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July 13, 2018

Ms. Monica Jackson
Office of the Executive Secretary
Consumer Financial Protection Bureau
1700 G Street, NW
Washington, DC 20552

Re: OMB Request on Consumer Complaint Intake System Company Portal Boarding Form Information Collection System; Docket No. BCFP-2018-0018

Dear Ms. Jackson:

On behalf of America's credit unions, I am writing the Consumer Financial Protection Bureau (Bureau) on its request to the Office of Management and Budget (OMB) regarding the Consumer Complaint Intake System. Specifically, the Bureau is requesting to renew OMB approval of an existing information collection titled, "Consumer Complaint Intake System Company Portal Boarding Form Information Collection System." The Credit Union National Association (CUNA) represents America's credit unions and their 110 million members.

Bureau Complaints Processing

CUNA supports the ability of consumers to access timely and clear information on consumer financial products and services. Further, we recognize that the Dodd-Frank Wall Street Reform and Consumer Protection Act requires the Bureau to maintain a user-friendly and efficient method for consumers to lodge complaints regarding the improper activities of financial institutions. However, we continue to have concerns with the Bureau's consumer complaint database overall.

We believe credit unions are in an exceptionally strong position to evaluate the complaint system objectively for two reasons. First, the high level of consumer satisfaction with credit union services suggests that relatively few complaints will be filed with the Bureau concerning credit unions. As member-owned cooperatives, credit unions are simply less likely to offend their member-owners compared to institutions that serve customers only for purposes of rewarding investors. Second, only a small number of credit unions are large enough to have any consumer complaints included in the Bureau's database.

Even though the number of credit union-related complaints is extremely low, to ensure the complaint intake process is effective, we urge the Bureau to take steps to reduce the number of non-substantive and meritless complaints contained in the database. Thus, we urge the Bureau to bolster the complaint intake system's process for filtering out clearly frivolous consumer complaints. It is important that the Bureau be aware that unsubstantiated complaints levied towards a credit union—especially those with undetermined authenticity—have a cost to the credit union and in turn its members.

CUNA urges the Bureau to take appropriate steps to verify the legitimacy and accuracy, to the extent possible, of a consumer's complaint and/or compliment prior to public disclosure. Further, under the current system, we believe it is possible that some institutions are effectively unable to respond to consumers' narrative description of complaints due to privacy restrictions. We ask the Bureau to explore improvements to the process, including the removal of unsubstantiated narratives.

In addition, we ask the Bureau to reexamine its marketing of the complaint system to consumers. Since most credit unions are not supervised by the Bureau, any complaints regarding them should be directed to the NCUA, not the Bureau. The Bureau's marketing directs consumers to the Bureau's complaint system, which causes confusion and delays in response when those consumers are then redirected to the NCUA and/or the credit union directly. The Bureau should explore how it can revise its marketing to alleviate consumer confusion and reduce unnecessary correspondence among agencies, institutions, and consumers.

OMB Request on Boarding Form Information Collection

As noted above, the Dodd-Frank Act requires the Bureau to facilitate the centralized collection of, monitoring of, and response to consumer complaints regarding consumer financial products or services. In furtherance of its statutory mandate related to consumer complaints, the Bureau utilizes a Consumer Complaint Intake System Company Portal Boarding Form (Boarding Form) to sign up companies for access to the secure, web-based Company Portal. The Company Portal allows companies to view and respond to complaints submitted to the Bureau, supports the efficient routing of consumer complaints to companies, and enables a timely and secure response by companies to the Bureau and consumers.

The Bureau has requested approval by the OMB to renew the information collection associated with the Company Portal. While we have not heard specific complaints regarding the Boarding Form—which is unsurprising since only a handful of credit unions utilize the Form—we ask the Bureau to regularly assess the complaint system overall to identify opportunities to decrease unnecessary compliance burden and increase efficiency and effectiveness. As part of the Bureau's review, we encourage it to examine ways automated collection techniques or other forms of information technology can be incorporated into the complaint collection process to minimize the burden of the information collection on respondents.

Conclusion

On behalf of America's credit unions and their 110 million members, thank you for the opportunity to share our views regarding the Bureau's request to OMB to renew its information collection pertaining to the consumer complaint system. If you have questions about our comments, please do not hesitate to contact me at (202) 508-6743.

Sincerely,

A handwritten signature in black ink that reads "Luke Martone". The signature is written in a cursive style with a large initial "L" and "M".

Luke Martone
Senior Director of Advocacy & Counsel