

Overdraft/NSF Questions

Unless otherwise stated, these questions pertain to a review period of April 1, 2021, through March 31, 2022 (Review Period).

Provide the below-requested information without regard to any manual fee waivers or reversals that may have been provided after the overdraft or non-sufficient fund fees (NSF fees) were assessed.

To ensure consistency, please provide responses (or incorporate responses provided in other materials) using the spreadsheet template(s) at **Attachment 1**. Please do not provide responses using embedded files or screenshots. Provide the spreadsheet in native excel form and not, for example, as a PDF file.

Provide a description of any material limitations or assumptions made in the responses to these data requests in the “Notes” column.

The definitions for the following terms as used below are as follows:

- “Open Consumer Checking Accounts” means any account with at least one debit per month, on average, during the Review Period that was open as of March 31, 2022 (e.g., for an account open for all 12 months of the Review Period, 12 or more debits regardless of the months during which the debits occurred)
- “Closed Consumer Checking Accounts” means any account with at least one debit per month, on average, during the Review Period that was closed as of March 31, 2022 (e.g., for an account open for six months of the Review Period, six or more debits regardless of the months during which the debits occurred).
- “Overdraft Coverage” means the dollar amount of an individual transaction for which the consumer lacked sufficient account balance and which the institution paid, causing the consumer’s account balance to become negative. For example, a transaction for one hundred dollars (\$100) made by a consumer with a fifty dollar (\$50) account balance that was paid by the institution and resulted in the consumer’s account balance being negative fifty dollar (\$50) would constitute \$50 of “Overdraft Coverage.” “Overdraft Coverage” is exclusive of overdraft/NSF fee amounts.
- “Regulation E Overdraft Services” means ATM and one-time debit card related overdraft services governed by 12 CFR 1005.17(b).
- Where not specified as fees for Regulation E Overdraft Services, references to overdraft fees include all overdraft fees (e.g. Regulation E Overdraft Services fees, ACH overdraft fees, recurring debit card overdraft fees, etc.).

Part I: Open Consumer Checking Accounts

1. Provide the following information relating to Regulation E Overdraft Services opt-in status for Open Consumer Checking Accounts:
 - a. The total number of Open Consumer Checking Accounts as of March 31, 2022.
 - b. The number of Open Consumer Checking Accounts opted into Regulation E Overdraft Services as of March 31, 2022.

- c. The number of Open Consumer Checking Accounts not opted into Regulation E Overdraft Services as of March 31, 2022.
 - d. The percentage of Open Consumer Checking Accounts opted into Regulation E Overdraft Services derived by dividing the number of Open Consumer Checking Accounts opted in as of March 31, 2022, by the total number of such accounts as of March 31, 2022.
 - e. If the sum of the number of Open Consumer Checking Accounts opted in (I.1.b.) and opted out (I.1.c) do not equal the total number of Open Consumer Checking Accounts (I.1.a.), explain the discrepancy.
2. Provide the following information relating to overdraft and NSF fee revenue:
- a. The total dollar amount of overdraft fees assessed on Open Consumer Checking Accounts during the Review Period.
 - b. The total dollar amount of NSF fees assessed on Open Consumer Checking Accounts during the Review Period.
 - c. The average dollar amount of overdraft fees assessed on Open Consumer Checking Accounts opted into Regulation E Overdraft Services during the Review Period. Derive this information by dividing the total dollar amount of overdraft fees assessed during the Review Period on Open Consumer Checking Accounts opted into Regulation E Overdraft Services as of March 31, 2022 by the number of Open Consumer Checking Accounts opted into Regulation E Overdraft Services as of March 31, 2022.
 - d. The average dollar amount of overdraft fees assessed on Open Consumer Checking Accounts not opted into Regulation E Overdraft Services during the Review Period. Derive this information by dividing the total dollar amount of overdraft fees assessed during the Review Period on Open Consumer Checking Accounts not opted into Regulation E Overdraft Services as of March 31, 2022, by the number of Open Consumer Checking Accounts not opted into Regulation E Overdraft Services as of March 31, 2022.
 - e. If total dollar amount of overdraft fees assessed during the Review Period on Open Consumer Checking Accounts does not equal the product of the average dollar amount of overdraft fees assessed on Open Consumer Checking Accounts opted into Regulation E Overdraft Services during the Review Period (I.2.c) multiplied by the number of Open Consumer Checking Accounts opted into Regulation E Overdraft Services as of March 31, 2022 (I.1.b) plus the product of the average dollar amount of overdraft fees assessed on Open Consumer Checking Accounts not opted into Regulation E Overdraft Services during the Review Period (I.2.d)

multiplied by the number of Open Consumer Checking Accounts not opted into Regulation E Overdraft Services as of March 31, 2022 (I.1.c), explain the discrepancy.

- f. The average dollar amount of non-sufficient fund fees (NSF fees) assessed on Open Consumer Checking Accounts opted into Regulation E Overdraft Services during the Review Period. Derive this information by dividing the total dollar amount of NSF fees assessed during the Review Period on Open Consumer Checking Accounts opted into Regulation E Overdraft Services as of March 31, 2022 by the number of Open Consumer Checking Accounts opted into Regulation E Overdraft Services as of March 31, 2022.
 - g. The average dollar amount of NSF fees assessed on Open Consumer Checking Accounts not opted into Regulation E Overdraft Services during the Review Period. Derive this information by dividing the total dollar amount of NSF fees assessed during the Review Period on Open Consumer Checking Accounts not opted into Regulation E Overdraft Services as of March 31, 2022 by the number of Open Consumer Checking Accounts not opted into Regulation E Overdraft Services as of March 31, 2022.
 - h. If total dollar amount of NSF fees assessed during the Review Period on Open Consumer Checking Accounts does not equal the product of the average dollar amount of NSF fees assessed on Open Consumer Checking Accounts opted into Regulation E Overdraft Services during the Review Period (I.2.f) multiplied by the number of Open Consumer Checking Accounts opted into Regulation E Overdraft Services as of March 31, 2022 (I.1.b) plus the product of the average dollar amount of NSF fees assessed on Open Consumer Checking Accounts not opted into Regulation E Overdraft Services during the Review Period (I.2.g) multiplied by the number of Open Consumer Checking Accounts not opted into Regulation E Overdraft Services as of March 31, 2022 (I.1.c), explain the discrepancy.
3. Provide the following information relating to frequency of overdraft and NSF fees for Open Consumer Checking Accounts:
- a. The percentage of Open Consumer Checking Accounts opted into Regulation E Overdraft Services as of March 31, 2022 that were assessed 6 or more combined overdraft and NSF fees during the Review Period.
 - b. The percentage of Open Consumer Checking Accounts opted into Regulation E Overdraft Services as of March 31, 2022 that were assessed 12 or more combined overdraft and NSF fees during the Review Period.
 - c. The percentage of Open Consumer Checking Accounts not opted into Regulation E Overdraft Services that were assessed 6 or more combined overdraft and NSF fees during the Review Period.

- d. The percentage of Open Consumer Checking Accounts not opted into Regulation E Overdraft Services that were assessed 12 or more combined overdraft and NSF fees during the Review Period.
4. Provide the following information relating to the amount of Overdraft Coverage provided to Open Consumer Checking Accounts during the Review Period:
 - a. Provide the sum of Overdraft Coverage extended to consumers for the Review Period across all Open Consumer Checking Accounts opted into Regulation E Overdraft Services as of March 31, 2022. Derive this number by identifying each transaction that resulted in an extension of Overdraft Coverage of any type (e.g. ACH, checks, ATM, etc.) to an Open Consumer Checking Account opted into Regulation E Overdraft Services as of March 31, 2022, and summing the dollar amounts of all such Overdraft Coverage extended to such Open Consumer Checking Accounts. Do not duplicate Overdraft Coverage amounts from individual transactions in this sum even if the consumer maintains the negative balance for more than one day (e.g., a transaction resulting in \$50 of Overdraft Coverage is counted only once even if the consumer remains overdrawn by \$50 for several days).
 - b. Provide this same information with respect to Open Consumer Checking Accounts not opted into Regulation E Overdraft Services as of March 31, 2022.

Part II: Closed Consumer Checking Accounts

1. Provide the following information relating to Regulation E Overdraft Services opt-in status for Closed Consumer Checking Accounts:
 - a. The total number of Closed Consumer Checking Accounts.
 - b. The number of Closed Consumer Checking Accounts opted into Regulation E Overdraft Services as of the time of account closure.
 - c. The number of Closed Consumer Checking Accounts not opted into Regulation E Overdraft Services as of the time of account closure.
 - d. The percentage of Closed Consumer Checking Accounts opted into Regulation E Overdraft Services derived by dividing the number of Closed Consumer Checking Accounts opted in as of the time of account closure by the total number of such accounts.
 - e. If the sum of the number of Closed Consumer Checking Accounts opted in (II.1.b) and opted out (II.1.c) do not equal the total number of Closed Consumer Checking Accounts (II.1.a), explain the discrepancy.

2. Provide the following information relating to overdraft and NSF fee revenue:
- a. The total dollar amount of overdraft fees assessed on Closed Consumer Checking Accounts during the Review Period.
 - b. The total dollar amount of NSF fees assessed on Closed Consumer Checking Accounts during the Review Period.
 - c. The average dollar amount of overdraft fees assessed on Closed Consumer Checking Accounts opted into Regulation E Overdraft Services during the Review Period. Derive this information by dividing the total dollar amount of overdraft fees assessed on Closed Consumer Checking Accounts opted into Regulation E Overdraft Services during the Review Period by the number of Closed Consumer Checking Accounts opted into Regulation E Overdraft Services during the Review Period.
 - d. The average dollar amount of overdraft fees assessed on Closed Consumer Checking Accounts not opted into Regulation E Overdraft Services during the Review Period. Derive this information by dividing the total dollar amount of overdraft fees assessed on Closed Consumer Checking Accounts not opted into Regulation E Overdraft Services during the Review Period by the number of Closed Consumer Checking Accounts not opted into Regulation E Overdraft Services during the Review Period.
 - e. If total dollar amount of overdraft fees assessed during the Review Period on Closed Consumer Checking Accounts does not equal the product of the average dollar amount of overdraft fees assessed on Closed Consumer Checking Accounts opted into Regulation E Overdraft Services during the Review Period (II.2.c) multiplied by the number of Closed Consumer Checking Accounts opted into Regulation E Overdraft Services as of March 31, 2022 (II.1.b) plus the product of the average dollar amount of overdraft fees assessed on Closed Consumer Checking Accounts not opted into Regulation E Overdraft Services during the Review Period (II.2.d) multiplied by the number of Closed Consumer Checking Accounts opted not into Regulation E Overdraft Services as of March 31, 2022 (II.1.c), explain the discrepancy.
 - f. The average dollar amount of non-sufficient fund fees (NSF fees) assessed on Closed Consumer Checking Accounts opted into Regulation E Overdraft Services during the Review Period. Derive this information by dividing the total dollar amount of NSF fees assessed on Closed Consumer Checking Accounts opted into Regulation E Overdraft Services during the Review Period by the number of Closed Consumer Checking Accounts opted into Regulation E Overdraft Services during the Review Period.

- g. The average dollar amount of NSF fees assessed on Closed Consumer Checking Accounts not opted into Regulation E Overdraft Services during the Review Period. Derive this information by dividing the total dollar amount of NSF fees assessed on Closed Consumer Checking Accounts not opted into Regulation E Overdraft Services during the Review Period by the number of Closed Consumer Checking Accounts not opted into Regulation E Overdraft Services during the Review Period.
 - h. If total dollar amount of NSF fees assessed during the Review Period on Closed Consumer Checking Accounts does not equal the product of the average dollar amount of NSF fees assessed on Closed Consumer Checking Accounts opted into Regulation E Overdraft Services during the Review Period (II.2.f) multiplied by the number of Closed Consumer Checking Accounts opted into Regulation E Overdraft Services as of March 31, 2022 (II.1.b) plus the product of the average dollar amount of NSF fees assessed on Closed Consumer Checking Accounts not opted into Regulation E Overdraft Services during the Review Period (II.2.g) multiplied by the number of Closed Consumer Checking Accounts not opted into Regulation E Overdraft Services as of March 31, 2022 (II.1.c), explain the discrepancy.
3. Provide the following information relating to frequency of overdraft and NSF fees for Closed Consumer Checking Accounts:
- a. The percentage of Closed Consumer Checking Accounts opted into Regulation E Overdraft Services that were assessed 6 or more combined overdraft and NSF fees during the Review Period.
 - b. The percentage of Closed Consumer Checking Accounts opted into Regulation E Overdraft Services that were assessed 12 or more combined overdraft and NSF fees during the Review Period.
 - c. The percentage of Closed Consumer Checking Accounts not opted into Regulation E Overdraft Services that were assessed 6 or more combined overdraft and NSF fees during the Review Period.
 - d. The percentage of Closed Consumer Checking Accounts not opted into Regulation E Overdraft Services that were assessed 12 or more combined overdraft and NSF fees during the Review Period.
4. Provide the following information relating to the amount of Overdraft Coverage provided to Closed Consumer Checking Accounts during the Review Period:
- a. Provide the sum of Overdraft Coverage extended to consumers for the Review Period across all Closed Consumer Checking Accounts opted into Regulation E Overdraft Services as of the time of account closure. Derive this number by identifying each transaction that resulted in an extension of Overdraft Coverage of any type (e.g., ACH,

checks, ATM, etc.) to a Closed Consumer Checking Account opted into Regulation E Overdraft Services as of the time of account closure, and summing the dollar amounts of all such Overdraft Coverage extended to such Closed Consumer Checking Accounts. Do not duplicate Overdraft Coverage Amounts from individual transactions in this sum even if the consumer maintains the negative balance for more than one day (e.g., a transaction resulting in \$50 of Overdraft Coverage is counted only once even if the consumer remains overdrawn by \$50 for several days).

- b. Provide the information requested in (II.4.a) with respect to Closed Consumer Checking Accounts not opted into Regulation E Overdraft Services as of the time of account closure.

Part III: Policy Questions

1. Provide the following information about the entity's overdraft and NSF services during the Review Period. If any of the information below changed within the Review Period, provide any relevant requested information and state the date(s) of any changes.
 - a. Amount of fee charged per overdraft.
 - b. Amount of fee charged per NSF.
 - c. Dollar threshold for transaction amount above which an overdraft fee was assessed, if any.
 - d. Dollar threshold for account balance below which an overdraft fee was assessed, if any.
 - e. Limitation, if any, on the number of overdraft or NSF fees that the entity charged in a day or statement period.
 - f. Grace period, if any, for consumers to make a deposit to avoid the assessment of overdraft and/or NSF fees. If the entity has such a grace period, describe how the entity notifies consumers that a transaction has occurred that might result in the assessment of a fee.
 - g. The balance that the entity uses for the assessment of overdraft or NSF fees (i.e. available balance or ledger balance).
 - h. Whether the entity charges overdraft or NSF fees for debit card transactions that authorize against a positive balance, but settle against a negative balance.