#### SUPPORTING STATEMENT FOR CONSUMER RESPONSE INTAKE FORM OMB CONTROL NO.: 3170-0011

#### A. JUSTIFICATION

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

Collecting, investigating, and responding to consumer complaints<sup>1</sup> are integral parts of the Consumer Financial Protection Bureau's (CFPB or Bureau henceforth) work.<sup>2</sup> Not only is this work required of the Agency under Title X of the Dodd-Frank Wall Street Reform and Consumer Protection Act ("Dodd-Frank Act"), this work also helps the CFPB fulfill its obligations to: (1) monitor for risks to consumers in the offering or provision of consumer financial products or services, including developments in the markets for such products or services; and (2) provide an annual report to Congress on complaints received in the prior year regarding such products and services, including information about complaint numbers, types, and resolution.<sup>3</sup> The Intake Form, the subject of this information collection request, provides the vehicle for the information collection by web, telephone, and mail.

The CFPB will be permanently adding to the existing Intake Form 72 fields and values previously approved by OMB under generic clearance. Underpinning the Intake Form is a series of products, sub-products, issues, sub-issues, and data-driven questions used to categorize the nature of a consumer's complaint. The permanent addition of these 72 net new fields and values representing a new product and new sub-products, issues, sub-issues, and data-driven questions will improve upon the form's clarity and ease of use. These new fields and values are informed by information collection and feedback gathered by comparing historical consumer complaint data and web analytics to the future state data. The Bureau has refined the products and associated issues contained within the Intake Form to ensure accurate representation of the consumer financial marketplace. Net new data driven questions are included in Attachment 1. Net new product, sub-product, issue, and sub-issue fields and values are included in Attachment 2.

The CFPB is also requesting approval of four additional optional fields for the Intake Form that capture demographic information: (1) the consumer's sex; (2) the consumer's race; (3) whether the consumer is of Hispanic, Latino, or Spanish origin and (4) preferred language. These questions are also presented in Attachment 1.

<sup>&</sup>lt;sup>1</sup> Consumer complaints are submissions that express dissatisfaction with, or communicate suspicion of wrongful conduct by, an identifiable entity related to a consumer's personal experience with a financial product or service.

<sup>&</sup>lt;sup>2</sup> Dodd-Frank Act, § 1021(c)(2).

<sup>&</sup>lt;sup>3</sup> *Id.* §§ 1022(c), 1013(b)(3)(C).

<sup>&</sup>lt;sup>4</sup> *See* CFPB's Consumer Response Intake Form Non Material Change Request, OMB Control No. 3170-0011 (Notice of Action 04/14/2022).

For each optional question, consumers will select the option that describes them. For the first and second questions consumers will also have an option to enter their information in a write-in space. These additional fields will allow the Bureau to better execute its statutory mandates, including: 1) researching, analyzing and reporting on access to fair and affordable credit for traditionally underserved communities; <sup>5</sup> 2) providing information, guidance, and technical assistance regarding the offering and provision of consumer financial products or services to traditionally underserved consumers and communities; <sup>6</sup> 3) collecting, researching, monitoring, and publishing information relevant to the functioning of markets for consumer financial products and services to identify risks to consumers and the proper functioning of such markets; and 4) educating and empowering consumers to make better informed financial decisions.<sup>8</sup> This data will help the Bureau gain insights about the populations they serve, identify emerging issues, and pinpoint what areas may benefit from new or revised educational tools. These questions are based on best practices in the field and similar in content and structure to those widely used in nationally representative surveys in many other government information collections, including the most recent Census. Additionally, these questions provide the opportunity to understand data across economic groups that enrich and reflect careful research across several Bureau offices.

# 2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

The Intake Form is designed to aid the public in the submission of complaints, inquiries, and feedback to the CFPB and to help the CFPB fulfill the aforementioned statutory requirements. Consumers who wish to submit complaints, inquiries, and feedback may submit relevant information using the CFPB's website where they will find an online version of the Intake Form. Alternatively, they may submit information by telephone and mail using the Intake Form. The Intake Form's various fields prompt respondents for a description of, and key facts about, their complaints, underlying products and issues, the companies that are the subject of their complaints, and any previous action taken on their complaints. Responses to the Intake Form's questions help provide the CFPB and the company with the information needed to contact the consumer and/or the consumer's authorized representative (if applicable); send the complaint to the company for response; and follow-up on the submitted complaint, inquiry, or feedback.

The permanent addition of the 72 net new fields and values mentioned above will improve upon the form's clarity and utility. As explained above, the addition of optional fields for sex; race; Hispanic, Latino, or Spanish origin; and preferred language will allow the Bureau to better execute its statutory mandates, as mentioned above.

<sup>&</sup>lt;sup>5</sup> Dodd-Frank Act, § 1013(b)(1)(B).

<sup>&</sup>lt;sup>6</sup> *Id.* § 1013(b)(2).

<sup>&</sup>lt;sup>7</sup> Id. § 1021(c)(3).

<sup>8</sup> Id. § 1013(d)(1).

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also, describe any consideration of using information technology to reduce burden.

The CFPB has created and will continue to enhance a system that provides consumers and their authorized representatives with the ability to submit their complaints through its website, by telephone, and mail and that accurately, efficiently, and securely sends complaints to companies for response. The CFPB's U.S.-based contact centers provide services to consumers in more than 180 languages and to consumers who are deaf, have hearing loss, or have speech disabilities via a toll-free telephone number.

Previously, the CFPB enhanced the consumer experience by merging 11 product-specific forms used to submit a complaint into one form and streamlining the number of financial products and services from which consumers can select. This allows for a more consistent experience across products and makes completing the form more intuitive. The CFPB also re-designed the complaint form to provide dynamic prompts based on consumers' inputs (i.e., data-driven questions), providing a cleaner and more intuitive interface that executes complex logic behind the scenes to minimize consumer burden. The CFPB made plain language enhancements and designed the form to work with screen reader technology to make the complaint form more accessible and easier to complete. The CFPB continues to use enhancements such as drop-down menus, error checks, and auto-completion (when possible) to minimize burden.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item A.2 above.

This information collection renewal request does not seek to duplicate any other complaint system being developed by other federal or state agencies. The information collections proposed will improve the processing of individual consumer complaints and inquiries by the CFPB. Duplication is further minimized as all CFPB information collections are considered and reviewed through an internal clearance process which includes several offices within the agency, including the CFPB's Office of the Chief Information Officer.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

The information collection is voluntary and is not anticipated to burden small businesses significantly. The Intake Form does not require information collection from small businesses or other small entities. A potential impact on small entities is that the CFPB, as required by law, will utilize the information obtained from consumers to request responses from, and potentially initiate investigations of, entities named in the complaints, some of which may be small entities. The CFPB will minimize any burden by striving to request readily available information and using plain, short, easy-to-complete information collection instruments.

# 6. Describe the consequence to federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

Under the Dodd-Frank Act, the CFPB is required to facilitate the centralized collection of, monitoring of, and response to consumer complaints regarding consumer financial products or services. The proposed collection is voluntary, and if the proposed collection is not conducted, the CFPB would not be able to fulfill its consumer response mandate.

## 7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- requiring respondents to report information to the agency more often than quarterly;
- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- requiring respondents to submit more than an original and two copies of any document;
- requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;
- in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;
- requiring the use of statistical data classification that has not been reviewed and approved by OMB;
- that includes a pledge of confidentially that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
- requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentially to the extent permitted by law.

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<sup>&</sup>lt;sup>9</sup> *Id.* § 1013(b)(3)(A).

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. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years -- even if the collection-of-information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

In accordance with 5 CFR §1320.8(d)(1), the Bureau has published a notice in Federal Register that provides the public 60 calendar days to comment on the revision of reporting requirements contained within OMB Control No. 3170-0011. No comments were received.

Also, in accordance with 5 CFR §1320.5(a)(1)(iv), the Bureau has also published a notice in the Federal Register providing the public 30 days to comment on reporting requirements contained within this information collection request.<sup>11</sup>

9. Explain any decision to provide any payments or gifts to respondents, other than remuneration of contractors or grantees.

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

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

<sup>&</sup>lt;sup>10</sup> 87 FR 31538 (published on 5/24/2022).

<sup>&</sup>lt;sup>11</sup> 87 FR 60385 (published on 10/5/2022; comment period ends on 11/4/2022).

All information collection activities will be conducted in full compliance with the requirements for the protection of nonpublic information and personally identifiable information and for data security and integrity set forth in the federal privacy laws, including the CFPB's rules (12 C.F.R. § 1070 et seq.) and pursuant to the Privacy Act (5 U.S.C. § 552a). At the point of information collection, the CFPB's website explains that personally identifiable information will be kept private to the extent permitted by law and CFPB rules. The CFPB website privacy policy, available at the bottom of the landing page for submitting complaints, further explains the CFPB's privacy practices. The web-form has been updated to have the collection Privacy Act Statement at the point of collection Privacy Act Statement.

The CFPB has in place 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. The information system is fully compliant with the Federal Information Security Management Act of 2002 security category of "Moderate, Moderate, Low."<sup>15</sup>

The information you provide will permit the Consumer Financial Protection Bureau (CFPB) to respond to your complaint or inquiry about companies and services we regulate. Information about your complaint or inquiry (including your personally identifiable information (PII)) may be shared:

- with the entity that is the subject of your complaint;
- with third parties as necessary to get information relevant to responding to your complaint;
- with a court, a party in litigation, a magistrate, an adjudicative body or administrative tribunal in the course of a proceeding, or the Department of Justice; and
- with other federal or state agencies or regulatory authorities for enforcement and statutory purposes.

We may also share your complaint or inquiry (but not your PII) with the public through a public Consumer Complaint Database.

Although the Bureau does not otherwise anticipate further disclosing the information provided, it may also be disclosed as indicated in the Routine Uses described in the System of Records Notice CFPB.005 – Consumer Response System.

The collection of information is authorized by Pub. L. No. 111-203, Title X, Sections 1011, 1012, 1013(b)(3), 1021, 1034, codified at 12 U.S.C. 5491, 5492, 5493(b)(3), 5511, 5534.

Submitting a complaint is voluntary. You are not required to submit a complaint or share any PII, including your Social Security number, and you may withdraw your complaint at any time. However, if you do not include the requested information, the CFPB may not be able to process your complaint.

<sup>&</sup>lt;sup>12</sup> For the related System of Record Notice (SORN), see <a href="https://www.consumerfinance.gov/privacy/system-records-notices/consumer-response-system/">https://www.federalregister.gov/privacy/system-records-notices/consumer-response-system/</a>; <a href="https://www.federalregister.gov/articles/2014/04/16/2014-08555/privacy-act-of-1974-as-amended">https://www.federalregister.gov/articles/2014/04/16/2014-08555/privacy-act-of-1974-as-amended</a>; <a href="https://www.federalregister.gov/documents/2018/07/13/2018-14990/privacy-act-of-1974-system-of-records">https://www.federalregister.gov/documents/2018/07/13/2018-14990/privacy-act-of-1974-system-of-records</a>.

<sup>&</sup>lt;sup>13</sup> See https://www.consumerfinance.gov/privacy/website-privacy-policy/.

<sup>&</sup>lt;sup>14</sup> Privacy Act Statement quote:

<sup>&</sup>lt;sup>15</sup> See https://csrc.nist.gov/publications/detail/fips/199/final.

On March 20, 2013, CFPB published a Privacy Impact Assessment (PIA) for the Consumer Response System. On December 3, 2021, CFPB published a PIA for the Consumer Resource Center (CRC). Pursuant to the E-Government Act of 2002, the CFPB uses PIAs to document how the personally identifiable information (PII) it collects is used, secured, and destroyed in a way that protects each individual's privacy. Additionally, the PIAs identify privacy risks associated with the system and information collection and mitigations CFPB takes to address these risks. The PIAs are published on CFPB's website at <a href="http://files.consumerfinance.gov/f/201303">https://files.consumerfinance.gov/f/201303</a> CFPB PIA-Consumer-Response-System.pdf and <a href="https://files.consumerfinance.gov/f/documents/cfpb\_consumerresource-center\_pia.pdf">https://files.consumerfinance.gov/f/documents/cfpb\_consumerresource-center\_pia.pdf</a>.

Additionally, in accordance with the Privacy Act of 1974, as amended, the CFPB published a Systems of Records Notice (SORN) in the Federal Register (79 FR 21440, April 16, 2014). The title for the SORN is CFPB.005—Consumer Response System. The SORN is available on the Internet at https://www.consumerfinance.gov/privacy/system-records-notices/consumer-response-system. <sup>16</sup>

Section 1057 of the Dodd-Frank Act provides additional protections for "whistleblowers" who work for covered persons or service providers and who experience employer retaliation after providing certain information about their employers to the CFPB. The CFPB will take all reasonable steps as permitted by law during this information collection process to provide distinct, alternative paths for their submissions. Please note that whistleblowers can report tips to the CFPB through a process separate from the complaint process. By using that separate process, unlike submitting a complaint, tips will not be sent to the company.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

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<sup>&</sup>lt;sup>16</sup> See also <a href="https://www.federalregister.gov/articles/2014/04/16/2014-08555/privacy-act-of-1974-as-amended">https://www.federalregister.gov/articles/2014/04/16/2014-08555/privacy-act-of-1974-as-amended</a>; <a href="https://www.federalregister.gov/documents/2018/07/13/2018-14990/privacy-act-of-1974-system-of-records">https://www.federalregister.gov/documents/2018/07/13/2018-14990/privacy-act-of-1974-as-amended</a>; <a href="https://www.federalregister.gov/documents/2018/07/13/2018-14990/privacy-act-of-1974-system-of-records">https://www.federalregister.gov/documents/2018/07/13/2018-14990/privacy-act-of-1974-system-of-records</a>.

Complaint intake questions may prompt the respondents for sensitive information such as credit card account or other financial account numbers only to facilitate complaint resolution and to minimize the burden of follow-up contact with the respondents. For instance, for credit card inquiries or complaints, certain account information such as a credit card number may be the most effective way to accurately identify the company and for the company to identify the consumer's account to support efficient investigation by companies. For complaints sent to the national credit reporting bureaus and other financial services providers that use social security numbers (SSNs) as primary identifiers, consumers will be asked to provide the last four digits of their SSNs to process their complaint or, where necessary for companies to respond, their full SSNs. Oftentimes, the full or partial SSN is the only effective way for certain companies to accurately locate the consumer's relevant financial information. Consumers' SSNs, along with other sensitive financial account identifiers, will be held in an encrypted system for their protection.

The CFPB is tasked with enforcing fair lending laws such as the Equal Credit Opportunity Act ("ECOA"). ECOA prohibits unlawful discrimination by any creditor against an applicant in a credit transaction based on race, color, religion, national origin, sex, marital status, or age. ECOA also prohibits such unlawful discrimination by a creditor based on the fact that all or part of the applicant's income derives from any public assistance program or based upon the applicant's good faith exercise of any right under the Consumer Credit Protection Act. For these reasons, complaint intake questions may inquire about these factors.

In addition, Section 1013(e)(1)(B) of the Dodd-Frank Act specifically charges the CFPB with the task of monitoring complaints by servicemembers and their families. Thus, the Intake Form includes a series of questions to help identify and correctly route such complaints.

The Intake Form also includes an optional question which prompts the respondent for his or her age. Pursuant to the Credit Card Accountability Responsibility and Disclosure Act of 2009 ("CARD Act"), there are statutory protections extended to underage credit card applicants. <sup>17</sup> Eliciting the respondent's age will help identify issues related to young consumers and legal competency to give consent. Furthermore, the Equal Credit Opportunity Act ("ECOA") makes it unlawful for any creditor to discriminate against an applicant for credit on the basis of age. Collecting information about the respondent's age will help identify instances where older Americans have been discriminated against when applying for credit.

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<sup>&</sup>lt;sup>17</sup> 15 U.S.C. § 1637(c)(8).

Also, as explained above, the CFPB is requesting approval of four additional optional fields for the Intake Form: (1) the consumer's sex; (2) the consumer's race; (3) whether the consumer is of Hispanic, Latino, or Spanish origin; and (4) preferred language. These additional fields will allow the Bureau to better execute its statutory mandates, including: 1) researching, analyzing and reporting on access to fair and affordable credit for traditionally underserved communities; 18 2) providing information, guidance, and technical assistance regarding the offering and provision of consumer financial products or services to traditionally underserved consumers and communities; 19 3) collecting, researching, monitoring, and publishing information relevant to the functioning of markets for consumer financial products and services to identify risks to consumers and the proper functioning of such markets;<sup>20</sup> and 4) educating and empowering consumers to make better informed financial decisions. 21 This data will help the Bureau gain insights about the populations they serve, identify emerging issues, and pinpoint what areas may benefit from new or revised educational tools. These questions are based on best practices in the field and similar in content and structure to those widely used in nationally representative surveys in many other government information collections, including the most recent Census. Additionally, these questions provide the opportunity to understand data across economic groups that enrich and reflect careful research across several Bureau offices.

### 12. Provide estimates of the hour burden of the collection of information. The statement should:

- Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. General, estimates should not include burden hours for customary and usual business practices.
- If this request for approval covers more than one form, provide separate hour burden estimates for each form.
- Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14.

The Bureau estimates the burden of this information collection as follows:

Information	Number of	Number of	Total	Average	Annual
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<sup>&</sup>lt;sup>18</sup> Dodd-Frank Act, § 1013(b)(1)(B).

<sup>&</sup>lt;sup>19</sup> *Id.* § 1013(b)(2).

<sup>&</sup>lt;sup>20</sup> *Id.* § 1021(c)(3).

<sup>&</sup>lt;sup>21</sup> *Id.* § 1013(d)(1).

Collection	Respondent	Responses per	Responses	Burden	Burden
Requirement		Respondent		Hours	Hours
Web	1,900,000	1	1,900,000	11 minutes	348,333
Paper/Telephone	250,000	1	250,000	16 minutes	66,667
TOTAL	2,150,000		2,150,000		415,000

The web-based Intake Form will take approximately eleven minutes for respondents to complete. Complaints from respondents who wish to provide additional details and more complicated complaints may take longer to complete.

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

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

14. Provide estimates of the annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 into a single table.

Based on an independent government cost estimate, including the cost of call center operations, software, and hardware, the estimated annualized cost for this information collection is \$12,067,980 for fiscal year 2021.

15. Explain the reasons for any program changes or adjustments.

The CFPB added 72 net new fields and values representing a new product and sub-products, issues, sub-issues, and data-driven questions. Net new data driven questions are included in "Inventory of Questions" attachment. Net new product, sub-product, issue, and sub-issue fields and values are included in the "Collection Instruments" attachment.

The CFPB added four optional fields for the Intake Form:

- the consumer's sex;
- the consumer's race;
- whether the consumer is of Hispanic, Latino, or Spanish origin; and
- preferred language.

The CFPB reduced the estimated annual responses by 850,000 based on updated internal analyses. The reduction in estimated annual responses is not due to programmatic changes to the intake form.

The CFPB increased the estimated burden by 27,500 hours (from 387,500 hours to 415,000 hours) over the previous clearance due to the aforementioned revisions which provide respondents more selections to consider. These added fields and values improve the form's clarity, ease of use, and utility to the Bureau. The Bureau anticipates these additions may increase respondents' individual research and review burden per response. Please note consumers are not required to answer the four additional fields that capture demographic information. In situations where respondents choose to answer, the fields are expected to be easily answerable and impose a minimal amount of additional burden.

ICR Summary of Burden							
	Requested	Program Change Due to New Statute	Program Change Due to Agency Discretion	Change Due to Adjustment in Agency Estimate	Previously Approved		
Annual Number of Responses	2,150,000	0	0	-850,000	3,000,000		
Annual Time Burden (Hours)	415,000	0	27,500	0	387,500		
Annual Cost Burden (\$)	0	0	0	0	0		

16. For collections of information whose results will be published, outline plans for tabulations, and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and

## ending dates of the collection of information, completion of report, publication dates, and other actions.

Data collected through complaint intake, inquiry, and feedback collections will be analyzed and may be disclosed through the CFPB's Consumer Complaint Database<sup>22</sup> and provided in annual reports to be issued by the CFPB to Congress. Particularly, under Section 1013(b)(3)(C) of the Dodd-Frank Act, the CFPB provides reports to Congress containing information and analysis about complaint numbers, types, and where applicable, resolution. The CFPB may publish trend reports based on aggregate data in summaries, reports, and briefings. Presentations of analyses may include frequency, classification, and cross-tabulation across consumer financial products or services, demographic and economic characteristics, and financial management behavior.

## 17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

The information collection is not collected in a manner that allows the display of the current expiration date. However, the expiration date can be found under the "Information Collections under Review" section of <a href="www.reginfo.gov">www.reginfo.gov</a> (<a href="https://www.reginfo.gov/public/do/PRAMain">https://www.reginfo.gov/public/do/PRAMain</a>).

#### 18. Explain each exception to the certification statement.

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

This information collection does not employ statistical methods. Due to the limitations of the proposed voluntary information collections, most importantly the absence of randomized sample selections, the responses will not be representative of any larger group. Because any aggregate results of the proposed information collections will not be statistically valid representations of a larger group, and are not meant to be, statistical methods cannot reduce or improve the accuracy of results.

<sup>&</sup>lt;sup>22</sup> 78 Fed. Reg. 21218, *available at* https://www.federalregister.gov/articles/2013/04/10/2013-07569/disclosure-of-consumer-complaint-data.