



TCCP Survey FAQs

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

General FAQs

QUESTION 1:

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

ANSWER (UPDATED 3/21/2023):

Yes. The CFPB 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 order from the CFPB requiring it to complete the TCCP Survey, your financial institution must complete and submit the TCCP Survey to the CFPB.

QUESTION 2:

Why was my financial institution selected for the TCCP Survey?

ANSWER (UPDATED 3/21/2023):

TILA requires the CFPB 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 CFPB?

ANSWER (UPDATED 3/21/2023):

The TCCP Survey dates are March 1 and September 1 unless otherwise stated in the order requiring the financial institution to complete the TCCP Survey. The information provided by the financial institution must be current as of December 31, for the March 1 survey date, or June 30, for the September 1 survey date.

QUESTION 4:

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

ANSWER (UPDATED 3/21/2023):

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 required to participate in the TCCP Survey, it is possible that your financial institution will be required to participate again in the future. Nevertheless, absent an order from the CFPB to submit the TCCP Survey, your financial institution is not required to file the survey.

However, a financial institution may volunteer to submit a TCCP Survey if it was not selected by the CFPB to participate in the survey. To volunteer to submit a TCCP Survey, please complete the [Collect Registration Form](#) and submit it to Collect_Support@cfpb.gov. After the Bureau CFPB 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 5:

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

ANSWER (UPDATED 3/21/2023):

There are three types of TCCP Survey participants: (1) large issuer survey participants, (2) regional issuer survey participants, and (3) voluntary survey participants. If your financial institution is required to participate in the TCCP Survey, the order from the CFPB will state whether your financial institution is a large issuer survey participant, or a regional issuer survey participant. If your financial institution is choosing to voluntarily submit a TCCP Survey, your financial institution is a voluntary survey participant.

Large issuer survey participants are required to submit a TCCP Survey for each of their network-branded, domestic consumer credit card products. For the purposes of the TCCP Survey, a credit card “product” is defined by “the existence of a unique marketing or brand name associated with that specific program. For example, a card issuer offers two credit card products marketed as the “Gold Card” and the “Silver Card.” While the terms and conditions for these two separate products may be disclosed under a singular credit card agreement, for the purposes of the TCCP Survey, the pricing terms of these products must be reported separately. The example above remains the same regardless of whether or the extent to which the terms applicable to the products differ. For example, even if the Silver and Gold cards have a range of purchase APRs from 10 percent to 20 percent, the issuer cannot include accounts under the Gold Card when calculating the median purchase APR by credit score tier for accounts under the Silver Card.

Regional issuer survey participants and voluntary survey participants submit a TCCP Survey for at least 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). Both regional and voluntary issuer survey participants

have the option to submit additional TCCP Surveys for other credit card products offered by your financial institution.

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. Are we required to 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 Guide](#). 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.

QUESTION 9:

If the credit card product is not offered to certain credit tiers, what should my financial institution enter for APR, fees, and other numeric fields related to those ineligible credit tiers?

ANSWER (UPDATED 4/11/2023):

If the credit card product is not offered to certain credit tiers, enter “999” for any relevant fields that require a numeric entry.

QUESTION 10:

My financial institution is a credit union that has an offset clause in the membership agreement. Is this card considered a secured card for the TCCP Survey?

ANSWER (UPDATED 4/11/2023):

For purposes of the TCCP Survey due on April 20, 2023, please report as “unsecured credit cards” any credit card accounts offered by credit unions that are secured by a lien pursuant to 12 USC 1757(11).

QUESTION 11:

Does the TCCP Survey question “Does this card offer an introductory APR?” refer to an introductory purchase APR, or both introductory purchase APR and balance transfer APR?

ANSWER (UPDATED 4/11/2023):

The TCCP Survey question “Does this card offer an introductory APR?” refers only to introductory purchase APR. It does not refer to introductory balance transfer APR.

QUESTION 12:

Does the question “Does this card offer balance transfers?” refer to balance transfer promotional periods?

ANSWER (UPDATED 4/11/2023):

It depends. You should respond “yes” if the credit card offered balance transfer promotional periods to new and/or existing cardholders during the survey period. You should respond “no” if

the card product did not offer balance transfer promotional periods to new and/or existing cardholders during the survey period.

QUESTION 13:

Does the question “Does the balance transfer APR offered vary by credit tier?” refer to balance transfer promotional periods? Should I populate APRs by credit tier, or the median APR, for the balance transfer promotional period?

ANSWER (UPDATED 4/11/2023):

You should provide a response that refers to balance transfer promotional periods offered during the survey period. If applicable, you should populate the credit tier fields for APR during the balance transfer promotion offered during the survey period. If applicable, you should populate the median APR field with the value during the balance transfer promotional period offered during the survey period.

QUESTION 14:

Does the question “What are the minimum and maximum balance transfer APRs for all new accounts?” refer to balance transfer promotional periods?

ANSWER (UPDATED 4/11/2023):

Yes. Please populate the response to the above question with information from balance transfer promotions offered during the survey period.

QUESTION 15:

For the field “Median Length of Balance Transfer in Months,” does this refer to the median length of a balance transfer promotional period? What if there is no balance transfer promotion?

ANSWER (UPDATED 4/11/2023):

For the field “Median Length of Balance Transfer in Months,” enter information about the median length of balance transfer promotional period for balance transfer promotions available during the survey period, if applicable. If there was no balance transfer promotion during the survey period, enter “999.”

QUESTION 16:

In the “Benefits” section of the survey, if a benefit is available to customers of a card product but requires a separate fee and/or separate registration process, should it be listed as a service?

ANSWER (UPDATED 4/11/2023):

The “Services” section under “Benefits” should include benefits that require separate registration and/or a separate fee. It should also include benefits that do not require a separate registration and/or a separate fee. Anything included in the “Benefits” section that requires a separate fee should also be noted in the “Fees” section under “Other.”

QUESTION 17:

In the “Benefits” section, should benefits that are offered through a card network, and not by the issuer, be included?

ANSWER (UPDATED 4/11/2023):

Benefits that are offered through a card network should be included. Anything included in the “Benefits” section that requires a separate fee should also be noted in the “Fees” section under “Other.” For the survey due April 20, 2023, financial institutions do not need to indicate whether the issuer or the card network is providing the benefit.

Submitting TCCP FAQs

QUESTION 1:

How does a financial institution submit a TCCP Survey?

ANSWER (UPDATED 3/21/2023):

A financial institution must submit the TCCP Survey using the CFPB’s Collect website. Collect will guide you through the entire survey submission process. The CFPB 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 CFPB’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 3/21/2023):

To register your financial institution to submit the TCCP Survey using Collect, please complete the [Collect Registration Form](#) and submit it to Collect_Support@cfpb.gov. After the CFPB processes the Collect Registration Form, the 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 3/21/2023):

Yes. All data submitted by your financial institution is viewable by you and any delegated POCs in Collect. Once your data is submitted, the CFPB 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 3/21/2023):

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 CFPB 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 CFPB 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-specifications-for-credit-card-agreement-and-data-submissions-required-under-tila-and-the-card-act-regulation-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.

QUESTION 7:

Can I save my TCCP Survey responses in the Collect Platform without submitting the TCCP Survey?

ANSWER (UPDATED 4/11/2023):

No. The Collect system does not have a save function. When completing a TCCP Survey, respondents should be prepared to fully complete the survey. To help with data gathering, the TCCP Survey User Guide includes all survey questions.

QUESTION 8:

Can multiple people from my financial institution work on a TCCP Survey simultaneously?

ANSWER (UPDATED 4/11/2023):

No. Each survey response can only be completed by one person in a login session. Once a survey is submitted, anyone registered in Collect from the same financial institution can pre-populate a new TCCP Survey with the previously submitted responses.

QUESTION 9:

Can I pre-populate the TCCP Survey using previous survey responses?

ANSWER (UPDATED 4/11/2023):

Yes, you can pre-populate a TCCP Survey with responses from previously submitted TCCP Survey. Note that if you pre-populate the survey with a TCCP Survey response prior to March 2023, you may need to answer additional questions.

Collect Website FAQs

QUESTION 1:

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

ANSWER (UPDATED 3/21/2023):

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

QUESTION 2:

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

ANSWER (UPDATED 3/21/2023):

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