

Preparing the short form disclosure for prepaid accounts

Disclosure guide and model form

This disclosure guide is based on Regulation E's Model Form A-10(c) and provides basic "how to" instructions to help financial institutions (FIs) prepare short form disclosures for prepaid accounts other than government benefit accounts or payroll card accounts. This disclosure guide provides general instructions about how to complete the short form disclosure for such prepaid accounts, and does not address other requirements under Regulation E, as amended by the Prepaid Rule.¹ In addition, this disclosure guide does not detail all of the requirements for the short form disclosure that may be applicable to a particular FI's prepaid accounts.² Consult the Prepaid Rule to comply with the requirements for preparing the short form disclosure; this guide is not a substitute for reviewing the rule.

Where the rule requires the FI to include statements, clauses, or other content in the model form, use the language used in the rule or substantially similar language. Do not include information other than what is required or permitted to be included on the short form disclosure.

¹ On October 5, 2016, the Consumer Financial Protection Bureau issued a final rule (Prepaid Rule) to create comprehensive protections for prepaid accounts under Regulation E, which implements the Electronic Fund Transfer Act (EFTA), and Regulation Z, which implements the Truth in Lending Act. The requirements for short form disclosures for prepaid accounts are generally set forth in § 1005.18(b). Regulation E, the Prepaid Rule, and their official interpretations (also known as the commentary) are the definitive sources of information regarding their requirements. The Prepaid Rule is available at consumerfinance.gov/policy-compliance/rulemaking/final-rules/prepaid-accounts-under-electronic-fund-transfer-act-regulation-e-and-truth-lending-act-regulation-z/.

² See Model Form A-10(d) for another example of a short form disclosure for prepaid accounts or see Model Form A-10(e) for a short form disclosure for prepaid accounts with multiple service plans. See Model Forms A-10(a) and (b), respectively, for short form disclosures for government benefit accounts and payroll card accounts.

| 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.

For more detailed guidance on preparing short form disclosures, see Section 4.2 of the *Prepaid Rule Small Entity Compliance Guide* available at consumerfinance.gov/documents/2439/20170131_cfpb_Prepaid_guide_V1.pdf.

| 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 . | | | |

Inserting fee amounts

Highest fee: When inserting the amount of a fee that could vary into the short form disclosure, insert the highest amount that the FI may charge, followed by a symbol, such as an asterisk, linked to a statement explaining that the fee could be lower depending on how and where the prepaid account is used (#12). § 1005.18(b)(3)(i).

Third-party fees: Except for the amount of the cash reload fee, the short form disclosure must not include any third-party fees. § 1005.18(b)(3)(iv). Fees charged by third parties performing services on behalf of the FI are not third-party fees. Comment 18(b)(3)(iv)-1. The cash reload fee must be the total of all charges from the FI and any third-party charges for a cash reload known by the FI at the time it prints, or otherwise prepares, the short form disclosure. § 1005.18(b)(3)(v); comment 18(b)(3)(v)-1.

Variable fees: If the amount of a fee could vary, insert an asterisk (*) or other symbol next to the inserted fee amount, linked to a statement explaining that the fee could be lower depending on how and where the prepaid account is used (#12). If the periodic fee could vary, the FI may choose instead to insert a different symbol, such as a dagger (†), linked to a statement explaining the circumstances under which a waiver or reduction of the periodic fee may occur (#11). § 1005.18(b)(3)(i) and (ii).

Single disclosure for like fees: If the fee amount is the same for the two-tier fees required to be disclosed for ATM withdrawal, ATM balance inquiry, or customer service, the FI may choose to disclose a single fee amount. Similarly, if the fee amount is the same for any two-tier additional fee type, the FI may choose to disclose a single fee amount. § 1005.18(b)(3)(iii).

Free or inapplicable features: The short form disclosure must include information about the periodic fee, per purchase fee, ATM withdrawal fee, cash reload fee, ATM balance inquiry fee, customer service fee, or inactivity fee, even if the particular feature for which the fee is charged is not offered for the prepaid account or if there is no cost to the consumer associated with that feature. For example, if the FI does not charge an ATM withdrawal fee, enter "\$0" as the applicable fee amount. If the FI does not offer the feature, insert "N/A" in place of the fee amount to indicate the feature is not applicable. Comment 18(b)(2)-1.

Finance charges: The short form disclosure must not include any finance charges imposed in connection with a covered separate credit feature. § 1005.18(b)(3)(vi). For more information on covered separate credit features, see Section 15 of the *Prepaid Rule Small Entity Compliance Guide*.

| | | | | | | |
|---|--|-------------------------|----------------------------|----------|---|-------------------------------|
| 1 | Monthly fee \$5.99[†] | 2 | Per purchase \$0 | 3 | ATM withdrawal \$0 in-network \$1.99 out-of-network | Cash reload \$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 . | | | | | | |

Static fees

All short form disclosures must include certain fees, referred to as “static fees,” even if the particular feature for which the fee would be charged is not offered for the prepaid account or if there is no cost to the consumer associated with that feature.

§ 1005.18(b)(2).

1 Periodic fee, § 1005.18(b)(2)(i)

Insert the appropriate term to reflect the applicable time period for which a periodic fee may be charged. For example, insert “Monthly fee,” “Annual fee,” or a substantially similar term.

Insert the amount of the periodic fee charged for holding the account.

If the amount of the periodic fee could vary, the FI may choose either to:

Insert an asterisk (*) or other symbol linked to a statement explaining that the fee could be lower

depending on how and where the prepaid account is used (#12).

OR

Insert another symbol, such as a dagger (†), linked to a statement explaining the circumstances under which a fee waiver or reduction of the periodic fee may occur (#11).

2 Per purchase fee, § 1005.18(b)(2)(ii)

Insert the term “Per purchase” or a substantially similar term.

Insert the amount of the fee charged for making a purchase.

3 ATM withdrawal fees, § 1005.18(b)(2)(iii)

Insert the terms “ATM withdrawal” and “in-network” and “out-of-network,” or substantially similar terms.

Insert the amount of the fee charged for initiating a cash withdrawal at an ATM in the United States that is within the FI’s network or within a network affiliated with the FI.

Insert the amount charged for initiating a cash withdrawal at an ATM in the United States that is outside the FI’s network or a network affiliated with the FI.

If the FI charges the same amount for in-network and out-of-network ATM withdrawals, it may insert a single fee amount and delete “in-network” and “out-of-network.” Comment 18(b)(3)(iii)-1.

4

| | | | |
|---------------------------|--------------|---|----------------|
| Monthly fee | Per purchase | ATM withdrawal | Cash reload |
| \$5.99[†] | \$0 | \$0 in-network \$1.99 out-of-network | \$3.99* |

5 ATM balance inquiry (in-network or out-of-network) \$0 or \$0.50

6 Customer service (automated or live agent) \$0 or \$0.50* per call

7 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.

4 Cash reload fee, § 1005.18(b)(2)(iv)

Insert the term “Cash reload” or a substantially similar term. If the FI does not permit cash reloads via a third-party reload network but instead permits cash deposits, for example, in a bank branch, it may use the term “Cash deposit,” instead of “Cash reload.” Comment 18(b)(2)(iv)-2.

Insert the amount of the fee charged for reloading cash into the prepaid account. The amount must be the total of all charges from the FI and any third parties for a cash reload. The fee amount must be the highest amount that may be charged for any cash reload method. Comment 18(b)(2)(iv)-1.

5 ATM balance inquiry fees, § 1005.18(b)(2)(v)

Insert the terms “ATM balance inquiry” and “(in-network or out-of-network),” or substantially similar terms.

Insert the amount of the fee charged to check the account balance using an ATM in the United States

that is within the FI’s network or within a network affiliated with the FI.

Insert the amount of the fee charged to check the account balance using an ATM in the United States that is outside the FI’s network or a network affiliated with the FI.

If the FI charges the same amount for in-network and out-of-network ATM balance inquiry fees, it may insert a single fee amount and delete “(in-network or out-of-network).” Comment 18(b)(3)(iii)-1.

6 Customer service fees, § 1005.18(b)(2)(vi)

Insert the terms “Customer service” and “(automated or live agent)” or substantially similar terms.

Insert the amount of the fee charged for using an interactive voice response (IVR) system to obtain information about the prepaid account.

Insert the amount of the fee charged for using a live customer service agent to obtain information about the prepaid account. If applicable, include “per call” next to the listed fee amount(s).

If the FI charges the same amount for both automated and live agent customer service, it may insert a single fee amount and delete “(automated or live agent).” Comment 18(b)(3)(iii)-1.

7 Inactivity fee, § 1005.18(b)(2)(vii)

Insert the term “Inactivity,” or a substantially similar term. If the FI charges an “inactivity fee,” also **insert the conditions** that trigger the imposition of the fee for non-use, dormancy, or inactivity (e.g., “(after 12 months with no transactions)”).

Insert the amount of the fee charged for non-use, dormancy, or inactivity of the prepaid account.



| 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 | |

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

10 [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.

9 Statement directing consumers to the disclosure listing additional fee types, § 1005.18(b)(2)(viii)(B)

On the same line as the statement “We charge [x] other types of fees,” **insert a statement** directing the consumer to that disclosure (i.e., “Here are some of them:” or a substantially similar clause, which lets the consumer know that the fees that follow are additional fee types). Comment 18(b)(2)(viii)(B)-1. Examples of clauses that the FI may use, depending on the circumstances, include:

- “We charge 5 other types of fees. Here are some of them:”
- “We charge 5 other types of fees. Here is 1 of them:”
- “We charge 2 other types of fees. They are:”
- “We charge 1 other type of fee. It is:”

If the FI is not required to (and does not choose to) list any additional fee types in (#10), it must not include this statement in (#9).

For information on the statement introducing the list of additional fee types that must be included in the short form disclosure, see Section 4.2.3 of the *Prepaid Rule Small Entity Compliance Guide*.

10 Disclosure listing additional fee types, § 1005.18(b)(2)(ix)

Insert the names and fee amounts of up to 2 additional fee types that are required or permitted to be disclosed under the rule.

For guidance on how to determine which additional fee types to list, see Section 4.2.3 of the *Prepaid Rule Small Entity Compliance Guide*. The form of the required disclosure may differ depending on the number of fee variations within each additional fee type. See § 1005.18(b)(2)(ix)(C) and comments 18(b)(2)(ix)(C)-1 and -2. See comment 18(b)(2)(viii)(A)-2 for examples of fee types and fee variations.

Additional fee types

While the specific static fees must be disclosed in all short forms, additional fee types disclosure likely will vary among the short forms for different prepaid account programs. The short form disclosure generally must include three disclosures regarding “additional fee types:” (1) the number of additional fee types, (2) disclosure of two additional fee types, and (3) a statement in between (1) and (2) that directs the consumer’s attention to the disclosure of the two additional fee types.

8 Disclosure of the number of additional fee types, § 1005.18(b)(2)(viii)(A)

Insert the following: “We charge [x] other types of fees,” or a substantially similar clause.

In place of the “[x]” in the statement “We charge [x] other types of fees,” **insert the number** of additional fee types that the FI may charge consumers with respect to the prepaid account.

For guidance on how to determine the number of additional fee types, see Section 4.2.3 of the *Prepaid Rule Small Entity Compliance Guide*.

| 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 | |

11 [†] No monthly fee with direct deposit or 30 transactions per month.
12 * This fee can be lower depending on how and where this card is used.
13 **You may be offered overdraft/credit after 30 days. Fees would apply.**
14 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.

Statement(s) explaining variable fees

11 Linked statement for variable periodic fee, § 1005.18(b)(3)(ii)

If, for (#1), a dagger was used to indicate that the periodic fee may vary, **insert the dagger symbol (†) and one additional line of text** disclosing the waiver or reduced fee amount and explaining the circumstances under which the fee may be waived or reduced, if applicable (e.g., “No monthly fee with direct deposit or 30 transactions per month.”).

12 Linked statement for variable fees generally, § 1005.18(b)(3)(i)

If an asterisk was used to indicate that fees may vary, **insert the asterisk (*)** and the following statement or a substantially similar clause: “This fee can be lower depending on how and where this card is used.” Use the asterisk and statement for all fees that could vary (other than the periodic fee).

Informational statements

13 Overdraft credit features statement, § 1005.18(b)(2)(x)

If consumers may be offered a covered separate credit feature at any point in connection with the prepaid account, **insert the following statement** or a substantially similar clause: “You may be offered overdraft/credit after [x] days. Fees would apply.” In place of the “[x],” **enter the time period** after which it may be offered to the consumer (e.g., 30 days).

If no such credit feature will be offered, **insert the following statement** or a substantially similar clause: “No overdraft/credit feature.”

14 Registration and FDIC or NCUA insurance statement, § 1005.18(b)(2)(xi)(A) through (E)

Insert a statement regarding eligibility for FDIC deposit insurance or NCUA share insurance, and directing the consumer to register the prepaid account for insurance and other account protections, using one of the following statements or substantially similar clauses, as applicable:

- Register your card for [FDIC insurance eligibility] [NCUA insurance, if eligible,] and other protections.
- Not [FDIC] [NCUA] insured. Register your card for other protections.
- Your funds are [eligible for FDIC insurance] [NCUA insured, if eligible].
- Your funds are not [FDIC] [NCUA] insured.
- Treat this card like cash. Not [FDIC] [NCUA] insured.

For guidance on determining the appropriate statement, see Section 4.2.5 of the *Prepaid Rule Small Entity Compliance Guide*.

| 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. | | | |
| 15 | For general information about prepaid accounts, visit cfpb.gov/prepaid . | | |
| 16 | Find details and conditions for all fees and services inside the package, or call 800-234-5678 or visit xyz.com/prepaid . | | |

- **Insert the phone number** that consumers may use to directly access an oral version of the long form disclosure.
- **Insert the website URL** that consumers may use to directly access an electronic version of the long form disclosure. The URL must not exceed 22 characters and must be meaningfully named.

Optional disclosure of an SMS code at the end of this statement is permitted if the SMS code may be accommodated on the same line of text.

For all other prepaid accounts: “Find details and conditions for all fees and services in [location].” Fill in the brackets with the appropriate location, such as “the cardholder agreement.”

15 CFPB website statement, § 1005.18(b)(2)(xii)

Insert the following statement or a substantially similar clause “For general information about prepaid accounts, visit cfpb.gov/prepaid.”

16 Statement regarding information on all fees and services, § 1005.18(b)(2)(xiii)

Insert a statement directing the consumer to the location of the long form disclosure to find details and conditions for all fees and services, using one of the following or a substantially similar clause, as applicable:

For prepaid accounts offered at retail locations pursuant to the retail location exception: “Find details and conditions for all fees and services inside the package, or call [telephone number] or visit [website].”

Short form disclosure format requirements

Prominence and size, § 1005.18(b)(7)(ii)(A)

All text on the short form disclosure must be in a single, easy-to-read type that is all black or one color and printed on a background that provides a clear contrast. For example, the short form disclosure may be printed in black type on a white background or white type on a black background.

Segregation, § 1005.18(b)(7)(iii)

The short form disclosure must contain only information that is required or specifically permitted by the Prepaid Rule and must be segregated from other information. However, additional information may be provided on the same page as the short form disclosure as long as this information is outside the confines of the short form disclosure.

Minimum type size, § 1005.18(b)(7)(ii)(B)(1) and (2)

The rule sets forth minimum type size requirements for the short form disclosure, provided in both points and pixels. "Point" refers to printed disclosures and "pixel" refers to electronic disclosures. The FI may provide disclosures in a type size larger than the required minimum to enhance consumer comprehension, as long as it complies with the type size hierarchy set forth in § 1005.18(b)(7)(ii).

| 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 . | | | |

Tabular format, § 1005.18(b)(6)(iii)(A)

| 1 | 2 | 3 | 4 |
|---------------------------|--|---|-------------------------|
| Monthly fee | Per purchase | ATM withdrawal | Cash reload |
| \$5.99[†] | \$0 | \$0 in-network \$1.99 out-of-network | \$3.99* |
| 5 | ATM balance inquiry (in-network or out-of-network) | | \$0 or \$0.50 |
| 6 | Customer service (automated or live agent) | | \$0 or \$0.50* per call |
| 7 | Inactivity (after 12 months with no transactions) | | \$1.00 per month |
| 8 | We charge 4 other types of fees. Here are some of them: | | 9 |
| 10 | [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.

Provide the following in the form of a table that is substantially similar to the model form:

- 1 Periodic fee
- 2 Per purchase fee
- 3 ATM withdrawal fees
- 4 Cash reload fee
- 5 ATM balance inquiry fees
- 6 Customer service fees
- 7 Inactivity fee
- 8 Disclosure of the number of additional fee types
- 9 Statement directing consumers to the disclosure listing additional fee types
- 10 Disclosure listing additional fee types

Groupings, § 1005.18(b)(7)(i)(A)

Grouping A

| 1 | 2 | 3 | 4 |
|--|----------------------------|---|-------------------------------|
| Monthly fee \$5.99[†] | Per purchase \$0 | ATM withdrawal \$0 in-network \$1.99 out-of-network | Cash reload \$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 . | | | |

- Two-tier fee amounts for ATM withdrawal in a minimum type size of 11 points (or 16 pixels) and in no larger a type size than what is used for the single fee amounts.
- Text used to distinguish the two-tier ATM withdrawal fees (*i.e.*, “in-network” and “out-of-network”) in a minimum type size of 6 points (or 8 pixels) and appear in no larger a type size than used for information in [Grouping D](#).

BOLD FONT

The following must appear in bold-faced type:

- 1 Periodic fee amount
- 2 Per purchase fee amount
- 3 ATM withdrawal fee amounts
- 4 Cash reload fee amount

Group the following together and in this order:

- 1 Periodic fee
- 2 Per purchase fee
- 3 ATM withdrawal fees
- 4 Cash reload fee

MINIMUM TYPE SIZE

Grouping A must appear as follows:

- Fee headings in a minimum type size of 8 points (or 11 pixels) and in no larger a type size than what is used for the single fee amounts.
- Single fee amounts in a minimum type size of 15 points (or 21 pixels).

Grouping B

| Monthly fee | Per purchase | ATM withdrawal | Cash reload |
|---------------------------|--|---|---------------------------|
| \$5.99[†] | \$0 | \$0 in-network \$1.99 out-of-network | \$3.99[*] |
| <hr/> | | | |
| 5 | ATM balance inquiry (in-network or out-of-network) | | \$0 or \$0.50 |
| 6 | Customer service (automated or live agent) | | \$0 or \$0.50* per call |
| 7 | Inactivity (after 12 months with no transactions) | | \$1.00 per month |
| <hr/> | | | |
| 8 | We charge 4 other types of fees. Here are some of them: | | 9 |
| 10 | [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.

Group the following together and in this order:

- 5** ATM balance inquiry fees
- 6** Customer service fees
- 7** Inactivity fee
- 8** Disclosure of the number of additional fee types
- 9** Statement directing consumers to the disclosure listing additional fee types
- 10** Disclosure listing additional fee types

MINIMUM TYPE SIZE

Grouping B must appear as follows:

- Grouping B must generally appear in a minimum type size of 8 points (or 11 pixels) and appear in the same or a smaller type size than what is used for the fee headings in [Grouping A](#).

- However, the following must appear in a minimum type size of 6 points (or 8 pixels) and appear in no larger a type size than used for information in [Grouping D](#):
 - Text used to distinguish the two-tier ATM balance inquiry fees and customer service fees.
 - Text used to distinguish any two-tier additional fee types.
 - Text used to explain that the customer service fees apply “per call,” where applicable.
 - Text used to explain the conditions that trigger an inactivity fee and text stating that the fee applies monthly or for the applicable time period.

BOLD FONT

The following must appear in bold-faced type, where applicable:

- 8** Disclosure of the number of additional fee types

Grouping C

| 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 | |

11 [†] No monthly fee with direct deposit or 30 transactions per month.
12 * 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.

Group the following together and in this order:

- 11 Linked statement for variable periodic fee
- 12 Linked statement for variable fees generally

MINIMUM TYPE SIZE

The symbols and corresponding statements regarding variable fees disclosed in Grouping C must appear in a minimum type size of 7 points (or 9 pixels), and appear in no larger a type size than what is used for the information required to be disclosed in Grouping D. A symbol required next to the fee amount must appear in the same type size or pixel size as what is used for the corresponding fee amount.

Grouping D

| 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 | |

13 [†] No monthly fee with direct deposit or 30 transactions per month.
14 * This fee can be lower depending on how and where this card is used.

13 You may be offered overdraft/credit after 30 days. Fees would apply.
14 Register your card for FDIC insurance eligibility and other protections.
15 For general information about prepaid accounts, visit cfpb.gov/prepaid.
16 Find details and conditions for all fees and services inside the package, or call 800-234-5678 or visit xyz.com/prepaid.

Group the following together and in this order:

- 13 Overdraft credit features statement
- 14 Registration and FDIC or NCUA insurance statement
- 15 CFPB website statement
- 16 Statement regarding information on all fees and services

MINIMUM TYPE SIZE

Grouping D must appear in a minimum type size of 7 points (or 9 pixels) and appear in no larger a type size than what is used for the fee headings and amounts that are required to be disclosed in [Grouping B](#).

BOLD FONT

The following must appear in bold-faced type:

- 13 Statement regarding overdraft credit features
- 16 FI telephone number and URL included as part of the statement regarding information on all fees and services for prepaid accounts offered at retail locations, where applicable

Type sizes used on Model Form A-10(c)

The diagram below outlines the exact type sizes used in Model Form A-10(c). The FI may provide disclosures with different type sizes, as long as they comply with the type size minimums and hierarchy set forth in § 1005.18(b)(7)(ii), which are described on pages 8-12 of this guide.

Fee headings, additional fee types statements, and fee amounts not in the top line are 8 point

| 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.

Single fee amounts in the top line are 15 point

| 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 | |

Two-tier fee amounts for ATM withdrawal are 11 point

| 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 | |

Fee variations or conditions are 6 point

| 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.

Remaining disclosure statements are 7 point

| | |
|---|------------------|
| [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 . | |

To aid FIs in their development of their own disclosures, native design files for print and source code for web-based disclosures for all of the model and sample disclosure forms included in the final rule are available at <http://www.consumerfinance.gov/prepaid-disclosure-files>.