## Sample Prepaid Fee Short Form Disclosure

The following is not legal advice and should only be used as starting precedents and operational best practices. Each product and company is unique, and you should consult with an experienced lawyer licensed in the relevant jurisdiction(s) to tailor the sample as needed.

Lithic does not assume responsibility for the contents of, or the consequence of using, any version of these documents or any other document found on our website. Lithic's legal team knows many fintech lawyers and we're happy to point Lithic customers to recommendations.

This sample is framed for consumer prepaid card programs.

- All highlighted brackets should be accurately completed and all footnotes should be deleted before the sample is finalized. Consider searching for "[" and "]" to make sure you don't miss any.
- This template is based on the CFPB's prescribed short form disclosure. Generally, financial services companies do not depart much from the CFPB's form. You can read the <u>Bureau's guide</u> for more detail.
- 3. Finally, delete this instructions page.
- 4. When done, the short form fee disclosure should only take up one page.

Other card program-related legal forms can be found in our <u>documentation</u>. This sample is made available by Lithic, Inc. under a Creative Commons Attribution-NoDerivs 4.0 International License: <a href="https://creativecommons.org/licenses/by-nd/4.0/legalcode">https://creativecommons.org/licenses/by-nd/4.0/legalcode</a>. You can use the samples for card programs, but must obtain Lithic's prior consent if you wish to publicly share any modified versions.



Per purchase **[0]** 

ATM withdrawal \$[0] in-network

\$[0] out-of-network Cash reload \$[0]

ATM balance inquiry (in-network or out-of-network) \$[0] or \$[0]\*

Customer service (automated or live agent) \$[0] or \$[0] per call

Inactivity \$[0] per month

We charge [number] other types of fees. Here are some of them:

[Additional fee type] \$[0]

[Additional fee type] \$[0]

[No monthly fee with direct deposit or 30 transactions per month.]

[Choose either Option A or B based on whether overdraft or other credit features will be made available on the card] [Option A: No Credit / Overdraft Feature] [Option B: You may be offered overdraft/credit after [X] days. Fees would apply.]

<sup>\*</sup> This fee can be lower depending on how and where this card is used.

[Choose the option from the five below that applies based on (1) whether your prepaid cards are FDIC-insurable and (2) whether you verify cardholder identities (i.e., perform KYC/KYB) before or after they receive a card, or not at all. Delete the other options and the bracketed lead in.]

identities before they receive cards:] Register your card for FDIC insurance eligibility and other protections.

Option 1: The prepaid cards are FDIC-insurable, but you don't verify cardholder

[Option 2: The prepaid cards are FDIC-insurable, and you verify cardholder identities before they receive cards:] Your funds are eligible for FDIC insurance.

[Option 3: The prepaid cards are FDIC-insurable, and you verify cardholder identities before they can receive cards:] Your funds are FDIC insured.

[Option 4: The prepaid cards are not FDIC-insurable, but cardholders can verify their identity after they receive cards:] Your funds are not FDIC insured.

[Option 5: The prepaid cards are not FDIC-insurable, and you never verify the identity of cardholders:] Treat this card like cash. Not FDIC insured.

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

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

agreement.