Date Completed: 12/15/16

Overdraft Protection Questionnaire

**Auditor:**«oaname»

**Interviewee Name and Title:** «ocname»

***Training***

* Does the Bank provide annual training to all applicable employees?

«o1»

* How is the training conducted?

«o2»

* + If online, what courses are required?

«o3»

* + What is the due date?

«o4»

* + What is the minimum passing score?

«o5»

* Is training provided for new employees?

«o6»

* + What is the deadline from hire date that training must be completed?

«o7»

* How does the Bank monitor training attendance?

«o8»

* Who is responsible for monitoring training attendance?

«o9»

***Disclosures***

* What accounts are eligible for overdrafts? (Checking, savings, money market, etc. – need specific, i.e. statement savings vs. passbook savings)

«o10»

* Is there an overdraft brochure or disclosure?

«o11»

* When is this disclosure provided?

«o12»

* Fee Schedule? Does the Bank charge any other overdraft or returned item fees other than the per item charge (**such as daily or sustained overdraft fees**)

«o13»

* Are there additional disclosures, such as TISA disclosures and/or Deposit Account Agreements that discuss overdraft terms?

«o14»

* Has there been any change in terms or fees related to the overdraft program?

«o15»

***ATM/Debit Card Opt in/Opt-out***

* What is the process for opting customers into or out of ATM/one time debit card transactions?

«o16»

* When can a customer opt in or out and who is allowed to process the request? How? (discuss all methods – in person, over the phone, online, fax, mail, etc.)

«o17»

* How are the system settings changed for customers that opt in and out? Who is responsible for making these changes? – be specific and get samples to document this process

«o18»

* Does the Bank retain documentation of the customer’s decision?

«o19»

* Is a confirmation sent if the customers opt in with any of the above-mentioned methods?

«o20»

* What is the process to provide the confirmation if this is done?

«o21»

* If confirmation is not provided until the next business day, are there controls in place to ensure customers are not charged for any overdrafts created by ATM and one time debit card transactions until after the notice is sent?

«o22»

* Does the Bank permit customers to opt out at any time after they have opted in?

«o23»

* + Is this accepted from any joint owner on the account?

«o24»

* If the customer does not opt in, do they still get the same account features as someone who had opted in (aside from the overdraft on ATM & one-time debit card feature)?

«o25»

* If the customer does not opt in, are they still provided access to the overdraft service for ACH, checks, etc… unless they have opted out for that?

«o26»

* Review the model form (A-9 Regulation E); Are **all** overdraft protection services that the bank currently offers listed?

«o27»

* Does the institution offer a sweep program that transfers money from a savings account to cover overdrafts on a checking account?

«o28»

* + If yes, if the customer/member has not opted in for ATM/one-time debit card transactions, does the institution refrain from assessing the one-time overdraft fee when the savings account doesn’t have sufficient funds?

«o29»

***Periodic Statements***

* What is the statement cycle? Different for each account?

«o30»

* Are the overdraft totals included at the bottom of each periodic statement always, or with a $0 until the first overdraft appears or not at all until the first overdraft appears?

«o31»

* With respect to overdrafts, do the overdraft fee totals reset as of January 1st of each year, or do the totals reset at the beginning of the January statement cycle?

«o32»

* If the Bank charges daily or sustained overdraft fees, are these fees included in the totals, and if so, in which bucket (i.e. paid or returned)

«o33»

* How does the Bank identify overdraft fees paid and overdraft fees returned?

«o34»

* If the bank offers 18/65 accounts, what is the overdraft fee? Is this fee included in the buckets and which one?

«o35»