

LUCKY SAVERS

Exhibit A: Implementation Guide

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1. Product Plan

1.1 Guide Purpose and Audience

The Lucky Saver Implementation Guide is a comprehensive source of requirements and guidelines for credit unions participating in the Prize-Linked Savings Promotion Raffle. Credit Union project managers and implementation teams should use this guide to ensure all aspects of the product are addressed completely in the appropriate time frame.

This guide equips you with the information and tools you need to thoroughly plan and implement the product. Please read this guide and share it with your team prior to expending resources on implementation tasks.

Please note that because each credit union is unique, this guide does not provide specifications for data processing, proprietary systems or third-party vendors. For additional guidance or if you have any questions, see program contacts below.

Program Contacts:

For questions regarding the program rules, implementation process, training, product billing, marketing orders and public relations, contact Chris Pajak, Director of Member Relations at Christopher.Pajak@nycua.org.

For questions regarding data file upload support or drawing inquires, contact TruLync, the Lucky Savers Technology at trulync@trulync.com.

1.2 Overview

1.2.1 Goals

Overall goals for Lucky Savers:

- Provide a unique product to credit union members that will help grow wallet share and membership
- Help credit union members develop a good savings habit
- Attract a wide demographic that includes low to moderate income consumers
- Generate new savings

1.2.2 Product Period

The Lucky Savers Prize Linked Savings Promotion Raffle is administered on an annual basis. Agreements, rules, and prizes are outlined for one year at a time. Credit unions are encouraged to implement the product at the start of the state's launch date; however, later launches can be accommodated. Members can open accounts at any time throughout the year; regardless of the account opening date, the certificate should have a 12-month term.

1.3.3 Product Construct

Lucky Savers is as 12-month Share Certificate, with dividend/interest rates that are set independently by each participating credit union. For every \$25 in month-over-month balance increase in a Lucky Savers account, that account holder will be entered into the monthly and quarterly prize drawings, with a limit of 10

entries per month, per member. See Exhibit B: Official Rules Template for current prize allocation, amounts and other information.

Each credit union may also opt to offer additional monthly prizes for their members and staff. These prize amounts are to be determined by the credit union and will be funded by the credit union. Prizes will be awarded in the form of dividends to the winners' traditional share accounts and must be included in an annual 1099 form, which must be provided by the credit union. Other accrued interest should be deposited into the Share Certificate account.

Details of the account:

- 12-month Share Certificate with ongoing deposit functionality
- Interest rate and payments: set independently by each Credit Union
- Minimum opening deposit and minimum balance requirement: \$25
- Minimum deposits/month: none
- Maximum deposits/month: none*
- Account dollar cap: none*
- Withdrawal: one per 12 month term
- Withdrawal penalty: \$25
- Account holder requirements:
 - Age 18+
 - Employee participation: yes
 - Employee's family: no restrictions (Credit Unions may make exceptions at their discretion and can include such restrictions in the Exhibit B: Official Rules Template).
 - Corporations, limited liability companies, partnerships, associations, sole proprietorships, trust accounts, business and labor organizations, other public or private entities, employees, board of directors, officers and vendors of participating credit unions are not eligible.

*Credit unions may choose to cap the certificate value provided it doesn't limit the member to less than the total maximum entries per month. Members must be permitted to deposit up to \$250 per month which totals \$3,000 per year. If you choose to implement a cap, you must disclose this in your truth-in-savings disclosure and official rules document.

1.2.4 Prize Drawing and Distribution

The prize drawing and distribution function will be conducted by a random-selection proprietary software program developed by TruLync, a subsidiary of Minnesota's not for profit credit union trade association, MnCUN.

For the central monthly and quarterly prizes, the drawing has been designed so that all qualifying accounts on the last business day of the month/quarter will be eligible to win prizes. If a winner is judged to be ineligible, an alternate will be selected. Multiple winners from one credit union may occur. See Exhibit B: Official Rules Template for current prize allocation, amounts and other information.

For the credit union monthly prizes, each account holder will be limited to one prize per month. Credit unions that choose to offer these prizes will be able to utilize the online prize administration portal to generate a list of winners drawn only from that individual credit union. In the Official Rules Template, credit unions have the ability to choose if participating members are eligible to win a central prize and a credit union prize in the same month/quarter.

Communication of winners will be sent to all participating credit unions and credit unions will notify their winning members. Appendix 6 provides the process for contacting winners and Appendix 8 is a media release template that will allow your credit union and NYCUA to use winners name and photo in marketing efforts.

1.2.5 Financial Commitment

The minimum financial commitment for credit unions is outlined in the Credit Union Fee Schedule.

Additional Cost Considerations:

- If your credit union chooses to offer its own monthly prizes (for your credit union members or staff), the total payout must be deposited into a fund at your credit union during the first month of offering the program.
- Marketing of this product throughout the year is required. Production of the materials, according to the needs of the credit union, is the responsibility of each credit union. Minimum marketing requirements are detailed in Appendix 5.

1.2.6 Legal and Regulatory Research

After a legislative change was secured by the NYCUA in 2014, New York credit unions are now permitted to offer prize linked savings products. NYCUA will continue to monitor laws and provide legal support for New York credit unions related to the Lucky Savers program. New credit unions piloting the program are advised to work with their legal counsel and compliance team to ensure that they are comfortable with the product as it is designed and to write any adjustments to the customizable areas within the Exhibit B: Official Rules Template document.

1.2.7 Participation Agreement

Each credit union will sign a Participation Agreement with NYCUA for the Lucky Savers product. The Participation Agreement will lay out the terms of participation and requirements. Each credit union should make sure that the Participation Agreement has been reviewed by their legal counsel and/or compliance team. Any additional changes to the Participation Agreement will be adjusted through an Addendum to the Participation Agreement.

2. Product Management

2.1 Assumptions

This guide assumes that your credit union has fully and visibly committed to implementing all aspects of the product within the specified time frame. It assumes that sufficient resources – human, system and financial – are available to accomplish the product plan without significant variance.

2.2 Product Plan Development

An organized product plan provides a solid foundation for successful implementation. Your implementation product plan should identify all of the detailed tasks required to introduce the Lucky Savers product to your membership. All specific functional areas and tasks should be included in your plan, along with team member(s) responsible, key milestones, and target time frames. Your product plan should include outside vendors if they are playing a role in your launch. Appendix 1 contains an Implementation Checklist you can use as a framework. Individual tasks, timing, and personnel will vary from credit union to credit union.

2.3 Credit Union Product Management Roles and Responsibilities

A successful new program launch will require an integrated, cross-functional team effort. Your implementation team should include members from the following areas of your organization:

- Operations
- Marketing
- Information Technology (in-house and/or outsourced)
- Finance and/or Business Planning
- Security, Risk and Legal
- Member Service and Branch Management

Also consider individuals who, in the regular course of business, have accountability for business and new product development. There are also ongoing product administration responsibilities to be carried out by team members. A product and data manager must be identified by each credit union to carry out the following responsibilities:

Product Manager Responsibilities

- Leads the product implementation process and serves as the primary contact for overall product administration and participates in ongoing product meetings
- Manages or delegates the following responsibilities:
 - Lead/oversee marketing campaigns and ensures marketing requirements are fulfilled
 - Train and regularly communicate with credit union staff about program, including goals, results, promotional efforts, account best practices and product enhancements

Data Manager Responsibilities

- Leads the data collection and review process
- Uploads monthly data to central administration website

2.4 Risks & Issues Management

Every project has inherent risks. The first step in managing them is to consider what risks exist and what impact they could have on the successful completion of the project. Credit unions should focus on risks that affect their own execution of the program. The risk management for administering the Lucky Savers program will be done by NYCUA. The risk of managing the program in compliance with state laws will be done by NYCUA.

Your project manager must work closely with all team members to assess the impact of proposed changes. Credit union project managers are encouraged to consult with NYCUA project team members before moving forward with significant program design or implementation changes.

2.5 Progress Monitoring and Reporting

Credit union product managers will participate in project conference calls with product managers from other credit unions, NYCUA, D2D and on technology calls with TruLync. These meetings are a good time to discuss issues and concerns and problem-solve with fellow product managers. The timing and frequency of product management meetings will be determined by overall credit union needs and product

implementation success. Post-launch, product and account data reporting will happen monthly and may move to a quarterly basis in order to streamline communication.

2.6 Success Metrics

The product is built on established success metrics. You should analyze your Lucky Savers account performance just as you would any other product. Key metrics you should plan to track include:

- Number of accounts opened
- Number of deposits per account
- Average deposit
- Total deposits
- Number of new members opening accounts
- Comparable data for a similar share certificate product

Individual credit unions will set their own goals for the above metrics.

3. Legal

3.1 Raffle Permissibility

In 2014 the NYCUA helped secure a legislative change which permits New York credit unions to offer a prize linked savings products. Additional legal work, if needed, will be completed by NYCUA to maintain the Lucky Savers product as a legal raffle in New York.

3.2 Participation Agreement

Each participating credit union will sign a Participation Agreement with NYCUA. The Participation Agreement has been drafted by NYCUA legal counsel. It is recommended that each credit union have the Participation Agreement reviewed by its legal counsel to confirm safety and soundness of the program in accordance with your credit unions policies and procedures.

3.3 The Official Rules document has been drafted by NYCUA legal counsel. Areas that require customization for your credit union's program are clearly marked for your changes. If your credit union chooses to offer your own monthly prizes, a paragraph reflecting the prize amounts is included. Completed rules documents must be submitted electronically to the NYCUA program manager for inclusion on the consumer-facing website at www.nycua.org

3.4 Disclosures

A sample Truth-in-Savings Disclosure template is provided in Appendix 4. You may consider this to be simply a template that you may adjust to suit your own credit union's procedures and needs. It is highly recommended that your legal counsel review this document. Your credit union can also choose to use your own standard truth-in-savings disclosure.

4. Operations and Systems Requirements

4.1 Core Data Processing Functionality

You will be creating and offering a new product. Because the Lucky Savers product is, at its core, a share certificate, you should model the new account structure within your core data processing and subordinate support systems.

The most significant system requirements of the Lucky Savers account product include the ability to:

- Create a unique share certificate account with unlimited deposit capacity
- Allow the share certificate account to automatically renew after each 12 month period so that members retain the same certificate account/share ID
- Invoke a \$25 penalty for the first withdrawal before the 12-month certificate period ends and close the account upon the second withdrawal
- Transfer funds into the account automatically and on an “as-requested” basis, as directed by the account holder and easily change the amount of an automatic transfer
- Generate a consolidated deposit account statement detailing each of an individual’s deposit accounts and his or her transactions
- Allow account holder access to account balances and deposit activity via remote access channels
- If capability exists, automate pop-up messages to remind credit union staff to discuss the product with account holders/targeted members

4.2 Member Account Statements

Your account holder statement must show the Lucky Savers account balance and list account transactions for the statement period. Details shown must conform to regulatory requirements. Account data should be included in all statement formats, including web-based access. Member statements are an effective way to communicate the availability of the Lucky Savers account.

4.3 Testing

It’s imperative that all operations and systems requirements are fully functional the first day of launch. To ensure optimal functionality, prepare a testing plan in conjunction with data and account planning. One approach would be to create a handful of dummy accounts and test deposit, reporting, statement formatting and access functionality. Allow time to correct discrepancies or system issues. See Appendix 3 for Data Requirements and Sample File.

4.4 Quality

It’s required that a program of spot account quality checking be incorporated into the data and systems plan. If errors are found, it should be determined if they are random, human-generated errors or systematic errors. Every effort should be made to look for errors on an ongoing basis, correct them within the same reporting cycle, and ensure any underlying issues are addressed.

5. Data Collection, Reporting and Evaluation

Data required to perform monthly and quarterly prize drawings will be collected centrally by TruLync. Individual credit unions will upload required data on a monthly basis, using a unique ID and password. Appendix 3 provides credit unions with complete data requirements and includes a sample data file which outlines important quality control processes your designated data manager will be responsible for.

The members social security number is transmitted by the Credit Union via a secure data sharing process then is replaced with a new unique identifier by TruLync for raffle and reporting purposes. The social security number will be deleted from the file by TruLync as soon as it is securely encrypted and is not stored on any third party system or accessible by third party administrators.

Data reports should be generated on a strict monthly cycle. In other words, the data reflected in monthly uploads should reflect activity beginning at 12:00 a.m. on the first day of the month and ending at 11:59 p.m. on the last day of the month.

Uploads must be completed within the first three business days of each month. If the 3rd business day of the month falls on a weekend, uploads will be due by the following Monday. It is recommended that you begin your uploads each month as early as possible in case of errors in the data that need to be fixed before completing your upload.

Data errors may occur in your data file. If your credit union receives notification of a data error, you will be required to make necessary corrections within your data file and upload the corrected file prior to the drawing deadline.

When all credit unions have completed the upload process, the monthly drawings can begin. Central monthly drawings must be completed by the 15th of each month. Credit unions will be notified via email when the program-wide/central winners have been drawn and when the credit union drawings may begin.

After the drawing, TruLync shall transfer monthly data files provided by the Credit Union to D2D via a secure data sharing process for the sole purpose of conducting research. Information that is transferred to D2D by TruLync in the monthly data files shall include all data fields, excluding members social security number, in order to analyze the impact of the Lucky Savers program on credit unions and their members. D2D will only publish data in the aggregate so no personally identifiable information will be publicized. Data that includes any personally identifiable information regarding any individual program participant, shall not be disclosed to any third party, unless an individual program participant has authorized disclosure of such information in writing to D2D and any third parties, and only to extent of such authorization.

6. Marketing and Public Relations

6.1 Marketing Plan Development

Credit unions should make the Lucky Savers product a “lead” product during the first three months after launch and be the focus of multiple scheduled campaigns throughout each year.

A variety of marketing materials have been developed to help you reach your members via branch lobbies, statements, e-mail, and your website. Your own marketing channels and ideas are also necessary. Only you know the best ways to reach your members.

This guide includes some basic marketing requirements that you must employ. However, you have the freedom to develop and execute your own marketing plan that includes these requirements as well as your own ideas. Effective and ongoing marketing of this product is crucial to its success because it is so different from products that most members are familiar with. Marketing requirements are meant to ensure that credit unions:

- Market the program for the full year
- Use as many channels as possible to reach as many members as possible
- Communicate with each member about the program throughout the year

6.1.1 Target Audiences

The product is appealing to a wide demographic range of members, and marketing efforts should reflect the mixed demographic. General marketing materials will not attempt to target specific types of members.

6.1.2 Product Positioning

Lucky Savers is all about developing and supporting good savings habits and making it fun. Focal features and benefits include:

- The chance to win monthly and quarterly cash prizes
- The development of personal savings balances and positive habits

6.2 Marketing and Public Relations Strategy

6.2.1 Mix and Channel Management

It's important that credit unions maximize their most cost-efficient and effective marketing channels. Consider what channels have yielded a high return in the past. Suggested channels include:

- Credit union website
- Online and telephone banking applications
- Member newsletters
- Statement messaging
- Branch merchandising
- Building banners (local ordinances permitting)
- Branch staff "flair"
- Small advertising specialty items, such as pens or balloons
- Collateral materials
- Deposit envelope and receipt messaging
- Call Center on-hold messaging
- ATM messaging
- "Ride-along" messaging within other product advertisements
- Mentions at member education sessions and special events
- Printed marketing materials

6.2.2 Marketing Materials

Creative work will be provided at no charge to the credit unions and credit unions may print or produce materials at their discretion. Ordering can be done through the NYCUA's print vendor or credit unions can download the print ready files and send to their local print vendors. Minimum marketing requirements are outlined in Appendix 5.

6.2.3 Non-Paid Media Coverage

While public relations activities are generally thought of as "free," they can be costly in terms of staff time. The NYCUA will implement a broad, over-arching PR campaign throughout the year and will assist credit unions in their own PR efforts through press release templates and other materials.

Credit unions should coordinate any planned media activities through the NYCUA, so there's a broad understanding of which outlets have been contacted. Often, credit unions have established partnerships with community organizations whose mission or service profile fits with the mission of the Lucky Savers product. Credit unions are encouraged to work with these organizations to spread the word about the product.

A newsletter article and press release template will be provided. Please use these to prepare for all media contacts so that we provide consistent messaging about the details of this innovative credit union product. Current marketing documents and public relations resources will be posted on the credit union administrative website.

6.2.4 Web Marketing

A consumer-facing website is provided at www.nycua.org. On this site, we advertise the Lucky Savers program and give consumers access to a participating credit union directory. Credit unions must provide their main branch address, an electronic copy of their rules and other information to be posted on this site. Details of the information needed are included on Appendix 2.

7. Staff Training and Communication

7.1 Requirements and Accountabilities

All credit unions will be provided with Staff Training Materials and Trainer's Guide. All credit unions will be required to conduct product staff training and engage in ongoing product communication throughout the year. Training materials are available on the credit union administrative website.

8. Account Holder Survey

As part of the Lucky Savers program, your staff will be required to ask your members to complete a short survey that provides demographic data on account holders and insight on attractiveness of product features. This survey is part of the ongoing research study of the prize linked savings product that began in 2009. The survey data will be beneficial to us as we grow the program across the country, as it provides a rich understanding of whom the product attracts and the impact of saving behaviors of users.

8.1 Survey Content

Developed by COMMONWEALTH, the survey consists of less than 20 questions and should not take the member longer than 5 minutes to complete. The survey asks members basic demographic data and provides feedback on the features they find most attractive in addition to current savings habits. To view the survey questions, see Appendix 9 located on the administrative website.

8.2 Data Collection and Submission

The survey is administered online via QuestionPro. The link to the most up to date survey is available on the credit union administrative site. We highly recommend account holders complete the survey online directly. This can be done with the credit union staff member at account opening. If a credit union chooses to distribute hard copies of the survey, credit union staff would be required to input responses into QuestionPro.

Appendices

Appendix 1 – Implementation Checklist Appendix 2

– Credit Union Information Sheet Appendix 3 –

Data Requirements and Sample File Appendix 4 –

Truth in Savings Disclosure Template Appendix 5 –

Marketing Plan

Appendix 6 – Process for Contacting Winners

Appendix 7 – Winner Eligibility Checklist

Appendix 8 – Winner Media Release

Appendix 9 – COMMONWEALTH Research Survey