



## Faster Payments Transparency Guidelines for Payment Services Providers Consumer Transactions FAQs

The objective of the U.S. Faster Payments Council (FPC) End-User Transparency initiative is to promote service provider strategies, policies, practices and capabilities that provide end users with transparency into what to expect when making faster payments. The primary way the FPC seeks to promote transparency in faster payments is by publishing guidelines that describe how providers can better inform their customers about the services they offer.

This document includes guidelines for faster payments service providers to formulate disclosures, marketing materials and notifications to consumers that increase transparency in three areas: transaction characteristics, fees, and the resolution of errors and disputes. The document is formatted as a “Frequently Asked Questions” chart to be answered by a service provider to describe the characteristics, fees, and consumer protections of their payment offering.

CHARACTERISTICS OF THE PAYMENT SERVICE	
<b>Accounts</b>	What type of account is required to use the faster payments service (e.g., existing account at a financial institution, prepaid account with the faster payment service, linked deposit or card account)?
	If the faster payment service requires users to open an account with the service provider, what info is required?
	Can multiple users (e.g., family members, employees) use the same account? What is required to allow multiple users (e.g., create separate sub-accounts, register on multiple devices)?
	If faster payments are funded from an account at the customer’s financial institution, is that financial institution notified? If so, how is this done? Note: applies to faster payment services not provided by that financial institution
	How are accounts validated and protected against fraud?
	Once an eligible account has been opened and funded, how soon can a customer make a faster payment?
	Are funds in the customer’s account insured (e.g., FDIC, NCUA)?
	What, if any, differences exist between personal and business accounts?
	If the faster payment service requires an account at the service provider: <ul style="list-style-type: none"> <li>• Can cash be withdrawn from the faster payments account at an ATM? Which ATMs?</li> <li>• Can cash be withdrawn from the faster payments account in person (e.g., bank branch, store)? Where and how?</li> <li>• What, if any, limits apply to ATM or in-person cash withdrawals?</li> </ul>
<b>Enrollment/Activation</b>	Does the faster payment service require enrollment to send payments?
	What steps are required for a payee to receive a faster payment? (e.g., enroll in the service, download an app, through mobile/online banking UI, at a branch)
	What information is required for enrollment in the faster payment service?
	How long does the enrollment process take?
	What is the process for restoring access to an account if credentials are lost?
<b>Scope</b>	What types of payments can be made through the faster payments service? (e.g., pay friends/family, merchants, bills)?
	What additional features are available with the faster payments service (e.g., request for payments, recurrent payments, loyalty program, cash back rewards)?
<b>Payments</b>	When a faster payment is initiated, when do funds leave the payer’s account?
	Will the payer receive notification that the payment is complete?

	How and when is the payer notified whether the payment is successful?
	When a faster payment is initiated, when do the funds become available in the payee’s account? How and when is the payee notified that they have received a payment?
	What, if any, restrictions are there on when a faster payment can be sent or received? (e.g., hours of operation)
	If a faster payment is initiated after regular business hours, when will the funds be debited from the payer’s account and available in the payee’s account?
	Under what, if any, circumstances can a payee’s access to a payment be withheld? For how long?
	What information does a payer need to provide to make a faster payment (e.g., account number, verification code)?
	Can an alias or token (e.g., phone number, email address) be used to send or receive a payment? <ul style="list-style-type: none"> <li>• What types of aliases or tokens can payers or payees use?</li> <li>• How many aliases or tokens can be associated with a single account?</li> <li>• Can the same alias or token be associated with multiple accounts?</li> <li>• Can a loyalty program ID be used to make or receive payments?</li> </ul>
<b>Payment Limits</b>	Is there a limit on the amount of a single transaction?
	Is there a limit on the amount or number of transactions made over a period? What is the limit and how does it apply (e.g., per payer, per account, across multiple accounts)?
<b>Payment Authorization</b>	How does the payer authorize payment?
	Can a payer add extra approval requirements for their account?
	Is the payee required to accept before they can receive a faster payment? Is yes, will the funds leave the payer’s account before or after the payee accepts?
<b>Terminate Authorization</b>	How does a payer or payee terminate or revoke a faster payment authorization?
<b>Conditions</b>	What are the conditions under which the account can be suspended or closed by the service provider?
<b>Funds Access on Termination</b>	If the account is terminated, how can funds be recovered?
<b>Self-Suspend and Reactivation</b>	Can I temporarily suspend and reactivate my account?
<b>Refund Terms</b>	Under what circumstances, if any, can a payer request a refund from the payee?
	How does a payer request a refund from a payee?
<b>VOIDS or Reversals</b>	Under what circumstances, if any, can a payer void or reverse a payment?
	How long does a payer have to void or reverse a transaction?
<b>Recovery of Funds</b>	How much can the payer recover if a faster payment transaction is voided, reversed or returned?
	If a transaction is voided, reversed, or refunded, when will funds be available in the payer’s account?
<b>Transaction Details</b>	What information about a faster payment is provided on account statements?
	How are faster payments identified on the account statement?
	Are a purchase receipt and additional transaction details available?
	Can a payer or payee get access to purchase receipts electronically?
	What methods are available to export transaction data to third-party services or applications?
	After a faster payment is sent, how long does the payer or payee have access to the details of the transaction?
	How long is data regarding transactions, accounts or customers retained by the faster payments service provider?

	<ul style="list-style-type: none"> <li>• For sensitive or non-public personally identifiable information?</li> <li>• For non-personally identifiable information?</li> </ul>
<b>FEES</b>	
<b>Origination</b>	
<b>Payment Fees</b>	What, if any, fees are required to send a faster payment?
	Does the amount of the payment affect the fee? How?
	Does the number or frequency of payments affect the fee? How?
<b>Recurring Fees</b>	What, if any, recurring fees are required (e.g., monthly, annual) to send faster payments?
<b>Enrollment</b>	What, if any, enrollment fees are there for the faster payments service?
<b>Payee Type</b>	How, if at all, does the type of payee impact the faster payments fee?
<b>Stop, Reverse or Refund</b>	What, if any, fees are required to stop/void, reverse or refund a faster payment?
<b>Overdraft</b>	What, if any, fees are required if a faster payment causes a payer's account to overdraw?
	What effect does the order in which transactions are posted to the account have on overdrafts?
	If a faster payment, inclusive of fees, will cause the account to overdraw, is the payee notified before sending a payment?
	Can an overdraft fee be avoided if the payer covers the negative balance? How much time does the payer have?
	Are there other ways overdraft fees can be avoided?
<b>Returned Payment</b>	What, if any, fees are required if a faster payment is returned to the payer?
<b>Account Inquiries</b>	What, if any fees are required for account balance and/or transaction history inquiries?
<b>Other</b>	What, if any, other fees (e.g., split payments, cash back) are required to send a faster payment?
<b>Receiving</b>	
<b>Service</b>	What, if any, fees are required to receive a faster payment?
	Does the amount of the payment affect the fee? How?
	Does the number or frequency of payments affect the fee? How?
<b>Recurring</b>	What, if any, recurring fees are required (e.g., monthly, annual) to receive faster payments?
<b>Enrollment</b>	Are there any enrollment fees for the faster payments service?
<b>Payee Type</b>	How, if at all, does the type of payee impact the faster payments fee?
<b>Returned Payment</b>	What, if any, fees are required if a faster payment is returned to the payer?
<b>Other</b>	What, if any, other fees (e.g., split payments, cash back) are required to receive a faster payment?
<b>CONSUMER PROTECTION</b>	
<b>Unauthorized Payment</b>	What is considered an unauthorized payment and what rights does a payer have if an unauthorized payment is made from the payer's account? (Provide examples to clarify).
<b>Authorized Payment Fraud</b>	Can a payment that was authorized by the payer be disputed if the payer was defrauded by the payee?
<b>Goods and Services</b>	If the service can be used for purchases, what right does a payer have if there is a dispute with the payee regarding the goods or services (e.g., not as described or not received)?
	How do merchant refund terms impact disputes?
<b>Errors</b>	Can I get my payment back if I sent it to the wrong party? If yes, under what circumstances, and how?
	What can a payer do in the event of a mistake such as sending the wrong amount?
	What can a payee do in the event of a mistake such as receiving the wrong amount?

	What can a payer or payee do if a payment is not delivered or delivery is delayed?
<b>Dispute Process</b>	<p>What is the process for disputing a payment?</p> <ul style="list-style-type: none"> <li>• Who does the payer/payee notify in case of a dispute and how is this done?</li> <li>• What documents are required to initiate a dispute?</li> <li>• How long does the payer/payee have from the time of the payment to open a dispute?</li> <li>• How long will it take for the dispute to be processed and a disposition of the funds to be made?</li> <li>• How can the payer/payee inquire about the status of a dispute process and escalate if necessary?</li> </ul>
<b>Expectations</b>	<p>Once a dispute is filed, what can a payer or payee expect?</p> <ul style="list-style-type: none"> <li>• Provisional credit, refund, notification (payer and payee), timeframe for resolution, notices during investigation, tools for process and progress, reversal timeframe for provisional credit, repeat offender considerations, timeframe for completion</li> </ul>
<b>Tools</b>	What resources and guidance are available to assist payers or payees in managing error and dispute resolution?
<b>Reversal Reason</b>	If a faster payment authorization is terminated, how will the reason be identified and communicated to payers/payees?
<b>Misuse</b>	What measures does the faster payments service take to prevent potentially fraudulent or abusive users from accessing the service? What actions does the faster payments service take in the case of fraudulent or abusive transactions?
<b>Service Suspension</b>	In instances of fraud, will use of the faster payments service be suspended (i.e., to prevent further errors or disputes) during the investigation? If yes, what are the impacts to the account owner?
<b>Data Protection</b>	What, if any, safeguards (e.g., encryption, differential privacy) are in place to protect the privacy of payer and payee data?
	What faster payment account data is exposed to third-party aggregation services (e.g., Mint, Credit Karma)?
	What action should payers or payees take if information is breached on a provider's service?
	What, if any, personal, transaction, or other data is stored by the faster payments service?
	How does a payer or payee gain access to what data has been collected about them?
	If an account is closed, what is the data retention/destruction timeline?
	How does a payer or payee opt-out of third-party data sharing?
	What payer or payee data is shared with other faster payments services?
If data errors are detected, what is the process for payers or payees to correct data?	

**For the purposes of this document:** “Account” refers to a “faster payments-enabled account” unless otherwise specified. “Payer” refers to the sender of the faster payment. “Payee” refers to the recipient of the faster payment. This is not a legal document and was not prepared by lawyers. This is intended as a guide to help service providers deliver information to their customers. Use of these guidelines is voluntary for faster payment service providers. This document does not address compliance requirements for disclosures and notifications in reference to Electronic Funds Transfer Act (Regulation E), UDAAP, Truth in Savings and any other applicable Federal or state regulations that may impact your service delivery. Service providers should consult with their legal counsel to ensure their disclosures comply with applicable legal requirements. The FAQ format used by this document is intended to help service providers take the customer point of view when providing information to consumers. The FAQ format may not be appropriate for every situation, so service providers should adapt the format to the context (e.g., “pop-up” notice when initiating a transaction, bold-face notice in enrollment agreement, periodic disclosures). The appropriate method of delivery may vary across access channel (e.g., online, mobile, physical POS, bill payment, etc.). The FPC plans to provide guidance on the context for providing information in future publications. There are significant differences among faster payment services, so the answers to these questions will vary. Not all questions will be applicable for a specific payment service. The provider should only answer questions that are relevant to their faster payment service. This document addresses U.S. domestic payments. Future FPC guidelines will address cross-border payments.