

Justification for Non-material/Nonsubstantive Change to Currently Approved Collection  
Consumer Financial Protection Bureau  
Information Collection Request  
Consumer Response Intake Form

The Consumer Financial Protection Bureau (CFPB) submits this memorandum to provide justification for changes to the form associated with information collection 3170-0011 Consumer Response Intake Form (Intake Form), approved by OMB on November 18, 2011.<sup>1</sup> These revisions are reflected on previously-approved information collection media (i.e., telephone script, “paper” form, and web form) and do not represent a new collection instrument. For ease of discussion, all references will be to the provided screenshots of the web version of the form.

The Intake Form for payday lending complaints borrows largely from previously-approved complaint forms and reflects only non-material, nonsubstantive changes, including language tailored to the payday loan product. More specifically, the following changes will be made to the Intake Form and instructions:

1. **Re-directing Instruction to Debt Collection Complaint Form.** The top of the payday lending form redirects consumers with debt collection complaints against payday lenders to the debt collection complaint form. Consequently, the debt collection complaint form will be revised to include the payday lending fields described in revision number 3 below.<sup>2</sup>
2. **Complaint Subject Matter at Issue.** As with the originally proposed web Intake Form, the payday lending complaint form displays certain product-related issue options. Specifically, the payday complaint form includes seven, easy-to-understand issue options with adjacent helper text.<sup>3</sup>
3. **Text Prompting the Consumer to Provide Information about the Payday Lender that is the Subject of the Complaint.** By replacing the sub-heading “Information about the Company” with the prompt, “Where did you get the payday loan?” accompanied with the choices “In person/at a store” or “Online”, the company information provided by consumers flows more naturally into actionable data: the address of the storefront payday lender or the lender’s website address. The opportunity to collect information from the consumer to assist the CFPB in identifying the company that is the subject of the consumer’s complaint has been approved under 3170-0011.<sup>4</sup>

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<sup>1</sup> Originally approved as a Department of Treasury/Department Offices form, the approved information collection was transferred to the Consumer Financial Protection Bureau on November 21, 2011. ICR Reference Number 201111-3170-004.

<sup>2</sup> See Attachment 1, Screenshots of Web Version of Payday Intake Form, page 1; Attachment 2, Call Scripts with Revisions for Payday Intake Form, page 3

<sup>3</sup> *Id.*

<sup>4</sup> See Attachment 1, page 8; Attachment 2, page 25.

4. **Third Party Representatives.** The pre-existing option of “Filing on behalf of self AND others” will be improved through bifurcation into separate and distinct options: “Filing on behalf of self” or “filing on behalf of another person.” This revision helps avoid the appearance of a “loaded question.” The fields associated with these options will be the same.<sup>5</sup>

**Note to Reviewers:** The original OMB submission provided the burden hours for all consumer financial products, as if they would all be rolled out at once, including payday lending. However, operationally, it has been a one product at-a-time, phase-in approach. Therefore, the number of annual responses and burden hours inventoried under this OMB number are already accounted for and are not being changed as result of adding payday lending to the consumer complaint intake form.

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<sup>5</sup> See Attachment 1, page 5; Attachment 2, page 15.