

April 2, 2014

Ms. Pamela Moran
U.S. Department of Education
Office of Postsecondary Education
1990 K Street, NW
Washington, DC 20006

Dear Ms. Moran:

In preparation for the third session of the Program Integrity and Improvement Negotiated Rulemaking Committee and in follow-up to the meetings held on March 26-28, we have developed additional input we respectfully submit for consideration by our fellow negotiators.

We are generally supportive of the direction the Department has taken to address concerns that have surfaced related to marketing and opening of financial accounts as an integrated feature of the processes Higher Education Institutions use in connection with the collection of student payment instructions and the distribution of Title IV credit balances.

The following summarizes additional input we have in connection with Issue #4 Cash Management. Where applicable, we had presented an explanation of our recommendations together with a mark-up of the regulatory language. So that our input reflects a broad perspective, we continue to dialog with members of our community of interest in the development of our input.

Subcontracting Direct Payments Responsibilities

In our March 24, 2014 letter, we recommended the addition of paragraph (4)(iii) as follows:

(iii) Should an institution contract with a third-party servicer to perform all or part of the institution's responsibilities under paragraph (d), the institution must ensure the third-party servicer performs those services in compliance with the requirements of paragraph (d). Any financial account offered by such third-party servicer is deemed "sponsored" only if the financial accounts are opened as described in paragraph (e).

Our purpose was to make clear that an Institution (of Higher Education) is able to subcontract with a bank, credit union or other third-party to carry out specific portions of the Institution's responsibilities under paragraph (d) Direct Payments, without triggering "sponsored" status for the financial accounts they may independently open within a branch or via an online account opening process hosted on the subcontractor's website. We believe it should be permitted for an Institution to contract with a bank to print and mail checks as provided for under paragraph (d)(2), which also operates a campus-based branch office. The proposed regulation currently only references third-party relationships within paragraph (e). We appreciate that during our negotiating session, the Department clarified that

Institutions may continue to contract for all or part of their responsibilities under (d) Direct Payments and that subcontracting alone would not trigger sponsored account treatment for accounts opened by the subcontractor. Rather, a determination of “sponsored” accounts would be made solely under the provisions of paragraph (e). We continue to believe additional clarity would be beneficial and recommend the following alternative to the previously proposed addition:

(iii) Should an institution contract with another party to perform all or part of the institution’s responsibilities under paragraph (d), the institution must ensure those contract services are performed in compliance with the requirements of paragraph (d). Any financial accounts opened by a subcontractor are deemed “sponsored” if the financial accounts are opened as described in paragraph (e).

Contracting for the Placement of Campus ATMs and/or Campus Branches

We believe an important clarification made during our Negotiated Rule Making Session on March 27, 2014, was that the Department does not consider the placement of campus ATMs, the presence of a campus-based bank or credit union branch, or tabling event participation (e.g. at orientation) as triggering the requirements of proposed regulation 668.164(e). We appreciate this guidance. Branch offices are staged as other campus amenities (coffee shops, barber shops) and their optional availability is evident to students. While we appreciate the clarification provided, we continue to believe the preamble to paragraph (e) could further clarify that paragraph (e) contemplates processes associated with carrying out Title IV Direct Payments and the integration of opening financial accounts within such processes. We recommend the Department consider this alternative to the preamble to paragraph (e):

(e) Sponsored account. If an institution requires or permits a student or parent to open a financial account as part of the process it establishes for making direct payments under paragraph (d), the institution—

Optional Linking of Student ID Card to Enable Debit/ATM Access to Student’s Existing Checking Account

In our March 24, 2014 letter, we suggested clarifying improvements to paragraph (e) noting that “process” was *“in connection with the provisions of paragraph (d)”*, that a student or parent follows to open a financial account *“as an integrated feature of such process”*. Our purpose was to clarify that the Department doesn’t seek to address arrangements in which a school may permit a student to optionally have their student ID card enabled as an access device for a checking account opened independent of any process related to the disbursement of Title IV funds. In our letter dated March 4, 2014, we broadly described these relationships as “campus cards”. Here is that reference:

Campus cards: A higher education institution’s official campus identification card is made available with the option to link to a checking/savings/prepaid account; the student can opt-in to link the ID card to an existing bank account, or, follow standard account opening procedures to open a bank account and then elect to link the ID card to the bank account; if linked, the ID Card can function as an ATM card, debit cards or prepaid card; access to Title IV funds varies by card type as described previously; campus card programs operate entirely separately from Title IV refund operations, offering ATM card or debit card functionality that may be used to access title IV funds if a student elects to have such funds deposited into the underlying checking or savings

accounts, typically via EFT, check or cash deposit. It is possible that a financial institution may participate in a campus card program and provide refund disbursement services at the same school; although parallel, each service is free-standing. If a student elects to link the campus ID card to a savings/checking/prepaid account, terms and conditions, including account opening disclosures governed by the Federal Truth in Savings Act and implementing regulation DD.

Campus cards are usually provided by banks and credit unions which open accounts in branch offices or on-line without the integration, presentation, or promotion within any process related to the Title IV disbursement services. Typically, students are made aware of the optional feature of the student ID card through orientation materials that generally discuss the student ID card or posters on campus. ***A student must already have a checking account opened through the standard account opening process in order to enable their student ID card to also function as a checking account access device.*** To technically affect the linking of a student ID card to a checking account, the student must request from the bank or credit union that the bank-ready ID card number be associated with the student's checking account in the appropriate banking systems. Some campuses do not issue bank-ready student ID cards, and the student would visit the school's card office (or in some cases the banking branch) to request a bank-ready ID card—replacing the student ID card they were originally issued. A third variant is that the ID card is not issued banking-ready, but is encoded with banking information when the student visits the banking branch office to request the card be linked to an existing checking account.

While a student may also designate such checking account for EFT delivery of their Title IV credit balance, that designation occurs without any knowledge of the school (i.e., only the student would know he/she is designating a particular account). Moreover, a school would not be aware of which students had activated the optional student ID feature, and the opening of the checking account is not integrated in any way with the processes a school established related to Title IV disbursement services. In fact, many linked checking accounts are opened well before the student arrives on campus, and typical participation rates in campus card programs are 20% to 40% of the student population. For additional discussion of campus card programs, we would refer you to comment letters submitted to the CFPB by UW Credit Union on March 14, 2013 and by Wells Fargo on March 18, 2013. Both are included as attachments for reference.

As made clear by the foregoing discussion, campus card arrangements do not involve the marketing of financial accounts or the opening of financial accounts within a process established in connection with the disbursement of Title IV credit balances. Nonetheless, there has been considerable concern within our community of interest about the economy of words used by the Department in clarifying the process referenced in paragraph (e). For that reason, we have proposed the clarifications introduced earlier. We continue to urge the Department in paragraph (e) to make clear that "process" is "*in connection with the provisions of paragraph (d)*", that a student or parent follows to open a financial account "*as an integrated feature of such process*".

Consent to Send Debit Cards, Prepaid Cards or Access Device

In connection with what the Department's proposed paragraph (e)(4), we would recommend a clarifying change as follows:

(e)(4) May not send a debit card, prepaid card or access device associated with the account to a student or parent unless the student or parent specifically requests it ~~after providing consent as required in paragraph (e)(2).~~

It is common practice within the banking industry for customers to simultaneously request a debit card in connection with the account opening process. We believe the Department's intent is to ensure that no debit card, prepaid card, or access device may be sent *before* consent is given to open the account. This clarifying change is intended to eliminate the requirement for a student or parent to request the debit card, prepaid card, or access device as a separate step *after* the account is opened, and instead allow account consent and card request to be submitted simultaneously.

Sharing Information about Student or Parent

In connection with the Department's proposed paragraph (e)(6), we would recommend a clarifying change as follows:

(6) May not provide to the servicer or entity any information about the student or parent for the purposes of opening a financial account until after the student or parent consents affirmatively to open the account under paragraph (e)(2);

Third-party service providers that assist higher education institutions with administration of their Title IV, HEA program administration may require certain information about students and/or parents to facilitate activities wholly unrelated to account opening. For example, communicating with students on behalf of the institution to inform students of the need to register a preference for receiving their financial aid or other refunds. We believe the department intends to ensure student and parent data is not provided or used *for the purposes of opening sponsored accounts* prior student or parent consent as required in (e)(2). This clarifying change allows third party servicers to continue to perform Title IV, HEA program administration functions unrelated to account opening.

Campus Logos or Mascot for Sponsored Accounts

With regard to the proposed paragraph (e)(5), we do not believe the provision is necessary in light of the other compensating protections incorporated by the Department which include no steering or pre-mailing of debit cards in connection with sponsored accounts. We believe a prohibition against use of the school's logo or mascot adds very little incremental protective value. Since a card opened as described in paragraph (e) is, by definition, "sponsored" by the school and given the substantial provisions for student choice, it seems unnecessary to deny a school the economic value of their brand logo or mascot. If, after complying with the provisions of the proposed regulation, a third-party seeks to pay a school for the use of their service marks, we don't believe there is any reason to deny schools that economic value. Finally, the Card Act, which effectively addressed public concerns with school affinity credit card programs, didn't go as far as depriving schools of the ability to negotiate based on the value of their brand logos or mascots. We would recommend the deletion of (e)(5).

ATM Fees

With regard to the proposed paragraph (e)(8)(iii), we believe this provision as proposed will challenge the economics of commercially providing sponsored account services. This is because the paragraph doesn't provide for some limit on the frequency with which a sponsored account holder may perform ATM transactions. Transactions occur either at ATMs owned by the provider of the sponsored account or at ATMs not owned by the provider. While it is clear the Department wants to make certain students have reasonable access to ATMs, financial service providers incur out-of-pocket costs in providing access to ATMs they do not own. While financial services providers also incur costs to maintain an owned ATM network, they are generally more willing to permit consumers unlimited access to those ATMs. If consumers are not provided a limit on the number of monthly ATM transactions they can perform at non-owned ATM terminals, we believe the sponsorship cost of these financial accounts will be greater than the cost of a school providing Title IV credit balance distributions by check. Further, during our Negotiated Rulemaking Session on March 24, 2014, there was some discussion that (e)(8)(iii) might be interpreted as requiring financial service providers to reimburse students for ATM terminal fees they might encounter based on the ATM terminal they chose to use. Again, we fear this approach will render the offering of sponsored accounts economically unfeasible. We urge the Department to clarify that terminal surcharge fees imposed by parties unrelated to the sponsorship account are not included within the definition of (e)(8)(iii). We propose this clarification to the regulation which we believe addresses the needs of all constituents:

(iii) Using the debit card, prepaid card, or access device to conduct any transaction at any automated teller machine (ATM) ~~located in any state as defined in 600.2~~ within provider's network of nationwide ATMs. Institutions should also disclose whether cards issued through its contracted financial institution's ATM are part of a surcharge-free network, indicate the name of the network, and indicate the approximate number of available ATMs in that network both nationally and locally. Institutions should also disclose how many surcharge-free ATMs are on their campus, their location, the hours they are accessible to patrons, and provide a hyperlink to an ATM locator for the affiliated networks;

Overdraft Fees

The Department has proposed that no overdraft fees may be charged to a sponsored account:

(11) May not assess the student or parent any overdraft fees if the financial account is overdrawn;

While we agree it is desirable for sponsored accounts to be structured so that students are protected from incurring unnecessary overdrafts fees, we are concerned that the proposed ban from all overdraft charges will effectively eliminate the possibility that a sponsored account could be in the form of a checking account. While financial providers can effectively structure systems to eliminate the possibility of account overdrafts from an ATM or non-reoccurring debit card transaction, the same is not true for accounts which permit check/draft access or reoccurring debit card transactions (like those from monthly health club membership fees). In the absence of any incentive for the student to not write checks or authorize the payment of monthly bills by debit card against insufficient funds, we are concerned the offering of sponsored accounts in the form of a checking product will not be economically

feasible. We have no objection to the Department seeking a reasonable limit in the amount or frequency of overdraft charges related only to check/draft access or reoccurring debit card transactions. We would propose the following revision to address these concerns:

(11) May not assess the student or parent any overdraft fees if the financial account is overdrawn for ATM and one-time debit card transactions. An overdraft fee may be assessed for other transactions such as drafts or reoccurring debit card transactions. However, the account may not be charged additional fees arising from the same overdraft transaction items.

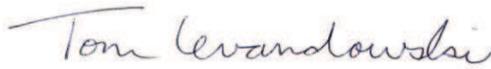
On behalf of our lender, bank and credit union community of interest, we appreciate the opportunity to participate in this process focused on assuring students are afforded the best value and consumer protection that an open and competitive financial services marketplace can provide.

We look forward to continuing to work with you and the Committee through the remainder of the negotiations.

Sincerely,



Paul Kundert
President and CEO
University of Wisconsin Credit Union



Tom Levandowski
Senior Company Counsel
Wells Fargo Bank, N.A.



Response to: CFPB-2013-0003

March 14, 2013

The UW Credit Union is pleased to provide input to the Consumer Financial Protection Bureau's *Request for Information Regarding Financial Products Marketed to Students Enrolled in Institutions of Higher Education*.

At UW Credit Union we have many years of experience related to the service of students, and believe that our strategies and business practices demonstrate the positive contribution to student success that is possible in a partnership with a campus-based financial institution. What follows is some background about our credit union, and responses to the questions you present in CFPB-2013-003. At the end we provide contact information and welcome your follow-up questions at any time.

Improving the financial well-being of our student members is within the core mission of UW Credit Union, so we are intensely interested in your research and any potential outcomes. Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink that reads "Paul Kundert".

Paul Kundert
President & CEO
UW Credit Union, Madison WI

About UW Credit Union

University of Wisconsin Credit Union (UW Credit Union) was formed by faculty members of the University of Wisconsin-Madison in 1931. Today we serve over 175,000 members and hold assets in excess of \$1.6 billion, with locations in six metro areas of Wisconsin. Our democratically elected and unpaid Board of Directors is made up of many former students and faculty who live in our local communities.

Our charter, bylaws and mission make it clear that our first priority is to the people of the University of Wisconsin community, and this has not changed over our 80-year history. In fact, our mission was strengthened in 1967 when undergraduate college students became eligible for membership at UW Credit Union, and soon thereafter membership eligibility expanded to all 26 campuses in the University of Wisconsin System. Our members today include over 20,000 enrolled college students.

During our first 30 years serving undergraduate students we observed little market interest from other financial services firms. Making a profit from student accounts has never been our purpose (nor our result), and for many years we suspect most financial services firms believed doing so was too challenging. With the increased focus on fee income by the financial services industry over the past two decades, and developments in online services that can improve account retention when students graduate and move away, more financial services firms entered this market. Many, we suspect, came to believe that student accounts could be immediately profitable through account, ATM, debit card, overdraft, and other service fees. However, these new entrants and their fee-focused business practices have only served to make our distinctions greater, and we continue to increase the share of students who choose to bank with us.

Scope of Services

UW Credit Union welcomes graduate and undergraduate student members from any of the 26 campuses of the University of Wisconsin System, as well as the campus communities of a private college and technical college in our home market. Our service to Wisconsin campuses includes ATMs, branches, debit-enabled student ID cards, and consumer financial education.

Campus ATM Services

UW Credit Union has over 20 years of experience providing on-campus ATM services, and currently serves seven college campuses. We never assess ATM surcharges at any of our on-campus or off-campus locations. As a result, all students have free access to their money, even if they don't bank with UW Credit Union. We operate over 100 ATMs, processing millions of needed cash withdrawal and deposit transactions each year.

To provide the highest level of convenience and security, UW Credit Union maintains at least one ATM for every 3,000 enrolled students, and often exceeds that benchmark. Wherever possible they are accessible 24/7, and all have minimum withdrawal amounts set to \$20 or less. Many of the ATMs we place on campuses do not reach the volume necessary to break-even financially, and as rent payments we share a portion of the income the ATMs generate from interchange payments by other financial firms and networks.

Full-Service Campus Branch Locations

UW Credit Union provides on-campus branch locations through leases with six college campuses. Some of these lease arrangements have been in place since the early 1980's. The branches are staffed during business hours by employees knowledgeable in providing services to students (many are students themselves). They welcome a diverse mix of young adults and provide a range of services from simple transactions to more complex products. They utilize unique tools we've designed to educate students and equip them for financial success (e.g. fraud warnings, tuition payment options).

Debit-enabled Student ID Cards

Since 2009, UW Credit Union has offered students the option to add debit card functionality to their student ID cards and today serves two college campuses with this convenience. With debit-linked ID cards, checking account holders can use their IDs in lieu of a standard debit or ATM card, to make a purchase at any PIN-based debit merchant in the world, including many on-campus retailers. The cards may also be used to get cash-back at participating merchants, or transact at ATMs. ID cardholders who opt-in to this free convenience also maintain a checking account at UW Credit Union.

Financial Education

UW Credit Union is committed to financial literacy for all consumers in our market, whether or not they are a credit union member. Use of any products or services is not connected with our educational efforts. A full-time director oversees our financial literacy program on campuses, where each year we deliver hundreds of seminars to thousands of individuals. UW Credit Union was the recipient of a statewide annual award in 2009, 2010, and 2011 for excellence in financial education, based on four categories: innovation, results, collaboration and scope.

UW Credit Union is particularly concerned with the success of college students. It's important that they are provided with the financial tools and information they need. Financial education seminars developed with student needs in mind are offered through orientation meetings, classrooms, student organizations, and general-public seminars. All costs are assumed by the credit union. Topics include:

- Take Control: Budgeting 101
- Build Your Own Budget Workshop
- Managing Your Finances in Today's Economy
- Financial Aid 101
- Keys to Financial Success
- Planning for Your Financial Future
- Car Buying 101
- Introduction to Financial Accounts & Services
- Score High: Using Credit Wisely
- Safety First: Preventing Fraud & ID Theft
- Pay it Down: How to Create and Stick to a Debt Repayment Plan

We also deliver financial education through our bi-monthly e-newsletter written specifically for students, Facebook posts, and a library of online financial articles that focus on college life, budgeting, and fraud prevention.

Value to Students

Banking Convenience & Technology

Through our branches and online systems all enrolled students (as well as campus faculty and staff) have optional access to a full range of credit union services, including a checking account package tailored to the needs of college students. These products and services represent our standard offerings available to all members, and do not vary by campus.

Our “Campus Package” is budget-friendly and simple. Any student, regardless of age, receives:

- Checking Account – no minimum balance requirements, free electronic statements.
- Debit/ATM Card – unlimited, free transactions and purchases worldwide.
- Savings Account – save for future purchases or emergencies.
- Online & Mobile Services – free and comprehensive (detailed below).
- Consumer Credit Scores – free online access with monthly updates and helpful advice.
- Optional Low-Cost Reserve Line of Credit – protection against bounced checks or mistakes.
- Optional Responsible Student Credit Card – to build credit history and for emergencies.

To offer the most efficient distribution, safety, and convenience, UW Credit Union provides instant-issue debit cards. They can be produced at any branch in just minutes. The same equipment is utilized to enable student-ID cards to add debit card functionality, and to select or change a card’s PIN.

For our members who have family in other states or countries, or are in the US temporarily, low-cost wire transfer and foreign currency services are critical for emergency cash needs.

When members spend time off campus, we own ATMs in the broader communities, and are a member of Alliance One – a nationwide group of over 4,800 ATMs that are free of surcharges to our members.

Because we serve so many young adults, UW Credit Union has always been expected to be a leader in financial services innovation. Our online and mobile features include:

- Instantly open and fund any account (certificate, savings, checking, or money market).
- Transfer funds from parents or friends, or accounts held elsewhere, quickly and free.
- Avoid errors with pre-arranged loan payments which calculate variable amounts due.
- Set alerts to email or text-message updates, balance thresholds, or transaction scenarios.
- Categorize transactions to track spending patterns and budgeting progress.
- Identify and track long-term savings goals, with recurring transfers set up to fund them.
- Pay any bills, including loan or credit card payments elsewhere, electronically, at no cost.
- Receive instant approval for any type of loan (credit card, auto loan, equity, and mortgage).
- View electronic statements and check images, stored indefinitely.
- Sort or search account or loan history and add notes to any transaction.
- Manage any pending/future transactions – a virtual check register.
- Change mailing or email address information.
- Report lost debit and credit cards, or update any future travel plans affecting card use.
- Nickname accounts, hide their view, or arrange the preferred viewing order.
- *Coming in 2013*: Free Remote Deposit – use a mobile phone camera to deposit any check.

UW Credit Union does not currently offer general purpose reloadable debit cards and we have not had member or campus requests to do so. We believe our standard debit cards and checking accounts offer a better value and greater consumer protection than most reloadable cards in the market.

Responsible Credit

UW Credit Union provides students who desire a personal credit card an option that allows them to build good credit responsibly, and maintain access to emergency funds while studying away from home. Credit is granted based on the student's income (or that of a cosigner) and the card is designed with lower limits and higher minimum payments, to make sure it is used responsibly. In our experience, most parents prefer the student establish their own credit during their transitional student years, rather than hold a card on their parents' account. The presence of a credit trade line on the student's credit report, in most cases, will enable the student to access credit more affordably after graduation.

UW Credit Union does not market student credit card products at campus events or through a mail or email list obtained from any school. We have no agreements with any campus to offer credit to students. Credit products are available only within our branch locations, and we welcome parental involvement in credit decisions and transactions, taking no steps to exclude them by process.

UW Credit Union is a trusted and experienced provider of private student loans for those attending an accredited college or university. Our private loans offer an adjustable or fixed rate, with deferred payments during school, and the ability to release a co-signer after 36 consecutive payments. Annual borrowings are limited to \$12,500 (or \$40,000 over a lifetime) to prevent over-extension, and we strongly encourage members to exhaust all federal options first. All private student loan disbursements are approved and certified by each school's Financial Aid department.

Pricing and Policies

UW Credit Union collects fewer fees per member than 95% of all US credit unions (and credit unions as a whole charge much less than for-profit banking alternatives). Among our student checking members, in any given month 96% avoid monthly account fees, 99% do not pay NSF fees, and 92% are free of overdraft transfer fees. As a result, between these most common charges the average student member pays about \$18 per year for their banking services at UW Credit Union. The average for our non-student members is \$24, excluding fees related to mortgages or auto loans (rarely applied to students).

In contrast, one large student-banking provider previously announced that they had earned 88% of their revenue from ATM and other banking fees to students (Wall St Journal, June 18, 2010). Direct member fees at UW Credit Union represent less than 10% of our revenue. According to Bankrate.com's 2008 study, the national bank NSF income average per customer was 10 times higher than what UW Credit Union members paid that year. Our fee policies do not vary for any age group or type of member, and our average NSF fees paid per member are actually lower among college students than other segments of our membership.

Beginning in 2010, federal regulations mandated financial institutions get permission from consumers to allow debit card purchases to overdraft accounts and be assessed fees. UW Credit Union believes such a program is not in the best interests of our members, and therefore would violate our credit union values. We do not offer "opt-in debit overdraft" coverage to any checking account holders, including students. Our consumer-friendly stance is so unique that we were positively referenced by the New York Times for this position in a February 22, 2010 article: *Banks Apply Pressure to Keep Fees Rolling In*.

UW Credit Union encourages the use of true overdraft protection (through savings or lines of credit) and automated account alerts at every member interaction. Our policies limit NSF and overdraft transfer fees to one per day per account, waive these fees when a resulting negative balance is within \$10, and don't manipulate the order of check or debit clearing to force more items to bounce. We also don't charge daily negative account balance fees, which can add up quickly when consumers don't notice a mistake immediately. Because our practices are designed to help members avoid overdrafts, we save them hundreds of dollars each year compared to our competitors.

UW Credit Union has no debit card transaction fees of any kind. There are no activation, transaction, or periodic fees associated with linking a student ID card to a UW Credit Union checking account, and we do not charge ATM fees whether our members use a UW Credit Union ATM or any another ATM. We also do not assess account inactivity or dormancy fees, or fees for account research or for closing and reopening accounts. There is no fee to replace a damaged or worn debit card (student ID orders are handled by the campus), or to select or change a PIN.

Access and Transparency

UW Credit Union believes a critical factor for anyone choosing a financial institution is trust. Students want to be certain that branches, ATMs, and online services are accessible and of high quality. It is our job to present our strengths to them (and often their parents) so they can be confident they are getting a good deal before making their decision. They should be able to trust us with their funds and personal information, and to look out for their best financial interests.

To earn this trust, financial institutions must be as transparent and clear as possible. At UW Credit Union we provide full disclosures of terms, fees, and policies on our public website, using simple consumer-oriented language (based on the Pew model), and we reach out to students and parents to educate them about their choices and reassure them of our values.

We supply all new account holders with a copy of the account terms and conditions when they apply for an account in person or online, and the same information is available on our public website for anyone to read in advance. UW Credit Union was recognized by the Pew Charitable Trust for being an early adopter of their model simplified account disclosures. Examples:

www.uwcu.org/Products/Checking/Default.aspx

www.uwcu.org/Legal/FeeSchedules/Default.aspx

www.uwcu.org/pdf/Legal/SimpleFeeSchedule_Access.pdf?update=20121106

<https://secure.uwcu.org/nma/pdf/MembershipDisclosures.pdf>

www.uwcu.org/Products/Checking/OverdraftBusinessPractices.aspx

Feedback and Behaviors

While campuses and students are offered no direct financial incentives, among the campuses we serve 75% of the incoming freshmen who are in need of a new banking partner each semester select UW Credit Union. Our presence is certainly very convenient, but it's the positive word of mouth that motivates students to place their business with us, and our dedication to value and service that ultimately retains them.

At the largest campus we serve roughly 40% of incoming students establish an account with us each year. We survey incoming students each year who do not join UW Credit Union. Of those, 10% select another local option, three-quarters keep an account they had already established elsewhere, and the rest indicated no need for a bank account at the time.

Other student statistics at UW Credit Union:

- 60% opt to link their account to their campus ID cards for debit purposes
- 10% of checking accounts include a joint holder (typically a parent, occasionally a spouse/other)
- 80% of eligible students add a small line of credit to act as overdraft protection
- 20% of new student memberships are established online
- Over 85% of student accounts remain open one year following graduation

Based on email surveys sent to students after opening new accounts in 2012, 98% of respondents indicated that we met or exceeded their expectations. 95% of students were satisfied with UW Credit Union, and 94% were likely to recommend us to a friend or colleague.

UW Credit Union also monitors feedback from members about their experiences with use of our phone center or website for service. Those satisfaction levels ranged from 93% to 99% in 2012.

Financial Incentives

UW Credit Union always keeps the student's best interest at the forefront. We do not participate in arrangements that would pay campuses for each new account we acquire or based on the spending behaviors of students. Rather, where contracts exist, they involve only fixed payments. We believe it is best for the financial institution to bear the risk of performance and the campus need not be in the position of benefitting monetarily from a student's personal financial decisions. In this way campuses are free to maintain the relationship without financial conflicts.

All campus agreements with UW Credit Union were established through a public bidding process that began with a request for proposal by the campus. Contracts with the public institutions we serve are a matter of public record and the RFPs and contracts are available to anyone for inspection.

Our service philosophy supports an opt-in model that benefits all consumers. The services we offer students are completely optional. Campus ID cards are issued by the university and it is up to each card holder whether they wish to establish a banking account at UW Credit Union, and if so, whether they would also like to link that account to their ID card for PIN-based debit functionality. There is no bundling or defaulting for banking services and all marketing of these options clearly contains a disclosure of their optional nature. The university is also not made aware of which students choose these options, and is not compensated based on student behavior. No student ever faces a fee or negative consequence for deciding not to activate the debit feature of their ID card.

UW Credit Union views fixed payments to campuses for contracted services as support for the mission of the campus and its students in general. We believe our service to the campus community meets the needs of students who seek to maximize convenience while on campus.

Refunds Management

UW Credit Union does not currently contract to provide financial aid reimbursement refund services. While we are open to providing such service if the operational cost savings will benefit a particular campus, we do not believe it is necessary for UW Credit Union to facilitate this process. We are aware that within the financial services industry some providers seek to bundle this service with their other offerings in order to steer students toward a checking account product they also provide. Because we invest in convenience and service and provide high levels of value and trust for our members, we experience success attracting student accounts without such an effort.

Marketing Practices

UW Credit Union has learned that students are served best when they are able to make their financial decisions on their own time, without pressure, with access to choices and detailed information. For this reason, we don't participate in kiosk marketing at sporting events or at orientation meetings. We encourage interested students to open accounts online from home before school starts, or at our on-campus branch while visiting for class registration or move-in. In either case their parents may then also be available and involved, and we take no steps to separate parents from their students in our process.

When we ask new students each year why they chose UW Credit Union, the most common responses are word-of-mouth recommendations from friends and parents. We understand that our mission and our excellent reputation are our best marketing tools.

Our contracts with campuses do not provide any special or unique access to student information. In fact, they do not permit the use of any promotional or marketing materials which state expressly or by fair implication a campus endorsement. Any use of campus marks or logos must be approved by the school, and we do not include credit products in any communication where on-campus services are referenced.

Whenever a public marketing reference is made regarding our contractual agreement to link student ID cards to UW Credit Union checking accounts, one of the following disclaimers is provided:

- *The [campus] formed a partnership with UW Credit Union after a competitive selection process. The [card program] is optional. [Campus] does not receive financial interest in the personal consumer behavior of its student population.*
- *Through a contractual relationship with UW Credit Union, [campus] offers an optional debit account that is linked to the [card program], the official photo ID card. The [campus] formed this partnership after a competitive selection process. [Campus] receives financial support of student programs and services from UW Credit Union. All provisions of the financial package are based on a flat guarantee. The [campus] does not receive money based on the number of participants in the debit card program. No credit card provisions or loans will be granted as part of the [card program].*

Within our leased spaces on campuses we conduct business as we would at any other branch location. Schools occasionally also grant us access to other space to build awareness of our services, or to provide financial education seminars. During educational sessions we do not solicit new business or advertise.

UW Credit Union does not market our checking account as "free checking." We believe that practice can be misleading to consumers who may typically still pay some fees, despite the name. Our fees are lower than those promoting "free checking" and consumers in our markets trust us as a result.

General Observations

Students, like other consumers, place some emphasis on convenience when establishing a banking relationship. Campuses seek to meet the convenience needs of students in a number of ways – dining, entertainment, health services and so on. It is understandable that campuses also seek to meet student needs in the placement of ATM services, branch banking services, and student ID card functionality. As participants in the financial services industry, we have keenly observed developments across the country in the campus-based marketplace.

Reflecting the values of our faculty founders, UW Credit Union has a strong commitment to the success of students. We believe that financial challenges continue to be a barrier to education completion for many students, and believe we contribute positively to the well-being of the community by providing advice, financial education, and low cost products to students. Our commitment is seen both in our business practices, as well as our commitment to student access. While not required by any contract, since 2008 UW Credit Union has contributed to needs-based scholarship funds and has created endowments now totaling in excess of \$1.5 million, with earnings given to applicants who have been accepted into the schools, but are unable to afford the cost of attendance. While we are proud of these funds, the annual savings we provide students in the lower fees we charge compared to the banking average is a far more impressive amount.

We don't doubt that in any survey of campus banking relationships across the country, some predatory banking practices may emerge. However, in whatever action the CFPB may plan, please consider the potential impact to those providers making a positive difference in the success of students. As with any well-functioning marketplace, transparency is a key concern. As you know, subtle differences in the business practices of financial services providers can mean significant differences to individual consumers. Pressuring students to "opt-in" for debit card overdrafts or not limiting daily overdraft fees can easily result in a financial hardship to students. Yet while these practices are well understood within the financial services industry, they may not be as well understood by student consumers, or campus officials evaluating potential campus partners.

We believe the marketplace might best be served through greater understanding and transparency by simply publishing guidance on best practices for the campus-based marketplace. We generally believe the US PIRG Education Fund report: *The Campus Debit Card Trap* (May 12, 2012) presented a number of reasonable recommendations that could be the basis of such guidance. These included:

- Contracted banking services should have low fees and unrestricted access
- No student revenue sharing for accounts/cards issued
- No debit overdraft opt-in policies
- Common sense overdraft limits
- No mandatory arbitration clauses in disclosures

We appreciate the opportunity to provide input on this important topic, and look forward to continued discussion. UW Credit Union believes strongly in the importance of quality higher education, and takes seriously our corporate mission in this connection.

Respondent Contact Information

<p>UW Credit Union 3500 University Avenue PO Box 44963 Madison, WI 53744-4963</p> <p>(800) 533-6773 or (608) 232-9000 www.uwcu.org</p>	<p>Paul Kundert President & CEO (608) 232-9000 ext 2168 pkundert@uwcu.org</p> <p>Chad LaFlash Research & Development Director (608) 232-9000 ext 2208 claflash@uwcu.org</p>
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March 18, 2013

Ms. Monica Jackson
Office of the Executive Secretary
Consumer Financial Protection Bureau
1700 G Street, NW
Washington, D.C. 20552

Re: Docket No. CFPB-2013-0003, Request for Information Regarding Financial Products Marketed to Students Enrolled in Institutions of Higher Education

Dear Ms. Jackson:

We write in response to the Bureau's Request for Information Regarding Financial Products Marketed to Students Enrolled in Institutions of Higher Education. Wells Fargo has a long history of serving students and their higher education institutions in many capacities, including offering consumer banking services, supporting educational institutions' needs to disburse funds to their students, and providing educational services to promote positive financial decision-making among young consumers.

The enclosed information summarizes Wells Fargo's campus banking programs and discusses key aspects of these important services. This information is current and accurate as of the date of this letter.

Should you have inquiries, please contact Sanders L. Adu, Director of Federal Government Relations, Wells Fargo & Company, at (202) 303-2993.

Sincerely,

A handwritten signature in black ink that reads "Erin Constantine". The signature is written in a cursive style with a long, sweeping horizontal line at the end.

Erin Constantine
Senior Vice President
Wells Fargo Bank, N.A.

Wells Fargo - Campus Banking Programs

March 18, 2013

Campus Banking Program Overview

Wells Fargo offers several campus banking programs designed to offer valuable services to students, their campus communities, and their higher education institutions. Our programs featuring consumer banking products offered to students include combined ID/debit card programs, co-branded debit card programs, and student disbursement services programs. We also attend institutions' on-campus events to offer banking services and promote financial education.

Campus Card Program

The Wells Fargo Campus CardSM Program allows higher education institutions to offer optional banking services to their school communities through their campus ID programs. At participating schools, students, faculty and staff who choose to bank with Wells Fargo have the option to use their school ID cards to access funds in their Wells Fargo consumer deposit accounts, such as the Wells Fargo College Checking[®] account. Schools do not mandate the use of Wells Fargo accounts or services—students, faculty, and staff must opt-in to link their school ID cards to their Wells Fargo consumer deposit accounts. The opt-in process is upfront, transparent and designed to honor and facilitate the consumer's choice; no Wells Fargo accounts are automatically opened or linked without specific and proactive action by the customer. The *Wells Fargo Campus Card* program is currently offered at 36 institutions.

Co-Branded Debit Card Program

Wells Fargo has worked with several higher education institutions to allow students, faculty, staff, alumni and fans who choose to bank with Wells Fargo to show their school pride by opting to carry Wells Fargo debit cards featuring school logos and imagery. These debit cards, which do not have any school ID functionality, are used to access funds in standard Wells Fargo consumer checking and savings accounts. Customers who elect to have their Wells Fargo debit card depict the logos/imagery of their school must take proactive action by specifically ordering the co-branded card in order to receive this type of card instead of a standard debit card. We currently serve seven schools with co-branded debit cards.

Student Disbursement Services Program

Our disbursement services program allows higher education institutions to outsource funds disbursement operations, relieving them of payment processing tasks like processing checks and mailing them. Students simply sign-on to a secure bank-hosted web site to choose how they will receive refunds from their schools: electronically via direct deposit to any domestic financial institution or as a check. Students who do not choose an option will automatically receive refunds via a check, either sent via mail or made available for pick up. Payments are processed according to student preferences, which can be changed at any time for no cost. Students have a clear upfront choice to receive funds through the method they select—and our process is designed to honor and facilitate that preference.

As a separate choice promoted with the disbursement services program, students are notified of the option of banking with Wells Fargo and carrying an optional co-branded debit card. However students must take specific and proactive action to apply for a Wells Fargo account,

request the co-branded card and register the account as their preference for receiving refunds. We currently serve one school with our disbursement services program.

On-Campus Events

Wells Fargo also participates in year-round on-campus events, such as new student orientation events, with many higher education institutions across the country. These events vary, and involve Wells Fargo representatives coming to campus to interact with students, answer questions and/or offer our standard consumer checking and savings accounts to the campus community. Financial education is also delivered at on-campus events. Wells Fargo participates in events on campuses where we have the programs mentioned above, and we also attend on-campus events by invitation from institutions not participating in the aforementioned programs.

With so much recent attention on campus debit cards, we feel it is important to note that debit cards promoted through our campus banking programs cannot be used without underlying checking accounts. Students cannot activate their ID cards as Wells Fargo debit cards, request co-branded debit cards, or access refunds with these debit cards without first opening a Wells Fargo checking account. These debit cards allow access to cash withdrawals and purchases from the linked checking and savings accounts. Accountholders must go through standard opening procedures; there is no fee to open an account or receive any type of debit card.

Through our Wholesale Banking Group, Wells Fargo does provide commercial banking and treasury management services to a wide variety of commercial banking customers, including higher education institutions; these commercial banking relationships can include products such as prepaid payment cards. Three institutions do use the Wells Fargo Stagecoach® Prepaid Card for student disbursements as part of their larger treasury management relationship with Wells Fargo. However, this is not a primary offering to higher education institutions or students, and we have therefore focused our response on the programs, activities and consumer accounts and services more commonly considered “campus affinity” products.

Accounts and Services Promoted

Wells Fargo’s campus banking programs feature our standard selection of consumer checking accounts. Students may choose to open any of Wells Fargo’s consumer checking accounts based on their individual financial situations and needs. These accounts are the same as those available to students attending higher education institutions not participating in Wells Fargo’s campus banking programs, with one exception: we offer an additional way to waive the *Wells Fargo College Checking* account monthly service fee to students of schools participating in the *Wells Fargo Campus Card* Program.

Many students choose the Wells Fargo College Combo®, a package of accounts and services designed with the needs of college students in mind. The *Wells Fargo College Combo* offers flexibility and choice, but a typical package includes:

- The *Wells Fargo College Checking* account, with a low \$3 monthly service fee that can be waived in several ways, including linkage to a campus ID card from a school participating in the *Wells Fargo Campus Card Program*.
- *Way2Save*® Savings account – the monthly service fee is waived when linked to a *Wells Fargo College Checking* account.
- Wells Fargo debit card
- Free access to Wells Fargo Online Banking and Bill Pay

The College Combo, like all of our consumer checking packages, also includes many valuable services provided at no extra charge:

- Free access to one of the largest ATM networks in the country with more than 12,000 Wells Fargo ATMs, including ATMs on higher education institution campuses and in surrounding communities
- Access to over 6,000 Wells Fargo banking locations in 39 states and the District of Columbia, including banking stores on campuses and in surrounding communities
- No charge for teller transactions in our banking locations
- 24/7 phone access – speak with a Wells Fargo banker anytime for free
- Free access to online Bill Pay service
- Free online statements and check images
- Alerts – Free, timely alerts about eligible account transactions, sent right to the accountholder’s email account or wireless device
 - Wide choice of alerts, including low balance and account activity
 - Note: Wells Fargo does not charge for this service, although a student’s mobile carrier message and data rates may apply
- Free access to Text and Mobile Banking
 - Quickly request and receive account information via text message
 - Easy access to an array of online banking capabilities via mobile app
 - Note: Wells Fargo does not charge for this service, although mobile carrier message and data rates may apply
- Wells Fargo Mobile Deposit – Make deposits with a mobile device anytime, anywhere
- Send and Receive Money service – send money to anyone with an eligible U.S. deposit account using an email address or mobile number
- Bank-to-Bank Transfers – transfer money between Wells Fargo checking and savings accounts and accounts a customer may have at other U.S. financial institutions
- My Money Map – Free online money management tools that allow customers to view spending, budgeting and savings in easy-to-understand charts:
 - My Savings Plan – an easy way to save for goals and automatically monitor progress
 - My Spending Report - track purchases made with eligible Wells Fargo accounts and Bill Pay
 - Budget Watch - track spending, set-up budget goals and see how expenses are tracking within a budget
 - Resource Library - solutions, resources, and tools to help customers plan for their financial futures

- Free access to Card Design Studio® (personalized ATM and debit cards – choose from the gallery or upload a favorite photo)
- In addition to the consumer protections provided under Regulation E, our Wells Fargo debit card customers are protected by our *Zero Liability* program, which provides cardholders with zero liability for unauthorized transactions if their Wells Fargo debit card is ever lost, stolen, or used without authorization and the cardholder notifies us promptly
- “Getting Started Guide” information to help students understand the basics of their new checking account. Available via brochure or at wells Fargo.com.

Attached as **Exhibit A** you will find a summary of *Wells Fargo College Combo* checking account fees, modeled after the *Pew Charitable Trusts’* recommended format for simple bank fee disclosure.

- We provide this summary for all current consumer checking accounts for all states on Wells Fargo’s website. The form is available in both English and Spanish.
- For our College Checking account, the summary is easily accessible as the first link on the “Fees and Information” tab for College Combo.

Agreements

Higher education institutions and Wells Fargo enter into formal agreements regarding terms of campus banking programs. These agreements are typically available from public higher education institutions upon request, as governed by applicable open records laws.

Typical agreement terms include:

- **Length of agreement** – a 5-year initial term is typical, with renewal options often included if both the institution and Wells Fargo agree to extend
- **Grants to use names and marks** – provisions allowing the institution and Wells Fargo to use one another’s names and brand marks in conjunction with promoting and administering the program
- **Financial terms, where applicable** – in the event that Wells Fargo agrees to provide payments to the school as part of the agreement (e.g., ID card plastic reimbursement, rent, bonuses, royalties, sponsorship), conditions and timing of these payments are listed in detail; in the event that the University pays for services (e.g., university-held bank accounts, electronic funds transfers, outsourcing of check printing), those terms are also agreed to under contract
- **Technical requirements** – where applicable, the institution and Wells Fargo agree to the technology each party must provide to deliver services under the agreement
- **Account terms** – while account terms are generally the same as those for accounts opened outside of our campus banking programs, this and any other non-standard terms are memorialized in our agreements
- **Marketing** – marketing efforts for promoting the program are often detailed in the agreement
- **Exclusivity** - where applicable, exclusive marketing rights or rights of first refusal to provide future services are detailed in the agreement; note that Wells Fargo does not typically obtain the right to be the sole provider or marketer of financial services on campus

- **Information sharing and information security** – in the event that data will be shared between Wells Fargo and the institution for administration of the program, details of the data and associated security measures are agreed to by contract
- **Additional terms** – agreements also generally memorialize other terms, such as termination, notices, assignment, liability, representations and warranties, confidentiality, examinations, insurance, subcontractors, amendments, governing law, force majeure, and more

Marketing Practices

We work closely with our participating institutions to help communicate optional deposit-related banking services via communications that best suit each individual program and each campus community. Communications are varied, and may include:

- Information included in admissions, financial aid, housing, and/or orientation communications
- Presentations given at orientation by school and/or bank representatives
- Informational brochures and flyers made available on campus or in local bank locations
- On-campus events where Wells Fargo representatives have a booth or table set up to provide information and answer questions
- Informational web pages
- Mailings to students, faculty, and/or staff
- Promotional signage on campus and in local bank locations
- Advertisements in school-affiliated and local publications

Data Sharing

Most institutions participating in our campus card and co-branded debit card programs do not provide any student data. If student data is provided, it is limited to directory information except in those cases where additional data is required for program administration. One example of additional data shared for program administration is when an access ID number must be encoded on a Wells Fargo-produced combined ID/debit card. If the institution did not provide the access ID number, Wells Fargo could not properly encode the card for on-campus functionality, such as door access.

For our Student Disbursement Services program, institutions must send Wells Fargo additional student information for program administration. This information allows Wells Fargo to authenticate students' identities and ensure funds are disbursed to the correct students.

If Wells Fargo is provided any student information, the information is NOT used for opening student accounts, and it is NOT shared with or sold to outside parties. If data is provided for any promotional program communications, such as mailings, it is thoroughly scrubbed in accordance with Wells Fargo's comprehensive solicitation preference management program.

Students who choose to open Wells Fargo accounts are required to provide personal information to Wells Fargo. This information is industry standard account application information that is used for account opening and customer identification purposes as required by law.

Financial Education

Wells Fargo understands that college is a time when students become more independent and learn a variety of life skills. One important skill is proper financial management. Accordingly, Wells Fargo offers an array of financial education materials in order to help students understand their accounts and make informed financial decisions. Examples of these materials include:

- Getting Started Guide – easy to understand information about important account functions, from making deposits, to keeping track of checking account transactions, along with helpful hints and definitions of banking terms. Available as a printed brochure or online at wellsfargo.com.
- Consumer Overdraft Services brochure – straight forward information regarding overdrafts – what they are, how they happen and tools and best-practices for successful money management. Includes detailed descriptions of overdraft services, including optional Overdraft Protection and optional Debit Card Overdraft Service.
- Hands on Banking® – A fun, free, non-commercial program that gives adults and young people all the essential basics of money management. Visit handsonbanking.org or elfuturoentusmanos.org.

We also work with our school partners to conduct on-campus financial education seminars for many of the campus communities we serve.

Our Programs Emphasize Choice

- Higher education institutions have the choice of many campus banking services providers, and they typically choose through an open Request for Proposal (RFP) process. We participate in that process and we offer schools many options for how we implement our programs. Schools set the criteria by which they choose a banking provider. Ultimately, each program is awarded based on the school's priorities.
- Students at participating institutions are never required to bank with Wells Fargo, carry co-branded debit cards, or link their student IDs to Wells Fargo accounts. Further, students never need to opt-out of such linkage. By default, student ID cards offer stand-alone on-campus functionality, without the additional functionality of being linked for ATM and/or debit card transactions. And co-branded debit cards can only be requested by student customers who have chosen to bank with Wells Fargo.
- Our Student Disbursement Services program offers students the option of how and where they receive their financial aid disbursements. The default option is a paper check, and students are given a clear option of choosing ACH deposit to Wells Fargo or any other domestic financial institution.
- Our communications and program enrollment processes make it clear that students have a choice.

- Students who choose to link their ID cards to their Wells Fargo checking accounts, carry co-branded debit cards, or have refunds directly deposited into a Wells Fargo account, can unlink their cards, close their Wells Fargo accounts, and choose other refund methods at any time with no penalties or closure fees.

Our Goal: Earn Lifelong Customers

At Wells Fargo, we want to satisfy all our customers' financial needs and help them succeed financially. This means that we strive to establish relationships with our customers that span decades, not just their time in school. By establishing relationships with young adults early, we help them build healthy financial habits that will serve them well over their lifetimes. We hope this, combined with our strong selection of products and services to meet changing needs, earns us the opportunity to continue to serve these customers well beyond their school years.

Exhibit A:

Summary of *Wells Fargo College Combo fees*

College Combo®

A guide to your common checking account fees

At Wells Fargo we are committed to providing the information you need to help manage your account. We developed this summary to help you understand some of the most common fees that may apply to your checking account. For a complete listing of fees and more detailed account information, please see the Wells Fargo Consumer Account Agreement and Consumer Fee and Information Schedule.

Monthly service fee	
Monthly service fee	\$3
Requirements to waive the monthly service fee (minimum opening deposit \$100)	<p>\$0 monthly service fee when the Wells Fargo College Checking account is linked to one of the following:</p> <ul style="list-style-type: none"> • PMA Package with the Wells Fargo PMA Premier Checking account <p>OR</p> <ul style="list-style-type: none"> • Wells Fargo Campus ATM or Campus Debit Card <p>OR</p> <p>When you complete your package with three or more accounts and services (such as debit card, online banking, a savings account)</p> <p>AND have one of the following (during each statement cycle):</p> <ul style="list-style-type: none"> • \$500 minimum daily balance <p>OR</p> <ul style="list-style-type: none"> • A direct deposit of \$25 or more <p>OR</p> <ul style="list-style-type: none"> • A linked Wells Fargo Credit Card with: <ul style="list-style-type: none"> • 2 or more transactions
ATM fees	
Cash withdrawals at Wells Fargo ATMs	\$0
Cash withdrawals at non-Wells Fargo ATMs in the U.S.	<p>\$2.50 per withdrawal</p> <p>Note: Additional fees charged by the ATM owner will apply.</p>
Cash withdrawals at non-Wells Fargo ATMs outside of the U.S.	<p>\$5 per withdrawal</p> <p>Note: Additional fees charged by the ATM owner will apply.</p>
Overdraft services fees	
Overdraft and returned item fees*	<p>\$35 per item</p> <p>Note:</p> <ul style="list-style-type: none"> • No overdraft fee will be assessed on ATM and everyday debit card transactions unless Debit Card Overdraft Service is added to the account • No more than 4 overdraft and returned item fees will be charged on any business day • No overdraft fees if at the end of the business day, your account is overdrawn by \$5 or less after all transactions have posted • No extended or continuous overdraft fee
Overdraft Protection transfer/advance fees – when you are enrolled we will transfer/advance available funds from your linked overdraft protection account	<p>\$12.50 per transfer from your linked savings account</p> <p>Note: Transfers will count towards the maximum number of six transfers and withdrawals per month from your savings account per government requirements. See the “Other common fees” section for excess activity fees on your savings accounts.</p> <p>\$12.50 if total advance from your linked credit card for the day is \$50 or less, otherwise \$20</p> <p>\$12.50 per advance from your linked Home Equity line of credit account</p>



College Combo®

Debit card overdraft service

When you add this service, your ATM and everyday debit card transactions may be approved at the bank’s discretion when you do not have enough money in your checking or linked overdraft protection account to cover your transaction.

Option 1 – Your account does not come with debit card overdraft services: If you do not add this service and you do not have enough money in your account, your ATM or everyday debit card transaction will be declined and no overdraft fee will be charged on these transactions.

Option 2 – If you add this option: If you add Debit Card Overdraft Service and an ATM or an everyday debit card transaction overdraws your account, the following fees will apply.

Overdraft fee for ATM and everyday debit card transactions*	<p>\$35 per item</p> <p>Note:</p> <ul style="list-style-type: none"> No fee if you transfer or deposit funds (and no hold is placed on the deposit) to cover the overdraft by the cutoff time for each store and Wells Fargo ATM on the same business day No more than 4 overdraft and returned item fees will be charged on any business day No overdraft fees if at the end of the business day, your account is overdrawn by \$5 or less after all transactions have posted No extended or continuous overdraft fee
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How deposits and withdrawals are processed

Posting order – the order your deposits and withdrawals are processed	Transactions are generally posted each business day in this order: <ul style="list-style-type: none"> First – deposits or incoming transfers received before the deposit cutoff time that day Second – your withdrawals (such as ATM and debit card transactions) that have been received for payment from your account. Transactions are sorted in chronological order if known. Otherwise, we post from lowest to highest dollar amounts. Third – checks and automatic payments (ACH) from the highest to lowest dollar amounts 			
Deposit availability (Hold Policy) – when your deposits will be made available	<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="border-bottom: 1px solid black; padding: 5px;"> Cash deposit with teller: same business day </td> </tr> <tr> <td style="border-bottom: 1px solid black; padding: 5px;"> Electronic direct deposits/wire transfers: same business day </td> </tr> <tr> <td style="padding: 5px;"> Check deposit with teller: depending on the item, funds are generally available on the next business day. <ul style="list-style-type: none"> If we place a hold on a check, the first \$200 will be available on the next business day The remaining balance will be available no later than the seventh business day after your deposit (additional business days may apply to new accounts and certain checks) We will notify you of the hold and when the funds will be made available to you <p>Note: Deposits made before the cutoff time for each store and Wells Fargo ATM will be processed that day. Deposits made after the cutoff time are treated as made on the next business day.</p> </td> </tr> </table>	Cash deposit with teller: same business day	Electronic direct deposits/wire transfers: same business day	Check deposit with teller: depending on the item, funds are generally available on the next business day. <ul style="list-style-type: none"> If we place a hold on a check, the first \$200 will be available on the next business day The remaining balance will be available no later than the seventh business day after your deposit (additional business days may apply to new accounts and certain checks) We will notify you of the hold and when the funds will be made available to you <p>Note: Deposits made before the cutoff time for each store and Wells Fargo ATM will be processed that day. Deposits made after the cutoff time are treated as made on the next business day.</p>
Cash deposit with teller: same business day				
Electronic direct deposits/wire transfers: same business day				
Check deposit with teller: depending on the item, funds are generally available on the next business day. <ul style="list-style-type: none"> If we place a hold on a check, the first \$200 will be available on the next business day The remaining balance will be available no later than the seventh business day after your deposit (additional business days may apply to new accounts and certain checks) We will notify you of the hold and when the funds will be made available to you <p>Note: Deposits made before the cutoff time for each store and Wells Fargo ATM will be processed that day. Deposits made after the cutoff time are treated as made on the next business day.</p>				

College Combo®

Other common fees	
Access to Wells Fargo Online Banking® with Bill Pay	\$0
Cashier's check	\$10 each
Cashed/Deposited returned item	\$12 per item – for items returned unpaid to Wells Fargo for any reason
Check Image Statements (not available with online statements)	\$2 per month for copies of the front of your checks (10 checks per page) \$3.50 per month for copies of the front and back of your checks (5 checks per page) Note: The fee is assessed every month, even if no checks are paid against your account.
Check printing	Varies
Excess activity fee	\$15 per item – when you have exceeded six transfers or withdrawals per month from your savings account per government requirements
International debit card purchase fee	3% of transaction amount
Money Order (up to \$1,000)	\$5 each
Online bank statements	\$0
Online check images – images of checks you've written	\$0
Stop Payment	\$31 each
Wire Transfer	\$15 for incoming domestic/internal \$30 for outgoing domestic/internal

Dispute resolution

If you have a dispute with the Bank, and we are not able to resolve the dispute informally, you agree that the dispute will be resolved through an arbitration process further detailed in the Dispute Resolution Program section of the Consumer Account Agreement. If a claim is eligible to be resolved in small claims court, you may pursue the claim in small claims court.

Getting started guide

This guide includes easy-to-digest information about important account functions, from making deposits, to keeping track of your checking account transactions. You'll find a handy list of banking terms and definitions, as well as helpful tips to get the most out of your new account. You'll also discover ways to avoid fees and develop good money management habits, which will help you build a solid financial history.

[Getting started guide](#)

*Our overdraft fee may apply whether the overdraft is by check, ATM withdrawal, debit card, electronic transaction or other means. The payment of transactions into overdraft is discretionary and the bank reserves the right not to pay. For example, the bank typically does not pay overdrafts if your account is not in good standing or you have had excessive overdrafts. You must immediately bring your account to a positive balance.

This summary of fees is applicable to consumer deposit accounts maintained at Wells Fargo Bank locations in DC, MD, VA.

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