

Federal Deposit Insurance Corporation Survey of Banks' Efforts to Serve the Unbanked & Underbanked

[Affix label here]

Please mark any edits here

Bank Name: <<Bank Name>> Bank Holding Company: << Bank Holding Company>> Assets (as of Dec. 31, 2007): << Assets>> Number of Deposit Branches (as of Dec. 31, 2007): << Branches>> Full-Service (Brick and Mortar) Offices: <<#>> Full Service Retail (In-Store) Offices: <<#>> Limited Service Offices (Drive-thru facilities, mobile or seasonal offices, military facilities): <<#>> Other offices reported on Summary of Deposits: <<#>> Respondent Name: << Respondent Name>> Respondent Title: << Respondent Title>> Address: <<Address 1>> <<Address 2>> <<Citv>>. <<State>> <<Zip>> Telephone Number: << Phone >> (Data for December 31, 2007, as reported in the Summary of Deposits (SOD)

submitted to the FDIC or the Branch Office Survey submitted to the Office of Thrift Supervision (OTS). Please see Survey Terms and Definitions for

information about branch classifications.)

Please return completed survey by MAY 30th to:

Dove Consulting, 2 Atlantic Ave., Boston, MA 02110
617-482-2100 (telephone) / 617-482-1470 (fax)
www.doveconsulting.com

Public Burden Statement

This survey collects information to fulfill a mandate in Section 7 of the Federal Deposit Insurance Reform Conforming Amendments Act of 2005 (Pub. L, 109-173) that the FDIC conduct ongoing surveys and submit periodic reports to Congress on efforts by insured depository institutions to bring unbanked and underbanked individuals into the conventional finance system. The FDIC believes this survey takes an average 290 minutes per response to complete. Send comments regarding the estimate or any other aspect of this form, including suggestions for reducing completion time, to the Office of Management and Budget, OIRA, Washington, D.C. 20503, or the Paperwork Clearance Officer, FDIC, 550 17th Street, N.W., Washington, D.C. 20429.

Confidentiality Notice

Any information you provide will be strictly confidential. Individual responses to the survey will not be shared with the public or the industry. The FDIC will be informed of your bank's participation, but your responses will only be used in the aggregate with responses from other banks to ensure the confidentiality of your submission.

Survey Contacts and Assistance

If you have any questions or concerns about the survey, please call **Ed Bachelder** at 617-753-9223 or FDIC contacts:

Barbara A. Ryan, Deputy to the Vice Chairman, (202) 898-3841

Angelisa M. Harris, Senior Community Affairs Specialist, Division of Supervision & Consumer Protection, (202) 898-6645

Yazmin E. Osaki, Special Assistant to the Deputy to the Vice Chairman, (202) 898-6553

Survey Instructions

Your bank has been selected for the FDIC Survey of Banks' Efforts to Serve the Unbanked & Underbanked. The FDIC would appreciate your confidential participation in this important effort.

We have provided a few guidelines to help you complete this survey below:

- 1. Please review all of the survey sections first to best assess the effort and input that your bank will require to complete the survey. FDIC ran a Pilot Test of the survey in November 2007 and most participating banks found that they required the input of several groups or departments within their bank to successfully complete all of the questions.
- 2. Please provide all responses for your bank on one copy of the survey (either in hard-copy or electronic form). However, if policies, product & service offerings, and/or pricing structures vary significantly across your retail bank operations, please complete a separate survey form for each entity. To limit the effort needed to participate, large banking organizations do not need to fill out more than three surveys.
- 3. For an electronic MS-Word version of the survey please email Ed Bachelder at ebachelder@doveconsulting.com.
- 4. Please return your completed survey to Dove Consulting in the business reply envelope provided, fax it to 617-482-1470, or email it to FDICsurvey@doveconsulting.com.

Important:



For additional survey forms or assistance please contact Ed Bachelder at (617) 753-9223 or ebachelder@doveconsulting.com



Please return your completed survey by MAY 30th, 2008

Survey Terms & Definitions

Term	Definition	
Bank	An FDIC-insured financial institution (bank or thrift)	
Bank Footprint	Census tracts in the bank's current CRA evaluation area	
Conventional Checking Account	Checking, NOW, DDA, MMDA	
Debit Card	Card linked to a transaction account	
Established Customer	An individual who has had a deposit account for more than 30 days	
Full-Service (Brick and Mortar) Offices	SOD office service type code 11 (not reported in the Branch Office Survey (OTS-supervised institutions); see fdic.gov/sod/pdf/SOD_2007_Instructions.pdf.	
Full-Service Retail (In store) Offices	SOD office service type code 12 (not reported in the Branch Office Survey (OTS-supervised institutions); see fdic.gov/sod/pdf/SOD_2007_Instructions.pdf.	
Limited Service Offices	SOD office service type codes 22, 23, and 29 not reported in the Branch Office Survey (OTS-supervised institutions); see fdic.gov/sod/pdf/SOD_2007_Instructions.pdf.	
Low and Moderate Income (LMI)	Low income: Income equal to or less than 50% of the median income of the local metropolitan (MSA) or appropriately defined rural area Moderate income: Income from 50% to 80% of the median income of the local metropolitan are (MSA) or appropriately defined rural area	
Non-Customer	An individual who does not have a deposit account or credit relationship with your bank	
Number of Deposit Branches	As of December 31, 2007, as reported in the Summary of Deposits (SOD) submitted to the FDIC or in the Branch Office Survey (reported to the OTS by OTS-supervised institutions).	
Other offices reported on the Summary of Deposits	SOD office service type codes 13, 21, and 30 (not reported in the Branch Office Survey (OTS-supervised institutions); see fdic.gov/sod/pdf/SOD_2007_Instructions.pdf.	
Prepaid Card	Not linked to a transaction account. Money can be loaded onto the card. Excludes gift cards.	
Savings Account	Statement savings, Passbook, Certificates of Deposit, etc.	
Unbanked	Individuals who do not have an account with a depository institution (a commercial bank, savings institution or credit union) or a transaction account with a money market mutual fund or brokerage firm	
Underbanked	Individuals who have a deposit account but also rely on alternative non-bank financial service providers (such as check cashing firms or payday lenders) for transaction or credit services	

I. Retail Bank Information:

Α.

Ple	ase provide the following information related to consumer acc	ounts/cards as of December 31, 2007:
1.	Number of conventional transaction accounts (e.g., checking, DDA, NOW, MMDA):	
2.	Number of non-transaction savings accounts:	
3.	Number of entry deposit accounts* designed for individuals not qualified for conventional accounts:	
4.	Number of debit cards issued and active:	
5.	Number of prepaid cards issued and active:	
6.	Number of credit cards issued and outstanding:	

B. Number of ATMs operated by your bank. *Please indicate approximate numbers of ATMs by location and functionality:*

<u>Location</u>	<u>Number</u>
Inside LMI tracts	
Outside LMI tracts	
Total ATMA	
Total ATMs	

Functionality	Number
Basic cash dispense only	
Basic cash dispense <u>and</u> deposit acceptance	
Advanced functionality with bill payment and/or automated money order and/or prepaid card	
Total ATMs	

^{* &}quot;Entry deposit accounts" may include limited features designed to serve individuals with insufficient financial history or derogatory data in ChexSystems needed for a conventional transaction account.

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II. Education & Outreach:

A. Does your	bank perceive that there are u	nbanked or und	lerbanked populations i	n your market area?
☐ Yes I	□ No □ Don't know			
•	bank provide financial education			website, etc.) aimed at the
			For Unbanked	For Underbanked
Basic B	anking (Deposit and Credit F	Products)		
Predato	ory /Abusive Lending Prevent	tion		
Savings	s Programs			
Home C	Ownership/Mortgage Product	S		
Credit (Counseling			
Other (I	Explain)			
	oes not provide financial edu Is for this population (Skip to			
1. Pleas	e describe the types of materia	als provided for:		
a)	Unbanked:			
b)	Underbanked:			
2. Have	the financial education materia	als helped to esta	ablish banking relations	hips with:
a)	Unbanked individuals?	☐ Yes ☐ No	☐ Have not evalua	ated
b)	Underbanked individuals?	☐ Yes ☐ No	☐ Have not evalua	ated

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3. Does the bank participate in education or outreach efforts by any organizations that could bring unbanked or underbanked individuals into the conventional banking system and/or reduce the use of non-bank financial services providers for unbanked individuals? Examples may include: employers who use payroll cards, government entities that use electronic benefit transfer (EBT) or prepaid cards, faith-If yes, please describe. a) C. Does your bank teach (either directly or through a third party) financial literacy and education sessions, such as classes or workshops, that target unbanked and/or underbanked individuals? Check all that apply. \square Yes, at bank facilities \square Yes, at off-premise locations \square No 1. If yes, for how long has your bank been providing the sessions? _____ Years (Mark 0 if don't know) 2. If yes, mark all types of sessions that your bank provides: ☐ Basic Banking (Deposit and Credit Products) ☐ Home Ownership/Mortgage Products ☐ Predatory /Abusive Lending Prevention ☐ Credit Counseling □ Other: **☐** Savings Programs D. Did your bank conduct off-premise financial education outreach visits targeted toward the unbanked or underbanked during calendar year 2007? ☐ Yes ☐ No 1. Please indicate which locations your bank has visited for outreach sessions: ☐ High Schools ☐ Employer Sites ☐ Public Gatherings/Fairs ☐ Local/State Government Sites □ Community-based Organizations ☐ Vocational Schools/Colleges ☐ Military Installations ☐ Other:

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E. Does the bank work with corporate or business customers to provide services for their unbanked employees? ☐ Yes ☐ No				
		roll cards?		
a)	If yes, how many payro	oll cards has the bank issued during t	he year 2007?	
b)	Describe the features a	and fees associated with this card (if	any).	
	bank use targeted marke d and/or underbanked ind	eting (e.g., meetings with large emplo dividuals? □ Yes □ No	oyers, mailings, etc.) to reach	
1. If yes	, are there particular segn	nents of the unbanked and/or underb	anked population your bank is targeting?	
□Y	es □ No			
2. If yes, which segments? Mark all that apply.				
	☐ Working poor	☐ Consumers on public assistance	e □ Post disaster assistance	
	☐ Urban residents	☐ Rural residents	☐ Immigrants	
	☐ African-Americans	☐ Hispanic-Americans	☐ Asian-Americans	
	☐ Other:			
consume	bank have any <u>other</u> outr ers to open an account? se describe.		encourage unbanked or underbanked	

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H. What are the three most effective types of financial education, outreach, and marketing programs that your bank has used to help establish account relationships with unbanked and/or underbanked individuals? Please rank 1 to 3, where 1 = the most effective, 2 = second most effective, and 3 = third most effective.
 Programs:

Please comment about the advantages and disadvantages:

Programs:		Please comment about the auvantages and disauvantages.
Financial Ed	lucation Materials	
Providing Fi	nancial Education Sessions	
Outreach Vi	sits	
Participation	in Other Organizations	
Targeted Ma	arketing	
Other:		
•	ified expanding services to ur n your bank's business strategy'	nbanked and underbanked individuals in your market ?
☐ Yes ☐ No	☐ Don't know	
Has your bank cond	lucted research on unbanked (or underbanked consumers in your CRA assessment area?
□ Ves □ No	□ Don't know	

1. If yes, please summarize this research.

J.

STRICTLY CONFIDENTIAL. Responses to the survey will not be shared with the public or the industry. Responses will be aggregated to ensure confidentiality. K. What are three activities that banks could do, in general, that would be most effective in **bringing unbanked** individuals and families into the conventional banking system? 1. 2. 3. L. What challenges does your organization face in serving or targeting unbanked and underbanked individuals? Please rank order by importance, with 1 being the greatest challenge, 2 the second greatest, etc. __ Competition from alternative service providers Profitability issues Unfamiliar with this population __ High cost of customer acquisition __ Regulatory barriers related to customer identification Internal challenges __ Other ____ Fraud concerns M. Does your bank perceive any regulatory impediments to providing/developing specialized products and

services for unbanked or underbanked consumers?

Yes
No

1. If yes, please describe.

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III. Retail Branch Information:

A. Does your bank offer extended, non-t	raditional evening and/or wee	ekend hours at any of your b	ank's locations?	
□ Yes □ No				
1. If yes, check all that apply, and ir	ndicate typical hours:			
	Extended Weekday Evening Hours (After 5 pm)	Saturday Afternoon Hours (After 1 pm)	Sunday Hours	
Full Service Brick and Mortar Branches	□ Until pm	□ Until pm	☐ Hours to	
Full Service Retail (In-store) Branches	□ Until pm	☐ Until pm	☐ Hours to	
Limited Service Branches	☐ Until pm	☐ Until pm	☐ Hours to	
B. What languages, other than English , does your branch staff use to interact with customers?				
☐ Spanish	☐ Chinese	☐ Vietnamese		
☐ Korean	☐ Tagalog	☐ Other		
 C. Has the bank modified its retail operations over the past five years to make it easier or more welcoming or convenient for unbanked or underbanked consumers to take advantage of its services?				
☐ Extended banking hours ☐ Non-traditional locations (community centers, supermarkets, etc.)				
☐ New branch located in LMI a		☐ Innovative branch formats/designs (e.g. more casual lobby décor)		
☐ Internet or mobile banking	☐ External ATMs (wa	☐ External ATMs (walk-up and through the wall)		
☐ Off-Premise ATMs	☐ Other:	 		
2. If yes, please describe what you	have done.			

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	D.	Please indicate efforts your bank provides underbanked in your market areas:	as part o	f its branch strategy to s	erve the unbanked ar	nd
		☐ Check cashing	□ Mon	ey orders		
		☐ Kiosks for check cashing	□ Bill p	payment services		
		☐ Prepaid card issuance and reloading	☐ Othe	er:		
IV.	Sai	rvices Provided to Non-Customers				
	A.	If an individual does not have an account retypes of checks?	elationsh	ip with the bank, will the	bank typically cash tl	ne following If yes:
		Type of check		Cash check for non- customer?	Is a fee is charged?	Typical fee per check cashed by non-customers Please indicate either a the fixed dollar amount or percentage of face value
		Business check drawn on your bank (On-us)		☐ Yes ☐ No	☐ Yes ☐ No	
		Personal check drawn on your bank (On-us)		☐ Yes ☐ No	☐ Yes ☐ No	
		Business check not drawn on your bank (Loca	al)	☐ Yes ☐ No	☐ Yes ☐ No	
		Payroll check not drawn on your bank (Local)		☐ Yes ☐ No	☐ Yes ☐ No	
		Personal check not drawn on your bank (Loca	al)	☐ Yes ☐ No	☐ Yes ☐ No	
		Government check		☐ Yes ☐ No	☐ Yes ☐ No	
		Double endorsed check from a third-party		☐ Yes ☐ No	☐ Yes ☐ No	

1. Please describe the bank's concerns which may have led to limitations on transactions for non-customers.

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B. Does the training provided to the bank's tellers and other customer service representatives **include strategies for reaching out** to unbanked or underbanked consumers (e.g., encouraging individuals who do not have a transaction or savings account who are cashing paychecks to open an account)? **Yes No**1. If yes, please describe.

C. What forms of consumer identification or validation does the bank rely on for individuals who do not have an account relationship to cash a check?

Identification Forms	Not Accepted as ID for check cashing	Primary: Sufficient alone by itself	Secondary: Insufficient alone but acceptable with another secondary ID
Driver's license		☐ Yes ☐ No	☐ Yes ☐ No
State-issued photo ID		☐ Yes ☐ No	□ Yes □ No
Social security number		☐ Yes ☐ No	□ Yes □ No
Passport (US. or foreign)		☐ Yes ☐ No	□ Yes □ No
Military ID		☐ Yes ☐ No	☐ Yes ☐ No
Student/school ID card		☐ Yes ☐ No	□ Yes □ No
Employer letters/pay stub		☐ Yes ☐ No	□ Yes □ No
Matrícula consular		☐ Yes ☐ No	□ Yes □ No
Utility bills/payments		☐ Yes ☐ No	□ Yes □ No
Housing lease		☐ Yes ☐ No	□ Yes □ No
Individual Taxpayer Identification Number (ITIN)		☐ Yes ☐ No	□ Yes □ No
Other:		☐ Yes ☐ No	☐ Yes ☐ No

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☐ Yes ☐ No 2. Which of the following te	eck cashing cards to individuals who do not have an account relationship? echniques or technology does your bank use to verify the identity of individuals who do elationship for check cashing?
☐ Fingerprinting	□ Biometrics
☐ None	□ Other:

D. Which of the following transaction products/services does the bank offer to individuals who do not have an account relationship with your bank, and what would the fees be if they were customers with established deposit accounts?

		For a Non	-Customer	For Cu	ıstomer
Product/Service	Offer for non- deposit customers?	If a fixed fee is charged per item please indicate the <i>typical</i> fee	If a fee is a percentage of the dollar amount, please indicate the <i>typical</i> percentage rate	If a fixed fee is charged per item please indicate the <i>typical</i> fee	If a fee is a percentage of the dollar amount, please indicate the <i>typical</i> percentage rate
Bank/official checks	☐ Yes ☐ No	\$	%	\$	%
Money orders	☐ Yes ☐ No	\$	%	\$	%
Domestic wire transfers	☐ Yes ☐ No	\$	%	\$	%
International remittances (not ACH)	☐ Yes ☐ No	\$	%	\$	%
International ACH transfers	☐ Yes ☐ No	\$	%	\$	%
Foreign currency exchange	☐ Yes ☐ No	\$	%	\$	%
Bill payment (e.g., utility)	☐ Yes ☐ No	\$	%	\$	%
Reloadable prepaid debit cards (Visa, MasterCard, etc.)	☐ Yes ☐ No	\$	%	\$	%

1. For any of the services above, does your bank offer **lower prices for customers** as an incentive to open an account? ☐ **Yes** ☐ **No**

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	E. Is your bank concerned about of	fering remittances due to regulatory i	requirements? Yes No
	1. If yes, please describe any	regulatory concerns you may have in	offering this product.
V.	Account Opening & Onboard	ing Process for New Custome	ers:
	A. What forms of government-issu process?	ued identification does the bank acc	cept as part of the new account opening
	☐ Driver's license	☐ US or Foreign Passport	☐ Social Security number
	☐ Matricula consular	☐ State-issued ID card	□ ITIN
	☐ Military ID	☐ Other:	
	B. Which, if any, of the following al termined deposit customer's identity?	ernative sources of information do	pes the bank accept to verify a prospective
	☐ Utility bills/payments	☐ Housing lease	
	☐ Employer letters/pay stub	☐ Other:	
	☐ None		
	C. What account screening and r	i sk management tools are used for	new deposit accounts?
	☐ ChexSystems/Qualifile	☐ Early Warning Services (form	nerly Primary Payment Systems)
	☐ OFAC Lists	☐ Credit Bureau Reports	
	☐ None	☐ Other:	

D.	•	a deposit account without the bank screening the customer using or third-party screen being used by the bank?
	Checking account:	□ Yes □ No
	Savings account:	□ Yes □ No
E.	If an applicant screening propering/overrides?	rocess returns a negative hit, what is the bank's policy regarding account
	☐ Application is automati	cally rejected
	☐ Account opening decis	ion is made at the discretion of the new account representative
	☐ Account opening decis	ion is made at the discretion of the branch manager
	☐ Application is submitte	d to a centralized back office for review
	☐ Other:	
F.	Does the bank use credit accounts?	report or bureau scores as part of its screening process for new checking
G.	• • • • • • • • • • • • • • • • • • •	ost common reasons that a new account application is declined? Please rank easons 1 to 3, where $1 =$ the most common reason, $2 =$ the second most common most common reason.
	Insufficient identit	ïcation information
	Negative account	screening hit due to prior account closure or mismanagement
	Negative account	screening hit due to potential fraud alert
	No credit score/Ir	sufficient credit history
	Low credit score/	or poor credit record/credit history
	Insufficient initial	deposit
	Other 1:	
	Other 2:	

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Account C: _____ Date Introduced: _____

VI. Deposit Products:

A. I	Does the bank's most basic or e	-	-	t have a mi	nimum balance red	quirement?
	Yes □ No, but only with d1. If minimum balance is required\$ with direct	red, what is th	ne minimum b		deposit	
R I	If minimum balance is not r with direct For the most basic transaction de	deposit / \$	wi	thout direct		able?
J	Product	Included at	Available for a fee	Not offered	Monthly Fee (if applicable)	Per-Transaction Fee (if applicable)
	Check writing				\$	\$
	ATM card (PIN-only)				\$	\$
	Debit card signature (Visa/MasterCard)				\$	\$
	Online bill payment				\$	\$
C. I	Does the bank charge a per-item 1. If yes, what is the standard			•	,	unt? 🗆 Yes 🗆 No
	2. Does the bank offer any proa) If yes, please descri	grams to cove				Yes □ No

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4 \	Will the bank automatically close this acco	ount if a threshold number of N	SE itams are reached or there is a
4. V	persistent negative balance? \square Yes		SF Items are reached of there is a
	a) If yes, what is the monthly thresho	old?/month	
Savings	Accounts		
Λ For s	avings accounts with balances of \$500 or	loce which if any of the follow	wing accounts are offered and
	t are the interest rates paid on the accour		wing accounts are offered and
	Product/Service	Offer for customer?	Interest rate offered (as of Dec. 31, 2007)
Basi	c Savings (non-transactional)	☐ Yes ☐ No	
Indiv	ridual Development Accounts	☐ Yes ☐ No	
	vidual Development Accounts VITA Program (direct deposit or split refund)		
IRS	<u> </u>		
IRS Mon	VITA Program (direct deposit or split refund)	☐ Yes ☐ No	
IRS Mon Spec	VITA Program (direct deposit or split refund) ey Market Deposit Accounts	☐ Yes ☐ No ☐ Yes ☐ No	

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VIII. Payment Products:

A. How soon (in terms of number of business days), beyond the \$100 specified by Reg. CC, are funds ordinarily available for an established customer *who presents the following items?*

<u> </u>				
Check value is \$2,500 or less	Current Business Day	Next Business Day	Second Business Day	Three or More Business Days
Business check drawn on your bank (On-us)				
Personal check drawn on your bank (On-us)				
Payroll check not drawn on your bank (Local)				
Business check not drawn on your bank (Local)				
Personal check <u>not</u> drawn on your bank (Local)				
Government check				
Double endorsed check from a third-party				

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IX.Credit Products:

Α. Ι	Does the bank	typically offe	r unsecured c	losed-end person	al loans up	to \$5,000?	□ Yes □	No
	1. If yes, who	at are the elig	ibility requirem	ents?				
	☐ Depos	sit relationship	with the bank	☐ Direct de	eposit			
	☐ Proof	of income		☐ Minimun	n credit score	Э		
	☐ Revie	w credit histo	ry	☐ Other: _				
	2. If yes, ple	ase indicate t	he following:					
	Minimum Loan Size	Maximum Loan Size	Origination Fee	Acct. Maintenance Fee	Minimum APR	Maximum APR	Typical APR	Maximum Term (Mos)
	3. How long	does it typica	lly take to origi	nate an unsecured	closed-end	personal loa	n?	
	□ Less t	han 30 minut	es 🗆 Les	ss than 24 hours	☐ Less tl	nan 48 hours	s □ More tha	an 48 hours
В.				ar Ioans (i.e., less P □ Yes □ No	than \$1,000	/at least a 90)-day repaymen	t
		•	•	cts the bank has denth loan at an ATM.		orovide smal	l dollar loans to	customers.

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C. Do	es the bank	offer tax	refund anticip	oation loan	s? □ Yes	□ No				
1	. If yes, ple	ase indica	ate the following	g :						
	Minimum Loan Size	Maximu Loan Si			aintenance Fee	Minimum APR	Maximur APR	n Typical A		aximum rm (Mos)
			sumer credit of red for someon			-			oly)	
X. Social sec	curity numbe	er E	I Minimum cred	dit score		☐ Review	v of credit hi	story		
XI. Proof of in	icome	□ Othe	r:							
1	L. If yes, for	your 'bas	ic' credit card, p	olease indica	ate the follo	wing:				
	Initiation Fee	Annual Fee	Acct. Maintenance Fee	Late Payment Fee	Over the Limit Fee	Typical Credit Limit	Minimum APR	Maximum APR	Typical APR	Maximum Term (Months)
2	☐ Yes	□No	osit account wit	h the bank i	improve a c	ustomer's a	ability to rece	eive a credit (card?	
	a) If	yes, how	<i>:</i>							

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☐ Yes	□ No								
a) I	f yes, for y	our secu	red credit car	d, please ir	ndicate the	following:			
Minimum			Acct.	Late		Typical			
Credit	Initiation	Annual	Maintenance	Payment	Over the	Credit	Minimum	Maximum	Турі
Score	Fee	Fee	Fee	Fee	Limit Fee	Limit	APR	APR	API

If yes, how?

a)

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Thank you for taking the time to complete this survey. We appreciate your participation and input.