



Conversations on ANR/NSF Fees

January 17, 2025



NCUA Overdraft Fees

Agenda

01

A brief overview of the concerns raised by the NCUA Letter and the associated regulatory and legal issues.

02

A walkthrough of the tools available to credit unions to perform a risk assessment on the overdraft and NSF fee program.

03

Details on overdraft and NSF configuration tools available to credit unions for the management of their programs.



NCUA LETTER 3-CU-24

Consumer Harm Stemming from Certain Overdraft and Non-Sufficient Funds Fee Practices

Response Roadmap

01

Regulatory and Legal Background

Regulatory Versus Legal

When reviewing the credit union's fee program, there are two key considerations. Addressing one concern does not automatically address the other.

Regulatory

Addressing the concerns in the NCUA letter, including providing evidence that NCUA (and CFPB potentially, for large credit unions) concerns have been addressed. Some States may have their own fee regulations that must be addressed.

Legal

Addressing the risk of consumer lawsuits, including class action lawsuits, for violation of Unfair, Deceptive, and Abusive Practices (UDAAP).

Unfair, Deceptive, and Abusive Practices (UDAAP)

Both the government and plaintiff law firms have conceded that financial institutions may charge fees for overdraft and NSF programs (essentially charging a fee in exchange for allowing a consumer to use someone else's money to pay for a good or service).

Therefore, to regulate or sue financial institutions for fee programs, both governmental institutions and law firms rely on UDAAP to regulate or sue financial institutions.

Junk Fees

The pejorative term used by the government and the press is “junk fees.” Per the White House, the argument a fee is a “junk fee” if it “obscures true prices and dilute[s] the forces of market competition that are the bedrock of the U.S economy.”

NCUA Supervisory Approach

“*The NCUA will also recognize your credit union’s proactive efforts to self identify and correct violations. Examiners will generally not cite and the NCUA will generally not pursue enforcement action under the FTC Act nor the CFPA for violations that have been self-identified and fully corrected prior to the start of an examination. In addition, in determining the scope of any restitution, the NCUA will consider the likelihood of substantial consumer harm as well as a credit union’s risk management processes to identify and correct violations.*”



NCUA Roadmap

Our team has reviewed the NCUA Letter, and there is the basis of a roadmap for credit unions to follow.

Unanticipated Fees

The NCUA is focused on **unanticipated** overdraft fees. Per the NCUA Letter, these are fees on transactions that a member would not reasonably expect would give rise to such fees, or when members face uncertainty as to when transactions will be posted to their account that could result in fees.

Assess Risk

The NCUA has identified four major areas to review with respect to the credit union's fee program. The NCUA will continue to review overdraft programs to ensure credit unions are effectively managing the heightened risk of certain fee practices and will expect credit unions to properly mitigate such risks

Fee Programs

The NCUA encourages credit unions to review their overdraft and NSF program practices to ensure compliance with Section 5 of the FTC Act, Sections 1031 and 1036 of the CFPA, and other applicable laws and regulations. Documentation of the program may be important for NCUA review and evidence of compliance.

Examination Response

The tools outlined in this presentation are intended to assist credit unions in their response. However, there are many methods for a credit union to manage their specific fee program.



02

Risk Assessment Tools

Risk Assessments: Overview

If a credit union wishes to document the risk of the overdraft and NSF program, there are four major areas addressed in the NCUA letter.

RISK	THREAT	CU*BASE TOOLS
Concentration/Liquidity Risk	Credit union has overreliance on fee income	NSF/Overdraft Protection Configuration (Tool #558)
		5300 Call Report
		Analytics Booth
Reputation Risk	Credit union is failing to manage consumer expectations	Member Trackers
		Create Tracker Notes/Leads from File (Tool #312)
		Print Outstanding Follow-ups (Tool #671)
		Print Member Trackers (Tool #664)
Strategic and Transaction Risk	Credit union is failing to manage its overdraft and NSF program	NSF/Overdraft Protection Configuration (Tool #558)
		NSF Transactions by Day (NSFTR) Inquiry (Tool #1051)
		Automated Non>Returns
Compliance and Legal Risk	Credit union is not in compliance with laws and is not managing its membership disclosures	n/a

Concentration/Liquidity Risk

“

In addition to potential heightened consumer financial protection risks, the NCUA is concerned that an overreliance on any one revenue stream — including overdraft and NSF fees — can result in concentration risk and impact the financial health of a credit union, its members, and the system as a whole.

”



Concentration Risk Note

Before making any changes to the overdraft and NSF program, credit unions should analyze fee income and determine the institution's reliance on this income for ongoing operations and liquidity.

Please note that the NCUA has not defined what percentage of overall income constitutes "***overreliance***." Therefore, credit unions should be prepared to answer examiner questions on how reduction or loss of overdraft and NSF fee income will affect credit union operations.

Concentration Risk: General Ledger

Configuration of overdraft and NSF fees, and their associated General Ledger accounts, can be accomplished through the [CU*BASE NSF/Overdraft Protection Configuration \(Tool #558\)](#). Financial statements can then be used to analyze the credit union's fee income via these G/L accounts.

Session 0 - SUCCESS CREDIT UNION

File Edit Tools Help

NSF/Overdraft Protection Master Configuration CHANGE

Dividend application BU BUSINESS CHECKING
Application type SD

Overdraft Transfers	NSF-Returned Items																								
O/D transfer increment (shares) <input type="text" value="0.00"/>	NSF fee amount <input type="text" value="35.00"/>																								
<input checked="" type="checkbox"/> Allow transfer of exact amount	NSF fee G/L <input type="text" value="134.00"/>																								
O/D transfer fee (from shares) <input type="text" value="0.00"/>	Transaction description NSF FEE																								
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O/D transfer fee (from LOC) <input type="text" value="0.00"/>	Transaction description BOUNCE PROTECT FEE																								
Transfer additional amount <input type="text" value="0.00"/>	Non-fee tolerance within <input type="text" value="7.00"/> of available balance																								
Overdraft transfer fee G/L <input type="text" value=""/>	Maximum non-return fee amount per day (cap) <input type="text" value="9,999,999.99"/>																								
Combined overdraft protection fee <input type="text" value="0.00"/>	Non-return fees by Origin Code:																								
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Charge O/D fee if total transfer amount is more than <input type="text" value="0.00"/>																									

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Concentration Risk:

5300 Report and Analytics Booth

5300 Report

The NCUA added 2 new Account Codes to the Statement of Income and Expense section for Overdraft Fee Income (IS0048) and NSF Income (IS0049). While these line items are only required for credit unions with over \$1 billion in assets, credit unions of any size may wish to use these Account Codes to track Overdraft and NSF Income. See [The 5300 Call Report & CU*BASE® Tools booklet](#) for more information.

Analytics Booth

Credit unions subscribed to [Analytics Booth](#) can configure reports to show the percentage of fee income and total income overdraft and NSF fees represents. Analytics Booth can also be used to view trends on month-end balances of specific G/L accounts such as a fee income accounts. Contact the Asterisk Intelligence Team for more information.

Reputation Risk

CFPB Consent Order (Navy Federal)

“ 31. Throughout the Relevant Period, [Navy Federal Credit Union] received complaints in which **consumers expressed anger and confusion about Overdraft Fees charged even though their available balances were high enough to cover the transactions at the time they were authorized.** During calls with [Navy Federal Credit Union’s] member service representatives, many consumers disclosed that **they understood “hold” to mean that funds were actually set aside** to cover the authorized transaction, or that they believed that the funds transfer to the merchant instantaneously, rather than through a later settlement process.

32. In internal documents one of [Navy Federal Credit Union’s] employees referenced Authorized-Positive Overdraft Fees as a leading cause of consumer frustration, a source of consumer confusion, and “a huge pain point with members.” ”

Reputation Risk: Tracker Notes

To help you track and follow up with member responses, [Member Trackers](#), which are part of the CU*BASE CRM (customer relationship management) toolset, provide a way to record information about interactions with members, as well as to flag staff for specific follow-up actions. (The [Create Tracker Notes/Leads from File feature \(Tool #312\)](#) allows credit unions to generate a batch of trackers using a list of memberships in a database file.)

The screenshot shows a web application window titled "Session 0 CU*BASE GOLD - ABC CREDIT UNION". The main heading is "Generate Trackers from Database File". The interface includes several input fields and checkboxes:

- Use accounts from database file name: [text input]
- Database file in library QUERYxx (xx=Your CU ID)
- Create as tracker type: SALES TRACKER
- Append to existing tracker
- Create as memo type:
- Tracker key word: [text input]
- Tracker follow-up date: 00000000 [calendar icon] [MMDDYYYY]
- Assign to employee ID:

Below these fields is a section titled "Tracker Text" with five numbered rows (1-5) for entering text.

At the bottom, there are additional options:

- Assign cross sales need group: Corp ID: [dropdown menu]
- Assign cross sales task #:
- Exclude members flagged for 3rd-party marketing opt out
- Exclude members flagged for CU contact opt out
- Exclude members flagged with written-off loans

The bottom navigation bar contains icons for back, forward, home, search, help, and other functions, along with the text "6692| 9/05/18".

Reputation Risk: Print Member Trackers

The [Print Outstanding Follow-ups feature \(Tool #671\)](#) displays any Tracker conversation notes that have been flagged as requiring follow-up. The [Print Member Trackers \(Tool #664\)](#) report can be used to compile all Tracker conversation notes based on date range, credit union employee, member account, or other identifying characteristics, whether or not a follow-up was required. These tools allow credit unions to document and manage member complaints. Specific complaints about the credit union's overdraft and NSF program, especially those involving member confusion about the program, should be retained. Repeated questions about the program is an indication documentation to members should be clarified and updated, with the assistance of the credit union's legal counsel.

Session 0 CU*BASE GOLD Edition - Follow-Ups by Employee Report Selection

File Edit Tools Help

Follow-Ups by Employee Report Selection

Report Options	Response
Follow-up date range (blank for all)	from <input type="text"/> [MMDDYYYY] Optional
	to <input type="text"/> [MMDDYYYY] Optional
Conversations date range (blank for all)	from <input type="text"/> [MMDDYYYY] Optional
	to <input type="text"/> [MMDDYYYY] Optional
Type of employee to select below - follow-up	<input checked="" type="radio"/> Created by <input type="radio"/> Assigned to
Employee IDs (blank for all)	<input type="checkbox"/> [?] Optional
	<input type="checkbox"/> [?] Optional
	<input type="checkbox"/> [?] Optional
	<input type="checkbox"/> [?] Optional
	<input type="checkbox"/> [?] Optional
Sort sequence, based on type selected above	Follow-up date
Follow-ups to include	<input checked="" type="radio"/> All <input type="radio"/> Open <input type="radio"/> Closed
<input type="checkbox"/> Page break on sort	

Job queue
 Copies
 Printer

Navigation icons: back, forward, up, down, print, link, info, help, search.

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Strategic and Transaction Risk

“ *If your credit union provides an overdraft program or charges NSF fees, you should:*

Closely analyze all aspects of your overdraft and NSF fee practices, including but not limited to opt-in disclosures, website advertising, and other materials that inform members about these practices;

”

Strategic and Transaction Risk: Settings and Analysis

Activating Overdraft Protection/ANR Settings

The [NSF/OD Transfer Configuration tool \(Tool #558\)](#) is used to manage the credit union's overdraft program. In addition, there is an [Automated Non>Returns \(ANR\) booklet](#) on how to configure your programs in CU*BASE, include a step-by-step guide. Credit unions should consider ensuring the overdraft and NSF fee program settings are documented and updated when there are changes to the program.

Fee Transaction Analysis Report

The [NSF Transactions by Day \(NSFTR\) inquiry \(Tool #1051\)](#) can be used to view all NSF/ANR transactions for a particular day for analysis and to evaluate fee reversals, if appropriate.

Compliance and Legal Risk

“

If your credit union provides an overdraft program or charges NSF fees, you should:

...

Review recent regulatory developments regarding unanticipated overdraft and NSF fees;

...

Consult legal counsel regarding consumer compliance responsibilities and associated risks.

”

Compliance and Legal Risk

Once a credit union has fully documented the configuration and implementation of its overdraft and NSF program, the program and all consumer disclosures should be sent to the credit union's legal counsel for a compliance check against federal and state regulations, as well as any relevant court cases that might impact the credit union.

03

Overdraft and NSF Configurations

Authorize Positive Settle Negative Overdraft Fees

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Policies that assess overdraft fees on debit card transactions that authorize when a member's account has a sufficient available balance to cover a debit card transaction but, due to one or more intervening transactions, has an insufficient balance to cover the transaction at the time it settles, are commonly referred to as authorize positive, settle negative (APSN) transactions. In addition to charging an overdraft fee on the APSN transaction, members may also be assessed an overdraft fee on intervening transactions that exceed the member's available balance.

Charging APSN overdraft fees when members would not reasonably anticipate them because they had a sufficient balance at the time the credit union authorized the payment is likely unfair under both the FTC Act and the CFPA.

Also, credit unions with core processing systems unable to identify APSN transactions that result in a fee, even though such fees may have been disclosed to the member in advance, have heightened third-party and reputation risk.

”

Authorize Positive Settle Negative: Current/Available Balance

Current Balance versus Available Balance

The [NSF/OD Transfer Configuration feature \(Tool #558\)](#) allows credit unions to select either Available Balance or Current Balance as the basis for assessing fees. Selecting the Current Balance option reduces the heightened risk as described in the NCUA 24-CU-03 Letter.

NCUA 24-CU-03 Letter

*Credit unions' processing systems generally use either a ledger-balance method or an available-balance method. A ledger-balance method factors in only settled transactions in calculating an account's balance; an available-balance method calculates an account's balance based on electronic transactions that the institutions have authorized (and therefore are obligated to pay) but not yet settled, along with settled transactions. Risks of unfairness may be present in both available-balance and ledger-balance methods of assessing overdraft fees. **These risks may be more pronounced in situations where institutions use an available-balance method.***

Authorize Positive Settle Negative: Programming Change

CU*Answers is planning software changes regarding APSN fees. The changes will allow us to make the determination as to whether a transaction was “approved positive” (meaning there were sufficient funds in the account, without dipping into allowed negative balance limits or overdraft protection funds) or “approved negative” (meaning negative balance limits and/or overdraft protection were used to approve the transaction).

When that transaction posts to the member’s account, if the account must be taken negative (or funds must be pulled from an overdraft protection account) due to other transactions posted since the original approval, that determination will allow us to correctly choose whether or not to charge a fee. This project will require about 900 hours of development and testing work. This is a top priority and updates on progress will be provided to clients.

Authorize Positive Settle Negative: Manual Review

While work continues on the programming change, CU*Answers is releasing a special analysis report in an attempt to help credit unions identify when an APSN fee may have been assessed, to assist with manual fee refund decisions. In general, the report compiles data as follows:

- In addition to transaction records, the report relies on data in a card transaction details file called ISOCUDTA. Data in this table is retained for 30 days, and **is not available in real time**.
- In order to identify potential APSN fees, the report compares debit card transactions to the original card activity messages that were used during the authorization. **If neither negative balance limits nor funds from overdraft protection accounts were used to authorize the transaction**, then those transaction details will be included on the report for the CU to review for potential reversals.
- Starting in January 2025 the report will be run automatically for all CUs weekly on Monday mornings, covering **activity from Saturday through Friday** of the preceding week. This window provides a sufficient lookback, while accounting for the non-real-time nature of the data.

While this is not guaranteed to identify every potential APSN fee instance, if run and reviewed consistently this report should allow for good-faith review and refunding of fees that are likely the result of an APSN scenario.

Authorize Positive Settle Negative: Manual Review

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AP/SN Weekly Fee Posing Report

Potential AP/SN ANR and NSF Fees for Previous Week

APSNWKL RPT PAGE 1

Account Base	Account Type	Business Date	Fee Amount	R=Tran has been reversed	Resulting Balance After Fee Posting	Extended Fee Description
Merchant Information	Last 4 of Card	ATM/Debit Transaction Amount	Message Available Balance at Time of Authorization	Resulting Balance After Debit Posting		
68	080	2024-12-25	25.00		155.43-	AVAIL BALANCE WAS \$14.05 BEFORE DBT/WDR
MEIJER STORE #216	080	24	164.52	300.00	130.43-	
			25.00		255.47-	AVAIL BALANCE WAS (\$210.43) BEFORE DBT/WDR
SPEEDWAY 06278 95 68		33	20.04	135.48	230.47-	

Credit unions should review this weekly report then post refunds manually using **Tool #869 Transaction Reversal**.

Learn more in the AnswerBook:

<https://kb.cuanswers.com/cuanswers/ext/kbdetail.aspx?kbid=5583>

Multiple NSF Re-presentment Fees

“

Some members are charged an NSF fee when a check or automated clearing house (ACH) transaction item is presented for payment from a member's deposit account which has insufficient funds to pay the check or ACH transaction. If the same check or ACH transaction is represented to the credit union when the member's account still has insufficient funds, some credit unions return the transaction unpaid again and assess an additional unanticipated NSF fee. Credit union members typically have no control over when a returned ACH transaction or check will be presented again and are unable to control whether an intervening deposit will be sufficient to cover the transaction and related fees.

Credit unions that assess additional fees on representment transactions, including **where the disclosure does not fully or clearly describe the credit union's representment practice**, have heightened consumer compliance and reputation risk. Credit unions may also have heightened third-party and reputation risk due to core processing system settings related to multiple NSF fees, such as identifying and tracking represented items and maintaining data on such transactions.

Inaccurate disclosures have the potential to mislead reasonable customers and are considered deceptive under the FTC Act and the CFPA. Even when member disclosures outline representment practices, a policy of assessing fees on each representment is likely unfair under the FTC Act and the CFPA **if the member is unable to reasonably avoid fees from represented transactions.**

”

Multiple NSF Re-presentation Fees: ACH and Checks

ACH Re-presentation Waiver

The CU*BASE [NSF/OD Transfer Configuration \(Tool #558\)](#) allows credit unions to waive any fees associated with an ACH retry item by checking the box under Waive Fee for Retry Items.

Check Re-presentments

The CU*BASE [Work Member Exception File feature \(Tool #986\)](#), where credit unions work daily check exceptions such as NSF items, includes tools that allow credit union personnel to search a member's transaction history for check numbers that have attempted to clear previously. The user can then force-post an item, if desired, without assessing additional NSF fees.

Returned Deposited Item Fees

A Returned Deposited Item (RDI) is a check that a member deposits into their checking account that is returned to the member because the check could not be processed against the check originator's account. Some reasons for RDI fees include, but are not limited to:

“

The check originator may not have sufficient funds in their account to pay the amount stated on the check;

The check originator may have directed the issuing financial institution to stop payment;

The account referenced on the check may be closed or located in a foreign country; or

There may be questionable, erroneous, or missing information on the check, including signature, date, account number, or payee name information.

While certain entities, such as lenders and landlords, may be able to recoup fees from the check originator for RDI fees, credit union members generally cannot. In many circumstances, the check depositor has no control over whether, and no reason to anticipate that, the deposited check would be returned. Nor can the check depositor verify with the check originator's financial institution prior to depositing a check whether there are sufficient funds in the issuer's account for the check to clear.

Blanket policies of charging a fee to the check depositor for every RDI, irrespective of the circumstances of the transaction or patterns of behavior on the account, are unfair under both the FTC Act and the CFPA. These practices also heighten consumer compliance and reputation risk.

”

Returned Deposited Item Fees: Manual Review

Information about RDIs is provided to the CU from their item processor, and any fees are posted manually by credit union back-office personnel. Credit unions should review procedures to determine how fees are being charged.



Daily Limits

“ **High or no daily limits on the number of fees assessed.** Charging overdraft or NSF fees with a **high limit, or without limit**, for multiple transactions in a single day result in high costs for members and difficulty in bringing accounts positive. Such practices increase consumer compliance and reputation risk and are likely unfair under both the FTC Act and the CFPA.

”

Daily Limits: Fee Caps and Thresholds

Using the [CU*BASE NSF/OD Transfer Configuration feature \(Tool #558\)](#), credit unions can establish:

A maximum per-day cap for non-return (ANR) fees,

A non-fee tolerance for items that post within \$x of available balance, and

A non-fee tolerance for individual transactions under \$x that are posted to the member's account.

Session 0 - SUCCESS CREDIT UNION
File Edit Tools Help

NSF/Overdraft Protection Master Configuration CHANGE

Dividend application BU BUSINESS CHECKING
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Overdraft Transfers		NSF-Returned Items																									
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Charge O/D fee if total transfer amount is more than	0.00																										
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By user DONNAH11 on Sep 22, 2014																											

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Fee Disclosures

“**Insufficient or inaccurate fee disclosures.** Overdraft program website advertising must accurately disclose fees and comply with the requirements under Part 707 of the NCUA Rules and Regulations, which implements the Truth in Savings Act of 1991. Failure to disclose and comply also increases consumer compliance and reputation risk. Inaccurate disclosures have the potential to mislead customers and are considered deceptive under both the FTC Act and the CFPB. **Failure to disclose processing cutoff times for the posting of payments credited to a member’s account through third-party peer-to-peer payment applications** is likely an unfair practice because it may mislead consumers to falsely believe they have sufficient funds to cover additional transactions posted the same day.”

Fee Disclosures: Review with Counsel

This was another area described in the [CFPB's Consent Order of November 7, 2024](#) against Navy Federal Credit Union. Credit unions should ensure advertisements and disclosures are accurate and reviewed by the credit union's legal counsel.



Transaction Ordering

“ **Ordering transactions to maximize fees.** Structuring the transaction processing order so the **largest debit item processes first** can result in the account being overdrawn quicker leading to more overdraft fees assessed against the credit union member. Such practices result in higher costs to the member with no countervailing benefit and are likely unfair under both the FTC Act and the CFPA. ”

Transaction Ordering

Credit unions on the CU*BASE platform have debit card transactions processed **in the order they are received**. It is not possible for a credit union to modify this setting.

For check (share draft) processing this setting is controlled via [Member SD/Checking Configuration \(Tool #510\)](#).

ACH items are posted **as they are received**.

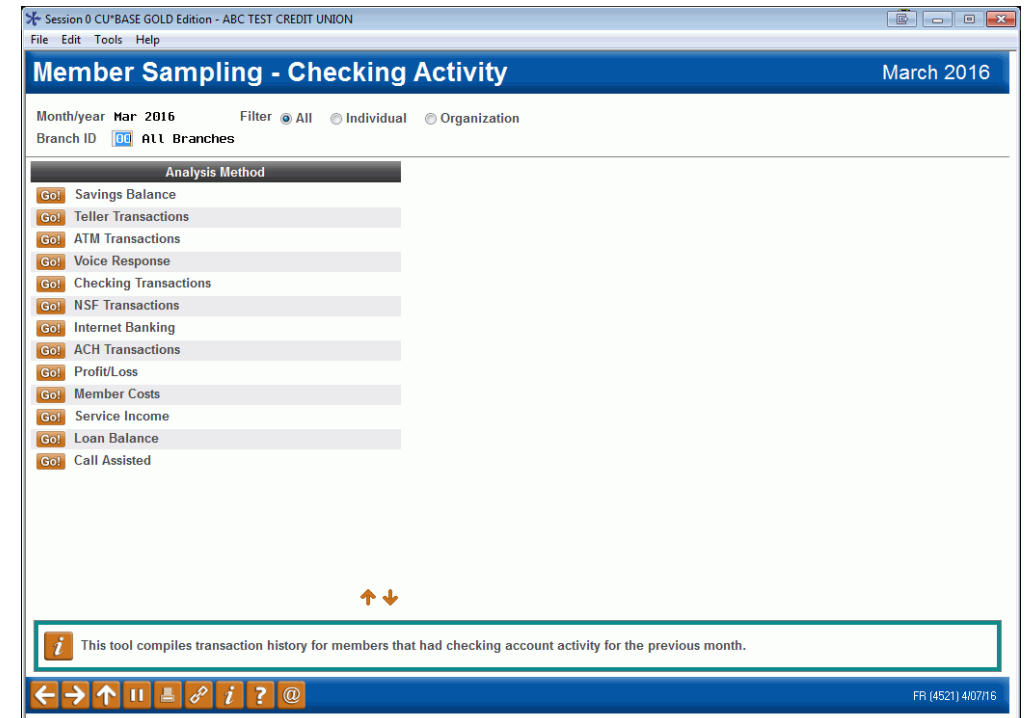
Check Posting Information	
<input type="checkbox"/> Process checks in descending amount sequence	
Corporate check reconciliation ID	XX
Check digit calculation ID	XX
<input type="checkbox"/> Check for duplicates	
# of days to scan	00

Consumer Programs

“ *In addition, your credit union may consider offering members the following features as part of your overdraft program: linked savings accounts; affordable lines of credit or short-term, small-dollar loans; and making educational resources available to members enrolled in overdraft programs, such as those available on the NCUA’s consumer website, MyCreditUnion.gov.* ”

Consumer Programs

The [Sample Checking Account Activity \(Tool #774\)](#) feature gathers a list of members based on how much they paid in NSF fees for the prior month. Credit unions can use this tool to perform outreach programs to educate members on alternative, lower-cost services. CU*Answers can also assist credit unions who are looking for ways to supplement their programs.



Fee Notifications

California Senate Bill 1075

New Notification Requirement

“

Each time a fee is assessed, credit unions must provide notice meeting all of the following requirements:

- 1. Notice must be sent via the communication method designated by the member.*
- 2. Notice must be sent on the same business day the fee-generating transaction occurs, or the next business day if same-day notification is not feasible.*
- 3. The notice must include:*
 - a. Transaction date and type*
 - b. Whether the transaction was declined or processed*
 - c. Overdraft amount (if applicable)*
 - d. Amount needed to restore a positive balance*
 - e. Timeframe to avoid potential consequences if the account remains negative.*
 - f. If applicable, the amount of time the member has to return the account to a positive balance to avoid the consequences.*

If the account has multiple accountholders, notice to one is sufficient.

”

Fee Notification Member Notices

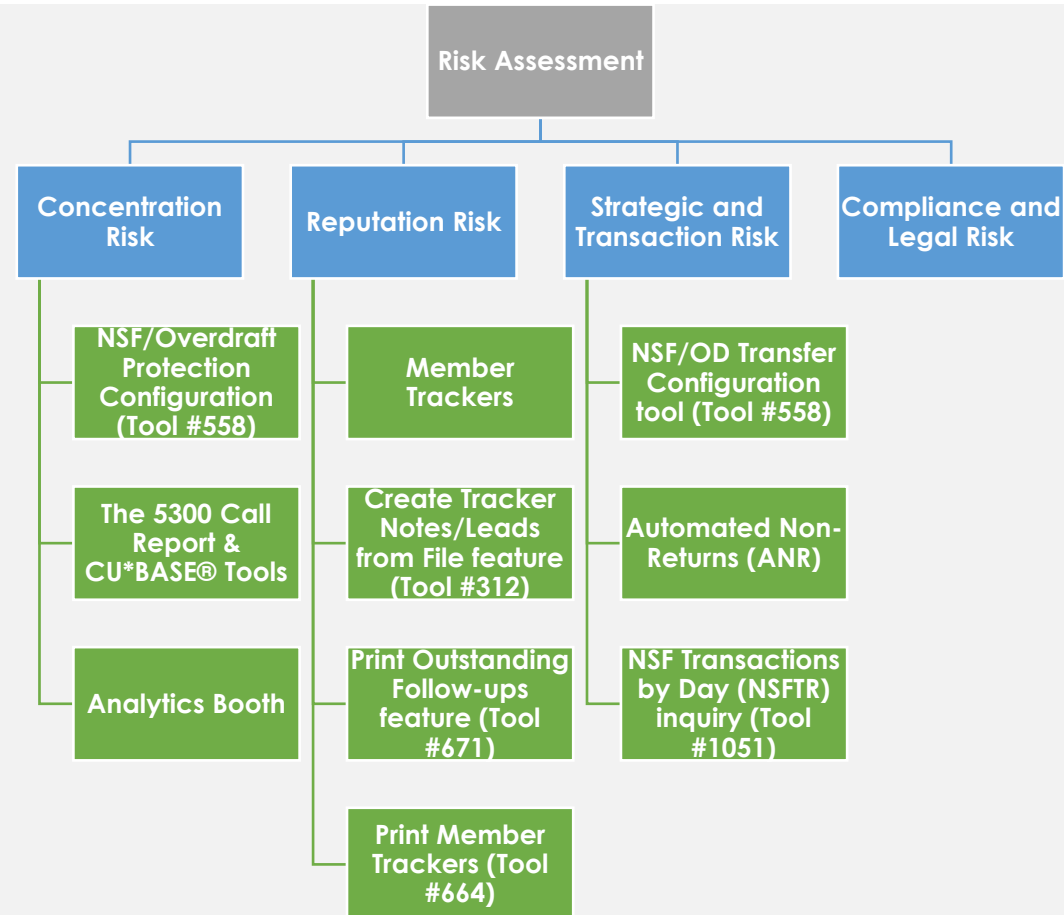
The CU*BASE [Member Notices](#) feature (Tools #258 and #653) can be used to configure and generate notices (and/or eNotices) to members for both non-return (ANR) fees as well as NSF fees for returned items. For details about this and other components of CA SB 1075, refer to [Credit Union Strategies in Responding to CA SB 1075 Member Notice for NSF, Overdraft Protection, ANR/Courtesy Pay](#) available on our website.

CONFIGURING NOTICE FORMS

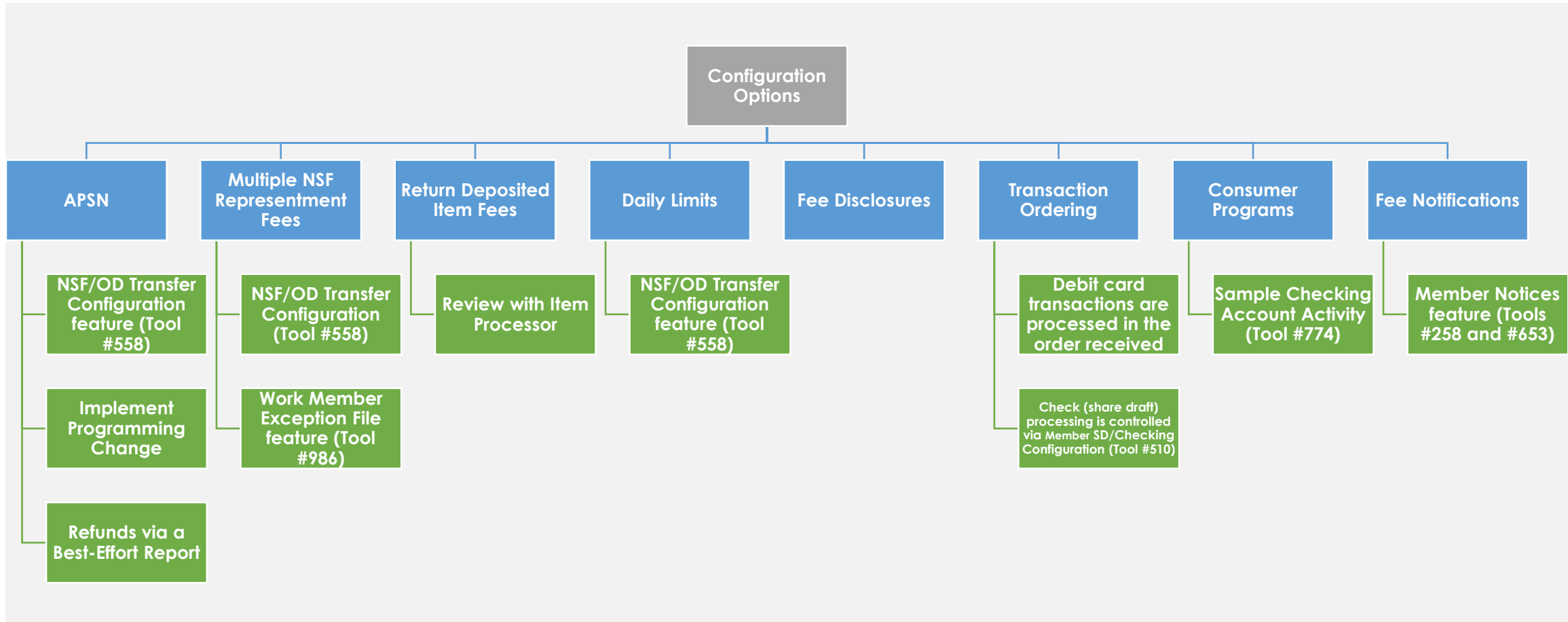
Configure Laser Notices (Tool #258), Screen 1

Form	Description	Maint Date
CDPW20	C PAY 20 DAYS	Jan 31, 2009
CDPW30	Courtesy Pay 30 day	Jan 31, 2009
CDPW15	CERTIFICATE NOTICELTY	Jun 19, 2008
CDPW10	C PAY 10 DAYS	Jan 31, 2009
DEL0	DELINQUENCY MEMBER	Jul 21, 2014
DDPWCH	CHG DDP/NSF NOTICE	Jun 19, 2008
DDPWNSF	CR DDP/NSF NOTICE	Jun 23, 2010
DDPWTR	DRG JAV/DRG	Jul 11, 2014
DDPWPH	PAYMENT CHANGE	Jun 19, 2008

Credit Union Fee Programs: Understand and Evidence



Credit Union Fee Programs: Specific NCUA Items



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More

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