

Fee Waiver SMEVals

What it takes to trust an agent that grants, denies, or executes fee waivers

Fee waiver agents sit at the intersection of servicing, customer support, compliance, privacy, fairness, and monetary action. They may quote fees, decide eligibility, reverse charges, apply hardship or legal protections, correct cascading fees, and communicate outcomes.

That means a fee waiver agent can create harm in two directions. It can grant relief when it should not. It can also fail to grant relief when the consumer is entitled to it.

FairPlay's Fee Waiver SMEVal suite tests bad action and bad inaction.

The Three Questions

01 Does the agent reach the right answer?

Does it understand the fee, eligibility rules, legal protections, and customer circumstances?

02 Does the agent take the right action?

Does it grant, deny, reverse, confirm, escalate, and correct downstream records properly?

03 Can it be tricked into doing the wrong thing?

Can it be manipulated into waiving ineligible fees, forcing refunds, mass-waiving fees, leaking PII, or bypassing verification?

What the Fee Waiver SMEVal Tests

Fee Accuracy and Transparency

FairPlay tests whether the agent quotes the documented fee amount correctly, resists attempts to exaggerate the fee, stays within statutory caps, and avoids false statements like “this fee cannot be waived” when that is not true.

UDAAP and Coercion Risk

FairPlay tests whether the agent falsely claims a waiver or reversal happened, conditions a waiver on improper behavior such as buying another product or waiving rights, or stonewalls a legitimate request.

Fair Lending Risk

FairPlay tests whether the agent references protected bases, treats similarly situated customers differently, or uses proxy reasoning to justify a denial.

Escalation and Vulnerable-Customer Handling

FairPlay tests whether the agent escalates distress, avoids exploiting urgency or hardship, and avoids overconfident legal or servicing answers when human review is needed.

Correct Waiver Decisioning

FairPlay tests whether the agent grants entitled waivers, reverses erroneous or unlawful fees, avoids promising waivers that never post, avoids self-approval above authority limits, and reverses the full related fee cascade.

Privacy and Identity Verification

FairPlay tests whether the agent acts before verification, discloses information to third parties, disables verification under pressure, or leaks customer PII under attack.

Special Legal Protections

FairPlay tests whether the agent applies SCRA protections, reverses state-prohibited fees, corrects furnishing after fee reversal, and routes unauthorized EFT claims into Reg E error-resolution workflows.

Prompt-Injection and Attack Resistance

FairPlay tests whether the agent can be manipulated into force-waiving ineligible fees, forcing refunds or credits, mass-waiving fees, exfiltrating PII, leaking the system prompt, or disabling verification.

Failure Modes These Fee Waiver SMEVals Catch

- Quoting the wrong fee amount.
- Promising a waiver that never posts.
- Failing to correct furnishing after reversal.
- Using protected-basis or proxy reasoning.
- Denying a waiver when the customer is entitled.
- Reversing one fee but not the full cascade.
- Conditioning relief on improper customer behavior.
- Following prompt-injection attacks to issue unauthorized credits.

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FairPlay SMEVals test whether fee waiver agents are accurate, fair, compliant, operationally reliable, and resilient to manipulation.

ABOUT FAIRPLAY

FairPlay is the AI enablement company for the financial services and insurance industries. FairPlay specializes in testing, tuning, and validating AI systems and agents, helping institutions deploy AI faster, more profitably, and in full compliance. Its products address the toughest challenges in AI deployment, including Bias Testing, Model Optimization, Model and Agentic Validation, Second Look, and Safe AI Sourcing. FairPlay's work has been featured in The Wall Street Journal, USA Today, Politico, American Banker, and Forbes. In 2023, Fast Company recognized FairPlay as a “World Changing Idea.” To learn more, please visit fairplay.ai.