

**SUPPORTING STATEMENT FOR  
CONSUMER COMPLAINT INTAKE SYSTEM COMPANY PORTAL  
BOARDING FORM  
OMB CONTROL NO.: 3170-0054**

**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.**

The Consumer Financial Protection Bureau (CFPB or the Bureau) has used the Boarding Form to sign up more than 1,200 companies. Information collected via the Boarding Form helps the Bureau route complaints to the correct company. This information includes company name, names of company representatives, and affiliate/subsidiary relationships. Typically, a company completes the Boarding Form after the Bureau has received a complaint about a company. Some companies opt to complete the form in advance of the Bureau receiving a complaint, for example, when a depository institution attains an asset level that brings it under the Bureau's supervisory authority. There are operational efficiencies realized by companies and the Bureau by having a single OMB-approved form used to board companies to the secure portal. Companies benefit from being able to join the portal before a complaint has been submitted about them, receiving their first complaint via the secure portal as soon as it is available. This also enables users to become familiar with the portal. Using a single OMB-approved form also provides the public with transparency into and clarity about the nature of the information collection itself. Additionally, the Bureau realizes operational efficiencies by collecting consistent information across companies.

**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.**

Information collected from companies completing the Boarding Form will support due diligence authentication of company identity, inform complaint processing, and give companies secure web-portal access to complaint information.

**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 Boarding Form provides a comprehensive list of questions to be posed to companies' representatives through collections that will be primarily web-based (i.e. the representative will submit the completed form by email). The form of questions will include open-ended and closed-ended (i.e. multiple choice).

**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 request does not seek to duplicate any other form being developed by other Federal or State agencies. These information collections will improve the processing of individual consumer complaints and inquiries. The Bureau strives to integrate technology to make the process efficient and user-friendly for companies.

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

Some small businesses and other small entities may be involved in these information collections. However, these information collections are voluntary for small businesses and are not anticipated to significantly burden small businesses. The Bureau will minimize any burden by requesting readily available information and using plain, short, and 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.**

Collecting, investigating, and responding to consumer complaints is one of the Bureau's primary functions.<sup>1</sup> The submission of information by companies using the Boarding Form will be voluntary. If the Boarding Form is not used, the Bureau will not be able to maximize the efficiency of complaint handling in partnership with companies. There are operational efficiencies realized by companies and the Bureau by having a single OMB-approved form used to board companies to the secure portal. Companies benefit from being able to join the portal before a complaint has been submitted about them, receiving their first complaint via the secure portal as soon as it is available. This also enables users to become familiar with the portal. Using a single OMB-approved form also provides the public with transparency into and clarity about the nature of the information collection itself. Additionally, the Bureau realizes operational efficiencies by collecting consistent information across companies.

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<sup>1</sup> Dodd-Frank Act § 1021(c)(2), codified at 12 U.S.C. § 5511(c)(2). *See also* Section 1034 (discussing responses to complaints), codified at 12 U.S.C. § 5534.

**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 confidentiality 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 confidentiality to the extent permitted by law.**

There are no special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR § 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.**

Per requirements in 44 USC 3506(c)(2)(a), the Bureau published a 60-day notice within the Federal Register<sup>2</sup>. No comments were received.

Per requirements in 44 USC 3507(b), the Bureau also published a 30-day notice within the Federal Register<sup>3</sup>. That notice directed respondents to submit comments directly to the OMB desk officer per normative procedure.

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

The 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.**

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 Bureau's rules (12 CFR § 1070.50 et seq.) pursuant to the Privacy Act (5 U.S.C. § 552a). At the point of information collection, the Bureau's website explains that personally identifiable information will be kept private to the extent permitted by law and Bureau rules. The Bureau website privacy policy further explains the Bureau's privacy practices.<sup>4</sup> The form includes a Privacy Act statement and the website privacy policy will be located on the bottom of the web-form page.

The Bureau 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."

On March 20, 2013, the Bureau published a Privacy Impact Assessment (PIA) for the Consumer Response System. Pursuant to the E-Government Act of 2002, the Bureau 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 PIA identifies privacy risks associated with the system and information collection and mitigations the Bureau takes to address these risks. The PIA is published on the Bureau's website at [https://files.consumerfinance.gov/f/201303\\_CFPB\\_PIA-Consumer-Response-System.pdf](https://files.consumerfinance.gov/f/201303_CFPB_PIA-Consumer-Response-System.pdf). The PIA is currently in the process of being updated.

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<sup>2</sup> 87 FR 4570 (1/28/2022).

<sup>3</sup> 87 FR 31536 (5/24/2022).

<sup>4</sup> See <https://www.consumerfinance.gov/privacy/privacy-policy/>.

Additionally, in accordance with the Privacy Act of 1974, as amended, the Bureau published a Systems of Records Notice (SORN) in the Federal Register (83 FR 32640, July 13, 2018). The title for the SORN is CFPB.005—Consumer Response System. The SORN is available on the Internet at <https://www.federalregister.gov/documents/2018/07/13/2018-14990/privacy-act-of-1974-system-of-records>.

**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.**

While much of the information requested in the Boarding Form is commercial information generally available to the public, some fields do ask for sensitive, nonpublic information. For instance, the form asks for the company's point-of-contact and a designee and asks for the company's tax ID number. Nonpublic information will not be disclosed to the public and will be held in an encrypted system for their protection.

**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.**

Respondents include companies that are the subjects of consumer complaints and companies that are service providers of the companies that are the subjects of consumer complaints. The Bureau estimates that approximately 400 companies will submit the Boarding Form for the first time per year. This form's previous clearance proposed an estimate of 500. However, that estimate is now being revised to 400 to better reflect

recent available boarding information. In addition, an estimated 50 companies (a subset of the 400 respondents) will submit the recently updated version of the form per year.

Collection of Information	Number of Respondents	Frequency	Number of Responses	Response Time (Hours)	Burden (Hours)
Company Portal Boarding Form	400 <sup>5</sup>	1	400	0.2125	85

**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.**

Companies are required to submit the form electronically as an email address is required to access the company portal. Therefore, there will be no costs to the federal government.

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

The Bureau has reduced the estimated number of annual responses. The Bureau has reduced the annual number of un-boarded companies (i.e., respondents) who will complete this form from 500 to 400. The total annual burden is also being reduced by nine hours to accommodate revised estimates concerning applicable burden per response and the reduction in expected respondents.

**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 the Boarding Form will be analyzed and certain information may be provided in reports to be issued by the Bureau to Congress, as required by the Dodd-Frank Act. Specifically, Section 1013(b)(3)(C) of the Dodd-Frank Act requires the

<sup>5</sup> Companies that submit a revised form are a subset of those that previously submitted an initial Boarding Form. Therefore, the estimated total of annual respondents is about 400.

Bureau to provide annual reports to Congress containing information and analysis about complaint numbers, types, and where applicable, resolution.<sup>6</sup> The Bureau 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 expiration date for OMB approval will be displayed on the form. Further, the OMB control number and expiration date will be displayed on the Federal government's electronic PRA docket at [www.reginfo.gov](http://www.reginfo.gov).

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

The Bureau certifies that this collection of information is consistent with the requirements of 5 CFR §1320.9 and the related provisions of 5 CFR §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.

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<sup>6</sup> Codified at 12 U.S.C. § 5493(b)(3)(C). *See also* Section 1016(c)(4) (requiring that the Bureau's semi-annual reports to Congress include "an analysis of complaints about consumer financial products or services that the Bureau has received and collected in its central database on complaints during the preceding year"), codified at 12 U.S.C. § 5496(c)(4).