February 27, 2026

Re: Consumer Response Intake Form request for information

Docket No. CFPB-2026-0005
OMB Control Number: 3170-0011
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Submitted via: Reginfo.gov
(https://www.reginfo.gov/public/do/PRA/icrPublicCommentRequest?ref_nbr=202511-3170-001)

Auriemma Roundtables Submission to the Consumer Financial Protection Bureau's Request for Comment Regarding its Complaint Intake Form

Auriemma Roundtables is a business intelligence firm that hosts roundtables for the top U.S. financial institutions and certain subclasses of their vendors, including a roundtable comprised of large national debt collection agencies, debt buyers, and the vendors that serve them (this roundtable is also known as the Consumer Relations Consortium).

To facilitate confidential discussions with our members, Auriemma Roundtables employs directors who are experienced and knowledgeable in debt collection and debt collection compliance. Further, by hosting roundtables in differing verticals, Auriemma has unique insights into the topics raised by this request for Comment, and we appreciate the opportunity to reply.

Sincerely,

Melissa Meggison,
General Counsel, Auriemma Roundtables

Auriemma Roundtables Comment Regarding the CFPB Complaint Intake Form

Auriemma Roundtables appreciates the opportunity to comment on this topic. As a business intelligence firm that hosts roundtables for the top U.S. financial institutions and certain subclasses of their vendors, including large national debt collection agencies, debt buyers, and the vendors that serve them, Auriemma has unique insights into the topics raised by this Request for Comment.

The CFPB's Request for Comment asked four questions:

a) Whether the collection of information is necessary for the proper performance of the functions of the CFPB, including whether the information will have practical utility;
b) The accuracy of the CFPB's estimate of the burden of the collection of information, including the validity of the methods and the assumptions used;
c) Ways to enhance the quality, utility, and clarity of the information to be collected; and
d) Ways to minimize the burden of the collection of information on respondents, including through the use of automated collection techniques or other forms of information technology.

Auriemma Roundtables and its debt collection roundtable (also known as the Consumer Relations Consortium) have considered these questions and offer the following in response:

a. <u>Whether the collection of information is necessary for the proper performance of the functions of the CFPB, including whether the information will have practical utility.</u>

Auriemma Roundtables and its debt collection roundtable (Consumer Relations Consortium) generally believe that collecting information in the intake form is necessary for the Consumer Financial Protection Bureau (CFPB) to perform its functions, and that most of the information collected has practical utility.

That said, the complaint portal is being systematically abused by credit repair organizations, which frequently submit formulaic, duplicative, or inaccurate complaints while purporting to be individual consumers. Many of these complaints relate to FCRA disputes that should not be routed through the portal at all.

Harm to consumers:

The for-profit credit-repair sector's abuse of the CFPB's complaint portal has diminished the utility of the information provided in the intake form and harms consumers. The growth in the credit repair sector has led to exponential growth in complaint volumes over the past 12 months. Of the 8.5M credit reporting complaints <u>***ever received by the CFPB,***</u> 5.2M (61% of them) were made <u>***in***</u>

<u>the past 12 months alone</u>. This threatens the integrity and usefulness of the CFPB's complaint database. The hijacking of the system by credit repair companies that fill the portal with bad-faith consumer disputes makes it a needle-in-a-haystack challenge to find and address a true consumer complaint. Legitimate complaints filed by legitimate consumers can often get buried by duplicative and frivolous complaints.

The CFPB's failure to stop this widespread abuse is harming consumers. While it is important to ensure that there are no unreasonable barriers to consumers to exercise their right to complain, the flood of illegitimate complaints from credit repairers is overwhelming the system. Genuine consumer complaints are being diluted by illegitimate complaints, delaying relief to consumers who may have suffered actual harm.

Further, mass-produced and bot-filed form-letter complaints divert company resources from addressing true consumer issues and create false positives for the CFPB, which uses the complaint data for enforcement and rulemaking. The net result is that consumers with real issues are more difficult to identify.

b. <u>The accuracy of the CFPB's estimate of the burden of the collection of information, including the validity of the methods and the assumptions used.</u>

The current CFPB intake form creates rather than relieves a burden. To file a complaint today, consumers need only submit minimal information. There are no controls to exclude non-compliant, duplicative, frivolous, or bot submissions. Consequently, and ultimately to the detriment of consumers, the CFPB is unable to differentiate between form credit repair organization submissions, a consumer who is upset that their account was sent to collections, or a consumer with a real problem that needs to be addressed.

Further, many complaints use form letters/templates asking for a tremendous amount of irrelevant information that respondents don't have and would never be able to provide. These form letters are a distraction from real consumers with real complaints.

Additionally, the list of agencies needs to be reviewed and cleaned up. The number of wrong agency and unable-to-locate complaints has increased significantly in the past year. When the consumer chooses the wrong agency, their complaint will never be investigated, even if they have a valid complaint or issue.

c. Ways to enhance the quality, utility, and clarity of the information to be collected.

To enhance quality, utility, and clarity of information, the CFPB should focus on eliminating credit repair organizations that abuse the system and require consumers to provide sufficient information. Adding logic-based questions and requiring consumers to submit more detailed and specific 'sub-type' information will allow the CFPB to better identify emerging systemic trends and alert the named company to real potential areas of consumer harm.

Some methods to eliminate filings from Credit Repair Organizations include:

- Requiring a declaration that the complaint is being made by the consumer directly, or if made by a third party on their behalf, be clearly specified in the complaint form with the party's details, and attaching a letter of authority signed by the consumer for the third party to act on their behalf.
- Prohibiting third parties from filing complaints on behalf of consumers in exchange for any fee or other compensation unless the third party is an attorney or law firm.
- Including a declaration that the complaint is made under penalty of perjury

Some methods to reduce or eliminate bots that are filing complaints include:

- Requiring CAPTCHA or multifactor authentication, including a cell phone-based MFA process, as it is more difficult to register multiple phone numbers than multiple email addresses.
- Implementing screening tools that prevent re-use of the same details for MFA on complaints made by different complainants.
- Identifying duplicate IP addresses to identify submissions that are not human-generated.
- Filtering out the complaints that are obvious form letters.
- Screen for and reject duplicates, template submissions, and complaints that are in fact credit disputes or requests for information.
- Screen for mismatches in name and other information provided as an indication of mass filing or involvement of a credit repair organization.

d. Ways to minimize the burden of the collection of information on respondents, including through the use of automated collection techniques or other forms of information technology.

The current system places a tremendous burden on respondents by requiring them to sift through voluminous and duplicative narratives, as well as credit repair and bot-filed complaints. The following adjustments would reduce respondents' burden and allow consumers with legitimate complaints to have those complaints addressed.

- Ask the consumer if they believe they owe the amounts being collected. This would provide more clarity regarding the actual issue.
- Add an option for the consumer to simply say "I'm disputing this debt," along with a place to indicate "why" they are submitting it. This will help respondents better identify and respond to the issue.
- Using more check boxes for responses, including specific options for
    - Frivolous
    - Improperly submitted; and
    - Consumer did not dispute directly with the company or has a pending dispute
- Extend the response timeline from 15 to 30 days to align with other regulators and ensure adequate investigation.
- Create a structured feedback channel for companies to alert CFPB to emerging patterns of portal abuse.
- Allow companies to correct inaccurate CFPB-assigned metadata (product type, issue/sub-issue, duplicate status).
- Introduce a mechanism for companies to quickly close frivolous or improperly submitted complaints.

The enhancements to the CFPB's complaint intake form suggested above will not suppress consumer complaints. Requiring consumers to provide accurate and verifiable information is not a deterrent to filing a complaint. Rather, such requirements will allow respondents to allocate resources to research potential gaps and to assist consumers. Navigating duplicative and frivolous complaints exhausts resources that could otherwise be used to resolve consumer issues. The above-referenced adjustments would allow respondents to focus on actual consumer harm.

Thank you for allowing Auriemma Roundtables the opportunity to respond to this request.