



January 27, 2025

Via Electronic Mail

The Honorable Russell Vought
Acting Director
Consumer Financial Protection Bureau
1700 G St., NW,
Washington, D.C. 20552

Re: Request to Extend the Office of Management and Budget's Approval for an Existing Information Collection Titled "Consumer Response Intake Form" (Docket No. CFPB-2025-0042).

Dear Acting Director Vought:

The Consumer Bankers Association (CBA),¹ on behalf of its members, appreciates the opportunity to provide feedback regarding the CFPB's request to extend the Office of Management and Budget's (OMB) approval for an existing information collection titled "Consumer Response Intake Form."²

I. Overview

Our members value the feedback they receive from their customers, including feedback they receive through the CFPB's complaint portal, which can help them improve their products and services and maintain positive customer relationships. The Bureau has expressed the same goal for the consumer complaint portal.³ Our members also share the Bureau's goal of ensuring that "consumers are provided with timely and understandable information to make responsible decisions about financial transactions."⁴

CBA's recommendations seek to ensure that the CFPB's complaint portal advances these common goals, first and foremost, by ensuring that when consumers access the CFPB's complaint portal the CFPB uses that interaction to advance consumers' financial literacy and

¹ The CBA is a member-driven trade association, and the only national financial trade group focused exclusively on retail banking—banking services geared toward consumers and small businesses. As the recognized voice on retail banking issues, CBA provides leadership, education, research, and federal representation for its members. CBA members operate in all 50 states. They include the nation's largest bank holding companies as well as regional and super-community banks. Eighty-three percent of CBA's members are financial institutions holding more than \$10 billion in assets.

² 90 Fed. Reg. 54643 (November 28, 2025).

³ See CFPB, [Consumer Response Annual Report for 2021](#), at 3 ("Responsible companies use complaints not only as an opportunity to engage with consumers, but also as an indicator of potential weaknesses in a particular product, service, function, department, or vendor.").

⁴ 12 U.S.C. § 5511(b)(1).

financial health by providing helpful, tailored educational content and disabusing consumers of the misinformation that is too often promoted by unscrupulous actors. CBA also believes that the CFPB must ensure that the information contained in the CFPB's complaint database—information relied upon by the CFPB and other regulators, the industry, and the public at large—reflects the genuine experience of consumers and is not submitted by unscrupulous credit repair and other organizations falsely identifying themselves as individual consumers.⁵ The CFPB has already taken the opportunity to provide educational content to consumers using the portal and has also taken measures to prevent third parties from falsely claiming to be individual account holders when submitting complaints. We applaud these efforts, but we believe there are additional measures that would further these worthy goals.

We also believe there are common sense measures the CFPB can take to improve the quality and usefulness of the data that is transmitted through the portal, with a goal of ensuring that those who use the data, including regulators and the responding companies themselves, are quickly able to distinguish true signal from mere noise. Further, should the CFPB continue to publicly disclose data regarding complaints, it should ensure that such information is placed in appropriate context and is not unfairly misleading.

Finally, we urge the CFPB to address the regulatory burden associated with responding to complaints issued through the portal by extending the response date from 15 to 30 days to correspond with the deadlines imposed by other regulators.

We appreciate the CFPB's willingness to consider improvements to how it carries out its important complaint function and stand ready to engage in further discussions or provide additional information if helpful.

II. The CFPB Must Protect the Integrity of the Complaint Database by Educating Consumers and Appropriately Authenticating the Identity of Consumers

Our primary recommendation is to ensure that the CFPB's consumer complaint portal is used to advance its worthy objectives and not as a useful tool for credit repair organizations (CROs) and other unscrupulous actors who peddle false information to consumers and, we believe, falsely submit complaints while purporting to be individual consumers.

Meritless complaints regarding credit and consumer reporting are threatening the integrity and usefulness of the complaint database. As the CFPB has recently acknowledged, the vast majority of complaints submitted through the portal relate to credit or consumer reporting.⁶ In 2024, over 2.7 million complaints—85% of all complaints—were submitted on this subject, almost all of them regarding credit reporting.⁷ This represents a significant increase over the already high base from prior years. Indeed, complaints about credit reporting during calendar 2024 increased 182% relative to the monthly average for the prior two years,⁸ and have been increasing dramatically as a share of total consumer complaints during the last several years. The percentage of total complaints related to credit or consumer reporting increased from 44%

⁵ We note that the problem of non-genuine disputes exists in other regulatory processes under the CFPB's purview, most particularly the dispute processes under the Fair Credit Reporting Act (FCRA). We urge the CFPB to consider reforms in those processes, as well, to protect the integrity and usefulness of those separate but related regulatory regimes.

⁶ See CFPB, [Consumer Response Annual Report for 2024](#), at 11 (May 2025).

⁷ *Id.* at 11.

⁸ *Id.* at 21.

in 2019 to nearly double that percentage in 2024.⁹ Even the 2019 percentage is elevated compared to the percentage of complaints concerning credit reporting in the early days of the CFPB's existence. In 2014, for example, complaints about credit reporting represented only 18% of total complaints, roughly half of those submitted about debt collection.¹⁰ This dramatic increase in the share of complaints related to credit reporting cannot fully be explained by changes in the market or conduct of credit reporting agencies or furnishers.

Instead, we believe this dramatic increase is a response to the proliferation of inaccurate credit repair strategies advanced through misleading social media posts or Tik-Tok videos that direct consumers to “quick credit fixes,” and tout high success rates that are rarely true in practice. These posts misrepresent the law and facts and leave consumers with the misimpression that they are legally entitled to have adverse information regarding their credit reports removed, even when it is accurate and up to date. As the CFPB, other regulators, consumer advocates, and responsible industry participants have all long recognized, these false advertisements significantly harm consumers.¹¹ The peddlers of this misinformation often collect significant unlawful fees from individuals already in financial distress, and even if that is not the case, the bad advice prevents consumers from taking responsible action to improve their financial health.

Consumer education is a core aspect of the CFPB's mission, and the complaint portal provides the agency with a unique opportunity to advance that mission. Consumers desiring to submit complaints, the vast majority of whom (at least purportedly) want to complain about credit reporting, have a real problem and need sound advice *at that time*. The CFPB can provide real-time assistance by taking the following steps:

- First, the CFPB should immediately enhance the information provided on its complaint landing page to address the scourge of bad advice regarding credit reporting, a step it can do easily with content it already possesses or can easily create. The current landing pages do not provide any useful information regarding the risk of credit reporting scams,¹² notwithstanding the fact that the database has been nearly overwhelmed with meritless complaints. This should be corrected.
- Second, we propose that the CFPB provide consumers who categorize their complaints as credit or consumer reporting complaints with targeted information in the complaint flow. For example, a pop up that says (to quote the FTC): “BEWARE: Only scammers say they’ll remove all negative information from your credit report”¹³ may dissuade consumers from submitting complaints that dispute accurate information, especially if it

⁹ Compare CFPB, Consumer Response Annual Report for 2024, at 11 (May 2025) with CFPB, [Consumer Response Annual Report for 2019](#), at 9 (March 2020).

¹⁰ CFPB, [Consumer Response Annual Report for 2014](#), at 7 (March 2015).

¹¹ See CFPB, [How can I tell a credit repair scam from a reputable credit counselor](#) (November 2023) (advising consumers to beware of CROs that falsely promise to have negative credit information removed even if it is accurate); FTC, [Debt Relief and Credit Repair Scams](#) (“Credit repair scams also frequently target financially distressed consumers who are having credit problems. These operations lure consumers to purchase their services by falsely claiming that they will remove negative information from consumers’ credit reports even if that information is accurate.”); New Jersey Attorney General, [Credit Repair Scams](#) (2024); National Consumer Law Center, [The Truth About Credit Reports and Credit Repair Companies](#) (August 2022).

¹² See CFPB, [Submit a Complaint About a Financial Product or Service](#) (last visited July 16, 2025); CFPB, [Let’s Get Started \[Filing a Complaint\]](#) (last visited July 16, 2025).

¹³ See FTC, [“Only Scammers Say They’ll Remove All Negative Information From Your Credit Report”](#) (Aug. 5, 2024).

is accompanied with further information regarding steps a consumer can take to improve their financial health.

In addition to bad information peddled online, we believe that the increase in credit reporting complaints may also reflect the submission of complaints by third parties falsely claiming to be individual consumers. These fraudulent complaints present a serious threat to the integrity of the complaint database, as they do not reflect consumers' genuine feedback.¹⁴ Industry analysis of publicly available complaints completed several years ago (when complaints regarding consumer or credit reporting accounted for only 59% of all complaints submitted), warned that an increasing proportion of consumer complaints were either submitted by the same organization or purported to be submitted by multiple individuals but used nearly identical language, suggesting that third parties (likely CROs) were submitting formulaic complaints on behalf of individuals, often to block negative credit reporting, and without regard to their veracity.¹⁵ This practice is not merely an industry concern—it harms consumers.

Consistent with its independent obligation to “investigate” consumer complaints, the CFPB must take steps to combat the rising trend of fraudulent complaints that threaten to overwhelm the integrity and usefulness of the consumer complaint process.¹⁶ The CFPB has previously acknowledged that it would undermine the integrity of the complaint system if third parties are not disclosing their involvement in the complaint process,¹⁷ but it has not taken adequate steps to police the process. While the CFPB's complaint portal requires those submitting complaints to include an email, and to enter a code sent by the system to that email, the complaints submitted to our members often reference emails that do not match the email associated with the account in the bank's records. Rather, these emails, which can be easily and instantly created using generally available software applications,¹⁸ appear to have been created simply to evade the CFPB's insufficient efforts to ensure the integrity of the consumer response system. Fortunately, there are measures that the CFPB can adopt to better ensure that consumers understand the process and third parties are not falsely submitting complaints that claim to be from individuals:

- First, the CFPB also should require multi-factor authentication of the identity of the individual submitting the complaint to verify that complaints are genuine. Consumers should be informed that they must confirm their identity by providing both an email address and phone number, at least one of which should match the information contained in the relevant financial institution's system of records, or else the complaint will be closed. The complainant must be able to verify their identity by entering a code sent to the email and phone number, and the bank or relevant financial institution should be permitted to administratively close the complaint (with notice to the consumer through the portal) if neither the email nor phone number match those in the institution's records.¹⁹

¹⁴ See Office of Inspector General, [Semiannual Report to Congress](#) (Apr. 1-Sept. 30, 2018) (making a recommendation to the CFPB in 2018 to “strengthen controls in the area of identity and access management to ensure that the security environment for [the Consumer Complaint Portal, called Mosaic] remains effective.”).

¹⁵ See Oliver Wyman, [CFPB Online Complaint Portal](#) (2021).

¹⁶ 12 U.S.C. 5511(c)(2).

¹⁷ See CFPB, [Annual report of credit and consumer reporting complaints](#), at 27 (Jan. 2022).

¹⁸ See, e.g., Microsoft, [Add or remove an email alias in Outlook.com](#) (last visited June 25, 2025).

¹⁹ This is similar to the methods the CFPB and other regulators have long advised financial institutions to employ before consumers can access their account information or trigger statutory and regulatory rights

associated with their account. *See, e.g.*, CFPB, [Consumer Financial Protection Circular 2022-04](#) (Aug. 11, 2022) (“[Multi-factor authentication] greatly increases the level of difficulty for adversaries to compromise enterprise user accounts, and thus gain access to sensitive customer data.”); FFIEC, [Authentication and Access to Financial Institution Services and Systems](#) (Aug. 11, 2021).

- Second, we propose strengthening formal feedback mechanisms between those companies with an account on the portal and the CFPB regarding complaints or complaint trends that may suggest that third parties are misleading consumers or are abusing the CFPB’s complaint portal. The CFPB should use this feedback to institute further refinements to the database or to advance its law enforcement functions including leveraging its supervisory and enforcement capabilities.

III. The CFPB Should Take Further Steps to Make Complaint Data More Useful

While CBA acknowledges the CFPB’s obligation to publish periodic reports regarding the consumer complaints it has received,²⁰ it believes such reports, or any other public disclosure of complaint data, should strive to provide regulators, policymakers and the public with information that will place that reporting and data in appropriate context. For example, the disclosure of the absolute number of complaints submitted through the portal to a particular financial institution, without accompanying that information with context regarding the number of accounts maintained by that institution, risks skewing public perception about the overall customer satisfaction at those institutions, which is actually exceptionally high.²¹ The goal in any public reporting should be to provide policymakers and the public with an accurate picture of the consumer financial services marketplace.

Further, we believe there are ways to ensure that the database reflects more useful information regarding particular complaints.

- First, companies who respond to credit reporting complaints should be afforded an opportunity to state that the complaint is a “duplicate” complaint and/or that the complaint did not result in a change to the consumer’s report.
- Second, we propose that consumers who tag their complaint as relating to credit or consumer reporting could be asked to identify the source of any advice they have received and more specific information about credit reporting complaints, such as product type.
- Finally, although consumers are currently asked whether the complaint is filed by a third party on behalf of a consumer, and whether they have first raised an issue with their financial institution, the answers to those questions are not provided to the responding companies. Such information would be helpful in understanding whether a consumer’s complaint has been addressed already, and whether a subsequent complaint through the portal resulted in a different outcome.

Relatedly, and as a longer-term measure, CBA recommends that the CFPB develop an application programming interface (API) to allow responding companies to more easily integrate data received through the complaint portal with data in the institution’s records.²²

²⁰ See, e.g., 12 U.S.C. § 5493(b)(3)(C).

²¹ ABA/Morning consult survey <https://www.aba.com/-/media/documents/infographics/morning-consult-consumer-bank-satisfaction-survey-infographic.pdf?rev=3a0c29090c42479a911b91716bdc6658> (reporting that 94% of consumers rate their bank’s customer service as “excellent,” “very good,” or “good.”).

²² In the longer term, the CFPB should consider modifications to the complaint intake flow that will help regulators, responding companies, policymakers, and the public better understand the nature of the

IV. The CFPB Should Take Steps to Facilitate Companies' Response to Complaints

Finally, CBA recommends that the CFPB take steps to address burdens and inefficiencies in the existing processes for receiving and responding to complaints to better serve consumers. Specifically, CBA recommends that the CFPB increase the non-statutory deadline for companies' initial response from 15 to 30 days. CBA's members report that the 15-day deadline often does not provide sufficient time to appropriately investigate the complaint, requiring banks to request extensions from the CFPB, which introduces unnecessary operational complexity. CBA recommends that the CFPB adopt the more typical 30-day response deadline of the Federal and state banking agencies.

V. Conclusion

We appreciate the opportunity to share our perspective on the CFPB's complaint portal and complaint function, and we welcome the opportunity to discuss these recommendations further at your convenience.

Please do not hesitate to reach out to the undersigned by email at dpommerehn@consumerbankers.com if you have any questions regarding this letter or would like to discuss further.

Respectfully submitted,



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Executive Vice President, General Counsel
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Consumer Bankers Association

issues that are being raised through this channel. In a series of blog posts, CBA has highlighted that credit reporting accounted for nearly 80% (it now accounts for 85% of all complaints) and that complaints related to fraud or scams perpetrated by third parties (i.e., not their bank or financial service provider) were underreported due to unavailability of tags at the outset of the submission process to indicate fraud or scams. See CBA, [The Data Desk – Complaints Part I “I’m Not Complaining But . . . ?” Refocusing the Regulatory Lens Using the CFPB’s Complaint Database](#) (Nov. 20, 2024); CBA, [The Data Desk – Complaints Part II “I’m Not Complaining But . . . What About Fraud and Scams?”](#) (Mar. 12, 2025). The CFPB should consider asking consumers at the outset of the complaint submission process whether their complaint relates to (1) a dispute, (2) frauds or scams committed by third parties (i.e., parties other than their financial services provider), or (3) a complaint about the conduct of the financial services provider that receives the complaint through the portal.