer people may self-exclude based on negative self-perception.
- Many clients do not want to use delivery channels that allow family members to see or access savings.
- Some clients are more likely to save if they have set a savings goal, even if it is non-binding.
- A client might refuse insurance because a premium expenditure is a certain and near-term expense, while the claim benefit is uncertain and distant.

In addition to offering a suite of products and services designed to fit your clients' financial lives, it is essential that your employees understand product suitability. Specifically, this means that not only should your employees be intimately familiar with product features, they should be trained in how to match clients with the right products/services. A provider can have perfectly designed products, but in order

[78] Guidance for standard 6c discusses setting prices that are affordable to clients.
[79] **Financial capability** refers to the client's "internal capacity to act in his/her own financial best interest, given socioeconomic and environmental conditions. It encompasses knowledge (literacy), attitudes, skills, and behavior of consumers with respect to understanding, selecting, and using financial services, and the ability to access financial services that fit their needs." (The World Bank/OECD Russia Trust Fund)

for clients to benefit from them, staff must be able to assist clients in choosing the appropriate products and options.

As discussed in the guidance for standard 3A, your institution should base product/service/delivery channel decisions on market research. Table 22 uses the delivery channel example found in the guidance for Essential Practice 3a to show how an institution can use its analysis of client data to make decisions. The example demonstrates a delivery channel decision that reduces a barrier to financial inclusion faced by the institution's target clients.

TABLE 22. DELIVERY CHANNEL DECISION BASED ON CLIENT NEEDS

CLIENT RESEARCH DATA	DELIVERY CHANNEL DECISION BASED ON CLIENT NEEDS
Segmented client data show: • Clients living in the east live within 2 km of their local branch office, and clients in the west live within 10 km. • Clients in the west spend three times more on transportation to branches than clients in the east. • Over 85% of clients living in both the east and west own mobile phones. • Clients in both regions prefer the convenience of mobile banking.	The institution decides to pilot mobile banking, as a majority of its clients have expressed demand for it. It begins with five branches located in the west, as these clients live further from their local branch offices and spend more money on transportation to the branches.

FIELD EXAMPLE 30. VISIONFUND UGANDA REDUCES THE BARRIERS TO FINANCIAL INCLUSION THROUGH PRODUCT TERM CHANGES

VisionFund Uganda works to provide "sustainable, gender-sensitive microfinance." Though the institution aims for 60% of its clients to be women, in recent years, actual outreach to women dropped to 32%. Through Oikocredit's SPM mentoring program, VisionFund realized that this decline was linked to two operational decisions:

1. emphasizing group loans while decreasing individual lending, and
2. requiring clients to present land title deeds as collateral for loans.

These product features created barriers to women clients, as men generally discourage their wives from joining borrower groups, and Ugandan women do not generally hold land titles. VisionFund therefore reviewed its balance between group and individual lending, explored other collateral that women could use, and systematically tracked its outreach to women. Eighteen months after tailoring product terms to women's needs, VisionFund Uganda's outreach to women had risen to 42% of clients.

FIELD EXAMPLE 31. KOMIDA USES DATA-DRIVEN PRODUCT DESIGN

Koperasi Mitra Dhuafa (KOMIDA) (Indonesia) surveys clients and non-clients within their target groups to understand their financial needs, constraints, and goals. One survey identified several problematic financial and lifestyle conditions facing KOMIDA's target group:

- They have high but predictable expenses during celebration seasons. During this time, some people sell their assets or borrow money formally or informally.
- They save money informally—including storing cash, gold, and jewelry in the home—and as such, they do not earn interest on their savings, and sometimes they lose the money they set aside (e.g., it is stolen).
- They are often sick due to a lack of clean water and sanitation.

Based on this market information, KOMIDA introduced interest-bearing savings accounts, celebration loans, "feast day savings" accounts specifically for savings money for celebration seasons, WASH (water, sanitation, hydration) loans, and a pilot for community health facilitators who will assist clients with using their WASH loans effectively. KOMIDA believes that in order to use a data-driven design process, a provider must be committed to the costs, risks, and challenges of reinventing their perceptions of clients, and ultimately, the products and services.

Read more about KOMIDA's SPM practices here.

3B.3 REDUCE CLIENT RISKS

Your institution should consider how it can offer a diverse or flexible set of products/services that clients can use to reduce risks and cope with common emergencies. Your institution may offer the products directly or indirectly through partners. Such products include:

- Loans to cope with emergencies and reduce risks, including but not limited to emergency loans;
- Rescheduling or restructuring of loans when appropriate;
- Savings to cope with emergencies and reduce risks, including products that allow clients to withdraw money rapidly and without complicated procedures;
- Voluntary insurance, including but not limited to coverage for credit-life, life, health, assets (e.g., home), and agriculture;
- Payments/remittances services that allow clients to quickly receive funds from other people when needed;
- Training services to strengthen clients' capacities to prevent risks (e.g., health education), or to strengthen their capacities to cope with risks (e.g. women's empowerment, or business skills); and
- Funds or reserves earmarked in case of collective disaster, such as an emergency fund against which cooperative members can borrow at zero interest.

Microfund for Women (Jordan) offers two insurance products—credit life insurance ("Himaya"), and hospitalization insurance ("Afietna"). The credit life product not only covers the borrower, but also his/her spouse, such that if the borrower's spouse dies, the insurance product can be used to pay funeral expenses or cover other needs. The hospitalization insurance covers the entire immediate family for a cost of US $3.50 per month, and it ensures that each family member is covered for up to 36 days in the hospital during each 12-month period that the

borrower has a loan. Both products are based on client research that indicated that healthcare is one of the top concerns of female clients, most of whom care for children and/or elderly parents. Some clients were refusing hospitalization based on cost and missed work opportunities. These products reduce client risks by providing assistance in times of distress and addressing clients' reasons for not seeking care.

Table 23 shows how a provider can use its analysis of client data to make product decisions that help clients to manage their risks and cope with common emergencies.

- CGAP's *Designing Financial Services to Respond to Household Shocks* uses a case study from Burkina Faso to discuss how best to design financial products for anticipating and covering health shock expenses. *Resilience and Health Shocks* discusses findings from the field suggesting that health savings accounts and health loans have great potential to help the poor better manage health shocks and build resilience.
- Microfund for Women's *Caregiver Experience: Lessons from Jordan on Health Microinsurance* is a case study on MfW's insurance products.

Lend in local currency

Managing foreign exchange ("FX") rate risk is a complex task, but it is important to protect your clients from FX risk to the extent possible. **Currency mismatch** occurs when an FSP holds assets (such as loans) denominated in the local currency of the FSP's country of operation but has hard currency debt financing its balance sheet.[80] Some providers pass on currency risk by lending in hard currency to their customers or by indexing their lending interest rates to a given foreign exchange rate. In these scenarios, borrowers face higher than expected repayment amounts if the local currency is devalued.[81]

[80] From MFX's *Identify, Quantify, and Manage FX Risk*. The resources available through MFX offer detailed examples of the various kinds of FX risk, as well as strategies for addressing them.
[81] From MFX's *Summary on FX Risk in Microfinance*.

TABLE 23. PRODUCT DECISION BASED ON CLIENT NEEDS

PRODUCT IDEA	DATA COLLECTED ON PRODUCT	ANALYSIS OF THE DATA, TO UNDERSTAND CLIENT NEEDS	PRODUCT DECISIONS BASED ON CLIENT NEEDS
Agricultural Insurance	• Claims by region • Asset value by business type (e.g., farming corn, raising livestock) • Client interview responses on product term preferences • Client survey responses on household needs	Segmented client data show: • Clients living in the north suffer natural disasters at three times the rate of clients living in the south. • Farmers' assets are worth twice as much as livestock owners' assets. Additional market research data show: • Farmers want to insure their crops as well as their farming inputs. • Livestock owners already have access to government insurance for their assets.	The FSP adjusts its current agricultural insurance product to target clients who are growing crops, rather than clients who are raising livestock. The basic product covers crops, but farmers are given the option to purchase supplemental insurance for their farming inputs, such as equipment and storage facilities. Farmers in the north are offered additional coverage specifically for natural disasters.

The most direct way to protect clients from FX risk is to lend to them in local currency to the greatest extent possible. Protecting your institution against FX risk is also essential to safeguarding clients. If you do borrow funds in hard currency, you should develop a strategy that closely monitors and assesses your FX exposure, supplemented by practices designed to help shield your institution from FX risk.[83]

The key ratio to monitor is the Foreign Exchange Risk (FER) Ratio, which calculates exposure to currency fluctuations using assets and liabilities, according to the following formula:

(Total Hard-currency Assets – Total Hard-currency Liabilities) / Total Net Assets

A higher ratio reflects a higher proportion of hard-currency assets relative to hard-currency liabilities, and therefore less vulnerability to currency fluctuations. An FSP can set a target range for its FER ratio and then closely monitor its balance sheet to gauge its risk exposure.

In addition to monitoring your exposure, the following practices can help shield your FSP from FX risk:

- Maintain a hard-currency deposit account (including setting a minimum hard-currency cash reserve threshold relative to hard-currency liabilities).
- Borrow in local instead of hard currency whenever possible, even if local rates are somewhat higher, including drawing on a local line of credit for short-term needs.
- Engage in "back-to-back borrowing," in which an FSP deposits proceeds from a hard-currency loan into a hard currency account at a local bank, which then serves as collateral for a local currency loan.

[83] The strategies discussed here do not include hedging FX risk through the use of derivative mechanisms, which is typically not recommended unless the FSP has significant FX exposure.

FIELD EXAMPLE 32. MUSOMA USES SAVINGS TO HELP CLIENTS REDUCE RISK AND MANAGE ANTICIPATED NEEDS

MUSOMA (Tanzania), a small savings and credit cooperative (SACCO, was troubled by poor uptake of voluntary savings amongst its members. They knew that clients needed savings to cope with unexpected and anticipated financial needs. Increasing savings would also provide the SACCO with additional capital. Therefore, MUSOMA took the following steps:

- Developed and distributed leaflets that explained voluntary savings, targeting both current members and non-members;
- Trained credit committee members to talk to other members about saving;
- Reviewed interest paid on savings and increased this from 1% to 5%; and
- Reviewed procedures and made voluntary savings more easily accessible to the members when they need to make withdrawals.

Due to these measures, between March 2012 and August 2013, MUSOMA saw a 30% increase in voluntary savings (compared with a 5% increase in new members).

FIELD EXAMPLE 33. **FRIENDSHIP BRIDGE MANAGES FOREIGN EXCHANGE RISK**

Friendship Bridge (FB) (Guatemala) provides microcredit to self-employed women. FB's funding sources include both local currency (the Guatemalan Quetzal, or GTQ) and US dollars. Though the Quetzal has been a relatively stable currency over the past 15 years, FB knows that an unexpected currency devaluation poses a risk to their ability to repay their USD notes. FB engages in multiple ways of mitigating this FX risk, without using derivative hedging instruments.

FB monitors its Foreign Exchange Risk Ratio, calculated as: (Total USD Assets – Total USD Liabilities) / Total Net Assets (USD & GTQ). If the Ratio exceeds FB's target limits, FB's finance committee reviews the situation.

FB also uses several other strategies, including:

- Keeping reserves and as much idle cash as possible in USD;
- Utilizing local lines of credit in GTQ for short-term needs;
- Borrowing in GTQ instead of USD when possible, even though rates are typically 5% higher than borrowing in USD;
- Keeping a minimum of 10% in reserves for future obligations, and increasing the percentage as maturity dates approach;
- Back-to-back borrowing;
- Stress testing of exchange rate risk fluctuations;[82] and
- Conducting a quarterly "Economic Risk Assessment," evaluating key indicators to measure supply and demand for the GTQ. These metrics include:
  - Trade deficits
  - Budget deficits
  - Price level/inflation (for Guatemala and FB's own "basket of goods")
  - Monetary policy (interest rates and monetary base for Guatemala and US)
  - Country risk rating
  - Informal economic activity
  - Bank ratings
  - Domestic and foreign income
  - Significant economic or political events

This Economic Risk Assessment is formally reviewed by the finance committee semi-annually, and it is followed by a report to the board of FB. Depending on the longer term trends in the value of the GTQ, FB may in the future also consider use of derivative strategies to hedge against potentially harmful currency fluctuations.

[82] The Federal Reserve Bank of San Francisco offers an explanation of stress testing.

3B.4 ENABLE CLIENTS TO INVEST IN ECONOMIC OPPORTUNITIES AND ADDRESS ANTICIPATED HOUSEHOLD NEEDS

Your institution should consider how products and services create benefits for clients, including the ability to invest in economic opportunities and address anticipated household needs at each life cycle stage. These products can include:

- Business loans, such as start-up business capital, working capital, lines of credit, and alternative forms of collateral to facilitate productive loans (e.g., leasing machinery for a business); and
- Loans for specific life cycle events such as weddings, funerals, education, and home improvements
- Savings products that address life cycle needs such as youth savings, educational savings, housing savings, wedding savings, funeral savings, and pension savings.

Table 24 shows how a provider can use its analysis of client data to make product decisions. The example demonstrates a product decision that helps clients to address anticipated household needs.

TABLE 24. **PRODUCT DECISION BASED ON CLIENT NEEDS**

PRODUCT IDEA	DATA COLLECTED ON PRODUCT	ANALYSIS OF THE DATA, TO UNDERSTAND CLIENT NEEDS	PRODUCT DECISIONS BASED ON CLIENT NEEDS
Voluntary savings	• Deposit size by client age • Deposit frequency by client age • Client interview responses on product term preferences • Client survey responses on household needs	Segmented client data show that younger clients (21-35 years) make larger, less frequent deposits. Additional market research data show: • Income flows are variable for younger clients • Younger clients save for weddings and mortgage payments	The FSP pilots two savings products—wedding savings and home purchase savings. The accounts offer higher interest rates but require larger minimum deposits that must be made at least twice a year. Clients may withdraw savings after a minimum of one year.

FIELD EXAMPLE 34. GENESIS LOCATES POINT OF SALE DEVICES IN CLIENT BUSINESSES

Fundación Genesis Empresarial (Guatemala) uses a delivery channel that is both convenient for clients who are *making* a transaction and beneficial for clients *conducting* the transaction. The innovative FSP is using point of sale (POS) devices to allow clients to make loan payments and send and receive remittances—and they have located the POS devices *in client businesses*, such as small stores and kiosks. This placement creates benefits for clients who are making payments, as the POS is located in their own community, usually much closer than a Genesis branch location. Additionally, clients who manage the POS also benefit, as their businesses get more foot traffic, they earn a commission for each transaction and each new person they refer to Genesis, and they receive customer service training and technical training on the use of the POS device.

Before this new system, Genesis clients made many of their loan payments at local banks. Clients were often intimidated to go into the banks, and sometimes the banks would even poach Genesis' customers or intentionally provide poor service. The new system is more in line with clients' preferences. Clients are transacting with fellow clients in locations that are familiar and unintimidating; complaints or problems can be resolved directly by Genesis (as opposed to going through the banks first); and since the POS operators are existing clients, they are familiar with Genesis' Code of Ethics and standards for customer treatment.

In addition to financial services related to loans and remittances, the POS devices can be used to pay utility and credit card bills, so clients can check several things off of their "to do" list at once. Furthermore, client businesses typically have longer working hours than banks (8:00-21:00 versus 9:00-16:00), which means greater convenience and lower opportunity cost for clients using the POS service.

3B.5 DO NOT USE AGGRESSIVE SALES TECHNIQUES

Train your employees on how to sell your products and services without pressuring clients. Aggressive sales techniques can be particularly damaging for low-income clients and those with limited financial capability, as they may be likely to buy products based more on sales pressure than on actual product "fit."

Clearly define for your institution what "aggressive sales" look like and what you will do to monitor and sanction sales employees who practice aggressive sales. Examples of aggressive sales include:

- Telling clients that there is a time limit on a specific offer ("you must sign *today*, because the price will go up tomorrow");
- Continuing to pursue a client who has clearly declined a product;
- Discouraging or preventing clients from consulting with a trusted person;
- Discouraging or preventing clients from reading product information, contract, etc.;
- Arguing, being hostile, or condescending toward the client;
- Intimidating or threatening the client ("if you don't purchase life insurance, you are going to look like you don't care about your family"); and
- Requiring all group members to renew a loan, with no option for one of the members to opt out.

Employees need to be able to talk about the products in a way that clients understand. Train employees to ask the right questions so that they can point individual clients to the most appropriate products. They should be able to sell a product by highlighting how it will be useful for the client; the tactic should be to convince the client that the product is valuable, not to badger him/her into signing a contract. Also, train employees to respect the client's right to refuse a product.

Sales techniques should be adapted to clients' education and literacy levels, as well as to local market conditions. For example, clients who have never used an

insurance product are vulnerable to aggressive sales, as they may have difficulty determining whether the product fits their needs, or they might believe that premium payments are refunded if claims are not made. Ensure that sales techniques—client recruitment, the sales pitch, and promotional materials—will not mislead clients about the benefits of a product.

Your institution is not responsible for training agents or third-party providers (e.g., mobile agents, insurance companies, money transfer companies) on aggressive sales, but you should check that such providers train their own representatives. Monitor your own employees as well as any third parties you are affiliated with. Routine monitoring should include checks on how employees sell products. Interview clients as well as staff.

3B.6 MONITOR AGENTS AND NETWORKS

While agent banking can help you reach more clients and deliver new services, you give up some control when using agents versus your own staff. This phenomenon is heightened when you use agents in conjunction with digital financial services. Many users are not only new to both formal finance and technology, they also live precarious financial lives that allow little room for error.[84] It becomes critical that you recognize the risks associated with agents and digital channels in your market. For many providers, these risks include:

- Inability to transact due to network downtime;
- Insufficient agent liquidity or float, which also affects clients' ability to transact;
- Transaction mistakes that are difficult or impossible to correct;
- Agent fraud that targets clients (e.g., charging clients extra fees);
- Loss of client data privacy or security;
- Insufficient recourse mechanisms available at the agent; and
- Confusing user interfaces (e.g., mobile banking menus).

Through close monitoring—typically by Internal Audit/internal control—you should be aware of potential risks and recurrent problems. Make sure that not only do routine risk management procedures include checks on agents and networks, but that you collect client feedback on agents and networks as part of your ongoing client satisfaction monitoring (see 3a.2). Keep in mind that agents and agent managers frequently underreport problems.

Your solutions to agent/network problems will depend on your capacity and the availability of cost-effective solutions. In some markets, for example, there is not an easy or low-cost fix for network downtime. A starting point for preventing problems is to make sure that agents are sufficiently trained in client-facing issues. Though you are not responsible for training agents who are managed by a third party (e.g., agent network manager), you are responsible for verifying that the third party trains their own representatives on at least the following topics:

- Fair and responsible treatment of clients. The training is aligned with the provider's code of conduct and spells out unacceptable behavior. (See 4c)
- The provider's debt collections practices and loan recovery procedures. (See 4c)
- Not using aggressive sales techniques and to respect clients' right to refuse products. (See 3b.5)
- Loan analysis and the credit approval process. (See 4a)
- How the complaints mechanism works, the role of complaints staff, how to appropriately manage complaints until they are resolved, and how to refer them to the appropriate person for investigation and resolution. (See 4e)
- Policies and processes related to privacy of client data. (See 4d)

[84] From Doing Digital Finance Right: The Case for Stronger Mitigation of Customer Risks, page 1.

- CGAP's *Doing Digital Finance Right* suggests actions that providers can take to improve the safety, reliability, and transparency of digital financial service products, channels, and systems, as well as to help customers to understand and mitigate associated risks. Also available in Spanish and French. *Recourse in Digital Financial Services* focuses on the role of recourse specifically. Also available in Spanish and French.
- The Better Than Cash Alliance's *Responsible Digital Payments Guidelines* identifies eight good practices for engaging with clients who are sending or receiving digital payments. Also available Spanish and French.
- MicroSave Briefing Notes #110 and #111 discuss both the agent and client perspective on agent banking, including how to problem solve common issues such as customer dissatisfaction.
- CGAP's *Fraud in Mobile Financial Services* highlights how fraud is impacting mobile money providers, agents, and consumers, as well as efforts to reduce risks and vulnerabilities to fraud in mobile money and related services.

FIELD EXAMPLE 35. ASSOCIATION BASE FANDIMA DEVELOPS A FLEXIBLE GROUP LENDING METHODOLOGY

A social audit using the SPI4 revealed that Association Base Fandima (ABF) (Burkina Faso) was failing to reach its target clients—poor and excluded women living in rural areas. With technical assistance from Entrepreneurs du Monde, ABF developed a new lending methodology to reach their target clients, while pursuing sustainability over a three-year period.

ABF identified barriers to access for clients: lack of loan guarantees, lack of financial education/literacy, and limited mobility. ABF designed a new product—Taan Yama—that addresses these barriers. Taan Yama uses a quasi group-lending methodology: clients are eligible for loans after creating a group of 30 people, but each person takes an individual loan, and does not co-guarantee others. As such, loan amounts, start dates, and terms vary among members, depending on their capacities and the needs of their businesses. Additionally, groups receive training on various social and financial topics.

To maintain the financial viability of such a product, ABF requires:

- Groups to meet weekly and to reach 30 members before any member takes a loan;
- Compulsory savings;
- Each group maintain a strict leadership structure and set of rules for conduct; and
- Group members visit delinquent/missing members and support them to repay (financial aid, advice, research into outlets where they can sell their products, etc.).

ABF has learned that the product must be flexible (e.g., different loan terms during the dry and rainy seasons) but group requirements must remain firm. Additionally, training sessions must be interesting and beneficial for the members in order to keep them engaged in learning and to keep meeting attendance high.

The Taan Yama product has allowed ABF to reach the poor—the average loan amount decreased from 208% of GNI per capita to 101% in one year. ABF is also reaching people who have been rejected from banks based on their ethnicity or their religion, such as immigrants. The new product was also accompanied by an improvement in ABF's portfolio quality—PAR 30 has decreased from 15.95% to 4.64% in one year.