

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

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), last approved by OMB on October 15, 2019. These revisions will be reflected in previously- approved information collection media (i.e., telephone script, and web form) and do not represent a new collection instrument, or a material change to the existing instrument. Specifically, the changes are:

- 1) **Add “United State Space Force” as a new picklist option for the “Branch of Service” field.** Currently, the CFPB’s complaint form collects servicemember affiliation information if the consumer chooses to self-identify. One of the required fields under that selection is “Branch of service” which was approved being a picklist field. We are expanding the options under that list to include the newly created United States Space Force.
- 2) **Add “Military base/location” picklist options:** Additionally, the CFPB’s complaint form has an optional question with a picklist of duty stations or bases for military members. We are adding some selections to the approved picklist field, “Military base/location,” field to reflect the possible duty stations of United States Space Force personnel.
- 3) **Change the label of “Who are the people involved?” to “Who are you submitting this complaint for?”** Step 5 of the CFPB’s complaint form asks who is submitting the complaint, and we are updating the text should to address stakeholder feedback and minimize potential confusion.
- 4) **Re-label the option “Just you” to “Myself” on Step 5.** As detailed in number three above, we are updating Step 5 of the form to “Who are you submitting this complaint for,” and in order to ensure the options match the phrasing of the question, we would like to update the option of “Just you” to “Myself” to ensure consistency.
- 5) **Remove “You and someone else” as an option on Step 5.** We are removing one of the options on Step 5 – “You and someone else”. Based on usage and user feedback, the CFPB would like to remove this option. Consumers will still be able to submit complaints if they are a joint account holder or co-borrower by submitting as “Myself”.
- 6) **Add “Re-enter your email address” field to ensure accuracy.** Currently, the CFPB’s complaint form collects e-mail address as an optional field. We are pursuing a best practice and will require it to be entered twice if the consumer desires to provide it. This will ensure they have entered it accurately.
- 7) **Relabel helper text and instructions for clarity.** Currently, the complaint form contains several areas of helper text. The CFPB will improve these instructions in several places by:
  - a. *Adding helper text to clarify whose information the submitter should be providing as a single individual or authorized third party*

- b. *Better detail the expectations, benefits, and understanding of sharing one's email address as it relates to the complaint process*
- c. *Adding details explaining the benefit and value of providing optional demographic information via pre-approved picklist questions.*

**8) Implement two OMB pre-approved questions and update picklist options for one.** As part of OMB No. 3170-0011, the CFPB has two questions that it has not implemented. We will implement both, improve the language for clarity, and update the picklist on one of them. For reference, the pre-approved questions are:

- a. How many people (total number of adults and children) are part of the primary consumer's household?
  - i. Answer options (drop down menu containing the following options):
    - 1. 1
    - 2. 2
    - 3. 3
    - 4. 4
    - 5. 5
    - 6. 6
    - 7. 7
    - 8. 8 or more
- b. What is the total combined income of all the people living in the primary consumer's household in the last twelve months?
  - i. Answer options (drop down menu containing the following options):
    - 1. \$0-\$25,000
    - 2. \$25,001-\$40,000
    - 3. \$40,001-\$60,000
    - 4. \$60,001-\$85,000
    - 5. \$85,001 or more

The CFPB would like to implement these two questions in a way that aligns with desired user experience, and we would like to update the picklist values for the second question to align with the income brackets used by the US Census Bureau. Therefore, we would like to implement these on the form that maintains the original intent:

- c. Household size including total number of adults and children (optional)
  - i. Same options
- d. Combined annual household income (optional)
  - i. Answer options (updated)
    - 1. < \$15,000
    - 2. \$15,000 - \$24,999
    - 3. \$25,000 - \$34,999
    - 4. \$35,000 - \$49,999
    - 5. \$50,000 - \$74,999

6. \$75,000 - \$99,999
7. \$100,000 - \$149,999
8. \$150,000 - \$199,999
9. \$200,000+

**9) Require e-mail, relationship, and relationship details for complaint submissions from authorized third parties.** Currently, the CFPB's complaint form asks the submitter (if they are filing on behalf of another consumer) their relationship to the consumer (picklist), details of the relationship (free form text) and their own e-mail (free form text) via approved optional fields. In order to ensure better data collection and integrity of the complaint process, we would like to make these fields required instead of optional to better analyze third party submissions. Lastly, we would also like to opt the third part into status updates instead of allowing them to choose so we can ensure a unified user experience.

**10) Update picklist values for the "Relationship" field.** The picklist options under the relationship field are currently:

- a. Advocate
- b. Attorney
- c. Family member
- d. Friend
- e. Government employee
- f. Housing counselor
- g. Other

Based on user feedback and data, we would like to change the values to better reflect the possible options as:

- a. Advocate
- b. Attorney
- c. Authorized representative
- d. Housing or credit counselor
- e. Other

We believe that these changes will improve the data collected by this form and do not in any way reflect a new collection of information or materially alter the existing approved collection. The changes are reflected in the screenshots also submitted with this request.