

Vantage Credit Union
Charter Number: 67804
19 Research Park Court
Saint Charles, MO, 63304

2/4/2026

Re: Order to Provide Information on Credit Cards for March 2026 TCCP Survey

Dear Vantage Credit Union,

As you may know, the Consumer Financial Protection Bureau (CFPB) is required by section 136(b) of the Truth in Lending Act (TILA) to collect semiannually certain credit card price and availability information from a sample of financial institutions, report the information to Congress, and make the information available to the public. This semiannual data collection is often referred to as the Terms of Credit Card Plans (TCCP) Survey.

Because your financial institution has been selected by the CFPB as part of a broad sample of financial institutions offering credit card services, your institution is required to report information as part of the TCCP Survey.

Accordingly, please find attached to this letter an Order, pursuant to section 136(b) of TILA, 15 USC § 1646(b), requiring your institution to submit the information identified in the Order, in the manner set forth in the Order, by March 25, 2026. Compliance with the Order is mandatory under the terms of section 136(b)(3) of TILA, 15 U.S.C. § 1646(b)(3).

The Order is not a supervisory order issued under Sections 1024 or 1025 of the CFPA, 12 U.S.C. §§ 5514 or 5515. The Order does not seek any personally identifiable information that directly identifies a consumer. The CFPB intends to publish information produced in response to the Order consistent with TILA.

As the Order notes, and as required pursuant to the CFPB's procedural rule governing required submissions under TILA and the CARD Act, the CFPB's Collect system is the mandatory vehicle for submitting TCCP Survey elements under section 136(b) of TILA.¹ Collect uses interactive forms to guide submitters through the submission process. For more information about the TCCP Survey, please visit the CFPB's TCCP website, <https://www.consumerfinance.gov/data-research/credit-card-data/terms-credit-card-plans-survey/>.

¹ Technical Specifications for Credit Card Agreement and Data Submissions Required Under TILA and the Card Act, 86 *Federal Register* 46,953, 46,956 (Aug. 23, 2021).

This Order is served by email to the email address provided by your institution. If you prefer service by certified mail, please contact Collect_Support@cfpb.gov by February 20, 2026, and provide the address and contact information for an officer or agent authorized by your institution to receive service of process.

Sincerely,

Wei Zhang

Acting Principal Assistant Director
Office of Consumer Credit, Payments and Deposit Markets
Consumer Financial Protection Bureau

consumerfinance.gov

Confidentiality Notice: If you received this email by mistake, you should notify the sender of the mistake and delete the e-mail and any attachments. An inadvertent disclosure is not intended to waive any privileges.

UNITED STATES OF AMERICA
Before the
CONSUMER FINANCIAL PROTECTION BUREAU

In re	)
	)
Terms of Credit Card Plan Survey	)
	)
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ORDER TO FILE INFORMATION

Pursuant to the Consumer Financial Protection Bureau's (CFPB's) authority under section 136(b)(3) of the Truth in Lending Act, 15 U.S.C. § 1646(b)(3), Vantage Credit Union is hereby ordered to file with the CFPB the information specified below.

Purpose

The CFPB is required by section 136(b) of the Truth in Lending Act to collect semiannually certain credit card price and availability information from a sample of financial institutions, report the information to Congress, and make the information available to the public. This semiannual data collection is often referred to as the Terms of Credit Card Plans (TCCP) Survey.

Because your institution has been selected by the CFPB as part of a broad sample of financial institutions offering credit card services, it is required to report information as part of the TCCP Survey.

Specifically, TILA section 136(b) requires the CFPB to collect, on a semiannual basis, credit card price and availability information, including the information required to be disclosed under section 127(c) of TILA, from a broad sample of financial institutions that offer credit card services. TILA section 136(b) also requires that the sample of TCCP Survey respondents include the 25 largest issuers of credit cards and no fewer than 125 additional financial institutions selected by the CFPB in a manner that ensures an equitable geographic distribution within the sample and the representation of a wide spectrum of institutions within the sample.

This is not a supervisory order issued under Sections 1024 or 1025 of the Consumer Financial Protection Act, 12 U.S.C. §§ 5514 or 5515.

Order Terms and Procedure

The information required by this Order must be filed pursuant to the terms of this Order, including the stated Instructions and Definitions. All data sought as listed in all attachments to this Order must be provided, and all responses are due on or before 5 p.m. Eastern Daylight Time, March 25, 2026.

Pursuant to the CFPB's procedural rule governing required submissions under TILA and the CARD Act, the information required by this Order must be submitted through the CFPB's Collect system.² The instructions below contain more information about how to submit your responses.

As indicated below, you should contact the CFPB as soon as possible if you have any questions about the terms of the Order or the procedure for responding to it.

It is so ordered.



Wei Zhang
Acting Principal Assistant Director
Consumer Financial Protection Bureau

2/4/2026

² Technical Specifications for Credit Card Agreement and Data Submissions Required Under TILA and the Card Act, 86 *Federal Register* 46,953, 46,956 (Aug. 23, 2021).

Instructions

1. Submission is to be made via the CFPB's Collect system: <https://collect.consumerfinance.gov/>. You will need to log in with a username you used to respond to previous surveys in the Collect system. Please note that your username is not the same as your email address. If you cannot remember your username, please email Collect_Support@cfpb.gov and Collect Support can provide it to you. If you do not have username, please create one by completing a registration form and submitting it to Collect. Please contact Collect_Support@cfpb.gov with any questions about the Collect system.
2. Do not include any personally identifiable information that directly identifies any consumer, such as a consumer's name, address, telephone number, Social Security number, or account number.
3. Unless otherwise specified, the questions seek information as of December 31, 2025.
4. A separate response is required to all relevant questions for the network-branded consumer credit card product that has the largest number of accounts open and was offered as of December 31, 2025. You may elect to submit additional responses for more network-branded credit card products offered.
5. You may not submit TCCP surveys that provide common pricing terms for different card products. Unless otherwise specified, requests apply to credit card accounts, defined by 12 CFR § 1026.2(a)(15)(ii) as "credit card accounts under an open-end (not home-secured) consumer credit plan."
6. Unless specifically noted in particular requests, requests apply to consumer credit cards, and do not cover commercial, government, purchasing, small business, or fleet credit cards.
7. Responses are due on or before March 25, 2026.

Definitions

For purposes of this order:

1. A card product is defined by the existence of a unique marketing or brand name associated with that specific program. This definition is used solely for purposes of the TCCP Survey and does not have any relevance to the use of the term in other contexts or CFPB data collections.
2. "You," or "your" means Vantage Credit Union and any parent companies, wholly or partially owned subsidiaries, unincorporated divisions, joint ventures, operations under assumed names, and affiliates, and all principals, directors, officers, owners, employees,

agents, representatives, consultants, attorneys, accountants, independent contractors, and other persons working for or on behalf of the foregoing.

3. “APR” means annual percentage rate.
4. “State” refers to any State, the Commonwealth of Puerto Rico, the District of Columbia, and any territory or possession of the United States.
5. “Survey period” means July 1, 2025, through December 31, 2025.
6. “Variable rate card” means a card product with a purchase APR that varies over time with changes in an underlying rate, such as the U.S. Prime Rate.

Questions

1. Card Product Name and Agreement Selection

- a. Provide the name of the card product. Mastercard Platinum
- b. Identify the card agreement associated with the card product. (Please note that more than one card product can be associated with a particular credit card agreement.) Credit Card Agreement and Disclosure Statement

2. Plan Availability – Card Product Offering Location

- a. Indicate whether the card product is offered nationally, regionally, or only in one state/territory.
 - i. If the card product is offered regionally, identify the states/territories in which the card product is offered. Must qualify for Vantage CU membership. Mastercard Platinum is offered to individual persons or their immediate family members* who have the common bond of residing or working in any of the following: Missouri: counties of Cape Girardeau, Franklin, Jefferson, St. Charles, St. Louis, St. Louis City, or Warren; Missouri zip codes 63627, 63628, and 63670 in Ste. Genevieve and St. Francois counties; and Illinois counties of St. Clair and Madison.
*Immediate family is defined as: spouse, child, sibling, parent, grandparent, aunt, uncle, niece, nephew, first cousin, or legal guardian and includes step, in-law, and legally adoptive relationships. Indicate whether the card product is offered only within specific counties, and if so, specify which counties.
 - ii. If the card product is offered only in one state, identify the states/territories in which the card product is offered. Indicate whether the card product is offered only within specific counties, and if so, specify which counties.

3. Plan Availability – Affiliation

- a. Indicate if the card product has geographic, professional affiliation, service member affiliation, or other requirements for account opening, and describe the requirements. Geographic requirements refer to geographic restrictions beyond place of residence. Must qualify for Vantage CU membership. Mastercard Platinum is offered to individual persons or their immediate family members* who have the common bond of residing or working in any of the following: Missouri: counties of Cape Girardeau, Franklin, Jefferson, St. Charles, St. Louis, St. Louis City, or Warren; Missouri zip codes 63627, 63628, and 63670 in Ste. Genevieve and St. Francois counties; and Illinois counties of St. Clair and Madison. *Immediate family is defined as: spouse, child, sibling, parent, grandparent, aunt, uncle, niece, nephew, first cousin, or legal guardian and includes step, in-law, and legally adoptive relationships.

4. Plan Availability – Card Type and Credit Tiers

- a. Indicate if the card product is a secured card. For purposes of this survey, any credit card accounts offered by credit unions that are secured by a lien pursuant to 12 USC 1757(11) should be reported as unsecured cards. Unsecured card.
- a. Of the following credit score tiers, identify the tier(s) to which the card product is primarily targeted. Score tiers are: No credit score; 619 or less; 620 to 719; 720 or greater. 620 to 719; 720 or greater.

5. Pricing – Purchase APR (Part 1)

- a. Indicate whether the card product includes a Purchase APR. All APR questions on the survey are about the Purchase APR that applies to balances on new customer accounts. For Purchase APRs, ignore promotional and introductory APRs, and report only non-promotional, non-introductory “go-to” rates. Yes
 - i. If the card product offers a Purchase APR, indicate whether the purchase APR for new customers varies with the balance that the consumers incur on the card. (If the stated purchase APR varies due to other factors, e.g., cardholder creditworthiness, promotional offers, etc., but does not vary with the balance on the card, respond “No” to this question.) No
 - i. If the stated purchase APR varies for new customers, state the purchase APRs and the balance tiers in dollars to which they apply. You can enter up to four additional tiers. N/A
- b. Indicate whether the card product is a variable rate card. Variable rate.
 - i. If the card product is a variable rate card, indicate the underlying index for the purchase APR from the following options: Prime; One-month T-bill; Three-month T-bill; Six-month T-bill; One-year T-bill; Fed Funds; Cost of Funds; Federal Reserve Discount Rate; Other. If other, identify the underlying index used. Prime rate as published in the Money Rates section of the Wall Street Journal in effect on the 15th calendar day that immediately precedes the 1st day of each calendar quarter.

6. Pricing – Purchase APR (Part 2)

- a. Indicate whether the card product's purchase APR at account origination varies by consumer credit worthiness. Yes
 - i. If the purchase APR varies by consumer credit worthiness, state the median values for the following credit score ranges (based on the purchase APR for new accounts originated in the survey period given the credit scores obtained at origination): No credit score; 619 or less; 620 to 719; 720 or greater.
 - i. No credit score: median APR 19.49%
 - ii. 619 or less: median APR was 19.49%
 - iii. 620 to 719: median APR was 15.99%
 - iv. 720 or greater: median APR was 12.99%
- b. State the median, maximum, and minimum purchase APRs for all accounts originated during the survey period.
 - i. The median APR was 14.74%
 - ii. The maximum APR was 19.49%
 - iii. The minimum APR was 12.49%

7. Pricing – Introductory APR

- a. Indicate whether the card product includes an introductory APR. This question refers only to introductory purchase APR. It does not refer to introductory balance transfer APR.
 - i. If the card product includes an introductory APR, indicate whether the introductory APR varies by credit tier. Yes
 - i. If the introductory APR varies by credit tier, state the median introductory APRs offered in the following credit score tiers gathered at application: No credit score; 619 or less; 620 to 719; 720 or greater.
 - i. No credit score: median introductory APR was 8.99%
 - ii. 619 or less: median introductory APR was 8.99%
 - iii. 620 to 719: median introductory APR was 6.99%
 - iv. 720 or greater: median introductory APR was 3.99%
- b. State the median, maximum, and minimum introductory APRs for all new accounts originated during the survey period.
 - i. The median introductory APR was 5.99%
 - ii. The maximum introductory APR was 8.99%
 - iii. The minimum introductory APR was 2.99%
- c. State the median length of introductory APR in months. 6 months

8. Pricing – Balance Transfer APR

- a. Indicate whether this card product allows promotional or introductory balance transfer APR in which new cardholders receive a temporary rate on existing credit card debt transferred to this card for a period of time following account opening. (Respond "Yes" if the credit card offered balance transfer promotional periods to new and/or existing cardholders during the survey period. Respond "No" if the

card product did not offer balance transfer promotional periods to new and/or existing cardholders during the survey period.) No

- i. If the card product offers promotional or introductory balance transfer APRs, indicate whether the balance transfer APR offered varies by credit tier. (This question refers to balance transfer promotional periods offered during the survey period) N/A
 - i. If the balance transfer APR offered varies by credit tier, state the median balance transfer APRs for the following credit score tiers gathered at application: No credit score; 619 or less; 620 to 719; 720 or greater. N/A
- b. State the median, maximum, and minimum balance transfer APRs for all new accounts during the survey period. (This question refers to balance transfer promotional periods offered during the survey period.) N/A
- c. State the median length (in months) of the period during which balance transfer APR applies. (This question refers to the median length of balance transfer promotional period for balance transfer promotions available during the survey period, if applicable.) N/A
- d. Indicate whether there is a grace period on new purchases while revolving a transferred balance during the promotional period. N/A

9. Pricing – Cash Advance APR

- a. Indicate whether the card product allows cash advances. Yes
 - i. If the card product allows cash advances, indicate whether the cash advance APR varies by credit tier. Yes, assessed at the same APR as the purchase APR.
 - i. If cash advance APR offered varies by credit tier, state the median cash advance APR for the following credit score tiers gathered at application: No credit score; 619 or less; 620 to 719; 720 or greater.
 1. No credit score: median APR was 19.49%
 2. 619 or less: median APR was 19.49%
 3. 620 to 719: median APR was 15.99%
 4. 720 or greater: median APR was 12.99%
- b. State the median, maximum, and minimum cash advance APRs for all accounts originated during the survey period.
 - i. The median APR was 14.74%
 - ii. The maximum APR was 19.49%
 - iii. The minimum APR was 12.49%

10. Pricing – Grace Periods

- a. Indicate whether the card product has a grace period on purchases during which interest does not accrue. For purposes of this question, the grace period is the period between the end of the billing cycle and the date by which purchases made

in that cycle can be repaid without incurring interest charges. If interest begins to accrue from the date of purchase, the card product does not offer a grace period.

- i. If the card product offers a grace period, state the length of the grace period in days. 21 days (we do not charge interest on purchases if the entire balance owed each month is paid by the payment due date).

11. Minimum Finance Charge

- a. Indicate whether the card product has a minimum finance charge. No
 - i. If the card product has a minimum finance charge, state the amount of the charge in dollars. N/A

12. Balance Computation Method

- a. Identify the balance computation method used to calculate interest charge on purchase balances from the following list of options; if “other”, describe the method used: average daily balance including new purchases; average daily balance excluding new purchases; adjusted balance; previous balance; other. Average daily balance including new purchases.

13. Annual, Monthly, Weekly Fees

- a. Indicate whether the card product has an annual, monthly, weekly, or other periodic fee. No annual, monthly, weekly, or other periodic fees.
 - i. If the card product has a periodic fee, identify the type and amount of each periodic fee. N/A

14. Purchase Transaction Fees

- a. Indicate whether the card product imposes a transaction fee for each use of the card product to make a purchase. (Note that this question does not refer to fees that are only charged for foreign transactions.) No
 - i. If the card product imposes such a purchase transaction fee, indicate all of the fee types that apply and provide amounts and percentages where appropriate from the following list of options: amount of fee in dollars; percentage of transaction amount; minimum dollar amount; other fee calculation (describe how the fee is calculated). N/A

15. Balance Transfer Fees

- a. Indicate whether the card product charges a fee for balance transfers. No
 - i. If the card product charges a balance transfer fee, identify the type and amount of each balance transfer fee from the following list of options: amount of fee in dollars; percentage of transaction amount; minimum dollar amount; other fee calculation (describe how the fee is calculated). N/A

16. Cash Advance Fees

- a. Indicate whether the card product charges a fee for cash advances. No
 - i. If the card product charges a cash advance fee, indicate whether you impose a transaction fee for each cash advance. N/A
 - ii. If the card product charges a cash advance fee, identify the type and amount of each cash advance fee from the following list of options: amount of fee in dollars; percentage of transaction amount; minimum dollar amount; other fee calculation (describe how the fee is calculated). N/A

17. Foreign Transaction Fees.

- a. Indicate whether the card product charges a fee for foreign transactions. Yes
 - i. If the card product charges a foreign transaction fee, identify the type and amount of each foreign transaction fee from the following list of options: amount of fee in dollars; percentage of transaction amount; minimum dollar amount; other fee calculation (describe how the fee is calculated). 1% of each foreign currency transaction in U.S. Dollars or 1% of each U.S. Dollar transaction that occurs in a foreign country.

18. Late Fees

- a. Indicate whether the card product charges a late fee. Yes
 - i. If the card product charges a late fee, identify the type and amount in dollars of each late fee from the following list: amount of the first late fee on the account; amount of late fees charged within six billing cycles of a previous late fee (repeat late fee); other late fees that are not fixed dollar amounts (describe late fee policy). For payments more than 15 days late, 5.00% of the payment due, subject to maximum of \$25.00 and a minimum of \$10.00 (whenever the payment due is greater than \$25.00).

19. Over-Limit Fees

- a. Indicate whether the card product charges a fee for exceeding the credit limit. No
 - i. If the card product charges such a fee, identify the amount of overlimit fee charged in dollars. If there are overlimit fees that are not fixed dollar amounts, describe those fees. N/A

20. Other Fees

- a. Indicate whether the card product charges any fees in addition to those identified in previous questions. Any service included in the “Benefits” section below that require a separate fee should also be noted here.
 - i. If the card product charges such a fee, describe each such fee, including when and why it is charged and the amount of each fee.
 - 1. The lesser of \$25.00 or the amount of the minimum payment due for each check (or other negotiable instrument used for payment) that is returned unpaid;

2. \$10.00 for each copy of a receipt requested by the cardholder (refunded if the basis for the request is a dispute and it is resolved in the cardholder's favor);
3. \$10.00 for each replacement card requested by the cardholder;
4. \$10.00 for each duplicate statement requested by the cardholder.

21. Benefits (Include benefits that are offered by the card issuer, through a card network, or by other partners)

- a. Indicate all of the following services that apply to the card product. If other, describe the benefit. Include benefits that require separate registration and/or a separate fee, and benefits that do not require a separate registration and/or a separate fee. Any service included in the "Benefits" section that requires a separate fee should also be noted in the "Fees" section under "Other":
 - i. Access to Free Credit Scores No
 - ii. Automobile rental insurance MasterRental Collision Damage Waiver Insurance
 - iii. Credit card registration No
 - iv. Debt cancellation coverage No
 - v. Discounts on purchases of goods and services (not travel related) See below.
 - vi. Extension on manufacturer's warranty No
 - vii. Other
 1. Annual cardholder statement with 60+ transactions per year
 2. Mastercard ID Theft Protection
 3. Mastercard Global Services: lost/stolen card reporting and emergency card replacement
 4. Zero Liability
 5. Mastercard Priceless Experiences, including Mastercard Golf
 6. Instacart: Offers a \$10.00 Instacart coupon per month for adding a Mastercard to a new or existing Instacart subscription; for new subscriptions, offers 3 months of free Instacart+ membership.
 7. Transit: receive a \$2.50 statement credit when spending USD \$100.00 or more each month in eligible cities
 8. HealthLock: receive a HealthLock medical claim monitor service complimentary and a 90-day premium upgrade to HealthLock's medical claim saver
 9. Movie Pass: save 50% on first 2 months when subscribing to a standard or premium plan
 10. Mastercard Music and Access to discounted tickets across sport events, concerts, and theaters. Up to 48-hour presale access.
- b. Indicate all of the following rewards that apply to the card product (if other,
- c. describe the reward):
 - i. Cashback rewards N/A

- ii. Travel-related rewards N/A
 - iii. Other rewards N/A
- d. Indicate all of the following features that apply to the card product (if other, describe the feature):
 - i. Contactless Payments Yes
 - ii. Chip card Yes
 - iii. Fee-free foreign transactions No
 - iv. Mobile wallet provisioning (for example, Apple Pay) Yes: Apple Pay, Google Pay and Samsung Pay
 - v. Other Cardholder alerts and fraud alerts are available via SMS, phone call, and/or email

22. Contact Information

- a. If there is a telephone number and/or a website that consumers can use to find out more about the card product's terms, provide the telephone number and/or website URL. 800.522.6009 or www.vcu.com