

River City Bank Tax Division Administrative Guide



Member
FDIC

Your guide to the program, bank products, services, and policies
of River City Bank's Tax Division.

Revised 12/7/2012

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The contents of this guide are subject to change at any time without prior notice.

► River City Bank Tax Division

River City Bank's Tax Division would like to welcome you to another promising and profitable tax season. We have worked hard to make sure that this will be another successful year. We are pleased that you have chosen River City Bank as the provider of your tax refund related bank products. Our goal is to provide you and your clients with the best customer service in the business while offering a timely, cost-effective and competitive product. We take great pride in our customer service and truly believe that a prosperous operation begins and ends with the flexibility and communication provided by our customer service staff!

► Staff

The Tax Division is headed by River City Bank Vice President Eric King.

Our staff has many years of experience in the bank product industry and are able to provide quality service that your office can depend on. We pride ourselves on our dedication to quality customer service. When you call us, a live representative will always answer the phone and help you with any questions or issues you are experiencing.

During the month of December, our customer service hours are 8am-4pm EST. As tax season nears, our hours are extended to be able to better accommodate your busy tax season schedule. If you reach us after hours, you can leave us a message and we will phone you back the following morning.



Communicating with the Bank

We hope the River City Bank Administrative Guide will help you learn about our program and provide a quick reference for you to use during tax season. However, we encourage you to contact the bank any time you need assistance.

Phone	(888) 820-7848 (270) 547-5151
Check Info Line	(855) 864-2743
Fax	(800) 896-9793 (270) 547-4403
Website	www.rcbral.com

Mailing Address

River City Bank
PO Box 389
Irvington, KY 40146

Shipping Address

River City Bank
303 Hillview Drive
Irvington, KY 40146



Customer service can be emailed at csr@rcbtaxdivision.com. When sending emails to the bank, never include social security numbers or any other sensitive data; email is *not* secure.

River City Bank will send communications to your office by email informing you of program changes, office hours, and other memos to help you keep current with what is happening at the bank. The

bank will also send you notices by mail of important actions that need to be taken. There are a range of administrative tasks that may require the bank to contact you by phone or fax. For this reason it is imperative that you have access to both a phone and fax machine, and ensure that the bank is always able to contact you during normal business hours.

▶ Getting ready for tax season

▶ ERO Agreement

An ERO Agreement was in the packages sent to your office. An owner or authorized individual from your office must sign the agreement, thereby agreeing to abide by the bank's policies and return it to the bank. You may mail the ERO Agreement to the bank or fax it for quicker service. The ERO Agreement must be returned to the bank and processed before your office will be permitted to submit product applications. If you fax the document, it is recommended that you contact customer service to ensure it was received.

▶ Storing check stock

The check stock mailed to you must be kept secure. Adequate precautions must be taken to ensure the check stock cannot be accessed by unauthorized persons. Only appropriately trained employees should have access to the check stock. You may be held liable for the loss or theft of those materials.

▶ Placing your marketing materials

Some marketing materials may have been provided to you for your convenience. Please verify with your federal, state and local regulatory agencies, that you are displaying marketing materials regarding bank services in a manner that follows any applicable laws in your area. Any materials that are not provided by the Bank that discuss any information, directly or indirectly, about the Bank or bank products must be sent to the Bank for approval prior to use. The Bank will ensure that all information is disclosed in an appropriate manner and that no UDAAP (Unfair, Deceptive or Abusive Acts or Practices) issues are present within the material. Following are examples of practices that are potentially deceptive: making misleading cost or price claims, using bait-and-switch techniques, offering to provide a product or service that is not, in fact, available, omitting material limitations or conditions from an offer, selling a product unfit for the purposes for which it is sold and failing to provide promised services. UDAAP is further defined in the Regulation Training section of this guide.

▶ Setting up your software

If you are a direct e-filer and require the River City Bank Remote software to submit bank products, it was included on a disk sent to your office. Insert the disk into your computer and follow the on-screen prompts to complete the installation. After installing the software, print your test checks, activate the program, and test your communications. Installation of the software is not required if you will be printing checks in your tax preparation software.

If you are printing checks through your tax software, but wish to use the Remote for

reporting purposes, you must have indicated such on your ERO Application. You may contact technical support to ensure your account is set up properly and that you have completed the steps required to activate your software.

▶ Training tutorials and exam

The bank provides a set of training tutorials to better inform you of the bank's policies and procedures. Each employee in your office who will be working with customers to explain bank products, complete bank applications and who will interact with the bank on the phone should view these tutorial videos and complete a brief exam over the topics discussed. Anyone who has been assigned a PTIN and will be transmitting bank applications to the bank with that PTIN must complete the training and compliance exam. If applications are received from PTINs that have not taken the exam, your office may be restricted from sending additional applications until the exam is complete. Viewing the tutorials and taking the exam will take approximately one hour.

The tutorials and exam may be accessed on the bank's website at www.rcbral.com/training.htm. After completing the exam, you can print the results page for your records. Your results will be automatically registered at the bank. If you have difficulty and do not pass the exam, you may review the tutorials and this guide and take the test again. It is important that this test be completed by every applicable person in your office before the season begins. Should there be a change in employees working in your office who deal with River City Bank products, please contact the bank to ensure that the new employee completes training and the compliance exam.

► Responsibilities of an ERO

As an ERO, you have many responsibilities to your customers and to the bank. Many of these are outlined in your ERO Agreement. The following is a list of basic things the bank expects EROs to be proactive and compliant with.

► Learning the bank's policies

In order to comply with FDIC regulations, to better help your customer understand the products they are applying for, and to help you understand the data that must be collected to facilitate their application, the bank expects you to familiarize yourself with bank procedures. These procedures are in place to ensure compliance with bank regulations, including the Truth in Savings Act, Bank Secrecy Act, Electronic Funds Transfer Act, Gramm–Leach–Bliley Act, and USA Patriot Act, among others.

► Due diligence

The bank expects you to follow the due diligence guidelines set forth by the IRS to ensure the tax returns you are completing are accurate. This includes making adequate efforts to verify the eligibility of dependents, requiring proper documentation for income, credits, and deductions, and taking other reasonable precautions to verify your customers' data.

► IRS compliance

The bank expects your office to remain in full compliance with all the regulations of the Internal Revenue Service and to follow the guidance and advice issued by the agency in their circulars, handbook, and other documentation. You should notify the bank if any preparer in your office is assessed preparer penalties, had their EFIN revoked or suspended, or any other adverse action taken against them by the IRS.

► Explaining products to the customer

When working with your customers, it is important to explain all their options for obtaining their refund, including methods that do not involve a bank product such as a direct deposit or a check by mail. It is important that they understand that by choosing a direct deposit from the IRS to their personal bank account they will receive their refund just as quickly as with a bank product.

For customers applying for a bank product, be sure they understand they are opening a temporary special use bank account and paying a fee for that service. Explain that a bank product will allow preparation fees to be collected from their refund. Also, explain that if they do not have a bank account, an ERC would allow them to receive their refund a week or more sooner than waiting for a check to be mailed to their home, and that the IRS typically deposits refunds three to fourteen days after filing their taxes. Ensure the customer understands that the timing of the refund payment is not

guaranteed. The timing of their deposit depends on factors that are determined by the IRS during the processing of their return.

▶ Fully completing applications

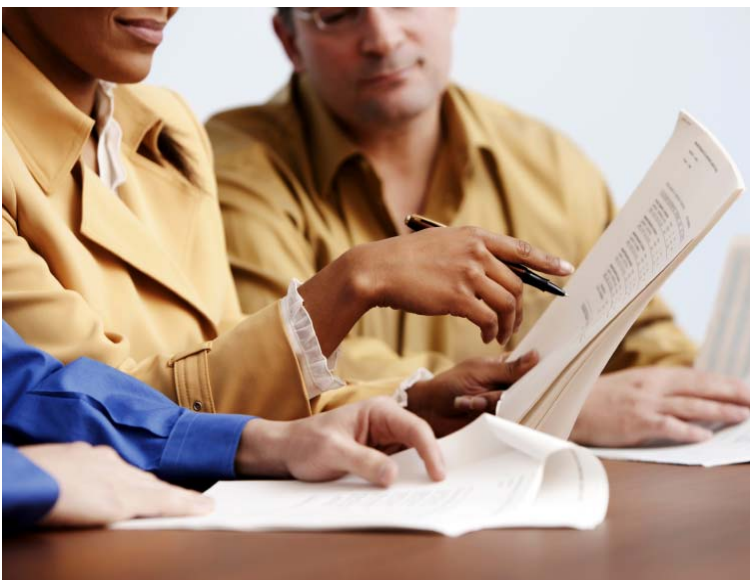
You must ensure you are fully completing your customers' bank applications and following proper procedures when doing so. This includes following the customer identification program, properly recording identification information, providing proper contact information, ensuring completion of the application and River City Bank Deposit Account Agreement and ensuring that the customer is provided with the River City Bank Disclosure Booklet. You must also sign the customer's deposit account agreement, confirming you have followed appropriate procedures and have verified the customer's identity with the IDs that were provided. Instructions for the proper procedures to follow when completing applications, the deposit account agreement and verifying IDs can be found on pages 16, 17, 22 and 23 of this guide.

▶ Providing timely service

It is your responsibility to the customer to provide a timely service. This includes e-filing your tax returns on a regular schedule, following up on bank product applications via your reports to ensure they were received by the bank, and printing and disbursing checks to your customer in a timely manner. If you have to close your office for an extended period of time, or become unable to process your customers' applications, or disburse their checks for any reason, contact the bank to make arrangements for your customers to continue receiving checks by mail.

▶ Maintain communication with the bank

If your office is not open every business day, provide alternate contact information to the bank so you may be reached on the days your office is not open. Regularly check



your messages and emails for communication from the bank, and always keep an open line of communication so the bank can contact you as needed. You should always contact the bank as soon as possible to update any changes in address, phone number or ownership information. If the bank is regularly unable to contact you, you may be removed from the program.

▶ Customer Complaints

Should any customer or potential customer forward a complaint, formally or informally, to the ERO relating to a River City Bank account or product in any regard, the customer should be advised to contact the Bank. All customer complaints will be resolved by the Bank in a timely manner.

▶ Distribution of disclosures

The River City Bank Disclosure Booklet includes important disclosures relating to Truth in Savings, Electronic Fund Transfer, Privacy of Consumer Financial Information and Funds Availability, among other regulations. The ERO is responsible for providing the customer with this disclosure booklet at the time that the application is completed and transmitted to the bank. Additionally, distribution of the customer's Statement of Activity upon receipt of their check is also required and must be provided to the customer at that time. Customers receiving a RET will receive the Statement of Activity by mail.

A copy of the River City Bank Disclosure Booklet should be provided to any consumer, upon request of any disclosures, terms or any other information regarding a River City Bank Deposit Account.

► Fraud Prevention and Data Protection

River City Bank expects all EROs to follow the fraud prevention guidance included in the IRS [Handbook for Electronic Filers of Individual Income Tax Returns](#) and the data protection guidance in the IRS publication [Safeguarding Taxpayer Data](#). In addition to the IRS guidance, the bank also provides guidance for protecting customer data in compliance with regulations established in the Gramm–Leach–Bliley Act of 1999.

► Scrutinize W-2s

Look closely at your customers' W-2 forms to see if they are noticeably altered: erasures, hand-written entries, or unusual marks can be indicative of a fake W-2. When presented with W-2s with unusually high withholding or W-2s that are different than those typically seen from a particular employer, it could be a sign of a fake W-2. In such cases, the bank recommends you contact the issuer of the W-2 to confirm its validity or report the W-2 to the IRS and the bank before filing the return.

► Unusual activity

If the same person accompanies multiple people to your office or if multiple customers have W-2 data with identical or similar information, it can be a sign that a fraud ring is attempting to exploit your office's services. Be wary of customers who ask you to complete their taxes using only their paystub; the IRS prohibits filing tax returns before the customer can supply copies of all their W-2s and other official income statements.

Do not accept and file pre-prepared tax returns from other tax preparers. In many cases EROs requesting you to do this are under IRS sanctions or have been barred from e-filing because of their practices. Never submit any return for a bank product unless you have personally completed the customer's return, personally interviewed the customer and witnessed them signing their paperwork. If at anytime you notice such unusual activities, promptly contact the bank so the situation can be investigated and applications can be thoroughly reviewed.

► Require documentation

You should always require customers to present documentation to support claims being made on their tax return. Schedule A deductions and Schedule C income and expenses are of particular importance to verify, along with all credits the customer seeks to claim. If your customer is unable to provide documentation to substantiate their claims, then appropriate action should be taken in accordance with the IRS Handbook.

▶ Internal auditing

If you operate a large office with multiple tax preparers, ensure that a staff member in your office is regularly auditing tax returns. Fraud rings sometimes attempt to infiltrate existing offices by getting one of their members hired as an employee and working to submit fraudulent returns on their behalf. In extreme situations, these fraud rings will be using stolen identities and false documentation to submit mass numbers of fake returns in a short period of time. If you see suspicious activity like this occurring, such as returns being filed for customers who you don't recall visiting your office, be sure to investigate and notify the bank.

▶ Protecting records

Tax preparation offices can be the target of identity theft. Because of this, it is important that adequate precautions are taken to protect your customers' sensitive data. Though the River City Bank Deposit Account Agreement that is signed by the customer does not contain sensitive customer information, it should still be kept secure.

Equally important is securing your customers' electronic data. Proper security measures must be taken to prevent unauthorized access of your computers and data networks. Your PCs must be running anti-virus software. Be wary of installing software from the internet and limit web browsing on work PCs. Only allow authorized employees to access your workplace PCs and internet. Media on which customer records are stored should be kept secure and only accessible by authorized employees. Customer data must be password protected, using firewalls where appropriate, and network hardware should be kept in modes where unauthorized devices are not permitted to join the network. Offices with multiple computers should consider having a networking professional to audit their network security. You or your business can be held liable by your customers if their data is compromised.

You must also take care when disposing of documents with sensitive information, this includes unused River City Bank Disclosures Booklets and checks. Bank documents must be destroyed beyond recognition by utilizing a method such as shredding or burning.

If you are unable to maintain the security of your customers' records, you should return the records to the bank where they can be properly stored. In any event that your customers' bank records have been or may have been compromised, it is imperative that you immediately contact the bank so proper action can be taken.

▶ **Bank Products**

▶ Electronic Refund Check (ERC) and Refund Electronic Transfer (RET)

When a customer applies for a bank product, the bank will open a special use account to receive the customer's tax refund from the IRS. Once the IRS deposits the refund at the bank, the tax preparation fees, tax software transmission fees, and bank fees are deducted from the refund and paid to the entity that charged the fee. The bank will then disburse the remainder to the customer based on their product selection.

An ERC is designed for a customer without a personal bank account. The customer can choose to have a check for the balance of their refund printed at your office, or the balance can be disbursed to a Refund Access Card you issue to the customer at the time they file their return.

A RET is designed for a customer with a personal bank account. With a RET, the bank will deposit the balance of the customer's refund into the customer's personal bank account.

The bank charges a \$30.95 fee for a federal bank product. There are additional fees associated with the Refund Access Card, but those fees are not deducted from the disbursement amount. Consult the Refund Access Card fee schedule for more information. Refunds larger than \$9,500 cannot be disbursed to Refund Access Cards.

▶ State Products (SERC & SRET)

State refunds can be processed by the bank and disbursed to customers as either a check or direct deposit. The disbursement will occur in the same manner as the customer chose for their federal refund. The bank charges a \$9.95 fee for this service.

An ERO can elect to have tax preparation fees withheld from their customers' state refunds. EROs can make this decision when completing their ERO application or by contacting the bank at any time.

▶ Timing

The IRS advises taxpayers that they will receive their refund within 21 days of them filing their tax return. The exact timing is determined by the IRS during processing. There are always exceptions and the IRS can delay the payment of any refund for various reasons. The timing of the refund payment is not guaranteed. The timing of their deposit depends on factors that are determined by the IRS during the processing of their return.

Pricing

Bank fees

All bank fees are collected from your customer's tax refund. The bank will only charge fees for the refunds received: for example, if only a state refund is received, only a state fee will be charged; if only a federal refund is received, only a federal fee will be charged.

Software provider fees

Most tax software providers charge fees to customers applying for bank products. The amount of fees vary between companies and are typically broken down as a *Technology Access Fee* and a *Bank Product Transmission Fee*. The fees will be withheld from the customers' refunds and paid directly to your software provider. Check with your software provider for the details and amount of these fees.

Preparer Fees

State laws prevent the charging of facilitation or document preparation fees. Only fees directly related to the preparation of the tax return are permitted to be charged from the customer's refund check.

Bank Product Requirement

To qualify for any bank product applicants must:

- Be at least 18 years of age (both applicants on joint returns)
- Present two forms of valid identification in compliance with the bank's Customer Identification Program
- Provide a physical street address on the bank application
- Have at least one working contact phone number (i.e.; home, work, nearest relative)
- Have their ERO witness their signature on the deposit account agreement
- Have their ERO verify their identification information
- Complete a Consent to Disclose and Consent to Use authorization form (Section 7216 compliance forms)

It is very important that the customer's information be entered accurately onto their application. An ERO's information, such as phone number or address, should **never** be entered onto the customer application.

Please note, other restrictions may apply when an application is being considered for approval.

▶ Customer Identification Program

To comply with the bank's Customer Identification Program, all applicants must provide two forms of identification to be eligible to apply for any bank product. Both applicants on joint returns must provide two forms of ID. Following is the identifying information that is required by the USA Patriot Act to be collected for each customer:

- Date of birth
- Legal name
- Address of the applicant's residence
- Social Security number (Or Taxpayer Identification Number for non-citizens)

When a customer presents their IDs, they must present one primary and one secondary or two primaries. The only IDs that a preparer can accept as a primary or secondary identification are listed below. The information on the IDs will be used to enter the name, date of birth, address, and Social Security Number (or taxpayer identification number) on the bank application. It is the responsibility of the ERO to ensure the information entered on an application matches the applicant's IDs; EROs must sign every deposit account agreement to confirm they have verified the applicant's IDs.

▶ Primary forms of identification are:

- Valid State Driver's License
- Valid State ID card
- Military ID
- Valid Passport

▶ Primary forms of identification for non-U.S. persons:

- Resident Alien Card
- Valid Passport
- Valid Visa*
- Matricula Consular

▶ Secondary forms of identification are:

- Form W-2
- Insurance card
- Social Security card
- Utility bill
- Medical bill
- Driver's license not issued by a State of the US
- Property tax bill
- Voter Registration card
- Student ID card
- Firearm license
- Prior year tax return
- Certified birth certificate
- Employer ID card
- Marriage certificate
- Divorce Decree
- Vehicle registration
- Work Visa
- Government or benefits check
- Proof of insurance
- Soc Sec Award Letter
- Benefits card

- Only IDs from this list may be used
- Any noticeably altered ID may not be used
- Expired IDs may not be used
- If the DOB, Name, Address, or SSN on the ID does not match what is entered on the application, the ID cannot be used.

▶ Ensure IDs are valid

- Examine the picture and compare it to the individual
- Check for any logos or holograms that should be present on the ID
- Check for evidence that the ID has been tampered with or altered
- Check the age listed on the ID and compare to the age of the individual
- Compare the signature on the ID to the signature on other forms for similarity
- Compare the information on the ID to other given information for consistency
- Ensure the ID has a valid date and is not expired

*This is a travel document issued by the Federal government. Visa credit cards are not valid forms of Identification.

▶ **Product Policies**

▶ Canceling a product

A customer is permitted to cancel any product they apply for up until they cash their check or receive their direct deposit. Once funds have been disbursed, no cancelation can occur. To cancel a product, the ERO must contact the bank and request the customer's refund be returned to the IRS. The bank will require any collected fees be returned and any issued checks must be voided. Customers should be made aware that once the funds are returned to the IRS it may take up to 90 days for the IRS to issue a check to the customer by mail.

▶ Deceased Taxpayers

The bank prohibits the use of bank products in situations where all of the taxpayers on a return are deceased. Deceased individuals may not open a bank account. On married-filing-joint or qualifying-widower returns, the name of the deceased taxpayer will still appear on any check issued by the bank with "(Deceased)" next to the taxpayer's name, which often prevents other financial institutions from accepting the check. The bank recommends taxpayers that are claiming a refund for a deceased person use direct deposit to a personal bank account or a prepaid card for delivery of the refund.

▶ Preparation fees

Preparation fees collected by the bank on behalf of a preparer must be fully disclosed on the customer's deposit account agreement which reflects the fees that were entered on the customer application. In the event that the tax preparation fees exceed \$450, the office may be contacted by the bank for individual explanations; the Bank is expected to maintain records to explain high fees and to ensure the bank's services are not being abused.

The bank prohibits EROs from using River City Bank's fee collection service to collect bookkeeping fees, personal loans, or any other fee or debt not directly related to tax preparation; these debts should be collected separately. IRS regulations prohibit tax preparers from lending money to clients and using their tax refund as collateral and/or repayment. If an ERO is contacted and fees are being collected for anything other than tax preparation, the ERO will be retrained on bank procedures. If this practice continues, action may be taken against the ERO including, but not limited to, removal from the program.

EROs may opt to have their tax preparation fees deducted from their customer's state refunds. To enable this option, an ERO must have indicated such on their ERO Application, or contact the bank and request the setting be placed on their ERO account.

▶ Prior debt collection

Delinquent tax loan debts owed to the bank will be deducted from any bank product the customer may choose. All customers should carefully review the Debt Collection Authorization in the River City Bank Deposit Account Agreement and the River City Bank Disclosure Booklet, and you should point out the Debt Collection Authorization to each applicant to alert them to its presence. River City Bank only collects debts owed to itself; it will not collect debts owed to other institutions.

▶ Check policies

▶ Check cashing

River City Bank customers have several options available to them when cashing their checks. Customers with personal bank accounts, or access to banks indemnified by River City Bank, can take their check to that location to have their check cashed; the cashier should contact River City Bank to verify it is a valid check before cashing it. Even though River City Bank verifies checks as valid, some institutions may still place a hold on the checks based on their own policies.

Customers may also take their check to locations that use Positive Pay® from Certegy FIS to verify checks. These locations scan the checks through an automated system to determine if they are valid. The institutions will not contact the bank directly but will rely only on the information they receive from the Positive Pay system. The fees and maximum check amount that can be cashed vary by location.

For the bank to authorize any check to be cashed, the bank must have first received a confirmation of check printing from the tax office. The confirmation information, including the check number, must have been recorded properly for authorization to occur. Check authorization will not occur immediately after printing and the timing will depend on the processing schedule of your tax software provider. This may take several minutes and possibly 30 minutes or longer. To ensure authorization occurs properly and in a timely manner, the bank recommends that EROs print checks as soon as they are available to print, and that EROs review the check printing reports to ensure the check numbers were recorded properly and that the confirmation data was returned to the bank.

▶ Check reprints

If a previously printed check needs to be reprinted after check printing has been finalized, EROs must complete a check rehang form and fax it to the bank. On the form, state the reason why the check needs to be reprinted. The form must be completely filled out with all the known information, including the customer's social security number, and the ERO's EFIN. If the original check is legible, the ERO may fax a voided copy of that check in lieu of the rehang form. The rehang form can be found in the appendix of this guide.

▶ Distributing checks

Before releasing a check to a customer, EROs must first verify the customer's identity to ensure the check belongs to them. The customer must sign the upper portion of the check stub, which must be detached and retained by the ERO. The customer must be given the "Statement of Activity" portion, complying with the Truth in Savings Act. The statement contains required information including the final fees and charges that were

deducted from the customer's refund, along with other required disclosures.

Duplicate checks

According to the ERO Agreement, in the event that an ERO prints and distributes a duplicate check, the ERO may be responsible for the check.

Expired checks

All checks expire sixty days after they are printed. All check stock has a final expiration date of June 14, 2013. To have an expired check reissued, void it and return it to the bank. If the check has expired because the customer has not returned to pick it up, it can be held by the bank and reissued when the customer does come to retrieve it, up to three years.

Forged signatures

When a customer's check has been stolen and cashed, an affidavit of forgery must be completed. The bank will investigate the situation and take appropriate action.

High-dollar check amounts

Software companies impose different limits on the maximum check amount their software is capable of printing. This limit is generally between \$10,000 and \$20,000. High-dollar checks which cannot be printed through an ERO's tax software will be printed at the bank and mailed to the ERO's office.

Lost and stolen checks

Checks that have been lost, stolen, or destroyed while in the customer's possession can be reissued after the customer completes a Client Lost Check Affidavit. Checks that have been lost, stolen, or destroyed while in the ERO's possession can be reissued after the ERO completes an ERO Lost Check Affidavit. These forms can be downloaded from the River City Bank website. In both cases, there may be a waiting period before the check can be reissued.

Unclaimed checks

If a customer does not pick up or cash their check, the bank will hold the customer's funds up to three years. After three years the funds must be escheated to the State of Kentucky as unclaimed property. Customers' checks from prior tax years that are still being held by the bank can be retrieved at the customers' request. If the original check is still available, it must be voided and returned to the bank. If it has been lost, then a lost check affidavit should be completed. The customer's check will be printed by the bank and mailed to the ERO's office.

Completing a bank application

When a customer applies for a bank product it is important that the application be completed properly. Most tax software providers and the bank's remote software will complete an application for the ERO. The ERO should then verify that the River City Bank Deposit Account Agreement prints correctly. This is the one page agreement which contains only the customer's name, last 4 digits of their social security number, anticipated refund amount, total fees and the date. This page also provides some account disclosures and verifies, upon execution, that the customer has received the River City Bank Disclosure Booklet which must be given to each customer who receives a product through the bank. By signing the deposit account agreement, the ERO is also certifying that they have verified the identifying information that was entered on the application from the customer IDs. As part of the audit process, the Bank will be verifying that this deposit account agreement is being properly signed by the customer and the ERO.

The tax software that is being used to e-file returns to the IRS will populate the majority of the information in the customer application, however, some information will need to be entered by the ERO including the customer's date of birth and identification information. All information for the primary applicant must be complete. The joint-applicant section must also be completed when the filing status is married-filing-joint. Follow the Customer Identification Program from pages 16 and 17 of this guide and use the customer's IDs to complete this section. The disbursement option will also be selected in this section. If the customer has opted for a RET, their account and routing number will be entered here. If the address used on the customer tax return was a P.O. Box, it must be updated at this point to reflect the customer's physical address. Lastly, the preparer's PTIN must be entered before transmission.

When the option to print has been chosen, the entire copy of the customer application will no longer print as it has in the past. The River City Bank Deposit Account Agreement will be the only document that prints. This deposit account agreement must be signed and dated by all applicants and the ERO. This agreement contains only the customer's name, the last 4 digits of the primary's Social Security Number, the date, the anticipated refund amount and all applicable fees. No other sensitive customer information prints with this agreement.

Prior to signing the deposit account agreement, the customer must be given a River City Bank Disclosure Booklet which has been provided to the ERO by the bank. A customer must not sign the deposit account agreement or accept a bank product if they have not received a disclosure booklet. This booklet provides required disclosures pertaining to their special use deposit account including Truth in Savings, Electronic Fund Transfer, Privacy of Consumer Financial Information and Funds Availability, among other regulations. This disclosure booklet also contains the bank privacy policy which explains how the bank will use the information provided by the customer and what limits the customer can place on that use as applicable under Regulation P, Privacy of Consumer Financial Information.

▶ Document retention

- ▶ All signed documents relating to bank products must be completed properly and retained on file. At the end of tax season, the ERO will have the option of storing these documents at their location by signing a Document Storage Agreement or by returning the documents to the bank for storage.

When a bank application is completed, the ERO must retain the copy of the deposit account agreement which prints and is signed by the ERO and the customer. The ERO may also keep a copy of this agreement for their records.

The top portion of checks contain a stub with a summary of the check. When a check is issued to your customer, the check stub must be detached and retained on record. The stub contains a customer signature line and date line providing a distribution record for the bank. By signing this, the customer is also verifying that they have received their Statement of Activity which is the second part of the check. The Statement of Activity **must** be given to the customer as it contains required disclosures in accordance with the Truth-in-Savings Act.

The originals of any additional bank documentation which may have been submitted to the bank during the tax year, including lost check affidavits, rehang forms and/or forgery affidavits should also be filed with the customer's records and kept secure.

The bank is not required to store copies of your customers' tax returns, income documentation, 7216 compliance forms, or other tax related documents; these documents should not be sent to the bank for long term storage. Maintenance of these documents should be done in accordance with IRS requirements.

▶ After-season

- ▶ As tax season ends, there are a number of items EROs need to do to satisfy their obligations to the bank:
 - You will be mailed a notice when it is time to complete a Document Storage Agreement or return your retained documents. You must respond to the notice by returning the agreement or sending a copy of all signed customer agreements and signed check stubs to the bank. Compiling these documents during tax season will make this process easier. If you have a paperless office, you may return a copy of all bank documents on a disk.
 - All unused check stock and River City Bank Disclosure Booklets must be returned to the bank or destroyed beyond recognition by utilizing a method such as shredding or burning. If unused check stock and/or disclosure booklets are returned to the bank, the ERO's EFIN should be included.
 - Beginning in June, all checks will be printed by River City Bank and mailed to the ERO. If an ERO should require the bank to begin doing this at an earlier date or would prefer the bank mail the checks directly to customers, the bank must be contacted to make arrangements.
 - If an ERO's office closes for the remainder of the year or is not open on a regular basis, the bank should be provided with alternate contact information so the ERO can be contacted as needed.
 - The bank should be notified of any checks that customers have not claimed; the checks will have expired and should be returned to the bank to be held until the customer calls to claim them.

▶ Administrative processes

▶ Automated phone line

The bank maintains an automated line customers may call to check the status of their refund check. The number is (855) 864-2743; the customer should select option two. The customer will be prompted to enter the last four digits of their social security number, zip code, and refund amount. They will be informed if the bank has received their application and if their check has been printed.

▶ Fee payments

Tax preparation fees are collected and paid on a weekly basis; processing is done and deposits are sent each Thursday. Every week, the bank will pay fees collected on customers who have received an IRS or state treasury (if an ERO has selected the option for fees to be deducted from state) deposit. No fees will be paid before a deposit is received. Funds are deposited to the account supplied at enrollment. It can take 1-5 business days for the funds to be available in your account, depending on the policies of your financial institution. Weekly fee reports are made available through the ERO's tax software and in the Remote software.

▶ Indemnification

River City Bank can set up an indemnification agreement with banks local to the ERO's area, allowing the customer a convenient location to cash their checks. Banks which an ERO has pre-established relations tend to be the best target for setting up such arrangements. An ERO may provide River City Bank with a contact person, phone number, fax number, and address of the bank and an indemnification agreement can be arranged.

▶ Internal audits

The bank will conduct required, random audits to ensure all EROs are in compliance with the bank's procedures and guidelines. In the event that an ERO's customer is flagged for a random audit, the ERO will be contacted by the audit department and client information will be requested. In most circumstances, the River City Bank Deposit Account Agreement will be requested to satisfy the audit. It is important to promptly respond to these audits. A customer's application will not be processed until the audit has been passed. The ERO has 72 hours to provide the requested documentation to the bank or the audit will fail. If an ERO fails to respond to a request for information, the ERO may be suspended. If an ERO fails an audit, they will be contacted and the reasons why the audit failed will be discussed. If an ERO fails more than one audit, the ERO may be permanently removed from the program. All documentation requests should be faxed to (800) 886-3705.

▶ Ordering supplies

Additional check stock may be ordered any time during tax season. Orders may be placed by calling customer service. Orders placed before 12:00 pm EST will be shipped the same day and sent regular mail and should arrive within 3 to 5 business days. Orders can be shipped overnight only when the ERO provides a FedEx account number for overnight charges. Marketing materials may be ordered by completing the online marketing order form at www.rcbral.com/marketing.htm. No marketing materials will be shipped to you unless an online order has been placed.

▶ Trace requests

In the event that the bank makes a direct deposit to a customer's personal account and the customer claims to have not received the deposit, the bank can conduct a trace request to confirm deposit of the funds and find a resolution to the situation. The customer should wait five business days from the date the deposit was issued before a trace request can be conducted. A trace request is subject to the policies and procedures of the financial institution to which the deposit was sent.

▶ Unpostables

In certain situations it may be possible for the Bank to receive a deposit for a client of without first receiving a bank application. When funds are received for a customer that does not have an account, it is referred to as an Unpostable. In order to disburse the funds, a bank application must be transmitted to the Bank so that an account can be established for the customer. There are two ways an account can be created: (1) Using the Bank's Remote software, or (2) Using the Bank's online application. To create the application using the Remote it must be properly installed. Installation instructions may be accessed at <http://rcbral.com/support.html>, Remote 12 Help Guide.

Using the Bank's Remote software

On the main screen of the Remote12 software, click "Create Bank Application" then type the client's social security number in the box provided. Within the section "Application Details", complete each field. The tab or enter key may be used to move from field to field more easily. Continue through each screen by clicking "Next Page" when a screen is complete. When the last screen is complete, click "Accept" to finish the application and begin transmission to the Bank. A print screen of the Deposit Account Agreement will appear. This must be printed and signed by the customer before the electronic application is transmitted. When printing is complete, close the print preview and a verification report will appear, indicating the amount of fees that will be deducted along with the product type. If all is correct, click "Okay". If you need to make corrections, click "Cancel". Another box will appear, indicating how many records there are to transmit. Click "Yes" to send the application that was just completed.

► Using the Bank's online application

Login to the ERO Web Portal account at <http://enroll.rcbtaxdivision.com>. If an ERO account has not previously been established, select the "Sign –Up" option to create an account. Once logged in, the ERO web account must be linked to the ERO application. If already linked this step may be skipped. To link, hover over the "ERO App" menu and click the "Account Validation" submenu. Fill in the required information and submit the link request. If the information provided is correct, the web account and ERO application will be successfully linked. Once the web account is linked, access the Online Bank Application by hovering over the "Action" menu and select the "Bank App" submenu. Proceed to fill out all fields with the correct information. Once complete, click "Submit" to transmit the application to the Bank.

Once the bank receives the application via the Remote or the online application, an account will be created and the funds will be manually processed through the account. Once processed, the funds will be disbursed in the method indicated when the application was completed. Unpostables are normally processed twice a day; once in the morning and once in the afternoon.

► Updating ERO account information

If at any point during the season an ERO needs to update information such as bank account information, contact person, address, or phone number, the ERO must contact the bank for instructions on how to do so. The ERO may be required to send the updated information in writing or may be able to make the changes through the ERO's web account on the bank website.

Regulations

Compliance & Consumer Protection have become synonymous with banking. As I'm sure you've noticed, we have had to make several changes in the last couple of seasons in the way of compliance training and audits. As the interpretation and enforcement of bank regulations continues to evolve and strengthen, we have had to respond with more in-depth training and follow up.

Prior to the season you were required to view the Bank's Training Tutorial and pass a test based on information contained within the module. Below you will find a brief explanation of why the bank has certain procedures and why it is important for you to follow them. Most all of our procedures are in place to mirror regulatory requirements. It is important to remember that when a customer chooses a bank product through River City Bank, the Bank is opening an account for that customer and regulatory requirements must be met to remain in compliance and to ensure consumer protection.

Reg P (Gramm-Leach-Bliley Act) Privacy: This regulation governs the use of nonpublic information about consumers by financial institutions. This Act includes provisions for privacy notices and prohibits the disclosing of nonpublic personal information to third parties without consumer's consent.

What we said...

Procedures discussing this regulation are found within the Administrative Guide and they include: (1) precautions the ERO must take in protecting customer information, (2) requirements for paperwork to be out of sight of other customers, (3) instructions to the preparer on how to treat documentation after the season (4) emphasis on keeping customer records secure and (5) the proper distribution of all disclosures, which contain the Bank's privacy notice.

Bank Secrecy Act-Customer Identification Program (BSA/CIP): This regulation pertains to obtaining customer information in order to properly identify the customer. As of the inception of the USA PATRIOT Act, this identifying information is also compared to the OFAC list to ensure we are not engaging in prohibited bank transactions with persons believed, by the US Government, to be involved in terrorism or the funding of terroristic activities.

What we said...

The ERO Agreement, Administrative Guide and training tutorials all outline the procedures relating to this regulation. The essence of the training is to ensure the ERO is collecting all CIP information in a proper manner. The Bank, in some instances, will also ask for CIP documentation to be forwarded to the bank for further identity verification.

Fair Credit Reporting Act & Fair and Accurate Credit Transactions Act (FACT Act), Red Flags & Identity Theft: These regulations and guidelines govern the detection, prevention and mitigation of identity theft.

What we said...

The training tutorial and Administrative Guide outline the Bank's procedures required to prevent identity theft. A key component of identity theft prevention is ensuring that all CIP requirements outlined by the Bank are enforced. The training and guide also outline the importance of detecting fraud in your office.

Reg DD (Truth in Savings Act): This regulation promotes and mandates that Banks consistently disclose account fee information and other disclosure requirements to its customers.

What we said...

The Administrative Guide and training tutorials detail the importance of providing the customer with a copy of the River City Bank Disclosure Booklet which includes all fees that will be assessed, as well as the Statement of Activity that the customer receives when they claim their check. Both the Disclosure Booklet and Statement of Activity provide required disclosures to the customer.

Reg E (Electronic Fund Transfer Act): This regulation establishes consumer rights regarding documentation of transfers and liability while establishing responsibilities for consumers and financial institutions utilizing electronic transfer services.

What we said...

The Administrative Guide and training tutorials detail the importance of providing the customer with a copy of the River City Bank Disclosure Booklet, which contains required Reg E disclosures, and the Statement of Activity which also contains required disclosures regarding EFT.

Reg CC (Expedited Funds Availability Act): This regulation establishes specific limitations and disclosure requirements for delaying availability of certain deposits.

What we said...

The Bank's Disclosure Booklet states that electronic direct deposits will be available on the day we receive the deposit and explains the various methods that funds may be withdrawn from the customer's account.

UDAAP: Unfair and deceptive acts or practices are prohibited by Section 5(c) of the Federal Trade Commission Act.

Title X Dodd-Frank Act empowers the Consumer Financial Protection Bureau to prevent unfair, deceptive, or abusive acts or practices (UDAAP).

The training below provides general rules relating to Unfair, Deceptive or Abusive acts or practices.

Unfair Acts and Practices

The guidelines use a three-pronged approach to determine whether an act or practice is unfair:

- The practice causes or is likely to cause substantial injury to consumers,
- It cannot be reasonably avoided by consumers, and
- It is not outweighed by countervailing benefits to consumers or to competition.

Deceptive Acts or Practices

A three-pronged test is also used to determine whether a representation, omission, or practice is deceptive. An act or practice is deceptive if:

- It misleads or is likely to mislead from the consumer's perspective;
- If the consumer's interpretation is reasonable under the circumstances; and
- If the representation, omission, or practice is material.

All three elements must be established for a practice to be deemed deceptive.

Abusive Acts and Practices

The Dodd-Frank Act makes it unlawful for any covered person or service provider to engage in an “abusive act or practice.” An abusive act or practice:

Materially interferes with the ability of a consumer to understand a term or condition of a consumer financial product or service or

Takes unreasonable advantage of :

- A lack of understanding on the part of the consumer of the material risks, costs, or conditions of the product or service;
- The inability of the consumer to protect its interests in selecting or using a consumer financial product or service; or
- The reasonable reliance by the consumer on a covered person to act in the interests of the consumer.

Document Appendix

ERO Information Update Form

EFIN _____

Name _____

Instructions: Fill out each field you would like to have updated. Sign the form and fax it to 800-896-9793, or mail to: River City Bank, PO Box 389, Irvington, KY 40146

Contact Name _____

Name of Business: _____

PLEASE COMPLETE ONLY THE SECTION YOU WANT CHANGED

For address change complete this section

Mailing Address: _____

City: _____ State: _____ Zip: _____

For e-mail, telephone or fax # changes complete this section

Phone Number: _____ Fax Number: _____

Email Address: _____

For bank account changes complete this section

Bank Name: _____ Type: Checking Savings

Routing Number: _____ Account Number: _____

Name on Account: _____

If possible, please attach a voided check for the bank account

Other (Specify): _____

I request that River City Bank update my ERO account with information entered on this form. I certify that the information on this form is correct and accurate.

ERO Signature _____

Date _____

Received by:
Entered by:

Bank use only
Date:
Time:



Check Rehang Form

P.O. Box 389
Irvington KY 40146

1-888-820-7848
Fax 1-888-332-4811

Date: _____ EFIN# _____

Business Name: _____

Telephone# _____ Fax# _____

Check Information

Name: _____ SS# _____

Check Type _____ Check Amount \$ _____

Reason for Rehang: Misprint **Damaged** **Didn't Print**

Other: _____

Liability Statement

I acknowledge that a check for the above client is being reissued. I indemnify River City Bank from any loss the Bank incurs should this duplicate check and the original check clear the Bank with the Payee's endorsement/s.

ERO Signature _____ Date _____

Office Use ONLY

Date Rehung:

Initials:

Comments:

**ERO LOST CHECK AFFIDAVIT
AND INDEMNIFICATION AGREEMENT**

TO BE COMPLETED BY ERO

Bank: RIVER CITY BANK Check No.: _____

Primary Taxpayer's Name: _____ SSN: _____

Spouse's Name: _____ SSN: _____

Filing Status On Tax Return: _____

Reason For Requesting Check Replacement: _____

In consideration of a new Bank/Cashier's Check issued by River City Bank to replace Bank/Cashier's check of which the **CHECK NUMBER IS UNKNOWN**, also which original Bank/Cashier's Check was not delivered to the above named Taxpayer and has been lost, mislaid, stolen, destroyed, or misappropriated. The undersigned ERO agrees, at all times hereafter to save, defend, hold harmless and indemnify RIVER CITY BANK and its successors and assigns from and against any and all claims of whatever nature related in any way to the presentation collection, or attempted collection of the original Bank/Cashier's Check and from all costs and expenses with respect thereto, including, but not limited to, attorney's fees to the extent allowed by law.

In the event that both original and replacement checks of the same type and the same amount are presented for payment at River City Bank, the undersigned ERO agrees that the original check presented will be returned to the depositing bank unpaid, and do also agree that if this option is not viable, that the funds (not exceeding the amount of the check) will be recovered from the ERO by RIVER CITY BANK by whatever means deemed necessary.

ERO SIGNATURE: _____ EFIN: _____

DATE: _____

WITNESS SIGNATURE: _____

DATE: _____

OFFICE USE ONLY

DATE RECEIVED: _____

ISSUED BY: _____

DATE ISSUED: _____

CLIENT LOST CHECK AFFIDAVIT AND INDEMNIFICATION AGREEMENT

To Be Completed By Tax Preparer

RAL Bank Name: River City Bank Check #:
 Primary Taxpayer's Name: SSN:
 Spouse's Name: SSN:
 Filing Status on Tax Return:
 Reason for Requesting Check Replacement:

To Be Completed Tax Payer(s)

In consideration of a new Bank/Cashier's Check issued by RIVER CITY BANK to replace Bank/Cashier's Check number# in the amount of \$, issued by RIVER CITY BANK on , 20 , which original Bank/Cashier's Check was not received or has been lost, mislaid, stolen, destroyed, or misappropriated, and which original Bank/Cashier's Check was not endorsed by the undersigned, and which original Bank/Cashier's Check or the obligation evidenced thereby has not been sold, transferred, or assigned, the undersigned agrees, at all times hereafter to save, defend, hold harmless and indemnify RIVER CITY BANK and its successors and assigns from and against any and all claims of whatever nature related in any way to the presentation collection, or attempted collection of the original Bank/Cashier's Check and from all costs and expenses with respect thereto, including, but not limited to, attorney's fees to the extent allowed by law.

Primary Taxpayer's Signature: Date:
 Witness*:
 Spouse's Signature: Date:
 Witness:

NOTE: Both taxpayers must sign if the tax return was filed Married Filing Joint.
 The Tax Preparer/Notary must witness both signatures above.

*If affidavit is not signed in the presence of the tax preparer, form MUST be notarized to be valid.

Office Use Only

EFIN: Date Received:
 Date of Reissue Request: Issued By:
 New Check Number: Date Issued:

FCS Training Appendix

This section is provided by Futura Card Services to EROs who offer Refund Access Cards in their offices.

Revised September 4, 2012

FCS Policies & Procedures – Offering the FCS Refund Access Prepaid Card

Inventory Management:

Your cards will arrive in envelopes. Please store those envelopes under a lock and key and DO NOT OPEN THE ENVELOPES.

Each envelope contains the card, instructions on how to set the PIN, and a Terms & Conditions handout.

FCS tracks your current card inventory in real time and will automatically reship as needed. Your supply is based on the number of returns you filed last year and the to-date number of cards you have issued at any given time. If you have an inventory concern, please call **1- 866-TAX-1101** (1-866-829-1101). *Please note: this is a special ERO hotline only for you. Please do not refer your customers to this number.

Marketing:

You may NOT create your own marketing materials featuring the FCS Refund Access Card, the MasterCard name or mark.

You can create your own marketing to advertise that you are offering a prepaid card without mentioning FCS or MasterCard.

You may display the pre-printed marketing materials provided to you by the Bank and FCS which will feature images of the Card.

You may NOT advertise in printed form, or by word of mouth, false statements which may lead customers to believe they will get “free money,” “refund guaranteed by getting the prepaid card,” or any misleading or untrue statements about the sweepstakes.

Sweepstakes:

Every customer whose Refund Access Card is successfully registered and which receives at least one federal tax refund by ACH to the Card will be entered to win one of five cash giveaways during our 2013 sweepstakes.

Customers need not do anything else to be entered to win.

Four drawings will be held from February – May, with one person winning \$500 during each drawing.

One grand prize drawing will be held in May in which the winner will receive \$3,000.

FCS will contact the winners of each drawing using the contact information the customer provided for registration of their FCS Refund Access Card.

You do not need to do anything additional to enter your customers into the sweepstakes or notify winners. Simply encourage your customers to get a Card and they will be automatically entered!

Unused Inventory

Any unused, left over inventory after tax season must be returned in its original packaging to FCS or the Bank. Instructions for this return will be provided prior to the end of tax season. Please keep all unused cards under lock and key until further instruction is provided.

If you decide not to offer the card after receiving your first shipment, please call the ERO hotline for instructions on returning your inventory at that time.

The Card & Program

Why a CARD is better than a check:

Speed & Convenience

Card is a virtual bank account; it has a DDA and Routing number. A customer has instant access to their funds when it is paid as a direct deposit.

The card is active within 24 hours of your customer leaving your office. They don't have to wait for a check in the mail or make a trip to cash that check.

Safety & Security

Thousands of checks are returned to the IRS by the US Post Office every year as undeliverable mail. The cardholder can get a text alert when funds are deposited onto the card.

How to Issue a Card to your Customer:

When completing your customer's tax return and entering the customer's information, elect for the customer to receive an FCS prepaid card. On the screen, enter the Activation Number shown through the window of the card envelope.

Do NOT open the Card package – FCS will make sure Account Numbers match the Activation Numbers you enter and enroll the customer for direct deposit of their tax return to the Card. No need to enter a Card account or routing number.

A Card cannot be issued if the combined federal and state return is expected to be greater than \$9,500.

Important Cardholder Fees

FCS has some of the lowest fees in the industry. If your cardholder is experiencing any declined transactions, it usually means there are not enough funds on the card to cover the transaction fee and actual transaction.

Monthly Fee à \$4.95 per month.

Transaction Fees

Debit (when you enter your PIN) and Credit (when you sign for your purchase):
FREE

ATM: \$2.50 + the fee the ATM displays. Usually need a minimum balance of \$25.50 to successfully complete an ATM cash withdrawal. MoneyPass ATMs do not charge any additional fee.

Cash Advance: \$19.95; usually need a minimum balance of \$21.00.

Cash Back at a Register: Free; usually need a minimum balance of \$20.00.

International Transaction: 3%

Customer Support Fees – Cardholders may call the **number on the back of their card**

Automated Balance Inquiry: \$.50 per inquiry.

Live Agent: \$3.00 per call; Available Mon-Fri 6am-6pm PST, Sat. 6am-12pm PST, Sun. CLOSED.

Gas Stations: *FCS recommends Cardholders use their card inside a gas station as a debit transaction and enter their PIN*, otherwise the gas station may place a temporary, pre-authorization hold on funds in an amount greater than the actual purchase until the final amount clears. If there is a hold, Cardholders will not be able to use the funds until the hold is released, even though the actual amount charged is less than the hold amount.

Registering the Card Online

Please inform your customers that they can register their card online and get access to their balance and transaction history 24/7: www.fcsrefundaccess.com

Important Cardholder Limits (subject to change; you will be notified accordingly)

\$9,500 can be deposited per transaction/per day (Do not issue a card if the refund will exceed these limits).

Purchases: \$2,500 limit; Cardholder must call the **number on the back of their card** for larger purchases (no fee applies for this call).

ATM withdrawal limits is \$2,000 per day (bank ATMs may permit only \$400 per day).

Cash Advance maximum is \$4,000 per day.

Card-to-Card transfers: up to \$9,500.

How to Access Cash

ATM à Your PIN- Although the card is active once it successfully completes the Real-Time Activation process, the cardholder must setup their own PIN by following the instructions included in the envelope.

Cash Back at a Cash Register: Select "Debit" and do a PIN-based transaction.

Cash Advance: An agent inside a bank can perform a Cash Advance on this card.

However, some banks may require a name embossed on the front of the card and not permit a cash advance. In these instances, the cardholder should visit an ATM or select cash back. Please remind your customers that this is a prepaid card and only money placed on the card is available.

More info is available at www.fcsrefundaccess.com.

Cardholder Support

Customer Service Call Center

Please instruct Cardholders to call the customer service number on the back of their card. They can get 24/7 automated balance and transaction information by calling the number on the back of their card (\$.50 per call). The Cardholder may speak to a live agent to answer other questions during call center hours (\$3.00 per call).

The cardholder can submit a FREE trouble ticket on-line by visiting www.futuracards.com/tax and clicking the "Support" link at the bottom of the page. Please allow up to 48 hours to respond.

Cardholder's Card Lost/Stolen

Have the Cardholder call the number on their wallet information card (which is the same as the number on the back of their card) to report the card lost or stolen.

The Cardholder will be directed to return to your tax prep location to receive a replacement card.

When the Cardholder returns for their replacement card, call the ERO Hotline at 1-866-TAX-1101 for instruction on how to activate a replacement card and have the Cardholder's funds transferred to the new card.

Joint Cards – Spousal Tax Returns

When spouses file joint tax returns, register one card using the Activation Number in the tax preparation software under one spouse's name. Hand the other spouse an additional card and instruct the non-registered spouse to call the number on the back of the card to register and activate their card.

When the tax return is refunded to the spouse registered by you, the cardholder can initiate a card-to-card transfer to the other spouse's card. All funds, including payroll and other deposits to the cards, can be transferred using this method.

Please note: The two cards will have DIFFERENT card accounts and funds can only be shared by manually transferring between the accounts.