



# Credit Cards –

## Reg. Z Disclosure Due Diligence Tool

*Sheshunoff's Online Compliance Consulting* has compiled this resource tool that users may find helpful when performing due diligence on certain Regulation Z credit card disclosures. The regulation and commentary should be consulted for specifications where appropriate.

<b>Institution:</b>	<b>Date:</b>
	<b>Prepared by:</b>

Component – Account Opening Disclosures <b>(1026.6(b))</b>	Yes	No	N/A
<b>Format – Do disclosures meet the format requirements? (In the form of a table with headings, content and format substantially similar to applicable tables in G-17 in Appendix G) <b>(b)(1)</b></b>			
<b>Content – Are the following items disclosed to the extent applicable? <b>(b)(2)</b></b>			
<ul style="list-style-type: none"> <li>• <b>Annual percentage rate <b>(i)</b></b> <ul style="list-style-type: none"> <li>○ Variable-rate information</li> <li>○ Discounted initial rates</li> <li>○ Premium initial rate</li> <li>○ Penalty rates</li> <li>○ Point of sale where APRs vary by state or based on creditworthiness</li> <li>○ Credit card accounts under an open-end (not home-secured) consumer credit plan – introductory rate information &amp; any rate that would apply upon expiration of premium initial rate</li> </ul> </li> </ul>			
<ul style="list-style-type: none"> <li>• <b>Fees for issuance or availability <b>(ii)</b></b></li> </ul>			
<ul style="list-style-type: none"> <li>• <b>Fixed finance charge; minimum interest charge <b>(iii)</b></b></li> </ul>			
<ul style="list-style-type: none"> <li>• <b>Transaction charges <b>(iv)</b></b></li> </ul>			
<ul style="list-style-type: none"> <li>• <b>Grace period <b>(v)</b></b></li> </ul>			
<ul style="list-style-type: none"> <li>• <b>Balance computation method <b>(vi)</b></b></li> </ul>			

<ul style="list-style-type: none"> <li>• <b>Cash advance fee (vii)</b></li> </ul>			
<ul style="list-style-type: none"> <li>• <b>Late payment fee (viii)</b></li> </ul>			
<ul style="list-style-type: none"> <li>• <b>Over-the-limit fee (ix)</b></li> </ul>			
<ul style="list-style-type: none"> <li>• <b>Balance transfer fee (x)</b></li> </ul>			
<ul style="list-style-type: none"> <li>• <b>Returned-payment fee (xi)</b></li> </ul>			
<ul style="list-style-type: none"> <li>• <b>Required insurance, debt cancellation or debt suspension coverage (xii)</b></li> </ul>			
<ul style="list-style-type: none"> <li>• <b>Available credit (xiii)</b></li> </ul>			
<ul style="list-style-type: none"> <li>• <b>Web site reference (xiv)</b></li> </ul>			
<ul style="list-style-type: none"> <li>• <b>Billing error rights reference (xv)</b></li> </ul>			
<p><b>Other Content – Disclosure of charges imposed as part of open-end (not home-secured) plans to the extent applicable? (b)(3)</b></p>			
<ul style="list-style-type: none"> <li>• <b>For charges imposed as part of an open-end (not home-secured) plan, the circumstances under which the charge may be imposed, including the amount of the charge or an explanation of how the charge is determined. For finance charges, a statement of when the charge begins to accrue and an explanation of whether or not any time period exists within which any credit that has been extended may be repaid without incurring the charge. If such a time period is provided, a creditor may, at its option and without disclosure, elect not to impose a finance charge when payment is received after the time period expires. (i)</b></li> </ul>			
<ul style="list-style-type: none"> <li>• <b>Charges imposed as part of the plan are: (ii)</b> <ul style="list-style-type: none"> <li>○ Finance charges identified under 1026.4(a) and 1026.4(b)</li> <li>○ Charges resulting from failure to use plan as agreed</li> <li>○ Taxes imposed</li> <li>○ Charges for which payment or nonpayment affect the consumer’s access to the plan, the duration of the plan, amount of credit extended, period for which credit is extended or timing or method of billing or payment</li> <li>○ Charges imposed for terminating a plan</li> <li>○ Charges for voluntary credit insurance, debt cancellation or debt suspension</li> </ul> </li> </ul>			

<ul style="list-style-type: none"> <li>• <b>Charges that are not imposed as part of the plan include: (iii)</b> <ul style="list-style-type: none"> <li>○ Charges imposed by an institution other than the card issuer for the use of the other institution’s ATM in a shared or interchange system</li> <li>○ A charge for a package of services that includes an open-end credit feature, if the fee is required whether or not the open-end credit feature is included and the non-credit services are not merely incidental to the credit feature</li> <li>○ Charges under 1026.4(e) disclosed as specified</li> </ul> </li> </ul>			
<p><b>Other Content – Disclosure of rates for open-end (not home-secured) plans to the extent applicable? (b)(4)</b></p>			
<ul style="list-style-type: none"> <li>• <b>For each periodic rate that may be used to calculate interest: (i)</b> <ul style="list-style-type: none"> <li>○ Rates</li> <li>○ Range of balances</li> <li>○ Type of transaction</li> <li>○ Balance computation method</li> </ul> </li> </ul>			
<ul style="list-style-type: none"> <li>• <b>Variable-rate accounts (ii)</b> <ul style="list-style-type: none"> <li>○ Fact that APR may increase</li> <li>○ How rate is determined, including margin</li> <li>○ Circumstances under which rate may increase</li> <li>○ Frequency with which the rate may increase</li> <li>○ Any limitation on amount the rate may change</li> <li>○ Effect(s) of an increase</li> <li>○ Except as specified in paragraph (b)(4)(ii)(H), a rate is accurate if it is a rate as of a specified date and this rate was in effect within the last 30 days before the disclosures are provided</li> <li>○ Creditors imposing APRs that vary according to an index that is not under the creditor’s control that provide the disclosures required by paragraph (b) of this section in person at the time the open-end (not home secured) plan is established in connection with financing the purchase of goods or services may disclose in the table a rate, or range of rates to the extent permitted by 1026.6(b)(2)(i)(E), that was in effect within the last 90 days before the disclosures are provided, along with a reference directing the consumer to the account agreement or other disclosure provided with the account-opening table where an APR applicable to the consumer’s account in effect within the last 30 days before the disclosures are provided is disclosed.</li> </ul> </li> </ul>			
<ul style="list-style-type: none"> <li>• <b>Rate changes not due to index or formula (iii)</b> <ul style="list-style-type: none"> <li>○ Initial rate</li> <li>○ How long the initial rate will remain in effect and the specific events that cause the initial rate to change</li> <li>○ The rate (periodic rate and corresponding APR) that will apply when the initial rate is no longer in effect and any limitation on the time period the new rate will remain in effect</li> <li>○ The balances to which the new rate will apply</li> <li>○ The balances to which the current rate at the time of the change will apply</li> </ul> </li> </ul>			

<b>Additional disclosures for open-end (not home-secured) plans to the extent applicable? (b)(5)</b>			
• <b>Voluntary credit insurance, debt cancellation or debt suspension</b>			
• <b>Security interests</b>			
• <b>Statement of billing rights</b>			

<b>Component – Periodic Statements (1026.7)</b>	<b>Yes</b>	<b>No</b>	<b>N/A</b>
<b>Does the creditor provide (for open-end plans other than home-equity plans subject to 1026.40) the consumer with a periodic statement that discloses the following, to the extent applicable? (b)</b> <b>And, are format requirements met as they pertain to certain disclosures?</b>			
• <b>Previous balance</b>			
• <b>Identification of transactions (in accordance with 1026.8)</b>			
• <b>Credits</b>			
• <b>Periodic rates</b>			
• <b>Balance on which finance charge computed</b>			
• <b>Charges imposed</b>			
• <b>Change-in terms and increased penalty rate summary</b>			
• <b>Grace period</b>			
• <b>Address for notice of billing errors</b>			
• <b>Closing date of billing cycle; new balance</b>			

• Due date; late payment costs			
• Repayment disclosures			
• Deferred interest or similar transactions information			

<b>Component – Subsequent Disclosures (1026.9)</b>	<b>Yes</b>	<b>No</b>	<b>N/A</b>
<p><b>Does the creditor provide the billing rights statement at least once per calendar year?</b></p> <p><b>Or, as an alternative, does the creditor provide a statement substantially similar to Model Form G-4 or Model Form G-4(A) in Appendix G, as applicable, on or with each periodic statement? (a)(1) &amp; (2)</b></p>			
<p><b>Does the creditor provide disclosures for supplemental credit access devices and additional features as required? (b)(1), (2) &amp; (3)</b></p>			
<p><b>Does the creditor provide change in terms notices as required for open-end (not home-secured) plans? (c)(2)</b></p> <p><b>And, do certain change notices meet timing and format requirements? (c)(2)(i) &amp; (c)(2)(iv)(D)</b></p>			
<p><b>Does the card issuer provide required notices prior to renewal of a credit or charge card subject to 1026.60? (e)(1) &amp; (2)</b></p>			
<p><b>Does the card issuer provide required notices prior to changing the provider of insurance for repayment of all or part of the outstanding balance of an open-end credit card account of the type subject to 1026.60? (f)(1)</b></p>			
<p><b>Does the card issuer provide required notices related to an increase in rates due to delinquency or default or as a penalty? (g)</b></p> <p><b>And, do certain change notices meet timing and format requirements? (g)(2) &amp; (3)</b></p>			