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Via E-mail

July 21, 2011

Ms. Elizabeth M. Murphy
Secretary
Securities and Exchange Commission
100 F Street, N.E.
Washington, DC 20549-1090

RE: File No. 4-626; Comment Request on Existing Private and Public Efforts to Educate Investors

Dear Ms. Murphy:

The Kentucky Department of Financial Institutions (“DFI”) is the state agency responsible for the supervision of the financial services industry and for chartering, licensing and registering certain financial institutions, securities entities and professionals operating in Kentucky. DFI considers education to be an integral component of its mission to assist and protect the public with regards to financial services and products, and, accordingly, provides educational materials and outreach programs. DFI appreciates the opportunity to submit the following comments in response to your requests:

- (1) Have you attended, or does your organization operate, organize, sponsor, promote, or host, any investor education programs? Please describe the program, including its duration, target audience, and any measurable goals and objectives aimed at changing investor behavior. What specific topics are covered in its curriculum?

DFI regulates the securities industry in Kentucky, and provides a number of investor education outreach/programs as follows:

1. **Senior Scam Jam campaign** – This Kentucky campaign has a goal of helping senior citizens statewide learn to recognize and avoid investment fraud. It is derived from what formerly was the Campaign for Wise and Safe Investing in Kentucky. The current campaign consists of six Senior Scam Jam public events to be conducted across the state between 2010 and 2012. At the conclusion of all events, a one-time



newsletter-style publication will be mailed to all event attendees as a reminder/refresher of the content delivered in the workshops. DFI hosts all the events with support from partners including Kentucky AARP, Kentucky Attorney General, Kentucky Dept. of Insurance, U.S. Postal Inspection Service, BBB, and others. www.kfi.ky.gov/public/scam

2. **EIFFE Prevention Program** – DFI is a partner in the national campaign titled “Elder Investment Fraud and Financial Exploitation Prevention Program.” The goal of this program is to train clinicians, nurses, social service workers and others who work directly with senior citizens to recognize those who may be vulnerable to investment fraud and provide information and referral sources for help. The IPT-funded program is based on one piloted in Texas, and is now being utilized in at least 22 other states. www.kfi.ky.gov/newsroom/eiffe111710.htm
3. **Investor education curriculum/materials for teachers** – DFI provides copies of “The Basics of Saving and Investing” curriculum and “Live ‘Stock’ Adventure” game to interested educators across the state. DFI also promotes the use of the “Fraud Scene Investigator” game, “MoneyTrack” videos and other investor education resources in classrooms. DFI is actively involved in the state’s career and technical educator’s conference and financial literacy summit each year, presenting workshops and distributing information about the availability of these materials and how to teach investing topics. www.kfi.ky.gov/public/teacher
4. **Speakers on request** – DFI provides speakers on request to groups interested in an investor education message. Topics include how to invest, avoiding fraud, securities regulation, etc. Audiences can vary widely in size and makeup (age and other demographics), and have included, middle/high school classrooms, churches, civic organization meetings, professional seminar workshops, public library functions, etc. www.kfi.ky.gov/public/speaker
5. **Information online and in brochures** – DFI provides general how-to and anti-fraud information to the public, both online and through brochures distributed in public places and at events. These materials include those created by DFI, NASAA, FINRA and IPT. www.kfi.ky.gov/public/invest

(2) What do you consider the most important characteristics of an effective investor education program?

A strong message that is appropriate to the audience you are trying to reach, presented in a format that can maintain audience interest. It must be a program that the audience would desire to learn from and promoted so that the audience knows about the opportunity. The best programs will affect change in the behavior of the attendees.



(3) What programs do you view as most effective?

Teacher curriculum materials and presentation programs for large groups. (maximize audience potential).

(4) Has your organization or an independent third party evaluated any of your organization's programs? If yes, please describe the findings of the evaluation, including any statistical evidence of how your program effectively changed one or more investor behaviors among participants.

We have not conducted evaluations to record behavior impact. We have done simple after-event evaluation forms and our programs are generally well-received. The EIFFE Prevention Program will be more thoroughly evaluated nationally including focus groups to gauge behavioral impact. I do not know when those results will be available. It is being coordinated by the Investor Protection Trust and/or Baylor College of Medicine.

(5) Are any of your organization's programs national in scope? If not, could any of these programs be replicated or expanded to reach a national audience?

The EIFFE Prevention Program is national. The Senior Scam Jam campaign is based on the national Campaign for Wise and Safe Investing. The teacher curriculum materials we offer are also available nationally.

(6) What types of investor behaviors or other topics do you think investor education programs should focus on? Why?

Anti-fraud awareness, general education such as basics of investing, how to select a broker/adviser, etc. I would like to have available some objective information on retirement planning at different stages of life that I could share with audiences.

(7) Which best describes you or your organization?

b. State government

If you have any questions or wish to discuss these matters further, please contact the below at (502) 573-3390.

Sincerely,

Kelly May
Public Information Officer

Anetria K. Connell
Attorney

