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POLICY & ACTION FROM CONSUMER REPORTS

March 30, 2015

Monica Jackson
Office of the Executive Secretary
Consumer Financial Protection Bureau
1700 G St. NW
Washington, DC 20552

Re: Request for Information Regarding an Initiative on Safe Student Banking (Docket No. CFPB-2015-0001)

Submitted via email to: FederalRegisterComments@cfpb.gov

Dear Ms. Jackson:

Consumers Union, the policy and advocacy arm of Consumer Reports,[1] appreciates the opportunity to comment on the Bureau's initiative to create a "Safe Student Account Scorecard" for schools to use when negotiating campus banking agreements with financial institutions.

We believe this initiative is an important step toward improving the quality and transparency of campus banking agreements. We offer the following suggestions to strengthen the Scorecard initiative, so that it guides schools toward selecting contract terms that will be in the best interests of their students:

- Create a "school edition" of the scorecard, much like the teacher's edition of a textbook, that provides specific guidance to schools on:
    - which account terms and features are better for students;
    - which marketing practices are more likely to cause conflicts of interest; and
    - which items should never be part of an agreement to offer campus banking products to students.
- Provide accompanying information throughout the Scorecard about minimum requirements for accounts regulated by the Department of Education's "cash management" rules for Title IV funds, so that schools have all the information they need in one place for ensuring compliance while negotiating a good deal for students. We believe that the cash management rules provide an important floor for protecting students – and that schools should apply the rules to any account offering they are evaluating. We encourage both agencies to continue their ongoing coordination on campus banking issues, as the Department considers new rules this year.

[1] Consumers Union is the public policy and advocacy division of Consumer Reports. Consumers Union works for a fair, just, and safe marketplace for all consumers and to empower consumers to protect themselves, focusing on the areas of telecommunications, health care, food and product safety, energy, and financial services, among others. Consumer Reports is the world's largest independent product-testing organization. Using its more than 50 labs, auto test center, and survey research center, the nonprofit organization rates thousands of products and services annually. Founded in 1936, Consumer Reports has over 8 million subscribers to its magazine, website, and other publications.

General Comments

In recent years, financial firms have increasingly marketed campus banking products to colleges, universities, and their students. Financial aid refund disbursement services, student ID cards linked to bank accounts or prepaid cards, and student checking and savings accounts are now common across U.S. campuses. While these products can be convenient for students and cost-effective for colleges and universities, certain campus banking products have come under scrutiny for their controversial fees and policies. Banking agreements between schools and financial firms may result in arrangements that expose students to aggressive marketing tactics, high or unusual fees, and restricted choices for managing their money.

In response to growing concerns about the close partnerships between schools and financial institutions to market campus banking products, the Department of Education recently convened a committee to update its "cash management" rules,[2] which pertain to the disbursement of federal student aid dollars. The 2014 negotiated rulemaking committee considered proposals to increase transparency, ensure free and convenient access to funds, and protect students from aggressive marketing tactics.[3] The committee did not reach consensus on a set of draft regulations, leaving the Department to finalize a proposed rule on its own.

For these reasons, the proposed Scorecard is an important tool to get schools thinking now about what is in their students' best interests, and will help structure proposals from vendors so that schools can compare relevant terms side by side.

We believe the Bureau can make this initiative even more effective by providing specific guidance to schools as to how certain account terms and features should be weighted. A well-designed Scorecard can and should guide schools to give more weight to account features that are attractive to students, such as minimal fees and convenient access to funds. The Scorecard should also note which features are a prerequisite for any agreement, because they are already required by law.

It is also very important that the Scorecard do more to discourage the kinds of contract terms that have proven harmful to students in the past, by warning against revenue-sharing provisions and urging schools to post their full campus banking contracts online.

<u>Creating a "school edition" of the Scorecard</u>

The Scorecard document as currently drafted reads like a template for schools to turn over to potential vendors. It is a comprehensive roadmap that will greatly assist schools in making apples-to-apples comparisons during a competitive bidding process.

However, we think the Scorecard would be even more effective if it were part of a package that includes (1) the Scorecard itself, and (2) a "school edition" of the Scorecard for schools to use as a reference. The school edition Scorecard should include

[2] 34 C.F.R. § 668, Subpart K (2014).
[3] U.S. Dep't of Education, Negotiated Rulemaking 2013-2014, Program Integrity and Improvement, http://www2.ed.gov/policy/highered/reg/hearulemaking/2012/programintegrity.html ("Issue 4 - Cash Management" under "Session 4 Materials").

guidance as to which account terms and features are most important to negotiate, which kinds of fees can add up the most for students, which kinds of marketing arrangements should be avoided, and more. It should also note, as appropriate, which kinds of contract terms or account features are banned for sponsored accounts under Department of Education regulations.

Question 1 lays out the basic elements of a "Safe Student Account," modeled from the FDIC Model Safe Accounts Template.[4] The Bureau could better educate schools on what constitutes a "safe" account with annotations to each, explaining reasonable practices and emphasizing priority focus areas. For example:

- *Card-based electronic account*. There should be no fees associated with opening an account and receiving an access device, such as a debit or prepaid card. There should also be no minimum balance requirements for opening an account. Department of Education regulations prohibit sponsored accounts[5] from incurring any fees for opening an account and receiving an access device.
- *Deposit insurance*. Every student accountholder should have deposit insurance. In the case of prepaid accounts, the provider should ensure that each prepaid cardholder has individual "pass-through" deposit insurance. Account offerings without individual deposit insurance should be rejected.
- *Direct deposit*. This is an important feature for students, because it enables timely delivery of funds without check processing wait times. It would be peculiar, per current banking and prepaid industry standards, for this feature to come with a fee.
- *Online and mobile banking/bill pay*. Online banking is a standard feature for bank and prepaid accounts today. Mobile banking is growing in popularity as well, making such a feature a "plus factor" when evaluating accounts.
- *Electronic statements*. Bureau regulations generally require banking and prepaid accountholders to have access to electronic transaction histories.[6] It would be peculiar, per current banking and prepaid industry standards, to charge a fee for electronic statements.
- *Overdraft or insufficient funds (NSF)*. Overdraft and NSF fees can contribute significant costs to a student account. Department of Education regulations prohibit sponsored accounts from having lines of credit.[7] Overdraft or NSF fees are inappropriate and should be rejected.
- *Money orders/e-checks*. Students may need access to checks or money orders for certain transactions, such as paying rent. No or low-fee access to checks or money orders would be a "plus factor" when evaluating accounts.

Question 2 asks for more information about monthly fees. The Bureau should assist schools by explaining reasonable practices regarding monthly fees and the possibility of

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[4] Fed. Deposit Ins. Corp, FDIC Model Safe Accounts Template, https://www.fdic.gov/consumers/template/template.pdf.
[5] The definition of "sponsored account" will likely be determined by the Department's new cash management rules. The Bureau should consider providing that definition in its preamble explaining relevant Department rules once amended.
[6] Relevant language here should conform to Regulation E, as amended by the Bureau's final rule extending protections to prepaid card accounts.
[7] 34 C.F.R. § 668.164(c)(vii) (2014). The Bureau should amend this language as needed to conform to new Department cash management rules.

fee waivers. In our recent Consumer Reports investigation of campus banking products, we found that most account offerings either charge no monthly fees at all, or provide easy ways to waive them.[8] Some accounts waive monthly fees for anyone with enrolled student status, while others waive monthly fees for setting up direct deposit or maintaining a reasonable minimum balance.[9] Schools should be encouraged to give priority to account offerings that offer no monthly fees or fee waivers that do not depend on having a minimum balance, in addition to the "safe account" features above.

Question 3 asks about any "non-standard" fees a provider may charge. The Bureau should add language to discourage schools from allowing accounts to have the following fees, and emphasize which are likely to pose the greatest harm to students:

- *Point-of-sale purchases*. Students who frequently use their debit or prepaid cards regularly would be greatly harmed by point-of-sale transaction fees. It would be peculiar, per current banking and prepaid industry standards, to charge such a fee. This fee should be rejected.[10]
- *Use of in-network ATMs*. ATM fees can contribute to significant costs for students. Department regulations require that students with sponsored accounts have "convenient" access to free ATMs on or near campus.[11] It would also be peculiar, per current banking and prepaid industry standards, to charge a fee for in-network ATM access. This fee should be rejected.
- *Declined authorizations for a debit card*.[12] Decline fees are peculiar, per current banking industry standards. They are also increasingly rare in the prepaid market. This fee should be rejected.[13]
- *Account termination*. Account closure fees could hinder students' ability to freely switch accounts. Students who experience fraud on their accounts may need to close them and move their money elsewhere. These fees should be strongly discouraged.
- *Prepaid card reload*. Prepaid accounts offered to students should already have reasonable access to free ATMs, thereby diminishing the need for a student to "reload" a prepaid account via a third party such as Western Union. These fees should be kept to a minimum, in any case, if the reload service is offered.
- *Account inactivity while enrolled as a student*. Account inactivity fees are inappropriate for enrolled students. If a student's account is dormant for more than 60 days, the provider should send the student a 30-day notice of account closure, and dispense any remaining funds at no cost to the student if the student does not instruct the provider to keep the account open.

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[8] CONSUMER REPORTS, CAMPUS BANKING PRODUCTS: COLLEGE STUDENT FACE HURDLES TO ACCESSING CLEAR INFORMATION AND ACCOUNTS THAT MEET THEIR NEEDS 11 (2014), *available at* https://consumersunion.org/wp-content/uploads/2014/08/Campus_banking_products_report.pdf. The report is also enclosed with this submission as an Appendix.

[9] *See id.*

[10] The Bureau should indicate whether such fees are banned for sponsored accounts under new Department cash management rules, as appropriate.

[11] The Bureau should indicate the scope of required free in-network ATM access for sponsored accounts under new Department cash management rules, as appropriate.

[12] The Bureau should consider amending this to read: "Declined authorization for debit transactions." This would clarify the relevant scenario in which a bank or prepaid accountholder could experience a fee.

[13] The Bureau should indicate whether such fees are banned for sponsored accounts under new Department cash management rules, as appropriate.

- *Check cashing*. Department regulations already require that students with sponsored accounts have convenient access to free ATMs, thereby diminishing the need for check cashing services via a third party. It would be peculiar, per banking industry standards, for a provider to charge a fee to cash a check at the provider's branch offices or in-network ATMs. Fees for cashing a check via a third party should be kept to a minimum, if that service is offered.
- *Balance inquiries*. Balance inquiry fees could discourage students from checking their balances at the ATM or via customer service, creating a barrier to sound money management. Balance inquiry fees at in-network ATMs would be peculiar, per current banking and prepaid industry standards. This fee should be rejected.
- *Speaking with a customer service representative*. Customer service fees could likewise discourage students from obtaining account information or trying to resolve problems. Live customer service fees would be peculiar, per current banking industry standards. They are also increasingly rare in the prepaid market. This fee should be rejected.

Questions 4 and 5 ask questions about additional services that a provider may include, with or without a fee. The Bureau should add language that emphasizes which additional services may be the most useful to students, and which among them should come with low or no fees:

- *Remote deposit capture*. This feature, if available through an account's mobile banking service, could provide added convenience to students. Remote deposit capture typically comes with no fee. This should be considered a "plus factor" when evaluating accounts.
- *Use of out-of-network ATMs*. Out-of-network ATMs can significantly contribute to costs for students. Robust in-network ATM coverage on and near campus can mitigate the need for out-of-network ATM use. Furthermore, many bank accounts marketed to students provide a certain number of fee reimbursements for out-of-network ATM transactions. Out-of-network ATM fee reimbursements should be considered a "plus factor" when evaluating accounts.
- *Foreign currency conversion*. Foreign currency conversion could be an attractive feature for students with family and friends in other countries. The service typically comes with a fee, set as a small percentage of the amount to be exchanged. A lower conversion fee relative to other competitors' accounts would be a "plus factor" when evaluating accounts.
- *Printed and mailed statement*. Many students may want access to paper statements, due to limited Internet access or other reasons. Free paper statements, upon ad hoc request, would be a "plus factor" when evaluating accounts. Regular paper statements, for no more than a nominal fee, would also be a "plus factor" when evaluating accounts.

Question 6 asks for details about certain marketing practices. The Bureau should make clear which kinds of marketing practices are restricted by Department regulations, and which practices should also be rejected due to their harm to students:

- *Presenting materials in a neutral and objective manner*. This is essential to ensure that students are not steered into using a particular account, which would violate federal law.[14] The Department of Education is considering amendments to its cash management rule that would specify procedures for presenting sponsored account options. The Bureau should include any new Department requirements here as appropriate.

- *Obtaining affirmative, written consent before issuing an access device, including any unactivated device*. Federal law already restricts the issuance of access devices without a consumer's consent.[15] The Department of Education is also considering amendments to its cash management rule that would prohibit issuing an unactivated device for a sponsored account without a student's prior written consent. The Bureau should include any new Department requirements here as appropriate, and should strongly discourage this practice for any accounts marketed to students.
- *Refraining from providing gifts or remuneration to school employees*. Gifts to schools are already banned for private student lenders.[16] Similarly, credit card issuers are prohibited from offering gifts to students when marketing credit cards.[17] Schools should likewise reject gifts or other remuneration from campus banking providers.
- *Obtaining school approval of co-branded marketing materials prior to dissemination*. Co-branded marketing materials are banned for private student loans.[18] The Bureau should discourage schools from using such materials in the context of marketing campus banking products.

Questions 7 and 8 ask about the current and/or expected number and locations of free ATMs. Here the Bureau should emphasize the importance of robust free ATM coverage to decrease potential costs to students.[19]

Question 9 asks about the availability of customer support services. The Bureau should urge schools to consider convenient and flexible options for customer service as a "plus factor" when evaluating accounts.

Question 10 asks about available fraud and error resolution protections. Consumers with bank accounts already have the right to limit their liability for unauthorized transactions and errors, as well as receive a prompt recredit of missing funds.[20] The Bureau has proposed new regulations to offer similar protections to general-use prepaid accounts.[21] The Bureau should state these prerequisites here, and suggest that schools consider procedures or services that go above and beyond to prevent fraud – for example, text alerts for unusual transactions – a "plus factor" when evaluating accounts.

The Scorecard concludes with several proposed requirements to ensure contract transparency. We strongly support efforts to make campus banking agreements

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[14] 15 U.S.C. § 1693k(2) (2012 & Supp. II).
[15] 15 U.S.C. § 1693i (2012 & Supp. II), 12 C.F.R. § 1005.5 (2014).
[16] 15 U.S.C. § 1650(b)(1) (2012 & Supp. II).
[17] 15 U.S.C. § 1650(f)(2).
[18] 15 U.S.C. § 1650(c).
[19] The Bureau should add language regarding the required scope of ATM coverage for sponsored under new Department cash management rules, as appropriate.
[20] 15 U.S.C. §§ 1693f—1693g (2012 & Supp. II), 12 C.F.R. §§ 1005.6, 1005.11 (2014).
[21] Prepaid Accounts Under the Electronic Fund Transfer Act (Regulation E) and the Truth in Lending Act (Regulation Z), 79 Fed. Reg. 77102, 77102 (proposed Dec. 23, 2014).

available to the public. For this reason, we urge the Bureau to advise schools – as well as the financial institutions they partner with – to publicly post their full campus banking agreements, and summaries of key provisions, in prominent locations online.   Schools with college credit card agreements are already required to make their agreements available to the public pursuant to the CARD Act. However, our own recent investigation found that it was all but impossible at some schools to obtain copies or more information about the agreements if they were not made available on the school's website.[22] The Bureau should strongly advise schools to ensure that these important materials are placed in a prominent location online; it is a simple, clear way to ensure transparency.

The Bureau should also discourage schools from entering into contracts with revenue-sharing provisions. Revenue sharing creates perverse incentives for schools, and could result in students being steered into products they do not want or need. Revenue sharing between schools and private student lenders is already prohibited.[23] While we support the comprehensive disclosure of such contract terms at minimum, we think a better solution is to urge schools to reject revenue-sharing provisions altogether.

We support the requirement that financial institutions provide schools with an annual summary of fees charged to accountholders. The Bureau should also urge schools to solicit information about the percentage (not just the number) of students using the campus accounts, as well as how many accounts go inactive or are closed during the academic year.

Related Department of Education requirements

The Department of Education's current "cash management" rule for Title IV aid requires schools to ensure that students aren't assessed a fee for opening school-sponsored accounts and receiving access devices such as debit or prepaid card.[24] The Department requires that schools get affirmative consent from students before opening school-sponsored accounts on their behalf.[25] In addition, students with sponsored accounts must have "convenient access" to ATMs or a branch office where they will not incur fees.[26] Schools must consider these factors, at minimum, when evaluating proposals from vendors offering campus banking products.

We urge the Bureau to include information throughout the Scorecard, as discussed above, to ensure schools know about all the relevant requirements they must follow to comply with the cash management rule. Because the Department is expected to issue new cash management rules later this year, the Bureau should continue its coordination with the Department to ensure that the Scorecard contains up-to-date information.

[22] *See* Letter from Suzanne Martindale, Consumers Union to Rohit Chopra & Anthony Alexis, Consumer Fin. Protection Bureau (Feb. 19, 2015), *available at* https://consumersunion.org/wp-content/uploads/2015/02/CFPBCollegeCreditCardAgreements.pdf.
[23] 15 U.S.C. § 1650(b)(2).
[24] § 668.164(c)(3)(iv).
[25] § 668.164(c)(3)(i).
[26] § 668.164(c)(3)(v).

The cash management rules set an important floor for consumer protections on certain student accounts. Whether or not a particular account offering falls under the Department's new definition of "sponsored account" – or the school even participates in the Title IV program – we believe that the Bureau should encourage schools to follow the new cash management rules in all cases when selecting vendors for campus banking products.

Answers to Specific RFI Questions

1. *How can institutions of higher education and students benefit from soliciting information on the features and cost of financial products marketed through a partnership with a financial institution?*

As the Bureau notes in its RFI, some schools appear to give little weight to the account terms offered by prospective vendors when considering bids. There could be several reasons for this – for example, schools may not have in-house expertise to assess whether a particular account offering has competitive features. Schools may assume that the financial institution has market-tested offerings that will be a good deal for students. However, as our own research has shown, student account terms can vary widely, with some having little or no fees while others are rather expensive if used frequently.[27]

Our research has shown that out-of-network ATM fees, point-of-sale fees, and overdraft fees can add up quickly if a student uses a school-sponsored account as their primary account.[28] Therefore, these kinds of fees should raise a red flag when evaluating bids from financial institutions.

This is precisely why the Scorecard is so important, and why it must be designed to point schools in the right direction. The Bureau should strengthen the Scorecard as discussed above by providing an accompanying "school edition" that helps schools focus on the right priorities and meet relevant legal requirements.

2. *How can the draft scorecard based on the FDIC Model Safe Accounts template be adapted to meet the needs of this specific market and to other types of products that institutions of higher education seek to offer to their students?*

The FDIC Model Safe Accounts template sets an important baseline for evaluating deposit accounts generally, by identifying priority transactions that should come with no fees. Unfortunately, however, little data exists on how students are most likely to use their accounts. Indeed, the profile of a college student is far from one-dimensional; though many still attend college full-time while approximately 18-22 years old, many college students today are older, with jobs and families. Therefore, it is difficult to draw broad conclusions about the level of financial savvy or banking experience a college student may have.

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[27] CAMPUS BANKING PRODUCTS, *supra* note 8, at 1.
[28] *Id.*

To the extent that the Bureau seeks to develop a template that will protect young, low-income and historically underserved students, the Scorecard does a good job of highlighting the kinds of features that may be especially attractive, such as online and mobile banking. Younger consumers are increasingly likely to have smartphones.[29] Communities of color are adopting smartphones faster than their white counterparts.[30] For many consumers, their smartphones may act as their main Internet access device. Campus banking products that include mobile features may be a good deal for students by providing free, convenient access to important banking services directly to their phones. However, some older students or students without regular online access may still need paper statements to monitor transactions, instead of electronic-only access.

As discussed above, the Scorecard should also note which account features are required by law, as well as which kinds of fees are most likely to harm students. Our recent investigation found that fees for ATM use, point-of-sale transactions and overdraft can add up the most if a student uses a campus banking product on a frequent basis.[31] Again, we recommend that point-of-sale and overdraft fees be rejected, and that free ATM access be as widespread as possible.

3. *What are the potential advantages and disadvantages of separately negotiating arrangements with prospective financial institutions to market financial products to students, compared to including these arrangements as part of a broader relationship with a financial institution encompassing other services?*

It is crucial for schools to negotiate campus banking agreements with a priority focus on their students' best interests. Students on campus are a captive audience for the marketing of these products; indeed, that is what makes the prospect of entering into a campus banking agreement so attractive for financial institutions. The vast majority of students today receive financial aid, such as grants and loans, in order to go to college; in fiscal year 2014, the Department of Education dispensed approximately $134 billion in federal aid to 13 million students around the country.[32] Although most college students arrive on campus with a pre-existing bank account,[33] some of them may arrive looking for a good account on or near campus to manage their money. If a campus banking agreement is crafted with students' best interests in mind, it can yield benefits for students by providing them access to a product that meets their near-term needs while also providing opportunity to develop long-term experience with a financial institution, and the mainstream banking system more broadly.

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[29] BD. OF GOVERNORS OF THE FED. RESERVE SYS., CONSUMERS AND MOBILE FINANCIAL SERVICES 2014 4 (2014), *available at* http://www.federalreserve.gov/econresdata/consumers-and-mobile-financial-services-report-201403.pdf.
[30] *Id.*
[31] CAMPUS BANKING PRODUCTS, *supra* note 8, at 17.
[32] U.S. DEP'T OF EDUCATION, FEDERAL STUDENT AID, ANNUAL REPORT 2014 iii (2014), *available at* http://www2.ed.gov/about/reports/annual/2014report/fsa-report.pdf.
[33] According to a survey of 65,000 students commissioned by Higher One, 86% of incoming first-year students have a checking or savings account when entering college. EVERFI, MONEY MATTERS ON CAMPUS 12 (2014), *available at* http://moneymattersoncampus.org/wp-content/uploads/2014/04/MMOC_Report_FINAL-4-4-14.pdf/. TouchNet, another financial firm that contracts with college and university to disburse payments, estimates that 98% of all college students have existing bank accounts. TouchNet Info. Sys., Inc., Financial Aid Refunds, 4 for Title IV eDisbursements Framework, https://www.touchnet.com/prod/the-disbursemess.html.

For these reasons, it is important for schools to focus on the features of campus banking products, and how they will be marketed, with a goal of promoting students' best interests – whether or not the campus banking agreement is part of a larger partnership with a financial institution.

4. *What factors would institutions of higher education consider when determining whether or not to include additional information on product features and cost as part of a Request for Proposal?*

Schools will benefit from having a comprehensive list of the potential features a provider may offer, with annotations as suggested above.

5. *What other information would be useful for institutions of higher education to solicit from potential marketing partners to assist them in determining whether financial product offerings are safe and affordable for their students?*
6. *What tools or information would be helpful for institutions of higher education when comparing proposals from potential marketing partners and selecting the proposal offering the safest, most affordable products for students?*

Schools would greatly benefit from seeing sample account disclosures, including screenshots of customer portals or mobile apps, in order to compare account offerings from potential vendors. In our experience researching campus banking products, we have found that disclosures can vary widely and are not always easy to access as a student or other member of the public.[34]

7. *For existing arrangements between institutions of higher education and financial institutions to market student checking accounts, prepaid cards, and other financial products, what fees do students most frequently incur? To what degree do transaction patterns and fees vary among different student populations? How does this compare to the frequency of fee assessments on accounts unrelated to these marketing arrangements?*

As stated above, little data exists on how students are most likely to use their accounts. Our investigation of 16 campus banking products offered by nine financial firms[35] found that while some campus banking products offered simple, low-cost fee structures and convenient access to funds, others came with high or multiple usage fees that added up to significant annual costs for those who use their accounts frequently.[36]

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[34] CAMPUS BANKING PRODUCTS, *supra* note 8, at 13.
[35] The nine firms we examined hold the vast majority of contracts with schools – Higher One alone holds over half of all campus banking contracts, while US Bank, Citibank, PNC and Wells Fargo hold an additional 20 percent. *See* U.S. GOV'T ACCOUNTABILITY OFFICE, COLLEGE DEBIT CARDS: ACTIONS NEEDED TO ADDRESS ATM ACCESS, STUDENT CHOICE, AND TRANSPARENCY 13 (2014), *available at* http://www.gao.gov/assets/670/660919.pdf.
[36] CAMPUS BANKING PRODUCTS, *supra* note 8, at 17.

8. *For which student financial products would a* Safe Student Account Scorecard *be most useful to institutions of higher education?*

The Scorecard will be greatly helpful to schools considering a range of possible campus banking products – whether structured as full-service bank accounts, individual bank accounts administered by a third-party servicer, or general-use prepaid accounts. They may serve as students' primary accounts for managing financial aid and other important household funds. For this reason, all campus banking products should be designed to provide low- or no-cost, safe, convenient and transparent financial services to students.

Conclusion

We appreciate the Bureau's efforts to create a fairer marketplace for students, and applaud this effort as an important piece of that work. We urge the Bureau to design a strong Scorecard that gives schools the tools they need to negotiate good deals for students when considering a partnership with a financial institution to market campus banking products.

We look forward to working with the Bureau on this and other efforts impacting student consumers.

Sincerely,

Suzanne Martindale
Staff Attorney