

**Justification for Non-material/Nonsubstantive Change to Currently Approved Collection**  
**Consumer Financial Protection Bureau**  
**Information Collection Request**  
**Consumer Response Intake Form**  
**OMB No. 3170-0011**

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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.

Currently, the consumer credit reporting Intake Form requires consumers to indicate that they have disputed their issues with a credit reporting agency prior to submitting a complaint to the CFPB when their issues involve inaccurate or incomplete credit reporting.<sup>2</sup> In revising the consumer credit reporting form, hundreds of processed credit reporting complaints were reviewed. It was discovered that consumers will “push through” the Intake Form and complain to the CFPB notwithstanding not having first contacted the credit reporting agency that is the subject of their complaints. The proposed changes to the Intake Form involve removing the requirement that consumers dispute their issue with a credit reporting agency prior to CFPB’s acceptance of their complaints. Issues relating to inaccurate or incomplete credit reporting will no longer direct consumers to first contact their credit reporting agencies and will follow the same query path as the other issues on the form.<sup>3</sup>

There will be no substantive impact on credit reporting agencies receiving the complaints from the CFPB as a result of the revision because credit reporting agencies review and respond to *all* consumer complaints received from the CFPB regardless of whether the consumer submitted a prior complaint directly to the agency.

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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 A, pages 1 & 2.

<sup>3</sup> See Attachment A, page 3.