

Model and sample pre-acquisition disclosure forms for prepaid accounts

On October 5, 2016, the Consumer Financial Protection Bureau (the Bureau) released a final rule governing Prepaid Accounts under the Electronic Fund Transfer Act (Regulation E) and the Truth In Lending Act (Regulation Z).

The final rule establishes pre-acquisition disclosure requirements specific to prepaid accounts. Under the final rule, financial institutions must generally provide both a “short form” disclosure and a “long form” disclosure before a consumer acquires a prepaid account.

The final rule includes several model short form disclosures that offer a safe harbor to the financial institutions that use them, provided that the model forms are used accurately and appropriately. The final rule also includes one sample long form disclosure as an example of how financial institutions might choose to structure this disclosure. The final rule’s model and sample disclosure forms appear below.

The final rule itself as well as a number of related materials are available at www.consumerfinance.gov/prepaid-rule. In addition, for the convenience of the prepaid industry and to help reduce development costs, the Bureau is also providing native design files for print and source code for web-based disclosures for all of the model and sample forms included in the final rule. See www.consumerfinance.gov/prepaid-disclosure-files.

Model form A-10(a) for Short Form Disclosures for Government Benefit Accounts
 (§1005.15(c) and §1005.18(b)(2), (3), (6), and (7))

You have several options to receive your payments: direct deposit to your bank account; direct deposit to your own prepaid account; or this benefits card. Tell the benefits office which option you choose.

| Monthly fee | Per purchase | ATM withdrawal | Cash reload |
|-------------|--------------|--|-------------|
| \$0 | \$0 | \$0 in-network \$1.95* out-of-network | N/A |

| | |
|--|----------------|
| ATM balance inquiry (in-network or out-of-network) | \$0 or \$1.95* |
|--|----------------|

| | |
|--|------------------------|
| Customer service (automated or live agent) | \$0 or \$1.95 per call |
|--|------------------------|

| | |
|------------|-----|
| Inactivity | \$0 |
|------------|-----|

We charge 4 other types of fees. Here are some of them:

| | |
|-----------------------|------------------|
| [Additional fee type] | \$0.50 or \$1.00 |
|-----------------------|------------------|

| | |
|-----------------------|--------|
| [Additional fee type] | \$3.00 |
|-----------------------|--------|

* This fee can be lower depending on how and where this card is used.
 [See [location] for free ways to access your funds and balance information.]

No overdraft/credit feature.

Your funds are eligible for FDIC insurance.

For general information about prepaid accounts, visit cfpb.gov/prepaid.

Find details and conditions for all fees and services in the cardholder agreement.

Model form A-10(b) for Short Form Disclosures for Payroll Card Accounts
 (§1005.18(b)(2), (3), (6), and (7))

You do not have to accept this payroll card.
 Ask your employer about other ways to receive your wages.

| Monthly fee | Per purchase | ATM withdrawal | Cash reload |
|-------------|--------------|--|-------------|
| \$0 | \$0 | \$0 in-network \$1.95* out-of-network | N/A |

| | |
|--|----------------|
| ATM balance inquiry (in-network or out-of-network) | \$0 or \$1.95* |
|--|----------------|

| | |
|--|------------------------|
| Customer service (automated or live agent) | \$0 or \$1.95 per call |
|--|------------------------|

| | |
|------------|-----|
| Inactivity | \$0 |
|------------|-----|

We charge 4 other types of fees. Here are some of them:

| | |
|-----------------------|---------|
| [Additional fee type] | \$1.00* |
|-----------------------|---------|

| | |
|-----------------------|--------|
| [Additional fee type] | \$3.00 |
|-----------------------|--------|

* This fee can be lower depending on how and where this card is used.
 [See [location] for free ways to access your funds and balance information.]

No overdraft/credit feature.

Your funds are eligible for FDIC insurance.

For general information about prepaid accounts, visit cfpb.gov/prepaid.

Find details and conditions for all fees and services in the cardholder agreement.

Model form A-10(c) for Short Form Disclosures for Prepaid Accounts, Example 1
 (§1005.18(b)(2), (3), (6), and (7))

| Monthly fee | Per purchase | ATM withdrawal | Cash reload |
|---|--------------|---|-------------------------|
| \$5.99[†] | \$0 | \$0 in-network \$1.99 out-of-network | \$3.99* |
| ATM balance inquiry (in-network or out-of-network) | | | \$0 or \$0.50 |
| Customer service (automated or live agent) | | | \$0 or \$0.50* per call |
| Inactivity (after 12 months with no transactions) | | | \$1.00 per month |
| We charge 4 other types of fees. Here are some of them: | | | |
| [Additional fee type] | | | \$0.50 or \$1.00 |
| [Additional fee type] | | | \$3.00 |
| [†] No monthly fee with direct deposit or 30 transactions per month. * This fee can be lower depending on how and where this card is used. | | | |
| You may be offered overdraft/credit after 30 days. Fees would apply. Register your card for FDIC insurance eligibility and other protections. For general information about prepaid accounts, visit cfpb.gov/prepaid . Find details and conditions for all fees and services inside the package, or call 800-234-5678 or visit xyz.com/prepaid . | | | |

Model form A-10(d) for Short Form Disclosures for Prepaid Accounts, Example 2
 (§1005.18(b)(2), (3), (6), and (7))

| Monthly fee | Per purchase | ATM withdrawal | Cash reload |
|--|--------------|---|-------------------------|
| \$5.99* | \$0 | \$0 in-network \$1.99 out-of-network | \$3.99* |
| ATM balance inquiry (in-network or out-of-network) | | | \$0 or \$0.50 |
| Customer service (automated or live agent) | | | \$0 or \$0.50* per call |
| Inactivity (after 12 months with no transactions) | | | \$1.00 per month |
| We charge 4 other types of fees. Here are some of them: | | | |
| [Additional fee type] | | | \$1.00* |
| [Additional fee type] | | | \$3.00 |

* This fee can be lower depending on how and where this card is used.

No overdraft/credit feature.
 Not FDIC insured. Register your card for other protections.

For general information about prepaid accounts, visit cfpb.gov/prepaid.
 Find details and conditions for all fees and services inside the package,
 or call **800-234-5678** or visit xyz.com/prepaid.

Model form A-10(e) for Short Form Disclosures for Prepaid Accounts With Multiple Service Plans
 (§1005.18(b)(2), (3), (6), and (7))

| | Pay-as-you-go plan | Monthly plan | Annual plan |
|--|--------------------|-----------------------------|-----------------|
| Plan fee | \$0 | \$5.99 [†] per mo. | \$39.99 per yr. |
| Per purchase | \$0.25 | \$0 | \$0 |
| ATM withdrawal (in-net.) | \$0 | \$0 | \$0 |
| ATM withdrawal (out-net.) | \$2.50 | \$1.99 | \$1.99 |
| Cash reload | \$4.99* | \$4.99* | \$4.99* |
| ATM balance inquiry (in-net.) | \$0.50 | \$0.50 | \$0.50 |
| ATM balance inquiry (out-net.) | \$1.00 | \$1.00 | \$1.00 |
| Live customer service (per call) | \$1.50 | \$0.50 | \$0.50 |
| Inactivity (after 12 mo. w/ no trans.) | \$2.50 per mo. | \$2.50 per mo. | \$2.50 per mo. |
| We charge 4 other types of fees. Here are some of them: | | | |
| [Additional fee type] | \$1.00* | \$1.00* | \$1.00* |
| [Additional fee type] | \$3.00 | \$3.00 | \$3.00 |

[†] \$1.00 monthly fee with direct deposit.
 * This fee can be lower depending on how and where this card is used.

No overdraft/credit feature.
 Not FDIC insured. Register your card for other protections.

For general information about prepaid accounts, visit cfpb.gov/prepaid.
 Find details and conditions for all fees and services inside the package,
 or call **800-234-5678** or visit xyz.com/prepaid.

Sample Form A-10(f) for Long Form Disclosures for Prepaid Accounts (§1005.18(b)(4), (6), and (7))

List of all fees for XYZ Prepaid Card

| All fees | Amount | Details |
|--------------------------------------|--------|--|
| Get started | | |
| Card purchase | \$3.95 | |
| Monthly usage | | |
| Monthly fee | \$5.99 | Monthly fee is waived in any month in which you receive a direct deposit or conduct at least 30 transactions. |
| Add money | | |
| Direct deposit | \$0.50 | |
| Cash reload | \$3.99 | Fees of up to \$3.99 may apply when reloading your card at XYZ reload agents. Locations may be found at xyzbank.com/prepaid/reloads . |
| Spend money | | |
| Bill payment (regular delivery) | \$0.50 | Bill pay available when you log in to your account at xyzbank.com/prepaid or using the XYZ Bank mobile app. Regular bill pay transactions will be completed within 3 business days for electronic payments and within approximately 7 days if we have to mail a paper check to pay your bill. |
| Bill payment (expedited delivery) | \$1.00 | Bill pay available when you log in to your account at xyzbank.com/prepaid or using the XYZ Bank mobile app. Expedited bill pay transactions will be completed within 1 business day. Electronic payments only. |
| Get cash | | |
| ATM withdrawal (in-network) | \$0 | "In-network" refers to the XYZ Bank ATM Network. Locations can be found at xyzbank.com/ATMs . |
| ATM withdrawal (out-of-network) | \$1.99 | This is our fee. We will not charge you this fee for your first 3 out-of-network ATM withdrawals each month. "Out-of-network" refers to all the ATMs outside of the XYZ Bank ATM Network. You may also be charged a fee by the ATM operator, even if you do not complete a transaction. |
| Information | | |
| Customer service (automated) | \$0 | No fee for calling our automated customer service line, including for balance inquiries. |
| Customer service (live agent) | \$0.50 | Per call. First 3 calls per month are free. |
| ATM balance inquiry (in-network) | \$0 | "In-network" refers to the XYZ Bank ATM Network. Locations can be found at xyzbank.com/ATMs . |
| ATM balance inquiry (out-of-network) | \$0.50 | This is our fee. "Out-of-network" refers to all the ATMs outside of the XYZ Bank ATM Network. You may also be charged a fee by the ATM operator. |
| Using your card outside the U.S. | | |
| International transaction | 3% | Of the U.S. dollar amount of each transaction. |
| International ATM withdrawal | \$3.00 | This is our fee. You may also be charged a fee by the ATM operator, even if you do not complete a transaction. |
| International ATM balance inquiry | \$2.00 | This is our fee. You may also be charged a fee by the ATM operator. |
| Other | | |
| Inactivity | \$1.00 | You will be charged \$1.00 each month after you have not completed a transaction using your card for 12 months. |

Register your card for FDIC insurance eligibility and other protections. Your funds will be held at or transferred to XYZ Bank, an FDIC-insured institution. Once there, your funds are insured up to \$250,000 by the FDIC in the event XYZ Bank fails, if specific deposit insurance requirements are met and your card is registered. See fdic.gov/deposit/deposits/prepaid.html for details.

No overdraft/credit feature.

Contact XYZ Bank by calling 1-800-555-5555, by mail at 555 Street Name, Anytown, NY, or visit xyzbank.com/prepaid.

For general information about prepaid accounts, visit cfpb.gov/prepaid.

If you have a complaint about a prepaid account, call the Consumer Financial Protection Bureau at 1-855-411-2372 or visit cfpb.gov/complaint.