CONSUMER FINANCIAL PROTECTION BUREAU REQUEST FOR APPROVAL UNDER THE GENERIC CLEARANCE FOR CONSUMER COMPLAINT AND INFORMATION COLLECTION SYSTEM (TESTING AND FEEDBACK)

(OMB Control Number: 3170-0042)

1. TITLE OF INFORMATION COLLECTION: Consumer Financial Protection Bureau's (CFPB) Consumer Response Intake Form Improvement Study

2. PURPOSE: The CFPB will be collecting information for the improvement of the "Submit a Complaint" intake form (available at www.consumerfinance.gov/complaint), an approved collection registered as the Consumer Response Intake Form (Intake Form) (OMB Control No. 3170-0011¹).

The intake form is designed to aid consumers in the submission of complaints. Consumers are able to complete and submit information electronically through the CFPB's website or they may submit information by telephone, mail, email, and fax.

The proposed study is designed to help the CFPB better understand the complexities associated with consumers' identification of financial products or services especially when problems are layered. The test aims to determine the best method to assess the primary issues underlying consumers' complaints. In exploring the possibility of adding new values to the CFPB's intake form, we seek to test these new items in a live environment prior to making permanent changes to our collection vehicle. By comparing historical consumer complaint data and web analytics to the future state test data, the CFPB seeks to refine the products and associated issues contained within the intake form to ensure their accurate representation of the consumer financial marketplace.

This collection is the third iteration of the improvement study (see OMB No. 3170-0042 Notice of Action 9/22/2014) designed to expand the participant pool based on internet literacy levels and internet accessibility, to test system enhancements, and to address minor deficiencies uncovered by the first and second iteration. The CFPB will return to the Office of Management and Budget (OMB) for full review and guidance related to any items deemed necessary to permanently include in consumer complaint web form.

3. DESCRIPTION OF RESPONDENTS:

Members of the general public who seek to submit a complaint about a financial product or service via the CFPB's complaint intake process.

4. TYPE OF COLLECTION: (Check all that	annly)
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[] Customer Satisfaction Survey [x] Piloting Revisions to Consumer Complaint Form

¹ OMB Control No. 3170-0011 covers the approved collection registered as the Consumer Complaint Intake Form. The intake form is designed to aid consumers in the submission of complaints, questions, and comments and to help the Consumer Financial Protection Bureau (CFPB) fulfill the CFPB's statutory requirements.

[] Focus group [x] Web-based	[] Usability or laboratory test (not in live system) [] Other (describe)
5. PERSONALLY IDE	NTIFIABLE INFORMATION:
a. Is personally id	entifiable information (PII) collected? [x] Yes [] No
to the Privacy A If applicable, wh	formation that will be collected included in records that are subject Act of 1974? [x] Yes [] No [] Not Applicable nat is the link to the Privacy Impact Assessment (PIA)? erfinance.gov/f/201303_CFPB_PIA-Consumer-Response-System.pdf
c. If Applicable, h	as a System of Records Notice (SORN) been published?] Not Applicable

6. GIFTS OR PAYMENTS:

Incentives will <u>not</u> be offered to respondents of the collection of information approved under this generic information collection plan.

7. BURDEN HOURS:

Information Collection	Number of Respondents	Frequency	Number of Annual Responses	Response Time (hours)	Burden Hours
Web	94,302	1x	94,302	0.2667	25,150
Paper/Telephone	15,939	1x	15,939	0.1667	2,657
Totals	110,241	-	-	-	27,807

8. FEDERAL COST: The estimated annual cost to the Federal government is \$ ______ The Consumer Response contract that covers the cost associated with the intake form development also includes numerous other technology improvement projects and cannot be accurately parsed to account just for form related improvements.

9. DURATION OF TEST: Six months.

10. CERTIFICATION:

CERTIFICATION PURSUANT TO 5 CFR 1320.9, AND THE RELATED PROVISIONS OF 5 CFR 1320.8(b)(3):

By submitting this document, the Bureau certifies the following to be true:

- (a) It is necessary for the proper performance of agency functions;
- (b) It avoids unnecessary duplication;
- (c) It uses plain, coherent, and unambiguous terminology that is understandable to respondents;
- (d) Its implementation will be consistent and compatible with current reporting and recordkeeping practices;
- (e) It indicates the retention period for recordkeeping requirements;
- (f) It informs respondents of the information called for under 5 CFR 1320.8(b)(3):
 - (i) Why the information is being collected;
 - (ii) Use of information;
 - (iii) Burden estimate:
 - (iv) Nature of response (voluntary);
 - (v) Nature and extent of confidentiality; and
 - (vi) Need to display currently valid OMB control number;
- (g) It was developed by an office that has planned and allocated resources for the efficient and effective management and use of the information to be collected;
- (h) It uses effective and efficient statistical survey methodology; and
- (i) It makes appropriate use of information technology.

CERTIFICATION FOR INFORMATION COLLECTIONS SUBMITTED UNDER A GENERIC INFORMATION COLLECTION PLAN

By submitting this document, the Bureau certifies the following to be true:

- The collection is voluntary.
- The collection is low-burden for respondents and low-cost for the Federal Government.
- The collection is non-controversial and does <u>not</u> raise issues of concern to other federal agencies.
- The results are not intended to be disseminated to the public.
- Information gathered will not be used for the purpose of <u>substantially</u> informing <u>influential</u> policy decisions.
- The collection is targeted to the solicitation of opinions from respondents who have experience with the program or may have experience with the program in the future.
- The data collection is not statistically significant, the sample is not intended to be representative, and the results will not be used to make inferences beyond the survey sample.
- The results will not be used to measure regulatory compliance or for program evaluation.