

This document should help answers questions concerning how CBS is meeting the Regulation E requirements for ATM and one-time Debit NSF charges and Overdraft Privilege (ODP)/Courtesy Pay charges for those credit unions that offer Overdraft Privilege.

**IMPORTANT:** If a member chooses to “opt-out” or does not respond to your notifications concerning the “opt-in” for these fees, you DO NOT have to modify their Personal Data Record or Draft Data Record in CAMS-ii.

### **CBS Changes to CAMS-ii to Comply with Regulation E**

- A CAMS-ii update in March 2010 added some new options to accommodate the canvassing of your membership for Opt-in/Opt-out for ATM/Debit Card NSF and Overdraft Privilege/Courtesy Pay. We added a check box and date text box for the Opt-in/Opt-out for ATM/Debit Card NSF in the Personal Data Record.
- We also added date text boxes on the Draft Data Record to correspond with the **Allow for ODP?** check boxes that were already there. These **Allow for ODP?** check boxes also fulfill the Regulation E requirement to show the Opt-in or Opt-out election for ODP NSF Charges. Initially, the date text boxes were blank, but when you select the corresponding Opt-in/Opt-out check box, the system populates that date text box with the date that you selected (checked), unless the check box is already selected.
- Added a new notice for ODP Opt-Ins, Draft-ODP Opt In, in Message-Narratives (Back Office > Standard > Parameters > Messages-Narratives) that is processed when the **ODP Allowed for Drafts?** Opt-in check box is selected in the Draft Data Record. This provides for positive feedback to the member that you have actually set their Opt In for Drafts charges.
- Added a new notice for ODP Opt-Ins, ATM-ATM/Debit Charges Opt In, in Message-Narratives (Back Office > Standard > Parameters > Messages-Narratives) that is processed when the **ODP Allowed for ATM?** Opt-in check box is selected in the Draft Data Record. This provides for positive feedback to the member that you have actually set their Opt In for ATM\Debit Card charges.
- At this time, Regulation E mandates that the ODP NSF and regular NSF for Opt-in/Opt-out requirements are for ATM and one-time Debit only.

### **If your credit union offers ATM/Debit Cards, but **NOT** ODP/Courtesy Pay:**

- As you receive your responses from your Opt-In notices, for members that opt to allow your credit union to charge a NSF fee for ATM withdrawals and one-time Debits, select the check box ATM/Debit Card NSF and the system should populate the **ATM/Debit Opt-in** date text box on the Personal Data Record

**If your credit union offers ODP/Courtesy Pay and ATM/Debit Cards:**

- As you receive your responses from your Opt-In notices, for members that opt to allow your credit union to charge a NSF fee for ATM withdrawals and one-time Debits, select the check box ATM/Debit Card NSF and the system should populate the **ATM/Debit Opt-in** date text box on the Personal Data Record
- When member opts in for ATM withdrawal and one time Debit charges, select the **ODP Allowed for ATM?** and **ODP Allowed for POS Debit? Check** boxes and enter the date you received the notice, if the system does not automatically populate the date text box.

**Other Important Information Regarding the CAMS-ii**

- If a member receives a new ATM/Debit Card after July 1, 2010...
  - And **opts out** for ATM withdrawal and one time Debit charges, **do not change the** Personal Data Record or the Draft Data record at all.
  - And **opts in** for ATM withdrawal and one-time Debit charges, change the Personal Data Record, if your credit offers ONLY Debit/Cards, or change the Personal Data Record and the Draft Data Record, if your credit union offers ATM/Debit Cards and ODP.
- The Personal Data Record Opt-in for ATM/Debit Card NSF field will be used (honored) for all new ATM/Debit cards starting July 1, 2010. It will be used for *all* cards set up after August 13, 2010.

**IMPORTANT:** When you set up a new ATM/Debit Card, ensure that the setup date is correct

- After batch on the night of August 13, 2010, CAMS-ii will...
  - Scan the share draft database and clear (uncheck) the Opt-In for all draft accounts where the Opt-in is selected and where the date is blank or prior to December 31, 2009.
  - Set the blank date text boxes to 08/13/2010. This allows you to receive fee income from Overdraft Privilege though the mandated cutoff date.
  - Cross-check the Personal Data Record options or Opt-in/Opt-out for ATM/Debit Card NSF and select it if the select the **ODP Allowed for ATM?** and **ODP Allowed for POS Debit? Check** boxes are selected.