UW Credit Union Lead Refinery Filtering Process

This document is intended to outline UW Credit Union's telemarketing process to remain compliant with the FTC Telemarketing Sales Rule and Wisconsin's Department of Agriculture, Trade and Consumer Protection (DATCP) telephone solicitations rules.

Regulations

1. The FTC Telemarketing Sales Rule rules allows calls from sellers or telemarketers with whom a consumer has an existing business relationship. **A company can call a consumer for <u>18 months after he/she makes a purchase</u> or <u>three months after he/she submits an inquiry or application</u>**; however, if the consumer asks the company to put his/her number on its own do-not-call list, the company must honor that request.
   - Do Not Call List: UWCU maintains a Do Not Call List for members that have requested "no solicitation". Member on the internal "do-not-call list" are removed from the list and a lead is not created.
2. Under the DATCP regulations, "telephone solicitation" does not include a telephone call made to a current client. A current client is a person who has a current agreement to receive from the caller property, goods or services "of the type" promoted by the telephone call. The rules do not define the phrase "of the type," but according to DATCP legal staff:
   - The exception **only applies if there is some "nexus" between the goods or services being promoted and those the customer is already buying.**
     - For example, the current client exception does not allow credit unions to call account holders in order to solicit loans, since there is not a sufficient "nexus" between deposit accounts and loans to consider them products or services of the same "type". However, a credit union may call members with auto loans in order to solicit mortgage loans, according to DATCP's legal staff, since these loan products are considered to be of the same "type."

UWCU Guideline

<u>Leads derived from booked loans:</u>

The following leads are received in the CLSS team 48 hours after the "purchase". These leads expire within 60 days of creation with one exception: mortgage leads expire 120 days after creation.

- **Mortgage Applications** – Mortgages that have booked in the prior month, not including denials or withdrawn applications.
- **Dealer Loan Applications** – Booked loans that came through the Indirect lending channel.
- **Web & Lending Center Applications** –Booked loans that were submitted via the Web & Lending Center channels.
- **NMA Application (Non-Student)** – New member applications (savings and checking accounts) that have booked a loan via the web.

Regulatory item:

- The above leads fall within **18 months after he/she makes a purchase** (i.e. <u>booked</u> a loan).

- DATCP regulations - We ensure that there is a clear "nexus" between the goods or services being promoted and those the customer is already buying. In other words, the Mortgage, Dealer, Web & Lending Center, and NMA Applications all have an existing loan, and we are reaching out about an additional lending opportunity. If a member has only a deposit relationship with us, we are not reaching out about a lending opportunity.

<u>Leads derived from applications/inquire:</u>

The following leads are received within 24-48 hours after the "inquiry or application" and these leads expire within 60 days of creation.

  - **Consumer Loan Application Withdrawn (CLAW)** – Members – Members that began an application online however, they did not submit the application.
  - **Web & Lending Center Approved Not Taken** – Applications that were submitted via the Web & Lending Center channel, approved, but not booked.

Regulatory items:

The above leads fall within **three months after he/she submits an inquiry or application.**

Additional filtering:

- We do NOT reach out to non-members.
- We do NOT reach out to members that we have contacted within the last six months.
- We do NOT reach out to members listed in the internal "do-not-call" list.
- If a contacted member request to no further solicitation:
  - The "Prefers No Further Contact" status in the lead is selected.
  - The members name is immediately entered in the internal "do-not-call" list.

MLC Filter Rules (in English)

A1 (in place from 5/23/2011 - 7/19/2011) – Create lead if the credit score is greater than or equal to 670, the current Debt-to-Income ratio is less than .6 **AND** if there is any balance in Home Loans (Conventional, 2nd Mortgage, Heloc and Secured by household) or if there is an Auto, Secured or Unsecured balance equal to or above $3,000.

A2 (in place from 7/19/2011 – 1/31/2012) – Create lead if the credit score is greater than or equal to 670, the current Debt-to-Income ratio is less than .6 **AND** if there is any balance in Secondary Home Loans (2nd Mortgage, Heloc and Secured by household) or if there is an Auto, Secured or Unsecured balance equal to or above $10,000.

L1 (in place from 1/31/2012 – 4/25/2012) Create lead if the credit score is greater than or equal to 670, the current Debt-to-Income ratio is less than .6 **AND** if there is any balance in Secondary Home Loans (2nd Mortgage, Heloc and Secured by household) or if there is an Auto, Secured or Unsecured balance equal to or above $8,000.

L2 (in place from 4/26/2012 – 6/21/2012) Create lead if the credit score is greater than or equal to 670, the current Debt-to-Income ratio is less than .6 **AND** if there is a balance in Secondary Home Loans (2nd Mortgage, Heloc and Secured by household) greater than or equal to $1,000 but less than $65,000 or if there is an Auto, Secured or Unsecured balance equal to or above $8,000.

L3 (in place from 6/29/2012 – 7/30/2012) Create lead if the credit score is greater than or equal to 670, the current Debt-to-Income ratio is less than .6 **AND** if there is any balance in Secondary Home Loans (2nd Mortgage, Heloc and Secured by household) greater than or equal to $1,000 but less than $65,000 or if there is an Auto or Secured balance equal to or above $8,000, or if there is an unsecured balance between $8,000 and $75,000 or if there is a Proposed Savings opportunity that is greater than $150.

L4 (in place from 7/31/2012 – today) Create lead if the credit score is greater than or equal to 670, the current Debt-to-Income ratio is less than .6, there is NOT currently a decision with a status of 'Withdrawn','Duplicate','Declined','DEC','CANCELED','Fraud','Cancelled', or 'DUP', they have not had a lead sent to the MLC team in the last 6 months, and they have not been denied in the last 4 months **AND** if there is any balance in Secondary Loans (2nd Mortgage, Heloc and Secured by household) greater than or equal to $1,000 but less than $65,000 or if there is an Auto or Secured balance equal to or above $8,000 or if there is an Unsecured Balance with a balance between $8,000 and $75,000 or if there is a proposed savings of more than $150 on installment loan accounts of more than $1000 where savings can be calculated.

MV1 (5/23/2011 – 6/11/2012) NOTE: I'm not clear on this one. I kind of don't think there was any real filtering in place, I think that ability didn't come until later for morvision leads. I'll have to validate this with Tim when he returns. (Craig)

MV2 (6/11/2012 – 6/14/2012) Create lead if the credit score is greater than or equal to 670 and if there is any balance in Secondary Loans (2nd Mortgage, Heloc and Secured by household) greater than or equal to $1,000 but less than $65,000 or if there is an Auto, Secured or Unsecured balance equal to or above $8,000.

MV3 (6/14/2012 – today) Create lead if the credit score is greater than or equal to 670, if current DTI is less that .6, if the member has not been referred to the MLC team in the last 6 months or if the member has not been denied an application in the last 4 months **AND** if there is any balance in Secondary Loans (2nd Mortgage, Heloc and Secured by household) greater than or equal to $1,000 but less than $65,000 or if there is an Auto or Secured balance equal to or above $8,000 or if there is an Unsecured balance between $8,000 and $75,000

MLC Filter Rules (Symbolic)

FilterName	Criteria
A1	((CreditType like 'ConventionalRealEs') or (CreditType like '%Home%') or (CreditType like 'SecondMortgage') or (CreditType like 'SecuredByHousehold') or (CreditType like 'Automobile' and Balance >= 3000) or (CreditType like 'Secured' and Balance >= 3000) or (CreditType like 'Unsecured' and Balance >= 3000)) and Score >= 670 and CurrentDI < .60
A2	((CreditType like '%Home%') or (CreditType like 'SecondMortgage') or (CreditType like 'SecuredByHousehold') or (CreditType like 'Automobile' and Balance >= 10000) or (CreditType like 'Secured' and Balance >= 10000) or (CreditType like 'Unsecured' and Balance >= 10000)) and Score >= 670 and CurrentDI < .60
L1	((CreditType like '%MTG%') or (CreditType like 'AUTO' and Balance >= 8000) or (CreditType in ('Secured') and Balance >= 8000) or (CreditType like 'Unsecured' and Balance >=8000)) and Score >= 670 and CurrentDI < .60
L2	((CreditType like '%MTG%' and Balance > 1000) or (CreditType like 'AUTO' and Balance >= 8000) or (CreditType in ('Secured') and Balance >= 8000) or (CreditType like 'Unsecured' and Balance >=8000)) and Score >= 670 and CurrentDI < .60 /*Updated Rough Filter to Exlude Mortgages > $65,000*/
L3	((CreditType like '%MTG%' and Balance > 1000) or (ProposedSavings > 150) or (CreditType like 'AUTO' and Balance >= 1000) or (CreditType in ('Secured') and Balance >= 8000) or (CreditType like 'Unsecured' and Balance between 8000 and 75000)) and Score >= 670 and CurrentDI < .60 /*Updated Rough Filter to Exlude Mortgages > $65,000*/

L4	((CreditType like '%MTG%' and Balance > 1000) or (ProposedSavings > 150 and AccountTypeText in ('INST') and Balance >= 1000) or (CreditType in ('Secured') and Balance >= 8000 and AccountTypeText in ('Rev')) or (CreditType like 'Unsecured' and Balance between 8000 and 75000 and AccountTypeText in ('Rev'))) and Score >= 670 and CurrentDI < .60 and IsNull(MultipleApps,0) = 0 and UWDecision not in ('Withdrawn','Duplicate','Declined','DEC','CANCELED','Fraud','Cancelled','DUP') and DateAdd(mm,6,IsNull(DateLast_MLC_Referral,'1900-01-01')) < GetDate() and DateAdd(mm,4,IsNull(DateLast_Denial,'1900-01-01')) < GetDate() and OrigProduct not in ('Visa Secured','Visa Student','CD Secured/Trig')/*Updated Rough Filter to Exlude Mortgages > $65,000*/
MV2	((CreditType like '%Mortgage%' and Balance > 1000) or (CreditType like 'Automobile' and Balance >= 8000) or (CreditType in ('Secured') and Balance >= 8000) or (CreditType like 'Unsecured' and Balance >= 8000)) and Score >= 670 /*Updated Rough Filter to Exlude Mortgages > $65,000*/
MV3	((CreditType like '%Mortgage%' and Balance > 1000) or (ProposedSavings > 150) or (CreditType in ('Secured') and Balance >= 8000) or (CreditType like 'Unsecured' and Balance between 8000 and 75000)) and Score >= 670 and CurrentDI < .60 and DateAdd(mm,6,IsNull(DateLast_MLC_Referral,'1900-01-01')) < GetDate() and DateAdd(mm,4,IsNull(DateLast_Denial,'1900-01-01')) < GetDate() /*Updated Rough Filter to Exlude Mortgages > $65,000*/
R1	CurrentDI < .60

Extreme Lending: Lead Refinery

XLOT Sub-team: February 19, 2013

History & Background

Prior to our "Extreme" lending initiatives, loan sales were primarily accomplished through direct mail or online offers and in-branch or telephone cross-sale discussions when members approached us. Our overall average sales compared favorably to the industry, especially given our young membership. But in the age of slow economic growth, compressed margins, and consumer loan deleveraging, competition has become very strong and a need for a more proactive approach was clear.

The Extreme Lending Business Initiative of 2011 set the stage for several changes to our operations and systems, our research efforts, and our sales techniques. A team was formed to focus on outbound calling (the Member Lending Center – MLC), and new tools were developed to support their efforts. One of the tools we created was a Credit Consultation process, where members would ask to have their credit histories reviewed for opportunities to refinance their debt and save money.

In order to reach the most likely beneficiaries of these credit consultations, a referral and lead management system (RLM) and a special Member Overview page was developed within our intranet, which could be accessed by all staff. Member requests for credit consultations were added to the RLM and assigned to the MLC. To support their staff capacity, other sources of continual leads were identified and implemented. We also built leads from one-time events or lists, typically tied to marketing promotions.

Lead Refinery Development

These first continual RLM lead sources were created and managed by Craig Robertson and Tim Hermanson in IT, with direction from David Olson, the MLC manager. Those early efforts were very successful at reaching the previously untapped opportunities, and getting the MLC off the ground. The initial MLC team of four originated $19.4 million of loans in their first year.

Until this point, modest filtering or manipulation of lead data was done to maximize the MLC efforts. In early 2012 the Extreme Lending Oversight Team identified the need to focus on this issue, and dubbed the filtering process our "lead refinery." Since narrowing our use of data for targeted sales approaches is very similar to the use of our MCIF system for promotions, Chad LaFlash stepped in to help the group organize our approach, and assume coordination of the Lead Refinery component of our RLM system.

Based on early results and observations from the MLC group, several enhancements were made to the Lead Refinery throughout 2012. A record of those changes is attached. Due to the implementation of a new Consumer Loan Origination system, some of the early efforts had to be reprogrammed, and more importantly, two key aspects of the Refinery were added:

- **Member Savings** – we now quantify the likely savings a refinancing member would realize, by comparing rates on loans held elsewhere with our current rates and terms. If the savings is not significant (<$150/loan), the lead is filtered out. This savings is not currently aggregated.
- **Lead Expirations** – by August, 2012 we realized there were many old leads building up that the team was not able to work on, so we established an expiration policy. We immediately eliminated 893 old leads and now automatically close out any (an average of 8/day) that reach the expiration policy limit. Most limits are 60-90 days, with some as long as four months.

Current Lead sources – Today we have seven regular Lead Refinery sources for credit consultation leads:

- CLAW – members/non-mbrs who begin app online but do not submit (24 hrs after starting the app)
- Loans Approved Not Taken – Web/LC approvals not taken w/in 30 days (48 hrs after "not taken")
- NMAs – online New Member Applications (non-students) where any loan chosen (from prior month)
- Branch Loans – booked consumer loans from a branch (generated w/in 48 hrs of booking)
- Dealer Loans – booked loans from the indirect channel (generated w/in 48 hrs of initial application)
- Mortgage Loans – booked first mortgage loans (from prior month)
- Web & Lending Center Loans – booked loans from Web or LC (generated w/in 48 hrs of booking)

There are also calls made by MLC based on sources outside of the lead refinery:

- Home Equity Callback – members/non-mbrs who request web HE Calculator call (gen. immediately)
- CLAW closings: instantly approved web apps after 18 hrs of no member contact are assigned to MLC to close. Includes credit cards, unsecured installment loans, reserve lines of credit, and auto refinances only. This is back-up to the Lending Center when they are unable to meet the 24-hr service level.

Finally, there are periodic lists from marketing campaigns where the MLC group can reach out to compliment a direct mail or online offer to close the loan or suggest a credit consultation. An example of that is an Auto Loan Pre-approval list – campaign targets for auto recapture pre-approvals.

Filtering – The seven regular lead types above have a filtering system applied that narrows the list to a reasonable volume for MLC to work. The filter looks for criteria that have a very high likelihood of causing a loan denial or a clear disinterest from the member. (See attached filtering rule history)

Where possible, we remove any consumer loan leads where:

- their credit score is less than 640
- their current Debt-to-Income ratio is greater than 60%
- there is a current decision 'Withdrawn', 'Duplicate', 'Declined', 'Fraud', or 'Cancelled'
- they have had another lead sent to the MLC team in the last 6 months
- they have been denied in the last 4 months
- their balance in outside HE loans is less than $1,000 or greater than $65,000
- their balance in outside unsecured loans is less than $8,000 or greater than $75,000
- their proposed refi savings on all consumer installment loan of at least $1,000 is estimated to be less than $150 per loan

For CLAW leads, the source of the data is not from LPQ, so some underwriting filters are not applicable (e.g. DTI).

Working Leads – The MLC team works through their lists of filtered leads until all members are contacted and they are able to either close out the lead with no final action, or deliver a booked loan. Those leads they cannot contact are automatically expired. LPQ-based leads expire after 60 days, mortgage leads after 90 days, and all others after four months.

Results

Throughout 2012 we discussed the best ways to quantify our success and identify additional opportunities for improvements to the Refinery process. Following are our most recent statistics:

Lead Type	Start Total	Remain (filtered)	Worked (closed)	In-Process (assigned)	Expired	Total Booked	Average Booked	Booked/ Starting	Booked/ Worked	$ Lost Potential*
CLAW	2,030	27.6%	99.29%	0.71%	0.00%	81	$12,767	3.99%	14.54%	$0
LANT	1,018	13.3%	46.67%	6.67%	46.67%	8	$27,290	0.79%	12.70%	$218,316
NMA	301	16.3%	83.67%	4.08%	12.24%	8	$14,178	2.66%	19.51%	$16,598
Branch	15,955	4.3%	74.96%	5.39%	19.65%	43	$15,305	0.27%	8.35%	$172,516
Dealer	1,264	13.1%	76.36%	9.09%	14.55%	13	$12,190	1.03%	10.32%	$30,186
Mortgage	1,449	19.2%	44.24%	5.04%	50.72%	28	$23,753	1.93%	22.76%	$762,414
Web/LC	9,845	6.6%	71.78%	4.60%	23.62%	47	$15,071	0.48%	10.04%	$233,091
TOTAL	**31,862**	**7.93%**	**74.91%**	**4.39%**	**20.70%**	**228**	**$15,596**	**0.72%**	**12.04%**	**$1,433,121**

*Aug 1 - Dec 31, 2012 (5 months) *Potential estimated using the average $ booked loan amounts per lead type x expired # leads.*

Except with the CLAW leads, the filters are removing more than 80% of the potential leads for having no member or CU benefit. And with CLAW leads the filters remove almost 75%. Not surprisingly, there are the fewest opportunities with leads that already had an in-person branch review. For the 5 months studied, the filters removed 1,450 bad leads per week, allowing MLC staff to focus on real opportunities.

The NMA and Mortgage leads have the highest success rates, while Loans Approved Not Taken and Mortgages produce the largest average dollar amounts, when successful. The CLAW lead list is the only one always worked fully (no expirations). LANT and Mortgages have had half of their good leads expire.

In this 5-month period, the lead lists have produced **$3.5 million** in booked loans. If there was capacity to contact all of the leads (no expiring leads), we may have produced as much as **$5 million** instead.

Filtering Criteria	CLAW	LANT	NMA	Branch	Dealer	Mortgage	Web/LC	TOTAL
Low Credit Score	31.86%	24.12%	47.22%	61.08%	41.95%	0.26%	50.29%	52.94%
Low Balances Elsewhere	10.07%	58.78%	30.16%	26.86%	43.31%	89.84%	30.15%	32.26%
Past Denial	n/a	2.15%	5.56%	3.99%	3.09%	0.00%	7.30%	4.83%
Duplicate or Repeat	6.13%	10.08%	3.97%	2.93%	3.37%	2.73%	5.22%	3.93%
Low Savings Potential	20.90%	4.42%	7.97%	2.71%	6.10%	0.17%	3.82%	3.20%
High DTI	n/a	0.45%	3.97%	1.66%	1.46%	0.26%	2.59%	1.88%
Negative Purpose / Other	31.04%	0.00%	0.79%	0.60%	0.73%	0.00%	0.45%	0.51%

Note: Results are shown in total impact rank order; although the actual filter program order is different. The program is hierarchical and looks at underwriting rules first and external balances or savings potential last.

More than half of the potential leads are filtered out because of underwriting standards (credit score, DTI, past denials). The rest would produce too low of a member or CU benefit to pursue. There are logical variations between source-types.

There are significant dollars lost from filtered but expired leads each month. In particular, Mortgage application leads yielded the best results during the monitoring period above, yet have the highest percentage of expirations. Tim and David will be reviewing better ways to access Morvision information and improve efficiencies to clear more of these leads.

Results of Remaining (Filtered) Leads Worked by MLC

No opportunity (not contacted)

Savings too low	34.02%
Already refi'd/being worked/App on file	21.59%
DTI issues	2.09%
Previous denial	1.91%
Incorrect contact info	0.51%
Product Not Available	0.28%
Other	4.42%
	64.82%

Lead Closed (contacted)

No Response from Member	10.19%
No Interest At This Time	9.87%
Not Qualified	0.88%
Non Member	0.84%
Prefers No Further Contact	0.23%
Other	0.33%
Application Taken	12.84%
	34.85%

Two-thirds of the filtered leads presented to MLC are not contacted after deeper review. And of those that are contacted, almost two-thirds of those do not result in an application. Over time our goal is to continue to improve our filtering so that the "no opportunity" leads do not make it to the staff at all. That should result in the elimination of leads that "expire," addressing every opportunity we can.

Of the applications that are taken, a few may still be declined or not taken by the member, but that is not frequent (the booked ratio is over 12%, while the application ratio is less than 13%).

The Team will continue to look for ways to filter out more leads based on low savings opportunities or duplicate applications/loans already in process.

Current Development

Projected Savings	Success
Unknown	0%
$0.01 - $150	0%
$150 - $250	16%
$250 - $500	24%
$500 - $1,000	27%
More than $1,000	38%

RE Loan Balances	Success
Unknown	7%
$0.01 - $1,000	0%
$1,000 - $8,000	5%
$8,000 - $15,000	3%
$15,000 - $30,000	6%
More than $30,000	1%

Unsecured Loan Bals	Success
Unknown	0%
$0.01 - $1,000	1%
$1,000 - $8,000	0%
$8,000 - $15,000	5%
$15,000 - $30,000	12%
More than $30,000	5%

Analysis: In order to identify the best cut-off points for savings potential (and other filters), we have started to identify the success rates at various isolated criteria tiers. This first analysis shows that there is significant improvement in booked loans when the identified savings is known to be over $150, and nearly double that when it's over $500. Looking at the loan balanaces held elsewhere proves to be less predictive or effective. We will continue to review these results and use them to suggest changes.

New Leads: As of Feb 2013, MLC is receiving a new lead type based on recent closed mortgages with no Home Equity loan. Only borrowers with at least $15k available (up to 90% LTV) are presented. These are not refinancing leads like the others, but opportunities for new extensions of credit.

We will also soon be testing distribution of some of the above refinancing leads with lower external loan balances for branches with excess capacity. These are not as likely to be successful (estimated savings is not considered), but they may enhance staff efficiency for growing branches. A pilot will start with the Milwaukee area branches, and only for members living within 20 miles.

The team will continue to discuss other opportunities:

- Recommend lead-working priorities in MLC to maximize results
- New filters or adjustments to current systems
- Enhance refinery reporting to include net income contribution impacts
- Expansion of filtered leads to branch and lending center staff
- Additional filtered leads for checking, mortgages, investment services, student loans, deposits, etc.

MLC Filter Rules History

Leads Generated from our Consumer Loan Origination Database

May-July 2011 Credit score is 670 or higher; debt-to-income is less than 60%; and any external balance in real estate loans **or** at least $3,000 in external auto, secured, or unsecured balances.

July 2011–January 2012 Credit score is 670 or higher; debt-to-income is less than 60%; and any external balance in real estate loans **or** at least *$10,000* in external auto, secured, or unsecured balances.

January–April 2012 Credit score is 670 or higher; debt-to-income is less than 60%; and any external balance in real estate loans **or** at least *$8,000* in external auto, secured, or unsecured balances.

April–June 2012 Credit score is 670+; debt-to-income is less than 60%; and between *$1,000 & $65,000* in external real estate loan balances **or** $8,000+ in external auto, secured, or unsecured balances.

June–July 2012 Credit score is 670+; debt-to-income is less than 60%; and $1,000 to $65,000 in external real estate loan balances, **or** $8,000+ in external auto or secured balances, **or** *$8,000 to $75,000* in external unsecured balances, **or** if there is a *Proposed Savings opportunity greater than $150*.

July–Dec 2012 Credit score is 670+; debt-to-income is less than 60%; *no current status of Withdrawn, Duplicate, Cancelled, Fraud, or Denied; no previous MLC leads in last 6 months; no loan denial in last 4 months*; and $1,000 to $65,000 in external real estate loan balances, **or** $8,000 to $75,000 in external revolving unsecured balances, **or** if there is a Proposed Savings opportunity greater than $150 *on installment consumer loans of at least $1,000*.

Jan 2013–today Credit score is *640+*; debt-to-income is less than 60%; no current status of Withdrawn, Duplicate, Cancelled, Fraud, or Denied; no previous MLC leads in last 6 months; no loan denial in last 4 months; and $1,000 to $65,000 in external real estate loan balances, **or** $8,000 to $75,000 in external revolving unsecured balances, **or** if there is a Proposed Savings opportunity greater than $150 on installment consumer loans of at least $1,000.

Leads Generated from our Mortgage Loan Origination Database had no filtering before June 2012, but those leads now follow the same rules as consumer loan leads above.

Leads Generated from incomplete CLAW applications on Web Branch

Before July 2012: No filtering done with these leads.

July–Dec 2012 Credit score is 670+; only application from the member; the applied for product is not Visa Secured or Student credit card; the purpose is not dealer loan, refinance existing vehicle, upgrade or convert an existing card, limit increase, Education loan, or Establish Credit; applied for Personal loan greater than $5,000, **or** Visa/RLOC limit greater than $2,500.

Jan 2013–today Credit score is *640+*; only application from the member; the applied for product is not Visa Secured or Student credit card; the purpose is not dealer loan, refinance existing vehicle, upgrade or convert an existing card, limit increase, Education loan, or Establish Credit; applied for Personal loan greater than $5,000, **or** Visa/RLOC limit greater than $2,500.