



## **Credit Access Business Data Reporting Policy Statement**

The purpose of this policy statement is to assure industry, consumers, and the public that data collected from credit access businesses as part of the reporting process will be accurate, purposeful, efficiently obtained, and made as confidential to the fullest extent of the law.

As part of the examination of credit access businesses, credit access businesses will file reports with the Office of Consumer Credit Commissioner (OCCC) detailing data on a quarterly basis beginning on or before April 30, 2012 as required by Section 393.627 of the TEXAS FINANCE CODE. The data will detail certain industry "snapshots" such as frequency of consumer use, fees assessed, and repayment characteristics. The specified data collection fields were identified through statutory requirements, and supplemental data requirements were formulated collaboratively with working groups of interested stakeholders. In order to ease the burden of quarterly collection, several fields of the supplemental data will only be reported on an annual basis through an additional report. The reporting and compiling of credit access business information will assist Texas in making informed, data-driven decisions.

Data will be collected for each licensed credit access business location. Location-level reporting allows for regionalized analysis of service area coverage, industry growth, patterns, and trends. In addition, the best opportunity for identification of anomalies, omitted material, and data accuracy is through location-level reporting. Further, store-level data is important for the regulatory examination process as it is useful in identifying compliance concerns or trends that drive examination compliance scheduling. Follow-up with individual stores may be required to verify data is reported in a consistent manner across the industry. In such instances, the origin of data would be required as reference.

Information included in data reported by a specific credit access business is considered confidential and proprietary under Sections 393.622 and 14.2015 of the TEXAS FINANCE CODE and may not be disclosed to the public. Due to the competitive harm that may be caused by releasing financial information and business practices, the data collected is exempted from open records requests and public reporting tied to a specific store. Aggregate reports published by the OCCC will not include data analysis on a smaller scale than either a metropolitan statistical area (MSA) for the 15 largest Texas MSAs, or a metropolitan division, which is a smaller grouping of counties within an MSA centered around a unique employment center or centers. Texas currently has two metropolitan divisions classified by the Office of Management and Budget: Dallas-Plano-Irving and Fort Worth-Arlington. Requests for information segmented into smaller categories will not be fulfilled as the Texas Public Information Act applies only to previously compiled information and does not require an agency to create reports on a different basis. Additionally, requests for data reported from a specific zip code or micro-geographic area would be considered proprietary and confidential information belonging to the contributing business.

For efficient collection and timely use of the data, an online electronic submission standard was chosen. Credit access business operators will be able to establish a unique user access account and securely transmit data per location to a flat file database. Users will have the option to choose the most efficient data transmission method available to them. A web interface will be available for each submission, or

alternatively a bulk data upload will be available for multiple branches reporting from a centralized user. Specifications on the bulk data upload will be released soon.

Public reporting of the data will be consolidated with agency analysis of the industry-wide data and selected geographic regions. Data from credit access businesses serving areas defined by the Office of Management and Budget (OMB) as metropolitan statistical areas and metropolitan divisions will be consolidated for reporting by individual area. All other data will be reported as credit access businesses operating outside a metropolitan statistical area.

Ratios of percentage growth, default, number of refinances before repayment, loan amount, and average fees will be reported in the analysis. The OCCC will continue to study the relevance of the supplemental data and implement modifications as needed, ensuring that the industry would have ample time to make any adjustments prior to requesting any additional data. The OCCC anticipates releasing aggregate compiled data within 31 days following each quarterly submission.