

# Bank On National Account Standards Validation and Certification: Frequently Asked Questions

Accounts meeting  
the National Account  
Standards are now  
available at

**22,000**  
**BRANCHES** **ACROSS**

**49 STATES**  
+ Washington, DC



## 1. FAQs: National Account Standard Certification

### What are the Bank On National Account Standards?

The Cities for Financial Empowerment Fund (CFE Fund) first issued Bank On National Account Standards in October 2015, and released [an updated version of the Standards in 2017](#). Compiled with input from local coalitions, financial institutions, regulators, advocates, and researchers across the country, they offer specific guidance on consumer transaction accounts appropriate for financial institution partnerships with local Bank On coalitions.

The Standards include core, strongly recommended, and recommended features that address cost, functionality, and consumer safety. They establish an ambitious, but achievable, baseline for safe, affordable, and appropriate accounts that meet the needs of consumers with low incomes, particularly those outside of the financial mainstream.

### How do I know if a bank or credit union account meets the Standards?

In 2017, the CFE Fund announced a national account certification process. [Available free online](#), financial institutions can submit for validation accounts that they believe meet the Standards. Once validated by the CFE Fund's third party evaluator, the National Consumer Law Center, as meeting Bank On Standards, financial institutions will receive a Bank On seal of approval for marketing and outreach purposes; national recognition highlighting the account's safety, affordability, and functionality; and opportunities to partner with local Bank On coalitions and other national stakeholders.

### How can stakeholders use the Bank On National Account Standards certification?

- Financial institutions can use the Standards and certification to highlight their commitment to safe and affordable accounts across all branches and local partnerships, as well as in product development planning. National certification also relieves financial institutions from pressure to modify products locally.
- Local coalitions can use national certification to identify appropriate products to which to connect their residents struggling outside of the mainstream banking system. Certification of nationally recognized standards also offers a clear basis for conversations with financial institutions that do not yet offer a certified product.

### What are reporting requirements for Bank On certified accounts?

There are no national reporting requirements for Bank On certified accounts. However, the CFE Fund is currently partnering with the Federal Reserve Bank of St. Louis and a few banking institutions to pilot a centralized national reporting portal that could allow for voluntary reporting in the near future. Such basic data, such as number of certified accounts opened in a given reporting period, will also be relevant to Community Reinvestment Act regulatory examinations. Of course, local Coalitions and financial institutions are free to partner on data as they please, but once the pilot phase is complete, financial institutions will be able to submit to one central national portal basic data from their Bank On certified accounts.

## 2. FAQs: The Validation Process

### How does the account validation process work?

Using the free [CFE Fund web portal](#), financial institutions submit their account terms and contact information, as well as any additional information that demonstrates that the account meets [Bank On National Account Standards](#) core features.

The CFE Fund's independent evaluator, the National Consumer Law Center (NCLC), compares account features to the "core features" outlined in the Standards. Both the "strongly recommended" and "recommended" features are intended to provide additional guidance for Bank On programs when partnering with financial institutions, but are not required for certification. The validation process is "up or down"– accounts either meet all core Standards features or they do not.

### Who can submit a financial product for certification review?

Banks and credit unions are eligible to submit one or more of their products for validation as meeting Bank On National Account Standards. Local Bank On programs and partners can work with and encourage financial institutions to apply for validation, but the application itself may only be submitted by the financial institution.

The CFE Fund welcomes the opportunity to meet with financial institutions to discuss their product and the Standards and answer any questions. Please contact [David Rothstein](#), Principal, for more information.

### Who conducts the validation?

The CFE Fund has partnered with a third-party nonprofit evaluator, the National Consumer Law Center, to evaluate Bank On accounts. Upon application, financial institutions may receive questions from NCLC and/or the CFE Fund to clarify product details.

### How will I learn the result of the validation process? Are results made public?

The CFE Fund will contact applicant financial institutions promptly with the results of the validation process. Accounts that are not certified are not announced publicly – the CFE Fund will only notify the financial institution applicant. The CFE Fund's goal is to certify as many products as possible, and will work with financial institutions to provide guidance for meeting the core features of the Standards.

### What are the benefits of getting a product validated and certified?



In addition to providing appropriate and safe accounts to millions of customers in need, financial institutions whose accounts are validated as meeting Bank On National Account Standards are officially and publicly certified as a Bank On Approved Account. Such certification will provide a basis for robust local coalition affiliations and programming opportunities. Additionally, financial institutions can use their product-specific national certification seal provided by the CFE Fund in online marketing, branch signage, and other collateral materials to communicate and highlight that their account meets these widely-accepted Standards. The CFE Fund will promote Bank On certified accounts through inclusion in Bank On materials and in communications with local Bank On coalitions, as well as through assets like CFE Fund websites and social media outlets. The CFE Fund will also connect financial institutions to opportunities to partner with local Bank On coalitions and national Bank On stakeholders, where appropriate.

Additionally, financial institutions with certified Bank On accounts will be eligible to participate voluntarily in a streamlined, national data collection effort to be launched in 2017, described above.

### My financial institution is located in multiple cities or states. Does the product need to be validated for each market?

No, this is a national certification, applying to products available across a financial institution's entire branch network. Note that the certification applies only to the product submitted and not to the entire suite of a financial institution's offerings or to the financial institution as a whole.

### 3. FAQs: The Standards Themselves

#### **Does an account need to be free?**

No. The Standards' core requirements ask only that monthly maintenance fees not exceed \$5 if there is no waivable fee option. If there is a waivable fee option through direct deposit, online bill pay or debit card purchase, the Standards accept monthly maintenance fees as high as \$10.

#### **Are prepaid debit cards eligible for Bank On National Account Standards validation?**

Yes. The Standards do not distinguish products based upon whether they are structured as a prepaid card or other type of account. Instead, financial products are evaluated against the articulated standards. Note that the standards do require that the product be offered by a banking institution with branches.

#### **Do financial institutions need to offer both free paper and electronic statements?**

No. The Standards require only that consumers be offered free paper statements. However, if a financial institution also offers electronic statements, the Standards require both that they also be free and they be offered as a substitute for paper statements on a voluntary basis by a customer. While the Standards do not allow for any statement charges, note that a financial institution of course can include such costs within allowable monthly fee limits.

#### **How can financial institutions address dormant accounts while remaining compliant with the Standards?**

The Standards require that there are no charges for dormancy or non-usage. However, a financial institution can establish a time period after which it may refund dormant account funds, for free, to the consumer.

#### **What are the bill pay options under the Bank On National Account Standards?**

Transactional accounts must meet consumers' needs, which include paying bills and vendors of different types. The Standards require two free bill pay features. First, the product must allow bill pay by the customer, to a vendor, using their 16-digit debit card account number. Second, the financial institution must have a free institutional or subcontracted bill pay system that allows customers to send payments to any person or business (e.g. by electronically generating a paper check) OR, at minimum, allow customers four free money orders or cashier's checks per month.

#### **Can the account have overdraft or nonsufficient funds fees?**

No, the Standards do not allow for overdraft or nonsufficient funds fees, period. The Standards do not allow for grace period, warning, or fee reversal exceptions to this requirement. Of course, transactions may be denied when an account balance is insufficient, and a financial institution retains the right to cancel a customer's account after repeated, purposeful overdraft attempts.

#### **What does "free and unrestricted" mean when it comes to the Telephone Banking core feature?**

This standard is designed to ensure that these account holders are not penalized with additional fees or more limited access for existing telephone banking services, or that they are not charged a fee to do something on the phone that is free at a branch. Thus, if the bank provides free balance inquiries or other customer service representative services to holders of other institutional accounts, as almost all do, they cannot add a charge or restrict such calls for these account holders.

## More Questions?

Please ***contact us*** ... we'll be happy to answer your questions quickly, and will also continue to update these FAQ's to help your colleagues!