



March 2, 2026

By Electronic Submission to www.reginfo.gov/public/do/PRAMain

Comment Intake
Consumer Financial Protection Bureau
Attn: PRA Office
1700 G Street, NW
Washington, DC 20552

Re: Docket No. [CFPB–2026–0005] | OMB Control No. 3170-0011 (Consumer Response Intake Form)
CFPB Consumer Complaint Portal / Consumer Response Intake Form – Paperwork Reduction Act Comment

I. Introduction and Interest of RMAI

The Receivables Management Association International (“RMAI”) appreciates the opportunity to comment under the Paperwork Reduction Act (“PRA”) on the Consumer Financial Protection Bureau’s (“Bureau” or “CFPB”) information collection associated with the consumer complaint portal and the Consumer Response Intake Form (OMB Control No. 3170-0011).¹

RMAI is a nonprofit trade association representing more than 600 businesses in the receivables management industry, including banks, credit unions, nonbank lenders, debt-buying companies, collection agencies, law firms, brokers, and industry-related product and service providers. RMAI’s members are frequent respondents to CFPB-routed complaints and therefore bear a substantial portion of the operational burdens associated with complaint intake, routing, and response.

RMAI’s comments are directed to the four PRA factors CFPB expressly requests commenters to address—necessity/practical utility, burden estimate accuracy, improving quality/utility/clarity, and minimizing burden through technology and design.

¹https://www.reginfo.gov/public/do/PRAViewICR?ref_nbr=202511-3170-001

II. Summary of Recommendations

RMAI recommends that the Bureau, at a minimum:

1. Strengthen identity and authority verification to reduce third-party/bulk misuse and improve the practical utility of the complaints routed to complaint respondents.
2. Reduce or eliminate certain optional demographic fields that add burden to complaint respondents but do not improve resolution outcomes.
3. Revise the burden estimates applied to complaint respondents to reflect the real compliance and legal review burdens borne by them.
4. Align the present renewal with CFPB’s own prior PRA representations about the purpose, operation, and safeguards of the complaint system—and explain, with specificity, why the burden and volume changes shown in the current information collection review remain “practically useful” under the PRA.^{2 3 4}

III. PRA Factor 1 — Necessity and Practical Utility.

A. Practical utility is questionable because the portal is susceptible to third-party and bulk misuse.

On May 6, 2025, RMAI raised concerns with CFPB staff regarding the ease with which consumers and third parties can submit multiple complaints, including in bulk, and CFPB staff have acknowledged challenges associated with complaint source validation. In RMAI’s view, those vulnerabilities directly reduce the practical utility of the collection by increasing the incidence of duplicative or unauthenticated complaints that nonetheless require time-sensitive review and response by companies.

Accordingly, the Bureau should treat **verification and attestation controls** as PRA-relevant quality safeguards rather than merely user-experience characteristics of an information collection (UX features). RMAI members have specifically recommended and again recommend (i) stronger respondent verification and (ii) an attestation/notice when submitting “on one’s own behalf,” with clearer enforcement consequences for third-party submission inconsistent with portal terms. Without these controls, the portal has no practical utility for consumers or regulated companies. Certainly, it has practical utility for the proper performance of the functions of the CFPB.

²https://www.reginfo.gov/public/do/PRAViewICR?ref_nbr=202511-3170-001.

³<https://www.reginfo.gov/public/do/DownloadDocument?objectID=54859601>.

⁴<https://www.federalregister.gov/documents/2025/05/22/2025-09226/agency-information-collection-activities-comment-request>.

B. The Bureau’s own public descriptions highlight limits on accuracy and representativeness, reinforcing the need for higher intake quality.

The PRA mandates that if the Bureau collects information, it must do so in a manner that (1) “ensure[s] the greatest possible public benefit from and maximize the utility of information created, collected, maintained, used, shared and disseminated by or for the Federal Government;” (2) “improve[s] the quality and use of Federal information to strengthen decision-making, accountability, and openness in Government and society;” (3) “provide[s] for the dissemination of public information . . . on equitable terms, and in a manner that promotes the utility of the information to the public;” and (4) ensure[s] the integrity, quality, and utility of the Federal statistical system.”⁵

However, the Bureau publicly states that the consumer complaint database “is not a statistical sample” and that complaints “are not necessarily representative of all consumers’ experiences.”⁶ In doing so, it acknowledges that the information obtained through the Complaint Intake Process is not representative of the wider consumer experience and lacks any practical utility. Therefore, the Bureau recognizes that the Complaint Intake Process fails under each of the PRA’s statutory mandates outlined above. We agree with the Bureau’s own assessment that the information collected is neither a “statistical sample” nor “representative of all consumers’ experiences.” Since the portal’s inception in 2011, the CFPB has not undertaken meaningful steps to “improve integrity, quality, and utility of information to all users within and outside the agency” of the Consumer Response Intake Form as required by the PRA.⁷

C. The Meteoric Rise in Complaint Portal volume underscores utility concerns and the need for intake gating.

The Bureau publicly states it sends more than 100,000 complaints each week to companies for response.⁸ At that scale, even a modest percentage of duplicative, misdirected, or third-party-generated submissions produces a substantial burden without corresponding utility.⁹ The PRA-mandated “practical utility” requirement is not satisfied by volume alone; it requires that the collection be suitably tailored and designed to generate reliable, decision-useful information.¹⁰ The information must serve a meaningful purpose. Because the Bureau recognizes that the information collected is neither a “statistical sample” nor

⁵ 44 U.S.C. § 3501.

⁶ <https://www.consumerfinance.gov/data-research/consumer-complaints/>.

⁷ 44 U.S.C. § 3506(b)(1)(C).

⁸ <https://www.consumerfinance.gov/complaint/>.

⁹ 44 U.S.C. § 3501(6).

¹⁰ 44 U.S.C.S. § 3502(11).

“necessarily representative of all consumers’ experiences,” it fails to achieve the PRA’s stated objectives.

IV. PRA Factor 2 — The CFPB’s Burden Estimate Ignores Respondent Burden.

A. CFPB’s current Information Collection Request (ICR) shows a dramatic increase in volume and total burden—requiring greater methodological transparency

The CFPB’s current ICR package for the Consumer Response Intake Form reflects a request for 6,000,000 annual responses and 1,123,334 annual burden hours, compared to 2,150,000 responses and 415,000 hours previously approved.¹¹ The Bureau attributes the increase primarily to an “adjustment in estimate,” explaining that complaint volume rose from approximately 540,000 (2020) to 3.18M (2024) and that CFPB anticipates continued year-over-year increases.¹²

Those figures, however, are only part of the real-world burden picture for RMAI’s regulated entities. For companies, the burden is not limited to intake routing; it includes:

- Investigation
- Record retrieval
- Compliance/legal review
- Reputational risk controls
- Response

None of the costs that responding companies incur in responding to the Complaint Intake Form are considered in the Bureau’s time-to-complete assumptions.

B. The ICR’s “program changes” must be assessed for incremental burden and marginal utility. The Bureau has not done so.

CFPB’s “short statement” indicates it is considering adding **four questions** to improve intake, including a **“Whistleblower” option** and additional questions concerning whether consumers contacted consumer reporting agencies and the responses received, intended to support the Bureau’s implementation of FCRA Section 611(e) and identify prior disputes.¹³ Under the PRA, CFPB must quantify the incremental time and operational effects of these additions and explain why these questions are necessary and not duplicative of other dispute workflows.

¹¹https://www.reginfo.gov/public/do/PRAViewICR?ref_nbr=202511-3170-001.

¹² *Id.*

¹³ *Id.*

V. PRA Factor 3 — Enhancing Quality, Utility, and Clarity.

- A. The Bureau must improve respondent verification, authority checks, and source validation.

The Bureau must **strengthen intake controls that improve data quality and reduce misuse**. The Bureau’s own discussions with RMAI reflect ongoing concerns about questionable third-party submissions and bulk filings that require better source tracking and validation of the information collected through the Consumer Response Intake Form. Consistent with RMAI member input, the CFPB should prioritize controls that deter third parties “posing as consumers” and bulk submissions that impose unnecessary burdens.

- B. Reassess demographic information collection for utility vs. burden

RMAI members recommend **stopping the collection of demographic information**. First, it increases the burden on responding companies, and there is no data demonstrating that this additional information helps consumers get their issues resolved through the portal process. The Bureau must justify any continued demographic collection by clearly linking each field to a concrete operational or statutory use that cannot be achieved through less burdensome means.

- C. Preserve clear sequencing that improves complaint quality

In prior CFPB supporting materials, it addressed public comments about Intake Form design and indicated that usability testing supported having consumers select product and issue fields before writing narratives to promote more focused submissions.¹⁴ The Bureau should continue to use testing-backed sequencing choices and publish updated testing results where design changes are proposed.

VI. PRA Factor 4 — Minimizing Burden Through Technology and Process Design

CFPB’s prior supporting statements emphasize the Bureau’s intent to reduce burden through web-form enhancements such as drop-down menus, error checks, and auto-completion.¹⁵ RMAI supports using technology to reduce burden, but the most effective burden reduction for respondents will come from **front-end gating and authentication**, which reduces the number of misdirected or duplicative complaints that reach companies.

¹⁴<https://www.reginfo.gov/public/do/DownloadDocument?objectID=54859601>.

¹⁵ *Id.*

Additionally, the Bureau has separately described the company portal boarding form as enabling “efficient routing” of complaints and “timely and secure” company responses.¹⁶ The Bureau should apply the same efficiency objective to the consumer intake side by implementing controls that reduce rework and prevent avoidable complaint cycles.

VII. The Bureau’s PRA Application is Flawed.

A. The Bureau has long treated complaint intake as a Title X mandate—but the Bureau must still show practical utility under PRA standards.

The Bureau’s prior PRA materials explain that complaint collection is integral to its consumer response mandate under Title X and related provisions.^{17 18} But the PRA requires more than identifying statutory authority; it requires showing that the specific information collected is necessary and practically useful. Where the Bureau acknowledges that complaint data is not representative, the record should reflect why its chosen intake fields and routing thresholds still yield reliable, decision-useful information.^{19 20}

B. Prior PRA approvals show CFPB’s segmentation of portals and OMB control numbers—the Bureau must clarify which “complaint portal” elements this ICR covers

The Bureau’s Federal Register notice for the Company Portal Boarding Form (OMB 3170-0054) describes a distinct, secure portal used by companies to view and respond to complaints and notes that separate portal boarding forms are available for government/congressional users (OMB 3170-0057).²¹ The current record must clearly delineate which parts of CFPB’s complaint ecosystem are governed by 3170-0011 (consumer intake) versus other control numbers, so commenters and OMB can evaluate necessity and burden with precision.^{22 23}

¹⁶<https://www.federalregister.gov/documents/2025/05/22/2025-09226/agency-information-collection-activities-comment-request>.

¹⁷<https://www.reginfo.gov/public/do/DownloadDocument?objectID=54859601>.

¹⁸<https://www.federalregister.gov/documents/2025/05/22/2025-09226/agency-information-collection-activities-comment-request>.

¹⁹<https://www.consumerfinance.gov/data-research/consumer-complaints/>.

²⁰<https://www.reginfo.gov/public/do/DownloadDocument?objectID=54859601>.

²¹<https://www.federalregister.gov/documents/2025/05/22/2025-09226/agency-information-collection-activities-comment-request>.

²²https://www.reginfo.gov/public/do/PRAViewICR?ref_nbr=202511-3170-001.

²³<https://www.federalregister.gov/documents/2025/05/22/2025-09226/agency-information-collection-activities-comment-request>.

C. CFPB’s own ICR data show an explosive change in response volumes and burden—OMB should require a more explicit causal explanation.

The [reginfo.gov](https://www.reginfo.gov) ICR package shows the Bureau requesting a material, substantial increase in responses and burden hours for 3170-0011, attributed to an “adjustment in estimate” and rising complaint volume.²⁴ Given the Bureau’s public representation that it sends over 100,000 complaints per week to companies, the record should explain (i) what portion of growth stems from particular product categories, (ii) how much is either duplicative or serial submissions, and (iii) what intake controls the CFPB has adopted to ensure that marginal volume still provides marginal utility.^{25 26}

D. Prior supporting statements demonstrate the Bureau’s commitment to iterative testing and burden reduction—update the record to reflect current realities.

Earlier CFPB supporting statements describe iterative improvements, usability testing, and technology features intended to minimize burden and improve data quality.²⁷ The current renewal should update that narrative with (i) evidence of the effectiveness of recent intake changes (or lack thereof), (ii) measured effects on duplicative or unauthenticated submissions, and (iii) the expected burden impact of proposed additional questions (e.g., “Whistleblower” and FCRA-related questions).^{28 29}

VIII. Conclusion

RMAI respectfully requests that the CFPB and OMB condition approval of the 3170-0011 renewal on improvements that increase authentication and reduce misuse, reassess the utility of demographic collection relative to its burden, consider the costs of responding to companies, and provide a more transparent burden methodology that reflects legitimate complaint volumes and operational realities.

²⁴ The ICR states “the program expects to see significant increases in the number of respondents.” https://www.reginfo.gov/public/do/PRAViewICR?ref_nbr=202511-3170-001.

²⁵ *Id.*

²⁶ <https://www.consumerfinance.gov/complaint/>.

²⁷ <https://www.reginfo.gov/public/do/DownloadDocument?objectID=54859601>.

²⁸ https://www.reginfo.gov/public/do/PRAViewICR?ref_nbr=202511-3170-001.

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Receivables Management Association International
Docket No. [CFPB-2026-0005] | OMB Control No. 3170-0011 (Consumer Response Intake Form)
March 2, 2026

Page 8

Respectfully submitted,

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cc: RMAI Board of Directors