

The Ultimate Subscription: Fees That Unlock the System for Millions



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**DIGITAL
BANKING
REPORT**



In today's challenging economy, we need financial institutions willing to manage risk rather than avoid it. We also need clearer pricing and improved financial education to help consumers access credit.



— Jim Marous

*Co-Publisher, The Financial Brand
Host, Banking Transformed Podcast
Owner, Digital Banking Report*

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Letter from the Author

I have spent nearly five decades in and around financial services. While the industry has changed dramatically, many of its biggest challenges remain. More importantly, some of these challenges are directly affecting our communities.

A surprisingly large number of people across the country are experiencing serious financial stress. These individuals are your neighbors, coworkers, everyday acquaintances, and even family members. For many, the stress stems from not having enough financial cushion to handle unexpected expenses or temporary setbacks.



Jim Marous

Watching a credit score determine whether someone can make ends meet changes everything. It influences how people behave at work, how they interact in relationships, and what they believe is possible for their family. Yet the banking industry, which claims to serve its communities, often provides the least support when people need it most.

We promote financial inclusion through annual reports, sponsor financial literacy initiatives, and share financial wellness tips on our websites and social media. However, we still decline an application from a working parent whose medical bill went to collections two years ago because a risk model says no.

This is the gap I have seen for decades. I have spoken with thousands of banking executives throughout my career, and very few have developed a business model designed to genuinely serve consumers with less-than-perfect credit.

What is most frustrating is that the pricing tools already exist. Not only within banking, but throughout everyday life. Consumers accept fees when they join a gym or subscribe to a streaming service. Financial institutions routinely use risk-based pricing in other lending products. Yet, when it comes to credit card fees for consumers with lower scores, the industry often treats them as something to avoid rather than something to build on.

Getting access to a \$1,000 credit line costs much less than what many consumers pay in payday lender fees, overdraft fees, or late payments on essentials like rent, car loans, or utilities. Without a safety net, this can trigger a chain reaction that pushes households further behind.

Modest fees are not exploitation. They are the mechanism that allows an institution to say yes when most others say no.

My hope is that this report challenges the industry to go beyond just talking about financial inclusion and start creating products that truly enable it. That includes pricing models that broaden access and financial education integrated directly into the customer experience instead of being buried deep within a website.

Letter from the Author

The data in this report, drawn from our national survey and supported by research from **The CFPB**, the **Financial Health Network**, the **Federal Reserve**, and **EverFi**, explores these issues in more detail.

This research was sponsored by **Credit One Bank**, one of the few institutions that has built its business around the belief that consumers with less-than-perfect credit deserve access, education, and a genuine path forward. I am grateful for their partnership and their willingness to bring this conversation to the industry.

Sincerely,

[Jim Marous](#)

Co-Publisher, The Financial Brand
Host, Banking Transformed Podcast
Owner, Digital Banking Report



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Executive Summary

Building Stronger Futures Through Credit Access

You can't rent a car, book a hotel room, or sign up for a streaming service without a credit card. Try buying something online, handling an emergency repair, or even joining a gym without one.

Credit is no longer a luxury; it is essential for participating in modern economic life. Yet, at the very moment daily life demands broader access, millions of Americans with less-than-perfect credit are seeing doors close.

Our national survey of banks, credit unions, and fintech companies confirms what many in the industry already know but rarely discuss openly. While institutions talk about financial inclusion, their credit decisions tell a different story. The gap between aspiration and action is widening.

Research from the CFPB, the Financial Health Network, the Federal Reserve, and EverFi confirms this pattern. The consumers who need responsible credit access the most are often the ones losing it.

As [Steve Min](#), Chief Credit Officer at Credit One Bank, notes, "About a quarter of the population has a credit score where they may not be able to get credit from a larger institution."

Most Institutions Are Pulling Back

Fifty-six percent of the institutions we surveyed have decreased their willingness to extend credit to consumers with scores below 670 over the past three years. Only 11% have increased their willingness to serve this group.

The [CFPB's 2025 Consumer Credit Card Market Report](#) shows the same trend. The proportion of large bank originations going to lower-score borrowers dropped from 23.3% in early 2022 to 16.4% by early 2025.

At the same time, the Financial Health Network's Pulse 2025 research found that only 31% of American households qualify as financially healthy. More than two-thirds remain financially vulnerable. The need for access continues to grow as supply tightens.

Understanding the Reality of Risk

When asked what holds them back, 87% point to expected credit losses first. Costs related to acquiring and servicing accounts follow at 57%. Regulatory constraints, often blamed in industry discussions, were mentioned by only 32%.

Nearly half of respondents see borrowers with scores below 670 as moderately higher risk. That perception increases sharply for scores below 600. Consumers with previous delinquencies, thin credit files, or limited histories are still the hardest to approve.

Roughly one in four Americans fall into the less-than-perfect credit category. For many, their credit history shows temporary setbacks rather than a long-term inability to pay.

“Building stronger futures through credit access requires institutions to balance disciplined risk management with thoughtful product design, transparent pricing, and genuine investment in education. It involves viewing credit not just as a profit center but as an entry point into long-term financial participation.”

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When traditional institutions pull back, consumers still need credit. They just turn to other sources, often less regulated and more costly.

Pricing as a Tool for Inclusion

Sixty-nine percent of institutions say fees are essential or very important for sustainably serving higher-risk consumers. Risk-based APRs, annual fees, and lower initial limits are the main tools that help institutions balance risk with access.

The annual fee discussion needs perspective. When divided over twelve months, many credit card fees are cheaper per month than a single streaming service. Plus, access to credit enables participation in almost all aspects of modern commerce.

When structured transparently and responsibly, pricing is not a barrier. It becomes a gateway, enabling institutions to extend credit to consumers whom others have declined to serve.

What Responsible Access Looks Like

Eighty-two percent of institutions report investing in transparent pricing. Sixty-five percent offer some form of financial literacy tools. And yet only 32% utilize alternative underwriting data, while an equal percentage leverage digital tools to promote responsible usage.

There is progress, but underinvestment persists across the industry. Institutions like Credit One Bank are already implementing models for more inclusive access to credit. But access is just the first step. Knowing what to do with that credit is equally important.

Financial education is more essential than ever for all consumers, especially those working to rebuild credit or with less-than-perfect credit scores. EverFi’s research shows that over 70% of adults feel stressed when making financial decisions, and only one in five are confident in their knowledge. People who receive meaningful education tend to be more confident and use a broader range of financial products.

As Min explains, effective education is straightforward and behavioral: pay bills on time, avoid maxing out credit, and build credit history. Yet two-thirds of consumers misunderstand even these basics.

The Path Forward

Consumers with lower credit scores are not asking for charity; they are looking for a way to join an economy that rewards those with a credit card.

Building stronger futures through credit access requires institutions to balance disciplined risk management with thoughtful product design, transparent pricing, and genuine investment in education. It involves viewing credit not just as a profit center but as an entry point into long-term financial participation.

Institutions that serve this segment responsibly will not only expand inclusion. They will create opportunities, strengthen relationships, and build more resilient portfolios in an economy that runs on credit.



The Modern Economy Runs on Credit

There was a time when credit cards were just a convenience. We paid cash at the hotel counter, wrote a check for a rental car deposit, or walked into a store and purchased what we needed with the money in our pockets. The world of plastic payments and digital transactions has changed everything.

This shift has happened gradually as commerce moved online and recurring payment models became more widespread. What was once mainly a convenience-based financial service has become a gateway to economic participation.

The Federal Reserve's Economic Well-Being of U.S. Households report shows that millions of Americans depend on credit to handle both planned expenses and unexpected financial shocks. Meanwhile, research from the Financial Health Network indicates that financial vulnerability remains widespread nationwide.

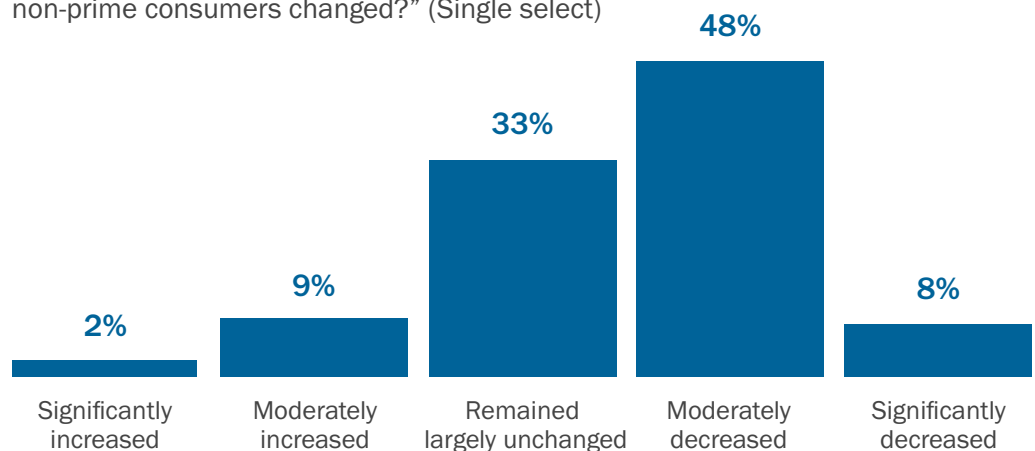
For many households, access to credit isn't just convenient; it's essential for financial stability. However, credit availability is becoming more concentrated among the most creditworthy consumers. This leaves many behind.

Our survey gathered insights from global, regional, and community banks, as well as credit unions and fintech companies, across various asset sizes and credit card portfolio structures. (See Appendix: Survey Methodology for a detailed breakdown of respondent profiles.)

The pattern remains consistent across different institution types and asset sizes. More than half have cut back on lending to consumers with scores below 670. The CFPB's 2025 data confirms the reduction in supply, showing that the share of large bank originations to lower-score borrowers declined by nearly 30% over the past three years.

CHANGE IN WILLINGNESS TO OFFER UNSECURED CREDIT

"Over the past three years, how has your institution's willingness to extend credit to non-prime consumers changed?" (Single select)



Source: Digital Banking Report Research © April 2026 Digital Banking Report

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What makes this data actionable isn't the retreat itself but the opportunity it presents. A growing, underserved population is seeking institutions willing to find ways to say yes. The institutions that figure out how to price for this risk, invest in education, and develop products that reward improvement will capture a market most competitors have voluntarily abandoned.

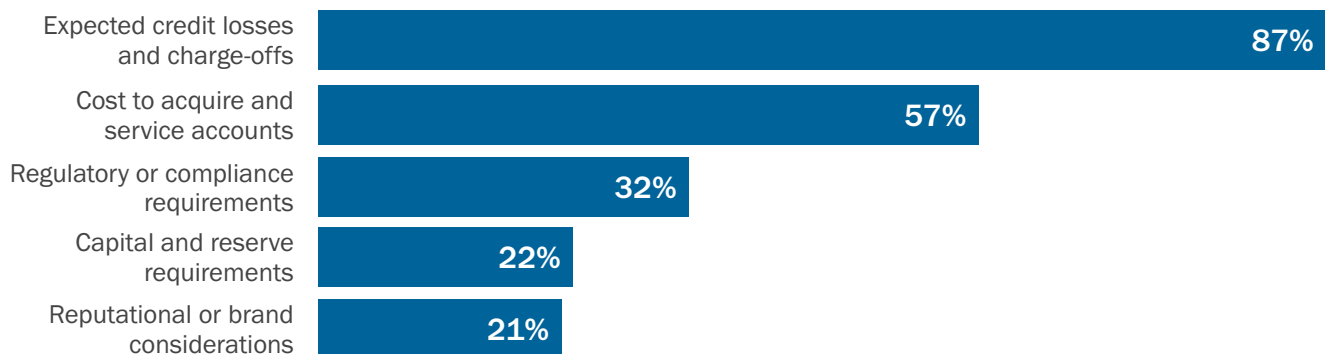
The Widening Gap

Our survey data first reveals that the industry's pullback is more driven by business reasons than regulatory issues. Expected credit losses top the list of concerns, with servicing costs in second place. Regulatory constraints rank third, far behind the others.

In other words, institutions that blame regulation for their inability to serve this market are overstating the obstacle and understating their own risk appetite.

REASONS FOR LIMITING ACCESS TO CREDIT

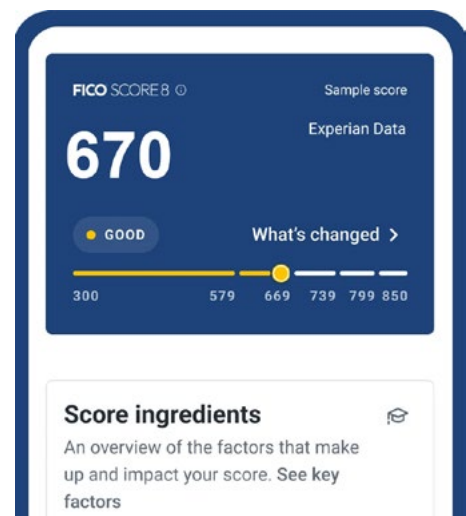
"Which risk factors most directly limit your institution's ability to expand credit access to non-prime consumers?" (Select up to 3)



Source: Digital Banking Report Research © April 2026 Digital Banking Report

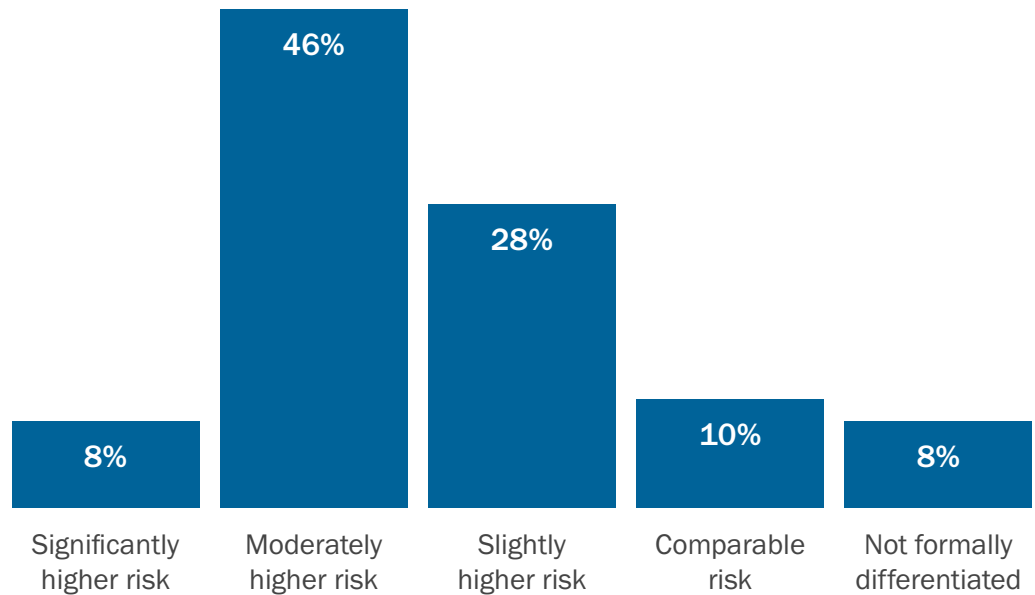
This distinction matters because it changes the debate from "we can't" to "we choose not to." Institutions that invest in better segmentation, more detailed risk models, and innovative pricing strategies that accurately reflect the cost of serving this population can close the gap between perceived risk and actual risk. The survey data shows that the two are not the same.

At the 670 credit score threshold, 18% of institutions see comparable or indistinguishable risk. That is nearly one in five suggesting the borrower appears the same as anyone else. For the rest, risk perception ranges along a spectrum, not a sudden jump. This matters for product design because institutions could develop tiered offerings that match pricing to actual risk levels rather than using a single cutoff that treats everyone below the threshold equally.



ACCESSING CREDIT SCORE RISK (SCORES <670)

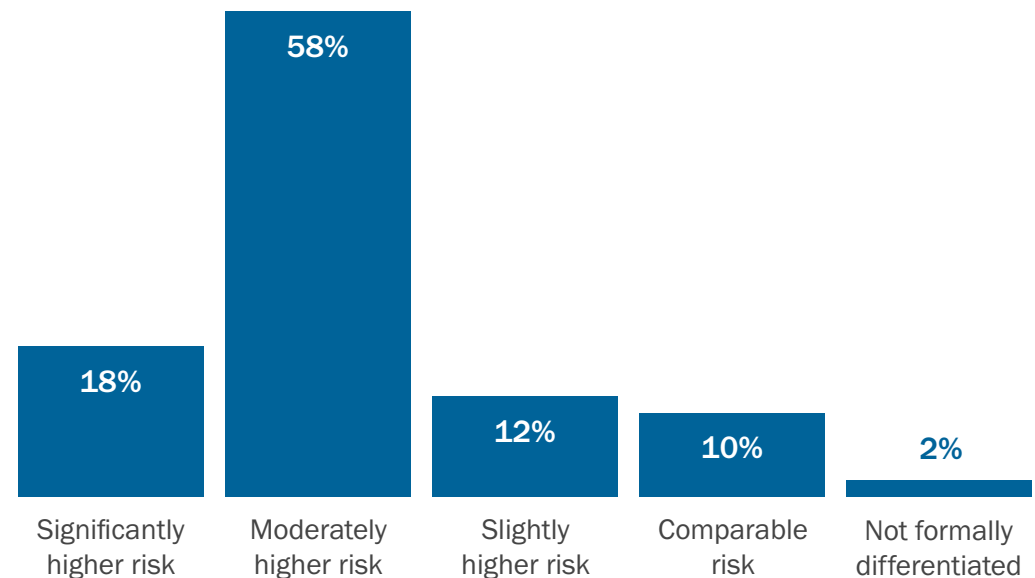
“How does your institution internally assess the risk of consumers with credit scores below 670 relative to prime consumers?” (Single select)



Source: Digital Banking Report Research © April 2026 Digital Banking Report

ASSESSING CREDIT RISK (SCORES <600)

“How does your institution internally assess the risk of consumers with credit scores below 600 relative to prime consumers?” (Single select)



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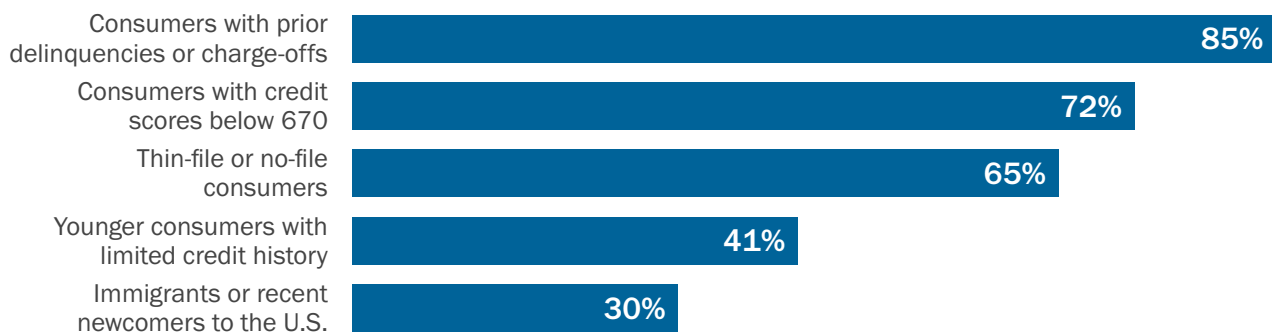
The segments that institutions find most difficult to approve are the ones with the highest unmet demand in consumer credit. These include consumers with prior delinquencies, those with scores below 670, and thin-file consumers.

But each of these segments includes a large number of people with temporary credit issues rather than ongoing ones. Losing a job, facing a medical crisis, or going through a transition can lower a credit score in just a few months. Sadly, rebuilding credit can take years.

This provides a great opportunity for those institutions that can distinguish between short-term setbacks and long-term risk, giving them a competitive edge that the rest of the market is missing.

HARD TO SERVE SEGMENTS FOR OFFERING UNSECURED CREDIT

“Which consumer segments does your institution currently find most difficult to approve for unsecured credit?” (Select up to 3)



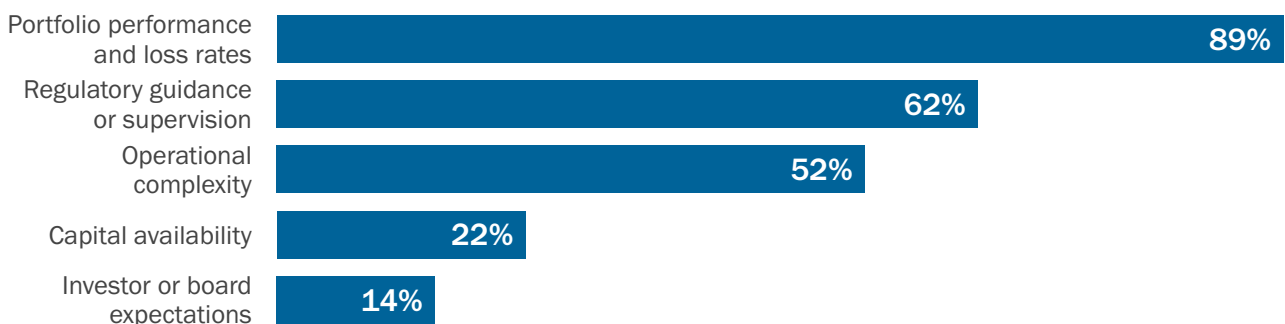
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The decision framework institutions use to expand or contract credit offerings is heavily weighted toward short-term portfolio metrics. Loss rates and regulatory guidance dominate. Operational complexity is a middle-tier concern. Investor and board expectations are at the bottom.

RATIONALE FOR OFFERING NON-PRIME UNSECURED CREDIT

“When deciding whether to expand or contract non-prime credit offerings, which constraints carry the most weight?” (Select up to 3)



Source: Digital Banking Report Research © April 2026 Digital Banking Report

“The annual fee unlocks a full ecosystem of support including access to credit, benefits, rewards, and resources. Our powerful educational tools, like the Credit Wreckers tips, help consumers understand and improve their credit.”

Michael Coleman
Chief Marketing Officer at
Credit One Bank

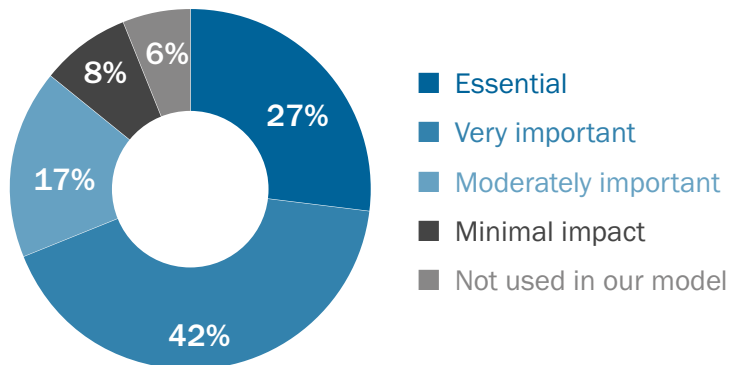
The Price of Participation

The main barrier to providing credit for people with less-than-perfect credit lies in outdated policies and inflexible pricing. Innovation in the credit card industry has often emphasized rewards and incentives for highly creditworthy individuals to use more credit, rather than finding ways to better serve the underserved.

Financial institutions are not unaware of the importance of fees when serving higher-risk consumers. In fact, nearly seventy percent of institutions say fees are essential or very important for sustainably reaching this group. The reality is that fees are typically applied on an exception basis rather than used to expand the universe of consumers offered a credit card product.

IMPORTANCE OF FEES FOR NON-PRIME UNSECURED CREDIT OFFERINGS

“How important are fees to your institution’s ability to sustainably offer credit to higher-risk consumers?” (Single select)



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The toolkit is straightforward. Risk-based APRs lead, followed closely by annual fees and lower initial credit limits. Secured products and tiered risk profiles play a smaller role.

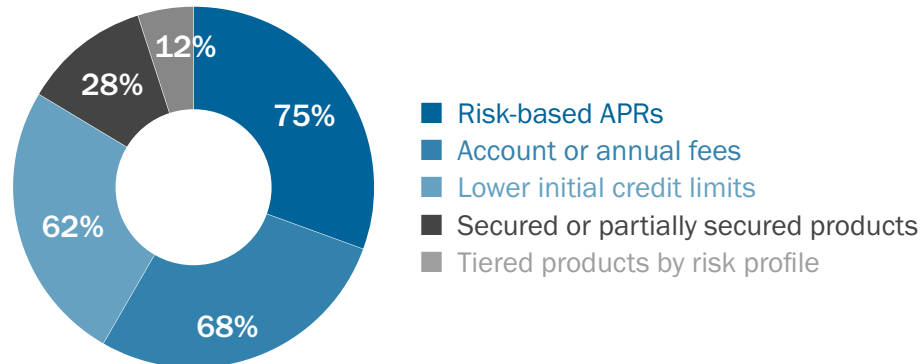


“Institutions that reframe the annual fee as a small membership in the financial system, instead of defending it as a necessary expense, will find consumers more receptive than the industry expects.”

Michael Coleman
Chief Marketing Officer at
Credit One Bank

CURRENT PRODUCT/PRICING OPTIONS FOR NON-PRIME CONSUMERS

“Which pricing or product design levers does your institution most commonly use when serving non-prime consumers?” (Select up to 3)



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What the industry has failed to do is clearly explain and promote why these tools exist. The annual fee, in particular, carries a stigma that does not match how consumers spend their money elsewhere.

A household already paying over \$100 a month for subscriptions like streaming, food delivery, mobile apps, and memberships rarely sees an annual credit card fee as comparable, even though it costs less per month than most of those services individually.

The key difference is that these services provide convenience. A credit card allows for economic participation. As Steve Min, Chief Credit Officer at Credit One Bank, states, “Institutions that reframe the annual fee as a small membership in the financial system, instead of defending it as a necessary expense, will find consumers more receptive than the industry expects.”

This reframing is a critical first step, but it must be paired with tangible value. The most successful models, like the one championed by Credit One Bank, also focus on transparency at the point of sale, embed financial education directly into the customer experience, and provide access to a portfolio of products that can be unlocked as a consumer’s credit improves.

This integrated strategy can redefine the fee as an entry point into the mechanics of credit, where visibility and understanding build a clearer line of sight between improved credit habits and expanded opportunities. An additional benefit is that the institution retains the customer longer and guides them toward higher-margin products over time.

Financial institutions should increase transparency in credit pricing by explaining how fees help cover risk, fund loan loss reserves, and meet capital requirements that keep the institution solvent. Without the ability to price risk through fees, the math doesn’t work, and when it doesn’t, the product disappears. A consumer objecting to a modest annual fee would end up with no card available.

What differentiates responsible pricing from predatory pricing is whether the institution is committed to the consumer’s growth rather than just maximizing product profits. In

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“For millions, the door to the mainstream economy is closed due to a lack of credit. Annual fee models are designed to open that door for consumers.”

Robert DeJong
President and CEO at
Credit One Bank

a responsible approach, the institution should offer tools to support the consumer’s progress, with the product’s cost decreasing as the consumer’s profile improves.

Taeisha Jamison’s story highlights the difference. After losing her daughter and going through a divorce, she faced medical bills and a damaged credit score. Most banks declined her credit card application, but Credit One Bank approved her with transparent pricing and helpful education tools. As she paid her bills consistently on time, she started seeing improvement on her credit score which unlocked access to better rates for an auto loan and other opportunities. Her score rose by over 150 points.



Taeisha Jamison

How Institutions Determine Eligibility for Credit

Our research shows that evaluating eligibility for unsecured credit requires lenders to consider more than just a single metric. While credit scores remain a key part of the process, most financial institutions rely on a wider range of behavioral and financial indicators when assessing potential borrowers.

Payment behavior and credit utilization patterns are among the most important signals. These indicators show how borrowers have managed their debts over time and often give lenders a clearer picture of financial discipline than a single snapshot score. Consistent repayment and responsible credit use can indicate reliability even if a borrower's overall credit score isn't perfect.

Lenders also assess a borrower's financial ability to handle extra debt. Tools like debt-to-income ratios and income stability help institutions decide if a consumer has enough resources to take on new loans without adding financial pressure.

Beyond these individual financial indicators, broader institutional factors also matter. Portfolio strategy, risk appetite, and internal underwriting models all shape how lenders balance opportunity with potential risk. These internal elements often determine how aggressively institutions go after different credit segments and how flexible they can be when assessing consumers with less-than-perfect credit.

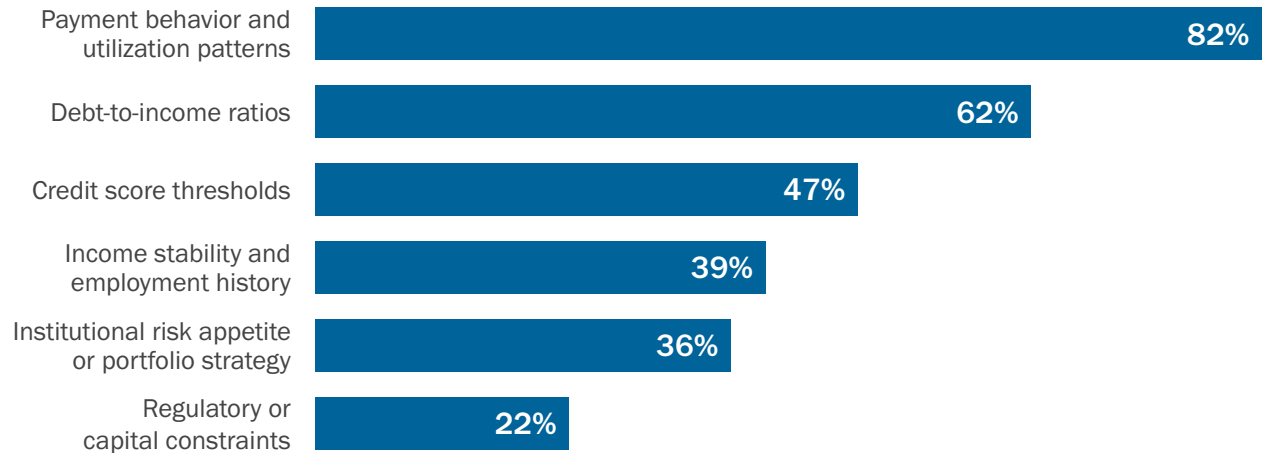
Taken together, these criteria show that credit decisions are rarely made based on one factor. Instead, they involve a layered assessment that combines borrower behavior, financial capacity, and institutional strategy.

For consumers trying to rebuild their credit histories, this complexity can make the journey back to mainstream credit hard to navigate. Although lenders use various signals, the process still tends to favor borrowers with established credit profiles, leaving many consumers with fewer clear options to regain access.



HOW UNSECURED CREDIT ELIGIBILITY IS DETERMINED

“Which factors does your institution primarily rely on when determining eligibility for unsecured credit products?” (Select up to 3)



Source: Digital Banking Report Research © April 2026 Digital Banking Report

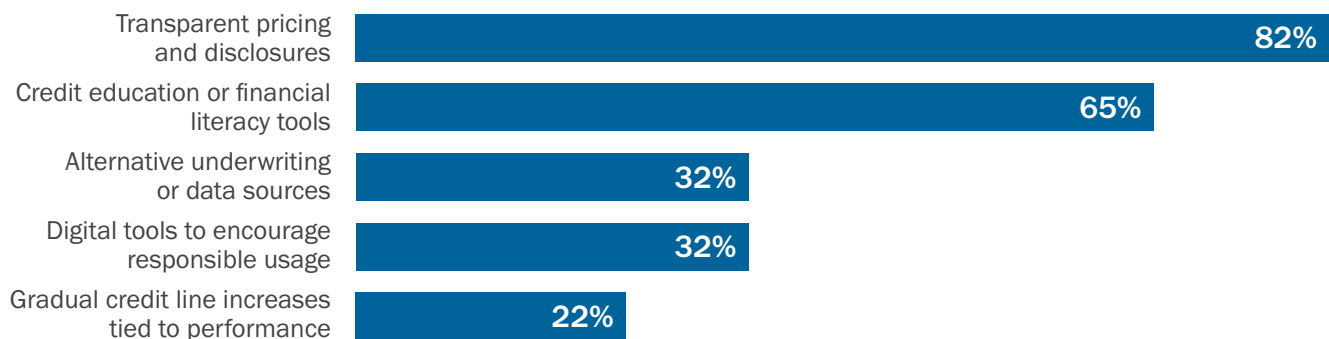


Expanding credit access is only the first step. Improving outcomes for consumers with less-than-perfect credit requires institutions to combine responsible lending with tools that help customers rebuild financial stability.

Our survey shows that many financial institutions recognize the importance of this broader approach.

WAYS TO ASSIST NON-PRIME CONSUMERS WITH CREDIT USE

“Which strategies does your institution actively use to improve outcomes for non-prime consumers?” (Select up to 3)



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The most common strategies used by financial institutions focus on transparency and education. Clear pricing disclosures and financial literacy tools help consumers better understand how credit works and how everyday decisions affect their long-term financial health.

More structural approaches, however, are far less common. Relatively few institutions

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report using alternative underwriting data or digital tools designed to encourage responsible credit usage. Even fewer offer programs that gradually increase credit limits as customers demonstrate consistent repayment behavior.

This gap highlights an important opportunity for the industry. Transparency and education are essential foundations, but meaningful progress often requires product designs that actively help consumers rebuild credit and move toward stronger financial footing.

The practical playbook for institutions that want to serve this market responsibly is not theoretical. It can be assembled into a coherent strategy:

- Use alternative data to supplement credit scores in underwriting.
- Price transparently with fees that decrease as the consumer improves.
- Build education into the product rather than treating it as a separate initiative.
- Tie credit line increases to demonstrated payment behavior.
- Offer a product spectrum that gives consumers something to aspire to rather than a single card that signals they are being tolerated.

The Financial Health Network's FinHealth Standards provide the first evidence-based framework for designing products along these lines. For institutions looking for a starting point, the standards offer concrete guidance on product structure, pricing transparency, and outcome measurement that goes beyond regulatory compliance.





Steve Min

A Conversation with Steve Min

Steve Min has spent his career in credit risk across multiple financial institutions. As Chief Credit Officer at Credit One Bank, he leads credit strategy for one of the largest issuers of credit cards for consumers with less-than-perfect credit. We sat down with Min to learn how Credit One Bank approaches access, education, product design, and what he calls “financial momentum.”

See the entire interview on YouTube [here](#).

Making Credit Accessible for All

Min is clear about what sets Credit One Bank apart from the rest of the industry. “Larger financial institutions are risk-averse,” he says. “They only want to lend to people that they know are going to pay them back. Our business model is a little different.”

That difference shows in the data. While most institutions in our survey reduced their willingness to lend, Credit One Bank increased it. Min estimates that about a quarter of the U.S. population has a credit score that could lead to rejection at larger banks. “We want to make sure that credit is accessible to all. That is a big part of what we as a business do.”

Min challenges the stigma linked to lower scores. For many consumers, a medical event, divorce, or unemployment was the trigger. Although the damage to their credit profile was temporary, the effects of being excluded from the credit system build up over time. “You can’t necessarily do a lot of things without having very basic credit, like a credit card,” Min says. “We want to make sure that we provide access and the information our customers need to continuously improve their credit profiles.”

Credit in Thirds

Credit One Bank recently launched its Credit Wreckers campaign ([CreditWreckers.com](#)), based on a simple insight: sometimes it’s easier to teach people what not to do. “It’s easy to say, ‘do this or do that,’” Min explains. “But it’s even easier to understand ‘I shouldn’t do this.’ When you touch a hot stove, you know not to touch it again.”

The program divides credit management into what Min calls “credit in thirds.” Make payments on time, avoid maxing out your available credit, and maintain both the breadth and length of your credit history (which includes not canceling older accounts just because they are paid off).

Min shares his own story to make a point. “I got my first credit card in college, and I didn’t know any of the credit facts. The first thing I did was go out and buy the biggest stereo I could afford on that credit card. It took me years to pay off that stereo because I didn’t know better.”

Credit One Bank’s own survey found that roughly two-thirds of consumers do not understand these basics, including that a missed payment can remain on a credit report for up to 7 years.

“Credit One Bank provides consumers with lower scores access to the same types of products and benefits that larger institutions reserve for customers with good to excellent credit scores.”

Financial Momentum

Min frames Credit One Bank’s approach as not merely managing credit, but as fostering financial momentum. “Our goal is not just to help people manage their credit. It’s really to help them gain financial momentum. And that financial momentum is incredibly empowering for our customer base.”

Each positive step builds on the last: making a payment on time, reducing a balance, or watching a score improve. Credit One Bank offers its cardmembers free access to credit scores, mobile app alerts, automatic payment tools, and resources through [ForWhatsAhead.com](https://forwhatsahead.com) so they can track their progress.

“Our goal is for every one of our customers to have a better credit score,” Min says. “If you continuously improve your credit profile, you’ll keep gaining access to better and broader product options. Things like auto loans, mortgages, and other things you may not qualify for now.”

The long-term goal is not to keep customers in a lower credit tier. It is to move them out of it.

A Full Spectrum of Products

Credit One Bank provides consumers with lower scores access to the same types of products and benefits that larger institutions reserve for customers with good to excellent credit scores. The Platinum X5 Visa Signature Card offers cash back rewards, while the Wander American Express Card gives elevated rewards on travel. Min says these product options are essentially unavailable to consumers with less-than-perfect credit from most larger lenders.

“If you don’t have perfect credit and you go out to a large issuer, you may not necessarily be approved for their top-end product,” he explains. “We want to make sure that we provide the best product that we can to those people who have less-than-perfect credit.” Offering a full product spectrum changes the nature of the relationship. A consumer who has access to a rewards card feels like a customer, not a risk category.

The Path Forward

Min wants the industry to shift toward collaboration with consumers instead of avoidance. “What I would like to see is more partnership with the customers, with everyone. With the banks partnering with their customers, making sure that everyone understands what it takes to improve their credit profile.”

Credit One Bank’s model succeeds because it aligns institutional and customer interests. When customers enhance their credit, they qualify for better products, get access to more services, and remain loyal longer. This alignment is the business opportunity that the rest of the industry often misses: serving this population is not charity, but customer development.

“We want to ensure that our entire customer base has access to the broadest and best spectrum of credit products available,” Min says. “And the only way to do that is to help people understand what their credit profile looks like and how to improve it, by providing the tools to do so.”

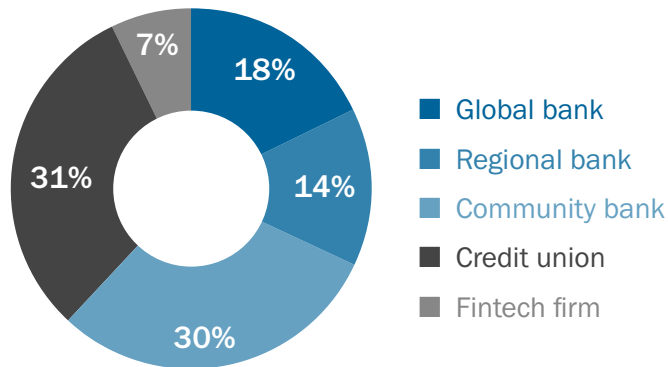
Appendix: Survey Methodology

Our national survey captured perspectives from a representative cross-section of U.S. financial institutions, including global banks, regional banks, community banks, credit unions, and fintech firms. The following charts provide a breakdown of respondent profiles by organization type, asset size, and credit card portfolio size.

ORGANIZATIONAL TYPE

“Which best describes your organization?” (U.S.-based organizations only)

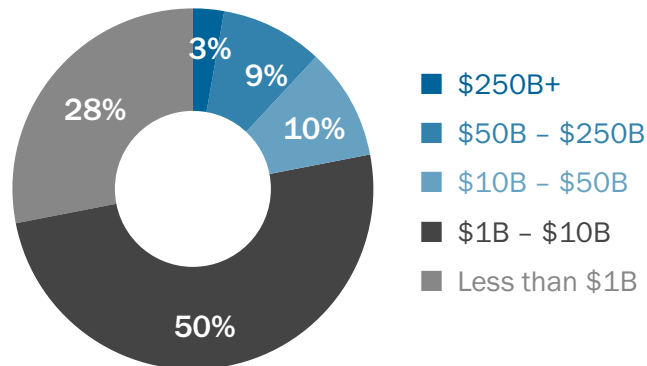
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ASSET SIZE OF ORGANIZATION

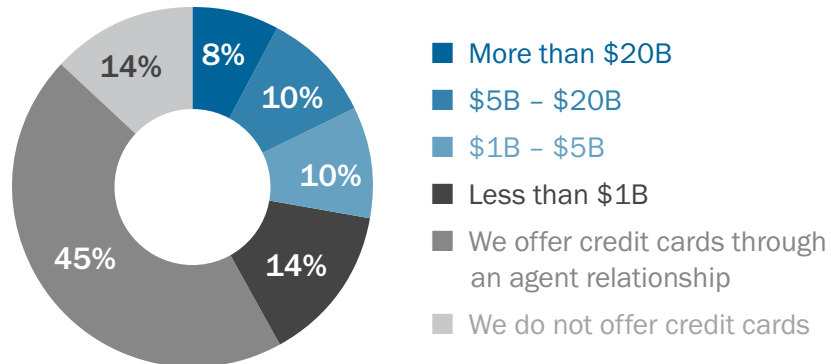
“What is the approximate asset size of your organization?” (Single select)

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SIZE OF CREDIT CARD PORTFOLIO

“What is the approximate size of your organization’s credit card portfolio?
(Single select)”



Source: Digital Banking Report Research © April 2026 Digital Banking Report



About Jim Marous

Named as one of the most influential people in banking and a 'Top 5 Fintech Influencer to Follow,' [Jim Marous](#) is an internationally recognized financial industry strategist, co-publisher of [The Financial Brand](#) and owner and publisher of the [Digital Banking Report](#).

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As a sought-after keynote speaker, author and recognized authority on disruption in the financial services industry, Jim has spoken to audiences worldwide. He has been featured by CNBC, CNN, Cheddar, The Wall Street Journal, The New York Times, The Financial Times, The Economist and American Banker.

Through his podcast, [Banking Transformed](#), Marous provides listeners with an opportunity to hear about the organizational impact of digital transformation. With new shows each Tuesday, Jim interviews his guests with the objective of digging deeper into the opportunities and challenges facing banking and other industries. You can download Banking Transformed on The Financial Brand podcast page or on your favorite podcast platform.

You can also follow Jim Marous on [Twitter](#) and [LinkedIn](#) or visit his [professional website](#).