

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 debt collection complaints reflects overall reformatting to improve usability. Only minor non-material, nonsubstantive changes have been made and they include appropriately tailored language for the CFPB’s intake of debt collection complaints. More specifically, the following changes have been made to the Intake Form and instructions:

1. **Description of the Product or Service Complained About.** The language prompting the consumer to describe the issue (i.e., “This is about. . .”) has been replaced with debt collection-specific language: “What type of debt is this?” This change narrows the scope of the question, which is to gather information about the product at issue, and is relevant in the context of consumer debt collection.<sup>2</sup>
2. **Text Prompting Description of the Complaint.** The language that instructs the consumer to provide a description of the complaint generally has been: “Describe your complaint. Include facts about what happened and any steps you have taken to resolve the issue.” The requested revision changes the language to: “Providing facts and details like dates and where transactions happened help us understand your complaint. For example, did someone call you? Did you visit a company in person?” This change provides more clearly the type of transactional information requested from the consumer.<sup>3</sup>
3. **Text Prompting the Consumer to Provide Information about the Company that is the Subject of the Complaint.** By revising the sub-heading “Information about the Company” to the more pointed “Who’s contacting you about this debt?” and “Do you know where this debt came from?”, the intent of the question is made clear as it pertains to companies that engage in debt collection. The opportunity to identify more than one company has been approved under 3170-0011. The instructions accompanying these questions allow the consumer to better distinguish the types of companies that engage in debt collection.<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 Screenshot 1.

<sup>3</sup> See Screenshot 1.

<sup>4</sup> See Screenshot 2.

4. **Last Four Digits of Social Security Number.** This optional field is an abbreviation of the previously approved social security number field.<sup>5</sup>
5. **Contact Information of Company Representative.** The section permitting the consumer to provide company contact information includes a field allowing the consumer to identify a company representative. This change clarifies the intent of the question, i.e., to gather information that allows the CFPB to identify the company at issue. This is important in the context of debt collection as many consumers may be contacted telephonically.<sup>6</sup>

In addition, the Paperwork Reduction Act (PRA) statement will be revised to state as follows:

**OMB Control Number 3170-0011**

This is how we accept complaints. You're not required to fill out this form if you don't want to submit a complaint. We estimate that it takes about 7 to 10 minutes to finish completing the form. Our OMB control number for this form is 3170-0011 and expires on 11/30/2014.

Comments or suggestions? Email us at [Public\\_PRA@cfpb.gov](mailto:Public_PRA@cfpb.gov).

The revision of the PRA statement improves the pre-existing statement and provides a more PRA compliant statement by (1) stating that the collection is not required and (2) providing how long it takes to complete the form.<sup>7</sup> There will be no burden increase as a result of these changes.

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<sup>5</sup> See Screenshot 3 and OMB Control No. 3170-0011 Supporting Statement.

<sup>6</sup> See Screenshot 4.

<sup>7</sup> See Screenshot 5.