Federal Student Aid Next Gen Payment Card Program Pilot

Solicitation Number: EDFSA18PaymentCard
Agency: Department of Education
Office: Federal Student Aid
Location: FSA Acquisitions

Excerpts only

Solicitation Number:	Notice Type:
EDFSA18PaymentCard	Presolicitation

Synopsis:

Added: Jan 19, 2018 4:44 pm

This is a PRE-SOLICITATION NOTICE to announce the anticipated release of a solicitation for contractor support for Federal Student Aid (FSA)'s Payment Card Program Pilot on or about February 2, 2018 and to share a draft of the solicitation.

FSA intends to launch a FSA Payment Card ("FSA Payment Card Program") to facilitate FSA loan refunds, along with other funds, originated by participating schools. Currently, FSA loan money is received directly by the Institutions of Higher Learning whereby schools apply those funds to student accounts for tuition and fees. The Institutions of Higher Learning then refund the overage to the student which is accomplished in a variety of ways: cards, ACH, manual checks, and even cash disbursements.

The purpose of the FSA Payment Card Program Pilot ("Pilot") is to test, with a select number of schools, an FSA Payment Card whereby federal student loan customers ("Customers") will have a consistent, economically advantageous and timely method to receive FSA loan refunds. To meet FSA's "best possible" approach to customers' needs, the Program Pilot will likely require a unique card product, different from existing credit, debit, or prepaid cards and checking accounts. FSA's focus for the Pilot would be delivering the FSA Payment Card Program for current, in-college student customers who receive regular refunds of FSA student loans throughout the year.

More details regarding the Program and the requirements of the anticipated contract can be found in the attached draft document.

Questions or comments MUST be submitted IN WRITING to FSAEAT@ed.gov. NO PHONE CALLS WILL BE ACCEPTED.

The Solicitation will be made available on http://www.fbo.gov.

From www.fbo.gov/index?s=opportunity&mode=form&id=caac84c91dc25bb98a5504a3045991cb

Federal Student Aid Next Gen
Payment Card Program Pilot

January 19, 2018

Section 1 - FSA Background

Federal Student Aid (FSA) is undertaking transformative measures to establish the Next Generation Financial Services Environment ("Next Gen") whereby FSA customers will enjoy a world-class customer experience throughout the lifecycle of their education finance journey. A mobile-first, mobile-complete, mobile-continuous digital platform, complemented by an omni-channel engagement strategy, will be implemented so as to provide easier, more seamless and more frequent customer interactions resulting in short term and long term positive outcomes for students and taxpayers. FSA's size and scale of consumer loan portfolio operations are on par with the largest banks in the United States:

- Over 40 million customers across the student lending lifecycle
- Total lending portfolio has over $1.3 trillion in outstandings
- Annually originates over 17 million student loans
- Annually processes nearly 250+ million payment transactions
- Annually processes up to 50+ million disbursements totaling more than $125 billion

Section 1.1 Federal Student Aid Next Gen Payment Card Program Definitions

Description	Definition
Federal Student Aid Next Gen Payment Card Program	"FSA Next Gen Payment ", "Card Program", "FSA Payment Card Program"; "Payment Card Program", "Program"
FSA Payment Card	"FSA Payment Card", the card, either virtual or physical, associated with the FSA Payment Card Program
Issuing Bank of Record	"Issuing Bank"
Processor of Record	"Processor"
Card Issuing Brand of Record	"Card Brand"
Card Product	"Product", the features, functionality and attributes of the FSA Payment Card Program; both virtual and physical
Program Manager	The party responsible for providing a **turnkey** solution - the combination of Issuing Bank, Processor, Card Brand and Product.
Program Administrator	Federal Student Aid ("FSA"), an office of the Department of Education

Active Account	An active account is any account for which there was at least one transaction associated with the account during the previous month
New Account	An opened account
Live Account	Any account for which there was at least one transaction during the previous 12 months
Customers	Individuals who apply for FAFSA or are FSA Title IV loan recipients
Proposing Vendor	An organization proposing to be the Program Manager
Schools or Participating Schools	"Schools" – participating schools including all Institutions of Higher Learning such as secondary schools, universities and colleges that partner with FSA to disburse Title IV Federal student loan funds
Next Gen Financial Services Environment	"Next Gen"

Section 2 - FSA Payment Card Program Pilot - Primary Purpose

As part of FSA's Next Gen digital transformation and improved customer experience efforts, FSA intends to launch a FSA Payment Card ("FSA Payment Card Program") to facilitate FSA loan refunds, along with other funds originated by participating Schools, along with funds received from other sources. Currently, FSA loan money is received directly by the Institutions of Higher Learning whereby schools apply those funds to student accounts for tuition and fees. The Institutions of Higher Learning ("Schools") then refund the overage to the student which is accomplished in a variety of ways: cards, ACH, manual checks, and even cash disbursements.

The purpose of the FSA Payment Card Program Pilot ("Pilot") would be to test, with a select number of schools, an FSA Payment Card whereby federal student loan customers ("Customers") will have a consistent, economically advantageous and timely method to receive FSA loan refunds. To meet FSA's "best possible" approach to Customers' needs, the Pilot will require a unique combination of Payment Card product features and mobile interface, different from existing credit, debit, or prepaid cards and checking accounts. Once the Pilot is underway, FSA will conduct an assessment of the success of the Pilot based on FSA's goals and objectives, followed by a determination by FSA of whether and how to modify and scale the Pilot to include a larger number of Customers and Schools.

FSA's focus for the Pilot would be delivering the FSA Payment Card Program for current, in-college student Customers who receive regular refunds of FSA student loans throughout the year (with intention to expand to pre-college student customers and

post-graduate students upon satisfactory determination of success of the Pilot). The Customer journey should include:

- **Applying for the Card**: In-college students would have the ability to sign up for the Payment Card Program through mobile or online applications, or a point of presence at a School location, ideally at the point and time they sign a promissory note. This would trigger, at the Customer's election, the establishment of a FSA Payment Card account.
- **Loading the Card**: Schools would refund overages to the Payment Card and communicate with the student about the funds status as they currently do with other refund processes. Additional funds may be loaded to the Card Account from additional sources in multiple different ways.
- **Using the Card**: Students would then be able to use the loan refunds and all other funds allocated to the card for purchases of everyday goods and services. Customers would benefit from integration of the FSA Payment Card Program with the FSA Mobile App., Furthermore, a rewards program could potentially be implemented whereby Students could receive special pricing/discounts from specific merchants.
- **Card Program Related Customer Service**: Students would have access to mobile self-service as well as call center assistance to resolve card-related issues. Schools and FSA would also be provided with the ability to obtain assistance from the customer service center on behalf of, and in support of, card Customers.
- **Additional features of the Program will include**:
    - No fees charged to student or school
    - Ability to issue checks from the app
    - Real time recordation of purchases and balance status
    - Real time transaction alerts and controls.
    - Direct connectivity to the Payment Card Authorization stream to allow for real-time program enhancements
    - Real time interface with the FSA myStudentAid Mobile app "Super Portal"

To build and test this Pilot, FSA envisions partnering with a Program Manager, (or multiple selected Program Managers), who will contract with various parties including a Card Brand, an Issuing Bank, and Processor, along with select Schools (selection of which will be determined by FSA.). The Program Manager will be responsible for creating awareness and providing training as needed for involved Schools, parents and students, collaborating with Financial Aid offices to handle student questions. Moreover, a media campaign with appropriate media assets should be developed for the purpose of promoting the program.

For card servicing or issues related to fraud, Customers will interface with the Program Manager, with connection points to Program Manager provided call centers, and other resources for questions or needs outside of the Program's scope.

Importance of the Program

Through this Pilot and a subsequent expansion of the Program, the Program Manager, Card Brand, Processor and Issuing Bank will have the opportunity to partner with FSA to reach and enable U.S. students' higher education dreams. Student loans from FSA are often a customer's first encounter with a financial services product and one of their first experiences with the Federal government. The Next Gen FSA Payment Card Program will be the first step in exploring a new, meaningful way to build a stronger, lifetime relationship with FSA's Customers.

Cross Program Customer Opportunities

While the data associated with the FSA Payment Card Program will be highly restricted as to cross marketing use, there will exist the opportunity for customers to specifically grant permission with regard to receiving proposals, offers or providing access to their privileged data for purpose of developing other financial service relationships. **For purpose of absolute clarification, any access to Customer data for the purpose of developing other financial relationships will be and must only be granted on a SPECIFIC permission basis by the Customer.**

Section 3 - FSA Payment Card Pilot - Primary Goals

There are several goals of the FSA Payment Card Program:

- Enable more **informed customer decision-making** that helps Customers understand the financial implications of their student loan debt
- Deliver a **consistent, simplified, and secure customer experience,** specifically relating to refunds, under the FSA brand for all customers, across all schools
- Achieve greater **operational efficiency and flexibility** and **reduce process complexity** in administering and handling FSA loan and grant funds
- Create an environment and platform that can **rapidly integrate new capabilities and features** through **continuous improvement and innovation**
- Educate FSA student loan Customers with real-time, continuous counseling at time of transaction via the mobile app

# Section 4 - FSA Payment Card Pilot - Objectives

- Provide FSA student loan Customers with a world-class, "Best Possible" payment account/payment card that is free of costs for adoption and ongoing use

- Test customer user experience and usage of Payment Card in enabling students to make informed decisions related to student loan debt
- Determine technical and operational feasibility of Payment Card Program, testing required functionalities
- Inform decisions regarding Payment Card Program functionalities to prioritize in ongoing updates to ensure "Best Possible" program
- Determine process and appropriate level of customization needed for implementation and ongoing management at Schools
- Determine whether frequent alerts and greater utility to students make the FSA Payment Card a consistent and active way of connecting the student to FSA and facilitating growth of a relationship

Section 5 - FSA'S Mobile-First, Mobile-Complete Strategy: myStudentAid "Super Portal" App

Currently in development with a target date for the Spring/Summer 2018 timeframe, FSA will deliver a mobile-first, mobile-complete, and mobile-continuous strategy, as depicted below, which includes a tile labeled myMoney intended to launch the FSA Payment Card Program. See the area highlighted below:

The FSA myStudentAid "Super Portal" App

myFAFSA
Allows students, parents, and preparers to complete the FAFSA® form anytime, anywhere

mySchools
Allows schools to provide customized content to students
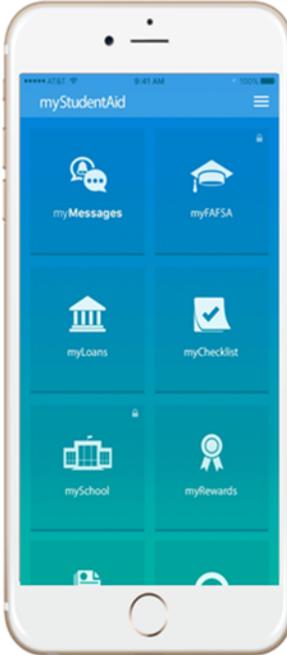
myChecklist
Allows customers to create and receive a personalized checklist based on where they are at in the student aid life cycle

myMoney
Leverages a Payment Card where the School can load refunds and the Customer can receive money from family, send money or pay bills

myRewards
Allows Customers to sign up for the FSA sponsored rewards program designed to enhance the value of FSA loan funds as well as promote savings and conservation of loan funds

myLoans
Provides a single portal whereby FSA student loan customers may view and interact with all elements of their personal student loan portfolio.

The payment card app behind the "myMoney" tile of the FSA myStudentAid "Super Portal" app needs to be designed and developed by the Proposing Vendor so as to integrate with the existing framework for the myStudentAid FSA "Super Portal" app. A Proposing Vendor's development of the "myMoney" mobile app technology should include card controls, real-time transaction messaging, and direct connectivity to the

payment card authorization system. The app should have the ability to direct a payment to a Customer's specific FSA Loan from the Customer or from a third party such as an employer or a parent.

Section 6 - Required Program Functionality

The FSA Payment Card Program **requires** the following product features, attributes and functionality along the primary steps in a potential customer journey, including: Applying for the card, Loading the card, Using the card, and Receiving support for card-related issues. FSA encourages a Proposing Vendor to set forth additional innovative ideas in crafting the FSA Payment Card Program. The Pilot is intended to be launched by late Spring 2018. Subsequent phases of the overall FSA Payment Card Program will be determined after an assessment by FSA of the Pilot.**Applying for the card**

1. **Application Requirements and Card Fulfillment**
   a. No credit check
   b. FSA Payment Card Disclosures
   c. Students must receive both a physical card and access to a virtual card via the myStudentAid mobile app
   d. Issuer agrees to abide by all rules and laws including, but not limited to: Federal Government and Bank Regulator, Privacy Rules, consumer laws and new account set-up rules.
   e. No use of Customer data for marketing or cross selling purposes, unless specifically permissioned by the Customer.

Loading the card

1. **Load/Reload Sources**
   a. School Financial Aid Offices
   b. Direct deposit - critical to long term usage
   c. Retail locations
   d. ACH
   e. FSA Direct (Potential for Future)

2. **Bank Account**: The FSA Payment Card Program must function as a complete transaction account. The FSA Payment Card Account must serve in place of a standard bank account. In essence, the Program should function as "e-banking" at its best.

Using the card

1. **Electronic Generated Checks**: Ability for FSA Payment Card Customers to electronically cause paper checks to be generated so they can pay for products

and services that do not have the capability to receive payment electronically, either one time or on a recurring basis; for example: rent payments to landlords. No overdraft capability.

2. **ATM and Cash Point Services**: The card and payment-related mobile app must be compatible with commercial ATM standards so that Customers can make cash withdrawals from ATM machines. A comprehensive "in-Network" ATM capability must be available as well as at least three out of Network ATM transactions per month. Additional "No Fee" cash points are encouraged.

3. **Monthly Reporting Capability**: The service to be capable of providing the Customers with a complete report of their monthly purchases, deposits, and all other account activities.

4. **Broad Acceptance**: The Card Program must have the ability to be accepted at a wide variety of merchants, including both merchants integrated with Schools as well as off-campus merchants.

5. **Alerts and Account Controls (Direct Connectivity to the Authorization Stream)**: The FSA Payment Card Program must deliver the ability to provide real-time alerts for all transactions along with robust controls related to how, when and where the card may be used, driven by direct connectivity to the Payment Card authorization stream.

Card Program Related Customer Service

1. **Omni-Channel Activation and Servicing**
    a. Customer Service
        i. Call Center with IVR and Live agent
        ii. SMS
        iii. Computer/Web service connectivity
    b. Mobile Payment Card App with interface to FSA's myStudentAid "Super Portal" App
        iv. Card Controls for on/off
        v. Self-servicing Capabilities
        vi. Real-time Transaction Alerts
    c. Exceptional "Peak Period" coverage for ATM's (adequate cash and denominations) and customer service call center staffing at the beginning of each semester when loans are disbursed.
    d. Exceptional Customer "Make Good" arrangements to be in place with regard to fraud or other account issues.

e. Highly responsive and effective Error Resolution and Complaint Management Process.

2. Hotline service ability between schools, FSA and Program Manager provided call centers.

3. **Security**: The FSA Payment Card Program and payment-related mobile app to align with high order commercial security standards (including transaction and fraud alerts) to address lost/stolen cards; hacked mobile accounts; and fraud prevention. Program must be compliant with all Federal and Banking Regulator mandated security requirements including the most advanced cyber security measures available for this type of Product.

Section 7 – Desired Additional Program Functionality

The FSA Payment Card Program desires the following features and attributes added now or in the future. These are not required for the purpose of this solicitation request. However, a presentment of these for roll-out /expansion in the future is requested.

Loading the card

1. **Incremental Funds Management**: The desired service to allow FSA the capability to disburse funds incrementally and at any time in the future.

2. **External controls**: Ability to hold funds until approved by external party (e.g., school) or recapture federal funds if there is an overpayment.

Using the card

1. **Peer to Peer Transfers**: Capability of providing electronic peer-to-peer transfers.

2. **Third-Party Transfers**: The Payment Card Account to be capable of accepting third-party fund transfers (for example: allow parents or employers to add funds to a Customer's card).

3. **Financial Counseling Capability via Mobile App:** The desired myMoney mobile app to provide the student with financial counseling, which could include:

   a. Sending customized text messages to a cell phone or within the mobile app, before moving forward with a transaction so as to provide the student loan customer with specific understanding of long-term dollars and cents ramification of making purchases using their student loan funds

b. Providing a dashboard of financial habits and health compared to peers (e.g., spending by category, credit score)
c. Setting saving or spending goals
d. Providing a content hub to improve financial literacy and Financial Citizenship (e.g., saving and spending strategies)

4. **Restricted Payments**: The FSA Payment Card Program would possess the ability to restrict the types of products and services/and or merchants that the Customer could acquire or have access to using the physical card or mobile app. Any ability to restrict purchases or merchant access using Federal financial aid funds must be aligned with government approved use of funds.

5. **Multi-Purse/Segregation of Funds**: The FSA Payment Card Program to be capable of segregating funds by different sources as well as to allow the student the ability to choose the source of funds they will use to execute a financial transaction. At a minimum, the service would be capable of segregating Federal grant funds, Federal loan funds, other grant funds, loans of all types, and third-party funds transfers.

Section 8 - Desired FSA Payment Card Program Enhanced Product Features and Functionality

FSA is interested in additional features, card enhancements and benefits being made available to Customers of the FSA Payment Card Program in keeping with types of enhancements customarily available from the payments card industry. Examples of these types of enhancement features could include:

- Purchase Protection
- Roadside Assistance
- Identity Theft Protection
- Inclusion in Mobile Wallets
- Remote Deposit Capture
- Other similar types of enhancements

A Proposing Vendor is encouraged to set forth an overview of the types of enhancement products they would incorporate into the FSA Payment Card Program.

Section 9 - Program Fees & Costs

This must be a "free" program for the Customers and Schools.

1. No Fees to Customers for any of the following

- Annual Membership
- Activation
- Load/Reload
- Swipe
- Electronic Generated Checks (Up to five per month)
- NSF
- Overdraft
- Account Maintenance
- ATM withdrawals, In-Network
- Three ATM withdrawals, Out-of-Network
- Alternative Cash Points (Tellers or Merchants)
- Account Dormancy
- Foreign Transactions
2. This must also be a "no tax" program for participating Schools with regard to tuition, fees, and other direct School services.
3. Interchange and Debit Fees
   - On Campus – 0% interchange or $0 debit fees tied to Participating Schools (tuition, fees and school owned merchants like their bookstore or cafeteria)
   - Off Campus – market standard interchange and debit fees for off-campus merchants may be applied.

Please note that this will, in all likelihood, be the first financial services product introduced to a student which could then lead to a long-term, even life-long, relationship for other financial services and products.

Section 10 – Proposal Instructions

Each Proposing Vendor for the FSA Payment Card Program is expected to provide responses to the following:

1. Presentment that the Proposing Vendor is prepared to deliver a full "turnkey" capability and is prepared to assume the duties and responsibilities of overall Program Management, as the contracted Program Manager. The Proposing Vendor shall set forth a description of what it means to be the Program Manager.

2. Presentment by the Proposing Vendor that, as Program Manager, they would assume full financial liability for all aspects of the FSA Payment Card Program to specifically include, but not limited to, full responsibility for any financial fraud associated with the FSA Payment Card Program. The Proposing Vendor shall set forth a description of how fraud issues shall be avoided and mitigated on behalf of FSA Payment Card Customers.

3. Presentment by the Proposing Vendor as to which entities will provide the following functional activities:

   a. Card Issuing Brand

   b. Issuer of Record

   c. Processing Services

   d. Product Definition

   e. Program Marketing Activities, both to participating schools and FSA Payment Card Customers

4. Presentment by the Proposing Vendor as to the intended customer journey of an FSA Payment Card Customer.

5. Presentment by the Proposing Vendor as to specific product features and attributes associated with an FSA Payment Card Program Pilot.

6. The Pilot should allow for up to four Schools with up to 25,000 Customers per participating School or School system. Presentment by the Proposing Vendor that they are willing to work in full collaboration with FSA as to ongoing refinement and development of the FSA Payment Card Program, so as to ensure that the features and attributes of the FSA Payment Card Program remain "futureproof" and "best possible." The Proposing Vendor shall describe the process of ongoing collaboration.

7. Presentment by the Proposing Vendor that they fully understand that any contractual relationship regarding the FSA Payment Card Program may be cancelled by FSA at any time for any reason.

8. Presentment by the Proposing Vendor that, as Program Manager, they will, at FSA's sole election, continue to fully support and provide necessary elements to fully expand the FSA Card Program beyond the Pilot Phase to as many FSA Customers and Schools as FSA may so elect on the same terms and conditions as contracted for under the Pilot Program.

9. Presentment by the Proposing Vendor that they will undertake all commercially reasonable activities to provide full connectivity to, and integration with, the FSA myStudentAid app Super Portal.

10. Presentment by the Proposing Vendor that they will also provide full omni-channel customer service, hotline interface between Schools, FSA and Program Manager provided call centers; all within mutually agreed upon Service Level Standards (to be defined prior to contract award).

11. Presentment by the Proposing Vendor that they are willing and capable of delivering the "**Required Program Functionality**" set forth in **Section 6** of this document..

12. Presentment by the Proposing Vendor as to **Section 7 - Desired Program Functionality** of this document.

13. Presentment by the Proposing Vendor of any Subsidy Payments to be paid for the benefit of the FSA Payment Card Program, or any Fee Assessments to be charged to FSA in association with the categories set forth below:

   a. **Important Note**: Any Subsidy Payments received on behalf of FSA will be directed to educational awareness of Student financial citizenship and the direct promotion of the FSA Payment Card Program.

      i. S1: Subsidy Payment to be paid for being selected by FSA as Program Manager: ($Amount)

      ii. S2: Monthly Subsidy Payment to be paid per "Active Account" on file ($Amount)

      iii. S3: Annual Subsidy Payment to be paid per "Live Account" on file ($Amount)

      iv. S4: One-time Subsidy Payment to be paid for each "New Account added to file" ($Amount)

   b. Fee Assessments proposed by Proposing Vendor to be charged to FSA.

      i. C1: One-Time Fee Assessment to be charged for Program Start up ($Amount)

      ii. C2: Monthly Per "Active Account on file" Fee Assessment to be charged ($Amount)

      iii. C3: Annual "Per Live Account on File" Fee Assessment to be charged ($Amount)

      iv. C4: One Time Fee Assessment for each "new account" added to file to be charged ($Amount)

   The Proposing Vendor may set forth additional categories and amounts of Subsidy Payments. Likewise, the Proposing Vendor may also set forth additional categories and amounts of Fee Assessments.

14. Presentment by the Proposing Vendor as to which Party(s) will be entitled to any interchange or debit transaction fees generated by the FSA Payment Card Program.

15. Presentment by the Proposing Vendor as to Program/Product features and benefits to be provided at no cost to the FSA Payment Card **Customers** as per

Section 9 Program Fees & Costs. The Proposing Vendor is encouraged to highlight enhancement services that would be fee-free.

16. Presentment by the Proposing Vendor for any categories and amounts of fees to be assessed to the FSA Payment Card Program for specialized services, i.e. Replacement Cards, Customized Cards, Out-of-network ATM greater than three per month, etc..

17. Presentment by the Proposing Vendor as to how **Participating Schools** will not be taxed, either for interchange or debit fees, for acceptance of the FSA Payment Card for tuition, school fees, other school services, and books, as per section 9

18. Presentment by the Proposing Vendor as to whether the FSA Payment Card Program will ride on "Debit Rails" or "Credit Rails", or both, for interchange, debit fees, or transaction authorization purposes.

19. Presentment by the Proposing Vendor of a plan as to Desired Product **Enhancement Product Features and Functionality in Section 8**.

20. Presentment by the Proposing Vendor that all data associated with the FSA Payment Card Program belongs solely to FSA, and that no other party may use the data for any purpose without the express written permission of FSA (it is noted that data and information associated with the FSA Payment Card Program can and will be provided to appropriate banking regulators, on a need to know basis).

21. Presentment by the Proposing Vendor as to full compliance with all applicable laws, including regulations and other government technology requirements for the FSA Payment Card Program.

22. Presentment by the Proposing Vendor to not use customer data for marketing or cross selling purposes except when explicitly given permission by Customers to be able to share data on their terms.

23. Presentment by the Proposing Vendor substantial support for product rationalization (Debit versus Prepaid versus hybrid card comparison).

24. Presentment by the Proposing Vendor on how they would create and evolve lifetime product value to customers.

25. Presentment by the Proposing Vendor on specific plans to offer financial education and training to payment card customers – includes monthly access to FICO score, budget tools, etc.

26. Presentment by the Proposing Vendor for a plan to issue, activate and re-issue/cancel cards to Customers (including instant card issuance, card racks, virtual cards, etc.).

27. Presentment by the Proposing Vendor of a conceptual plan to provide merchant discounts and a rewards program to increase customer engagement and loyalty.

28. Presentment by the Proposing Vendor of an education and training program for parents to support responsible financial behavior for their student to build good credit.

29. Presentment by the Proposing Vendor of the proposed system architecture, emphasizing the flexibility and adaptability of the architecture to integrate with existing FSA systems or new systems to be developed.