

TCCP Survey FAQs

This is a compliance aid issued by the Consumer Financial Protection Bureau (Bureau). The Bureau published a policy statement on compliance aids, available at www.consumerfinance.gov/rules-policy/final-rules/policystatement-compliance-aids/, that explains the Bureau's approach to compliance aids. The questions and answers below pertain to compliance with the Bureau's Terms of Credit Card Plan (TCCP) semiannual survey.

General FAQs

QUESTION 1:

My financial institution received an email from the Bureau of Consumer Financial Protection (Bureau) asking it to complete the Terms of Credit Card Plans (TCCP) Survey. Is participation in the TCCP Survey mandatory?

ANSWER (UPDATED 6/20/2018):

Yes. The Bureau is required by law to collect certain credit card price and availability information from a sample of credit card issuers and report this information to Congress and make it available to the public, pursuant to provisions of the Truth In Lending Act (TILA), 15 USC § 1646(b)(1), (2) & (4). If your financial institution received an email from the Bureau requesting it to complete the TCCP Survey, your financial institution must complete and submit the TCCP Survey to the Bureau.

QUESTION 2:

Why was my financial institution selected for the TCCP Survey?

ANSWER (UPDATED 6/20/2018):

TILA requires the Bureau to survey the 25 largest issuers of credit cards, and no fewer than 125 additional credit card issuers that are distributed equitably and geographically and represent a wide spectrum of institutions. See 15 USC § 1646(b)(2). Your financial institution was selected because it meets one of the above standards.

QUESTION 3:

When must my financial institution submit the TCCP Survey to the Bureau?

ANSWER (UPDATED 6/20/2018):

The TCCP Survey dates are January 31 and July 31. If instructed by the Bureau to complete the TCCP Survey, a financial institution would need to complete its survey within ten business days of the end of the survey date (e.g., February 14, or August 14). The information provided by the financial institution must be current as of the survey date (i.e., January 31 or July 31).

QUESTION 4:

My financial institution received an email from the Bureau requiring the financial institution to submit the TCCP Survey for January. However, my financial institution did not receive an email from the Bureau to submit the TCCP Survey for July. Should my financial institution prepare to submit the TCCP Survey despite not receiving another request to submit the survey?

ANSWER (UPDATED 6/20/2018):

No. Prior participation in the TCCP Survey does not mean that your financial institution will be selected to participate in the future. If your financial institution was previously asked to participate in the TCCP Survey, it is possible that your financial institution will receive a notice to participate again. Nevertheless, absent instructions from the Bureau to submit the TCCP Survey, your financial institution should not file the survey.

QUESTION 5:

What credit card plan should my financial institution list when completing the TCCP Survey? How many plans must I submit?

ANSWER (UPDATED 1/31/2022):

Your financial institution must report information on the pricing and terms of only one consumer credit card plan offered by your financial institution. The plan must be a third-party plan, such as Visa, MasterCard, or Discover. Do not report information on a specific retail store card plan. Your financial institution must use the third-party plan that had the largest number of cards outstanding and that was available to new customers as of the report date. If your largest plan is an affinity group plan, you may report information on that plan, or you may report on the largest plan made available to the general public (such as Visa or MasterCard that does not require affinity relationship). For more information on completing the TCCP Survey, review the data and access resources for submitting the TCCP Survey.

QUESTION 6:

My financial institution recently sold its credit card portfolio and no longer issues credit cards. Should we continue to submit the TCCP Survey?

ANSWER (UPDATED 6/20/2018):

No. Please email Collect Support@cfpb.gov to be removed from the survey panel.

QUESTION 7:

Is Apple Pay considered "mobile wallet provisioning" for the TCCP survey?

ANSWER (UPDATED 1/31/2022):

Yes, Apple Pay is considered "mobile wallet provisioning" for the TCCP survey. *See* Section 3.11 of the TCCP User Guide.

QUESTION 8:

Should a credit card issuer report a foreign transaction fee as a "Transaction Fee" on the TCCP survey?

ANSWER (UPDATED 1/31/2022):

No. The TCCP Survey requires a reporting credit card issuer to report whether it imposes a transaction fee for *each use* of the card to make a purchase. See Section 3.6 of the TCCP User

<u>Guide</u>. A foreign transaction fee is *not* assessed for *each use* of the card, as a foreign transaction fee is *only* assessed when a consumer uses a credit card to make a purchase in a foreign currency.

Submitting TCCP FAQs

QUESTION 1:

How does a financial institution submit a TCCP Survey?

ANSWER (UPDATED 1/31/2022):

A financial institution must submit the TCCP Survey using the Bureau's Collect website. Collect will guide you through the entire survey submission process. The Bureau has created a TCCP quick reference guide and user guide that explain how a financial institution can submit the TCCP Survey using Collect. These guides can be accessed on the Bureau's website: https://www.consumerfinance.gov/data-research/credit-card-data/terms-credit-card-plans-survey/.

QUESTION 2:

How do I register my financial institution on the Collect website?

ANSWER (UPDATED 1/31/2022):

To register your financial institution to submit the TCCP Survey using Collect, please complete the <u>Collect Registration Form</u> and submit it to <u>Collect Support@cfpb.gov</u>. After the Bureau processes the Collect Registration Form, the point of contact (POC) listed on the Collect Registration Form can either complete the TCCP Survey or delegate another person (delegated POC) to complete the TCCP Survey.

QUESTION 3:

What is a POC? How can I identify my financial institution's POC?

ANSWER (UPDATED 6/20/2018):

A POC is an individual at your financial institution who can delegate to other people at your financial institution permission to submit information via Collect (delegated POCs). The POC also has the ability to remove these permissions, if desired. If you are unsure who your financial institution's POC is, contact Collect Support@cfpb.gov.

QUESTION 4:

I am my financial institution's POC, but I am not responsible for submitting the TCCP Survey (I delegate this task to another employee). Can I view the information being submitted by a delegated POC in Collect?

ANSWER (UPDATED 6/20/2018):

Yes. All data submitted by your financial institution is viewable by you and any delegated POCs in Collect. Once your data is submitted, the Bureau will review and publish the data at https://data.consumerfinance.gov/Government/Survey-of-Credit-Card-Plans/gme7-gkkr.

QUESTION 5:

My financial institution would like to submit the TCCP Survey by email using the Excel spreadsheet. Where can I find instructions for filling out and submitting the Excel spreadsheet?

ANSWER (UPDATED 1/31/2022):

Pursuant to the Technical Specifications for Credit Card Agreement and Data Submissions Required under TILA and the CARD Act (Regulation Z) Procedural Rule issued on August 20, 2021, the Bureau no longer accepts FR 2572 (the Excel spreadsheet) as a method for submitting TCCP data. Thus, card issuers selected to participate in the TCCP Survey must use Collect to submit their TCCP data to the Bureau starting with the survey cycle beginning on January 31, 2022, for which responses are due on February 14, 2022. You can read the procedural rule at: www.consumerfinance.gov/rules-policy/final-rules/technical-specificationsfor-credit-card-agreement-and-data-submissions-required-under-tila-and-the-card-actregulation-z/.

QUESTION 6:

After I submitted the TCCP Survey for my financial institution, I realized that the submission contained an error. Can I correct the error?

ANSWER (UPDATED 6/20/2018):

Yes. To correct the error, please contact Collect Support@cfpb.gov.

Collect Website FAQs

QUESTION 1:

I lost my Collect login information, or my account has been locked. Can the Bureau provide me with new login information or unlock my account?

ANSWER (UPDATED 6/20/2018):

Yes. Please email <u>Collect_Support@cfpb.gov</u> to request your user login information or to unlock your account. The Bureau's support team will contact you to verify your identity and provide you with access to your account.

QUESTION 2:

May I contact the Bureau with questions regarding uploading a TCCP Survey or Bureau Collect?

ANSWER (UPDATED 6/20/2018):

Yes. Please email all questions to <u>Collect_Support@cfpb.gov</u>. The Bureau's support team will ensure that you receive a timely response.