Collect – Prepaid Product Agreement User Guide
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1. Introduction

The Bureau’s 2016 rule governing prepaid accounts, as subsequently amended, requires that prepaid account issuers submit to the Bureau the prepaid account agreements that they offer, subject to product testing and de minimis exceptions. This document refers to this as the prepaid product agreement (“PPA”) reporting requirements. Prepaid account issuers must make a submission to the Bureau within 30 days whenever a new agreement is offered, a previously submitted agreement is amended, or a previously submitted agreement is no longer offered.\(^1\)

This document provides a detailed walkthrough of how to create a prepaid product entry and upload an agreement for it, amend an agreement for an existing product, or withdraw a prepaid product entry using Collect. Collect is the website through which issuers must submit their required agreements to the Bureau. The Bureau cannot accept prepaid product agreements through emails, handwritten forms, or faxed information. To access Collect, visit https://collect.consumerfinance.gov.

In addition to this detailed walkthrough of Collect, the Bureau has published additional resources to help financial institutions submit prepaid product agreements through Collect. These resources can be found on the Bureau’s Collect submission instructions page at https://www.consumerfinance.gov/data-research/prepaid-accounts/issuer-instructions/.

The Bureau has previously issued various implementation tools regarding the Bureau’s 2016 prepaid rule and subsequent amendments, including small entity compliance guide, executive summary of the rule, summaries of key changes for payroll card accounts and government benefit accounts, a prepaid account coverage chart, a summary of the rule’s effective date provisions, and a guide to preparing the short form disclosure, among others. These materials can be found on the Bureau’s guidance and implementation website at https://www.consumerfinance.gov/policy-compliance/guidance/prepaid-rule/.

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\(^1\) See 12 CFR 1005.19 (effective April 1, 2019).
2. Registering with Collect

The Collect website requires every financial institution to register for login credentials prior to using the website. To register with Collect, a representative from a financial institution must complete the Collect registration form. The Collect registration form is found on the Bureau’s Collect submission instructions page at https://www.consumerfinance.gov/data-research/prepaid-accounts/issuer-instructions/. The registration form requires the following information: the institution’s name and headquarters location; the institution’s identification number, which can be an LEI, RSSD ID, or Tax ID; and the name and contact information for a point of contact.

In addition to being the institution’s primary contact for Collect, the point of contact will be assigned an account with privileges to add or remove user access for others at your institution. For example, the point of contact can provide a colleague access to Collect in order to make PPA submissions. If that colleague forgets or loses their login information, they can contact the point of contact to get help with accessing their login information. If a point of contact is unavailable, an employee is always able to contact the Collect Support team directly by emailing Collect_Support@cfpb.gov.

Once the registration form has been completed, the form should be emailed to Collect_Support@cfpb.gov.

After processing your institution’s registration form, the Bureau’s Collect team will send a welcome email to the point of contact listed on the registration form. The welcome email will contain information about logging in to Collect. The Collect website can be accessed at https://collect.consumerfinance.gov.
3. Create a prepaid product entry

Before uploading a prepaid product agreement, you must first create a new prepaid product entry.

1. From the Collect homepage, select ‘Upload agreement documents for a new prepaid product.’

2. Enter all required fields:

   *Product Name: this is the name of the prepaid product.

   *Issuer Name: this will be auto-populated when you enter your institution’s name in ‘Search Entities.’

   Product Type: select one of the following: GPR (General Purpose Reloadable), Payroll, Government Benefits, Digital wallet/P2P, Prison Release, Refunds, Student, Tax, Travel, Other.

   If Other, please specify: if you chose Other as Product Type, please respond.

   *Initial Offer Date of Program: the date the program was first offered.

   *Is there a Program Manager: choose Yes or No.

   Program Manager: if you chose Yes in the previous question, please note the name of the Program Manager.
*Are there Other Relevant Parties: choose Yes or No.

Other Relevant Parties: if you chose Yes in the previous question, please note the name(s) of the Relevant Parties. Please enter a newline for each relevant party.

Note: All fields with a (*) next to them are required.

Select ‘Confirm’ to proceed.
3. After inputting information and selecting ‘Confirm,’ you will land on the ‘Add/Amend/Withdraw Agreements’ page.
4. Add an agreement for a prepaid product

1. From the ‘Add/Amend/Withdraw Agreements’ page, select ‘Upload New or Amended Agreement Documents.’
2. Add the ‘Agreement Effective Date.’ A dropdown calendar will appear when you select the input field.

3. Select ‘File Upload’ to proceed.
4. Submissions must contain the cardholder agreement, short form, and long form information. This may be submitted all in one file, or in two or three files.

Please select the appropriate Submission Upload Type(s) for each file uploaded.

If you need to submit more than one file, upload the first file and follow the instructions on the next page to upload more files.

Files submitted through Collect must be in the Portable Document Format (PDF) file format, and must be text-searchable, digitally-created PDFs. PDF files should not be scanned documents, otherwise known as “image-only” PDFs. For questions about file formats, please contact Collect Support.

Hold the Ctrl or command button while clicking to select multiple Submission Upload Types.
2. If you included both your agreement and fee information in one document, and selected the appropriate Submission Upload Type(s), you have now successfully submitted a prepaid product agreement.

If you need to submit additional documents to meet the PPA reporting requirements, select the Agreement Number.

A dropdown will appear. Next, select ‘File Upload’ to proceed. Return to Step 4 and submit the remainder of the agreement submission.
5. Amend an agreement for a prepaid product

1. There are two ways to begin the process of amending an agreement for an existing prepaid product.

   One, from the Collect homepage, select ‘Upload amended agreement documents or withdraw an existing prepaid product.’

Two, you can also select ‘My Prepaid Accounts.’

2. With either option, you will land on the ‘My Prepaid Products’ page. Next, select the product you would like to amend.
1. You will be on that product’s ‘Add/Amend/Withdraw Agreements’ page. Select ‘Upload New or Amended Agreement Documents’ to proceed.

2. Add the ‘Agreement Effective Date.’ A dropdown calendar will appear when you select the input field.
3. Select ‘File Upload’ to proceed.

4. Submissions must contain the cardholder agreement, short form, and long form information. This may be submitted all in one file, or in two or three files.

   Please select the appropriate Submission Upload Type(s) for each file uploaded.

   If you need to submit more than one file, upload the first file and follow the instructions on the next page to upload more files.

   Please hold the Ctrl or command button while clicking to select multiple Submission Upload Types.
5. If you included both your agreement and fee information in one document, and selected the appropriate Submission Upload Type(s), you have now successfully submitted the prepaid product agreement. You need to submit the full agreement, including fee information, regardless of which part of the agreement was amended.

   If you need to submit additional documents to meet the PPA reporting requirements, select the Agreement Number.

   A dropdown will appear. Next, select ‘File Upload’ to proceed. Return to Step 5 and submit the remainder of the agreement submission.

   Your previous agreements will still be visible, should you need to reference them at a later date.
6. Withdraw a prepaid product entry

1. There are two ways to begin the process of withdrawing an entry for a previously submitted prepaid product. An issuer may need to withdraw a prepaid product entry if the agreement is no longer offered, or choose to withdraw it if the product or issuer newly qualifies for one of the exceptions.

   One, from the Collect homepage, select ‘Upload amended agreement documents or withdraw an existing prepaid product.’

   Two, you can also select ‘My Prepaid Accounts.’
2. With either option, you will land on the ‘My Prepaid Products’ page. Next, select the product that you plan to withdraw.

3. You will be on that product’s ‘Add/Amend/Withdraw Agreements’ page. Select ‘Withdraw Product’ to proceed.
4. Add the ‘Product Withdrawal Date.’ A dropdown calendar will appear when you select the input field. Select ‘Save’ to proceed.

5. This product has been marked “withdrawn.” No new agreement documents can be uploaded for this product.
7. User management

1. The prepaid account issuer has the legal requirement to comply with the agreement submission requirements; however, an issuer generally may use a third-party service provider (such as a program manager) to satisfy those obligations, subject to regulatory guidance regarding use of third-party service providers and other applicable regulatory guidance.

To create users, or review which users are active or inactive, select ‘User Management’ from the Collect homepage.

2. The ‘User Management’ tab displays all the users for your institution. The POC is able to make a user active or inactive by toggling the ‘Active/Inactive’ switch. The POC can also create a new user by selecting ‘Create New User.’

<table>
<thead>
<tr>
<th>NAME</th>
<th>TITLE</th>
<th>EMAIL</th>
<th>ACTIVE / INACTIVE</th>
</tr>
</thead>
<tbody>
<tr>
<td>Test User 1</td>
<td></td>
<td><a href="mailto:testuser1@cfpb.test">testuser1@cfpb.test</a></td>
<td>✅ Active</td>
</tr>
<tr>
<td>Test User 2</td>
<td></td>
<td><a href="mailto:testuser2@cfpb.test">testuser2@cfpb.test</a></td>
<td>✅ Active</td>
</tr>
</tbody>
</table>
3. In order to create a new user, you will be prompted to provide their first name, last name, title, phone number, and email address. Afterwards, select ‘Save Contact.’ A new user has been created.
8. Contact Collect Support

Does your submission contain an error? Need additional help submitting prepaid product agreements? We’re here to help. There are two easy ways to reach out to the Collect Support Team (see below). In addition, the Bureau has developed additional resources to help issuers submit their prepaid product agreements. These resources can be found at https://www.consumerfinance.gov/data-research/prepaid-accounts/issuer-instructions/.

8.1 Collect Support button

At the bottom of each Collect page, select the ‘Need Help? Reach out to us!’ button to send a message to the support team.

![Image of Collect Support button]

8.2 Email the Collect Support team directly

Email the support team directly at Collect_Support@cfpb.gov. Include your question and any additional details and a team member will reach back out to you.