

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

The Consumer Financial Protection Bureau (CFPB) is submitting this memorandum to outline proposed changes to forms associated with information collection 3170-0011 Consumer Response Intake Form, approved by OMB on November 18, 2011.<sup>1</sup> The proposed revisions derive from the previously-approved information collection media (i.e., telephone, “paper” version, and web versions) and do not represent a new collection instrument. For ease of discussion, all references will be to the paper version of the Intake Form. Renumbering and republication of questions in a “user-friendly” or plain language format comprise the majority of revisions.

### **Product and Issue Descriptions**

#### *User-Friendly, Plain Language Revisions*

As compared to the other information collection media, the paper version of the Intake Form will undergo the most non-material revision of product descriptions because it is the only medium in which all products appear. Corresponding changes will appear in the web version and telephone script. The guiding principle in development of the Intake Form has been the use accessible, plain language. “User-friendliness” is an important consideration. There will be no burden increase as a result of these changes. The non-material revisions are as follows (Question #5, Paper Version):

- “Money transfer” has replaced “money transmission or remittance”
- “Mortgage loan purchase” will become “conventional fixed” and “conventional adjustable (ARM)” and “Federal Housing Administration (FHA)” to address consumer confusion
- “Settlement service” will become “purchase or lease of land from developer”
- “Veterans Affairs (VA),” “installment loan,” “personal line of credit,” and “other mortgage” will be offered as options in lieu of “second mortgage” to address consumer confusion with the term’s definition
- “Auto” is used in lieu of the terms “vehicle” and “car”
- “Vehicle lease” has been extracted from the term “auto loan”
- “ACH transfer” will be removed from the form
- “Money market” has been replaced by the more colloquial term “savings account”
- “Identity theft” will be expanded to include “fraud” and “embezzlement”
- “Cashing check without an account” has been replaced with “Check cashing”
- “Deposit insurance” has been moved from deposit products category to the “Other” category
- “Personal line of credit” will be used as a term “home equity line of credit”

### **Privacy Considerations**

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

The question that prompts consumers to indicate their desire to *not* have their complaints forwarded to the target company has been revised (Question #12, Paper Version). Requiring a “yes or no” answer to compounded statements led to consumer confusion, and the question will be revised to simply inquiring whether or not the consumer would like the CFPB to forward the information to the company. There will be no burden increase as a result of this revision.

**Discrimination**

Consumers who affirmatively answer the question concerning discrimination will see a textual prompt to provide for any discrimination in the description area provided (Question #7, Paper Version). A pre-approved instruction (Question #2, Paper Version), consumers are instructed to describe their complaint fully in a narrative box. However, as gathered from feedback, consumers have neglected to describe their discrimination experiences since the narrative box does not appear on the same page. A textual prompt next to the discrimination question ensures consumers will use the narrative box provided. There would be no burden increase as a result of this revision.

**Phone Scripts - Consumer Submissions without Form**

Some consumers do not wish to use the Intake Form in any media and wish to submit complaints by written correspondence to the CFPB. In order to process these non-standard submissions, consumers must provide some basic information. The collection of this information has been pre-approved as part of the Intake Form and includes the consumer’s name, mailing address and phone number (see Section P, Phone Script, Non-traditional Consumer Submissions)

Revised forms and scripts are attached.