

30 DAY NOTICE

**CONSUMER FINANCIAL PROTECTION BUREAU
INFORMATION COLLECTION REQUEST – SUPPORTING STATEMENT**

**CONSUMER RESPONSE GOVERNMENT AND CONGRESSIONAL PORTAL BOARDING
FORMS**

(OMB CONTROL NUMBER: 3170-00XX)

Terms of Clearance

Not applicable. This is a request for a new Office of Management and Budget (OMB) control number.

Abstract

The Consumer Financial Protection Act of 2010 (the “Consumer Financial Protection Act” or the “Act”) directs the Consumer Financial Protection Bureau (“CFPB”) to facilitate the coordinated collection, monitoring, and response to consumer complaints regarding certain financial products and services. The Consumer Financial Protection Act further provides for consumer complaint information sharing between the Consumer Financial Protection Bureau (“CFPB”) and State and Federal agencies (“Agencies”) and for consumer complaint sharing and reporting to Congress. To fulfill these mandates, the CFPB has developed separate portals for Agencies and Congressional users as part of its secure web portal offerings (the “Government Portal” and the “Congressional Portal,” respectively).

Through the portals, Agencies and Congressional offices can view consumer submitted complaint data in a user-friendly format that allows easy identification of complaints currently active in the CFPB process, complaints referred to a prudential federal regulator and other closed/archived complaints. The portals include features for Agencies and Congressional offices to export selected complaint data and search by company, consumer name, consumer financial product and more. They also allow Agencies and Congressional offices to identify whether a named company has responded to a complaint and view the company closure response category.

A. Justification

1. Circumstances Necessitating the Data Collection

Government Boarding Form

The Government Portal Boarding Form (“Government Boarding Form”) will be used to collect information from Agencies that will help identify the individuals who will have authorization to access the CFPB Government Portal.

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Congressional Boarding Form

The Congressional Portal Boarding Form (“Congressional Boarding Form”) will be used to collect information from Congressional offices that will help identify the individuals who will have authorization to access the Congressional Portal.

2. Use of the Information

Information collected from Agencies and Congressional offices completing the Government Boarding Form or Congressional Boarding Form will support due diligence authentication of individuals who have access to both portals.

3. Use of Information Technology

The CFPB has created, and will continue to improve, a system that gives Agencies’ and Congressional offices’ authorized users secure web portal access to consumer complaint information. The CFPB will use enhancements such as drop down menus and error checks when possible to minimize burden.

The currently proposed Government Boarding Form and Congressional Boarding Form provide comprehensive lists of questions to be posed to Agencies’ or Congressional offices’ representatives through collections that will be primarily mail-in (paper), facsimile, and web-based. The form of questions will include open-ended and closed-ended (e.g., multiple choice) along with free-form text boxes.

4. Efforts to Identify Duplication

This information collection request does not seek to duplicate any other form being developed by other Federal or State agencies. The information collections proposed will improve access Agencies and Congressional offices have to consumer complaint information. The CFPB strives to integrate cutting-edge technology to make the process efficient and user-friendly for Agencies and Congressional offices.

5. Efforts to Minimize Burdens on Small Entities

There will be no impact on small entities.

6. Consequences of Less Frequent Collection and Obstacles to Burden Reduction

The Consumer Financial Protection Act provides for consumer complaint information sharing between the CFPB and Agencies¹ and sharing and complaint information with and reporting to Congress.² The submission of information by Agencies and Congressional offices and their respective representatives using these forms will be voluntary. If the proposed Boarding Form collections are not conducted, the CFPB will not be able to maximize the efficiency of complaint information sharing in partnership with Agencies and Congressional offices.

7. Circumstances Requiring Special Information Collection

There are no special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 C.F.R. § 1320(5)(d)(2).

8. Consultation Outside the Agency

In accordance with 5 CFR § 1320.8(d)(1), the Bureau published a *Federal Register* notice allowing the public 60 days to comment on this proposed collection of information. In accordance with 5 CFR § 1320.5(a)(1)(iv), the Bureau has also published a notice in the *Federal Register* allowing the public 30 days to comment on the submission of this information collection request to the OMB.

9. Payments or Gifts to Respondents

The proposed information collections do not provide any payment or gift to respondents.

10. Assurances of Confidentiality Provided to Respondents

All information collection activities will conform to the requirements for the protection of the confidentiality of nonpublic information and personally identifiable information and for data

¹ Codified at 12 U.S.C. § 5493(b)(3)(C) and 12 U.S.C. § 5493(b)(3)(D).

² Codified at 12 U.S.C. § 5493(b)(3)(C).

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security and integrity set forth in federal privacy laws, including the CFPB's rules (12 C.F.R. §1070 et seq.) and the Privacy Act (5 U.S.C. § 552a).³ At the point of information collection, individuals will be provided with the CFPB's Privacy Act statement. The CFPB will implement the appropriate security measures to ensure data is safeguarded including the use of locked file storage, confidentiality stamping, restricted system access, data encryption, restricted print options and disposal by cross-cut shredding.⁴ The Government and Congressional Portal systems will be fully compliant with the Federal Information Security Management Act of 2002 with the security category of "High, Moderate, Low."

11. Justification for Sensitive Questions

While the proposed Government Boarding Form and Congressional Boarding Form seek to gather information generally available to the public, they may request that Agencies' and Congressional offices' representatives provide sensitive information. Sensitive information will not be disclosed.

12. Estimated Burden of Information Collection

Government Boarding Form

Respondents will include Agencies that are interested in having access to complaint information collected by the CFPB. Based on current records, the CFPB estimates that about 20 Agencies will submit a Government Boarding Form each year. Initially, the CFPB estimates that about 50 Agencies will submit a Government Boarding Form.

The CFPB has created a process to allow Agencies that need to make revisions to do so in an efficient and streamlined manner. If an Agency needs to make substantive revisions to the Government Boarding Form, the CFPB will provide it with a completed form, allowing the Agency to only fill out the sections that need to be revised. This was done to reduce the burden on Agencies that need to make revisions to the Government Boarding Form. The CFPB estimates that there will be about 12 revisions submitted each year.

³ For the related System of Record Notice (SORN), see <https://www.federalregister.gov/articles/2014/04/16/2014-08555/privacy-act-of-1974-as-amended>

⁴ The E-Government Act of 2002, Section 208, establishes the requirement for agencies to conduct privacy impact assessments (PIAs) and demonstrate the agencies' commitment to protect the privacy of any personal information collected, stored, retrieved, used and shared. For the PIA related to the Company Portal, see http://files.consumerfinance.gov/f/201303_CFPB_PIA-Consumer-Response-System.pdf.

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Congressional Boarding Form

Respondents will include Congressional offices that are interested in having access to complaint information collected by the CFPB. Based on current records, the CFPB estimates that about 100 Congressional offices will submit a Congressional Boarding Form each year.

The CFPB has created a process to allow Congressional offices that need to make revisions to do so in an efficient and streamlined manner. If a Congressional office needs to make revisions to the Congressional Boarding Form, the CFPB will provide it with a completed form, allowing the Congressional office to only fill out the sections that need to be revised. This was done to reduce the burden on offices that need to make revisions to the Boarding Form.

Type of Information Collection	Estimated Number of Respondents	Frequency of Response	Estimated Number of Annual Responses	Average Burden Hours per Intake	Estimated Total Annual Burden Hours Requested
Government Boarding Form (Initial Intake)	50	1x	50	.25	13
Government Boarding Form (Revisions)	12	1x	12	.08	1
Congressional Boarding Form (Initial Intake)	100	1x	100	.25	25
Congressional Boarding Form (Revisions)	25	1x	25	.08	2
Total:	150*	//////////	187	//////////	41

*Agencies and Congressional offices that submit revision are a subset of those that submitted an initial Government Boarding Form or Congressional Boarding Form; therefore, the estimated total of annual Respondents is about 150.

13. Estimated Total Annual Cost Burden to Respondents

There will be no annualized capital or start-up costs for the respondents to collect and submit this information.

14. Estimated Cost to the Federal Government

Generally, Agencies and Congressional offices will be provided a copy of the form electronically. Costs may be incurred for printing and mail distribution of the document is estimated as follows:

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- Government Boarding Form: Approximately 10 Agencies at a cost of \$0.60 per document (i.e., 4 pages, copy costs at \$0.15 per page, and postage is \$1.00), for a total cost of \$6.
- Congressional Boarding Form: Approximately 20 Congressional offices at a cost of \$0.45 per document (i.e., 3 pages, copy costs at \$0.15 per page, and postage is \$1.00), for a total cost of \$9.

Total Estimated Federal Costs: \$15

15. Program Changes or Adjustments

These are new forms; therefore, the entire burden associated with these information collection requests are considered a program change.

16. Plans for Tabulation, Statistical Analysis, and Publication

Data collected through the Government and Congressional Boarding Forms will be analyzed and may be provided in annual reports to be issued by the CFPB to Congress.

17. Display of Expiration Date

The expiration dates for OMB approval will be displayed or otherwise provided to respondents for the proposed forms. Further, the OMB control number and expiration date will be displayed on the Federal government's electronic PRA docket at www.reginfo.gov."

18. Exceptions to the Certification Requirement

The Bureau certifies that this collection of information is consistent with the requirements of 5 C.F.R. §1320.9, and the related provisions of 5 C.F.R. §1320.8(b)(3) and is not seeking an exemption to these certification requirements.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

These information collections do not employ statistical methods.

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