

Consumer Financial Protection Bureau

Re: Consumer Response Intake Form and Process

Docket No. CFPB-2026-0005 OMB Control Number: 3170-0011

March 2, 2026

Dear Acting Director Vought,

The undersigned organizations write in response to the request for information to revise the Consumer Financial Protection Bureau's (CFPB) complaint intake process. The CFPB's complaint process, from intake to agency oversight to user feedback, is a first-in-class system that consumers and responsible companies rely on every day.

Recent changes to the complaint process, which were enacted just days after the close of the initial comment period required by the Paperwork Reduction Act, have substantially reduced the utility of the system for potentially millions of people seeking CFPB assistance with a major financial problem and did not adequately address public comments. We urge that these changes be reversed and the CFPB continue to collect complaints in a similar manner to the process in place prior to early February 2026. If these changes are not reversed, consumers will be less likely to contact the CFPB to resolve financial problems and it will be more difficult for the CFPB to carry out its mission.

The complaint information collected by the CFPB's complaint system has significant practical utility for the agency, the financial company and its competitors, and for consumers who are working to efficiently and cost effectively address unresolved disputes with financial firms. Consumers can empower themselves with critical complaint details that can impact how or if they will do business with a company that has a record of predatory behavior or poor customer service.

Consumers value the narratives that individuals choose to publicly disclose to others, in the complaint database. These details can help the user evaluate if a complaint is reasonable, if the problem is frequently repeated by others and if the company appears to be addressing the problem.

The system is designed to assist individuals, alert the agency (and industry) to harmful trends, and ideally to resolve financial complaints in an efficient, informal and responsible manner for all involved.

Recommendations that the agency collect additional personal details and reduce complaint data details will harm the process and the people the system is designed to help. Recent

page additions to the intake portion of the website serve only to intimidate consumers and deter legitimate complaints.

Recent warning signs serve to intimidate

We write to express our concern over the CFPB's recent addition of warning signs when filing a credit bureau complaint. The multipage admonitions serve only to discourage consumers' submission of credit report complaints, which is precisely counter to what the Bureau's exceptional complaint process is designed to do.

The CFPB wisely crafted a complaint process that provides help to individual consumers, puts the onus on financial firms to take responsibility, respond to consumers' unresolved disputes and alerts the agency to burgeoning problems before they become systemic.

The threatening language used to alert consumers who seek to complain to the Bureau does not respectfully recommend that consumers first lodge a complaint with a credit reporting agency with which the consumer has a dispute. In fact, the vast majority of consumers try to resolve problems with companies before turning to the agency for help.

Only after people have been ignored or dismissed, do they tend to file a complaint with the CFPB. According to data from the CFPB's Consumer Response Annual Report, 85-93% of consumers reported that they had first attempted to resolve a problem directly with the financial company prior to reporting a complaint to the Bureau.

For credit and consumer reporting complaints, in particular, the 2024 report says 86% of consumers first submitted their complaint to the credit bureau before turning to the CFPB¹. CFPB data from January 2024 through June 2025 says, consumers reported that they had previously disputed issues with the credit bureau in 85% of complaints about covered issues. The CFPB also notes, "The share of consumers reporting a previous dispute has hovered around 90% since 2020 for all three NCRAs" (nationwide credit reporting agencies).²

The data makes clear that there is no need for harsh tactics to force consumers to comply since they already seek help directly from the source prior to turning to the Bureau for assistance.

The intimidating language and bold font on the recently updated complaint intake pages put consumers on notice that if they file a credit reporting complaint with the CFPB before

¹ <https://www.consumerfinance.gov/data-research/research-reports/2024-consumer-response-annual-report/>

² In 2025, there were 2,397,000 complaints about covered issues. Of those, consumers in 2,033,000 complaints reported that had previously disputed with the CRA.
https://files.consumerfinance.gov/f/documents/cfpb_fcra-611e-report_2025-12.pdf

submitting a complaint to a credit bureau that their submission may not be lawful. Yet, there is no legal requirement for an individual to first file a complaint with a credit reporting agency.

The Consumer Financial Protection Act does not require consumers to contact a credit bureau before complaining to the CFPB. The Fair Credit Reporting Act provides for a specific process with respect to complaints submitted to the CFPB after a consumer files a dispute with a credit reporting agency. But this process is not mandatory and does not affect the ability of consumers to file a complaint under the Consumer Financial Protection Act.

The Submit a complaint page now boldly, incorrectly reads, **“CONSISTENT WITH THE LAW, CONSUMERS MUST FIRST DISPUTE INACCURATE OR INCOMPLETE INFORMATION ON THEIR CREDIT REPORT WITH THE CREDIT REPORTING AGENCY. PREMATURE SUBMISSIONS SLOW DOWN THE SYSTEM FOR THOSE MOST IN NEED OF HELP AND WHO HAVE CORRECTLY FOLLOWED THE PROCESS.**

HAVE YOU SUBMITTED YOUR DISPUTE TO A CREDIT REPORTING AGENCY MORE THAN 45 DAYS AGO, OR IS YOUR DISPUTE WITH THEM NO LONGER PENDING?

IF NOT, DO NOT SUBMIT YOUR COMPLAINT HERE AT THIS TIME.”³

If a consumer proceeds s/he sees, “Furthermore, if you submit a complaint to the CFPB against a credit or consumer reporting agency about inaccurate or incomplete information without first disputing the information directly with that company:

- They may not respond to your complaint
- The CFPB will discontinue processing your complaint if the company alerts us that you did not first dispute the information with them directly.

DO NOT SUBMIT UNLESS YOUR DISPUTE WITH THE CRA IS NO LONGER PENDING OR 45 DAYS HAVE ELAPSED SINCE YOU FILED THAT DISPUTE:”⁴

The complainant is then required to attest to the truth of the complaint and that the complaint has been submitted to the CRA and that 45 days has elapsed.⁵

³ <https://www.consumerfinance.gov/complaint/credit-and-consumer-reporting-complaint-notice/>

⁴ <https://www.consumerfinance.gov/complaint/credit-and-consumer-reporting-complaint-notice-2/>

⁵ <https://www.consumerfinance.gov/complaint/credit-and-consumer-reporting-complaint-notice-3/>

As the Bureau is well aware, credit reporting complaints are by far the top complaint category that the CFPB hears from consumers on. The nearly 4.8 million consumer and credit reporting complaints accounted for 85 percent of all complaints, in the last year, with consumers often describing problems with incorrect information. These errors can drive up costs across every aspect of consumers' financial lives. Companies reported that more than 2 million people received relief after filing a credit reporting consumer complaint in 2025.

While encouraging consumers to file first with a credit reporting agency can be an effective way to manage credit bureau complaints, we recommend that the Bureau continue to process a consumer's credit reporting complaint, whether submitted before or after a complaint is filed with a credit reporting agency.

Not all credit reporting complaints are related to the accuracy of information or a dispute over an error. Some consumers file a complaint about improper use of a credit report or a problem with a credit monitoring subscription service from a credit bureau. When help is not received, it makes sense to turn to the agency that Congress has tasked with responding to these problems.

We urge the CFPB to remove the recently added language that discourages consumers from filing complaints.

In order to submit a complaint of any kind, the Bureau's complaint intake process requires users to create an account and register with the agency. The CFPB then threatens the complainant with "civil and criminal penalties" should someone use the system in an "unauthorized" manner.

The Bureau caps off the registration process by frightening consumers with their own complaint information with an ominous warning that the data submitted is now the agency's and will be used in any way and by anyone they choose.

"Because this is a CFPB information system, you have no reasonable expectation of privacy regarding any communication or data transiting or stored on this information system. All data contained on CFPB information systems is owned by CFPB and your use of the CFPB information system serves as your consent to your usage being monitored, intercepted, recorded, read, copied, captured or otherwise audited in any manner, by authorized personnel, including but not limited to employees, contractors, and/or agents of the United States Government."⁶

This warning notice is one last aggressive attempt at dissuading filers from submitting complaints. This approach harms individuals seeking help and the agency which is statutorily mandated to assist them.

⁶ <https://portal.consumerfinance.gov/consumer/s/login/SelfRegister>

Here too, we urge that this intimidating language be removed.

In many cases, the CFPB is the only place an individual can turn to resolve their credit bureau, debt collection or mortgage servicing complaint. When the Bureau institutes roadblocks for those who file financial complaints, it defies the congressionally mandated purpose of this complaint process and discourages resolution of credit bureau problems. It also disrupts the agency's ability to better understand and monitor the chronic issues that prompt consumers to turn to the CFPB for help with ongoing credit reporting and other problems.

Personal data puts all at risk

We strongly discourage any consideration to require further detailed personal information of those who file a complaint. Collection of individuals' highly sensitive data puts more pressure on the CFPB to protect that personal data and adds additional and unnecessary liability for the agency.

Conceding to industry requests for additional identifying information, such as date of birth, demographic data or SSNs, will hinder consumers' trust in the agency and valued process, and put individual's personal, sensitive data at potential risk.

Additionally, some complainants could be prevented from filing disputes if there's a limit to the number of complaints that are allowed to be submitted from one phone number or IP address. Limiting the number of complaints tied to a particular phone number or IP address will unfairly constrain consumers' access to the complaint tool, if they rely on third parties, such as Legal Aid offices, housing counseling agencies, and public libraries, to report a problem.

As industry representatives call on the CFPB to reduce their responsibility in resolving consumers' complaints, and reduce market transparency, we urge the Bureau to maintain its robust complaint process and public complaint database. Both consumers and lawful businesses rely on access to the CFPB's complaint data to hold companies accountable, to learn what harmful trends are developing in the marketplace and to avoid companies that prey on consumers. The narrative details of consumers' complaints allow the user to evaluate if a complaint has validity and is worthy of concern.

Narratives

Complaint narratives give consumers a window into what the actual unresolved problems are between a consumer and a financial firm. The narrative often expresses the crux of the ongoing dispute and can help both the Bureau and individuals begin to detect patterns of unfair, deceptive, even abusive behavior.

Access to the complaint narratives helps to educate and empower consumers to make wise financial decisions and meets the Bureau's mandate to inform and protect consumers. The complaint details description of "what happened" can help to prevent future problems by warning individuals in advance of others' unresolved disputes with companies that the Bureau is responsible for overseeing. Public access to this critical information also helps to hold companies accountable for their behavior in the financial marketplace.

In response to some industry representatives' longstanding, fervent opposition to the public's access to this valuable information, the Bureau has already accommodated these concerns by adding disclaimers that warn consumers that the complaints listed "are not necessarily representative of all consumers experiences".⁷

Improving the system

We commend the Bureau for seeking ways to improve the quality, utility and clarity of complaint process. Here are some recommendations to enhance this excellent tool.

- To improve the quality and utility of the portal system, the CFPB would be best served by regularly onboarding new companies to improve the Bureau's ability to monitor more financial firms, address more consumer complaints and ensure that disputes are receiving timely responses, as is statutorily mandated.
- We recommend expanding public access to the information consumers provide following a company's handling of a consumer dispute. It would be valuable to all parties to allow the public to view the consumer feedback portion of the process.
- Lastly, we would encourage the Bureau to provide better oversight of companies' responses to complaints, to ensure that businesses are not providing non-responsive responses to simply meet their mandate to reply.

Conclusion

The CFPB complaint process, portal and database are critical tools that consumers turn to when financial companies are unresponsive to their concerns. This highly valued complaint system provides consumers with a place to report their grievances and expect a response, if not a resolution, to a financial dispute. The complaint system and the public visibility into that system are a low-burden way to address consumer financial problems and to encourage companies to follow the law and treat their customers fairly.

Rather than overhauling this vital complaint process, we recommend robust support for this very efficient way to impact the marketplace without relying on regulation, in-depth industry examinations or enforcement actions. The CFPB complaint process makes for a more fair and accountable marketplace.

⁷ <https://www.consumerfinance.gov/data-research/consumer-complaints/>

Thank you for the opportunity to comment on the CFPB's critical complaint system.

Sincerely,

Alaska Public Interest Research Group

Americans For Financial Reform Education Fund

Better Markets

California Pan-Ethnic Health Network

Center for Economic Integrity

Center for Elder Law and Justice

Center for Responsible Lending

Check My Ads

Colorado Fiscal Institute

Community Catalyst

Community Economic Empowerment Network

Community Legal Services, East Palo Alto

Connecticut Fair Housing Center

Consumer Action

Consumers for Auto Reliability and Safety

Consumer Federation of America

Consumer Federation of California

Consumer Justice for the Elderly Litigation Clinic

Consumer Reports

Demand Progress Education Fund

East Bay Community Law Center

Economic Action Maryland Fund

Economic Empowerment Center, Lending Link

Economic Progress Institute

Georgia Watch

HEAL (Health, Environment, Agriculture, Labor) Food Alliance

Hip Hop Caucus

JustLeadershipUSA

Legal Aid Society of Northeastern New York

Legal Services NYC

Long Island Housing Services

Media Access Project

National Association of Consumer Advocates

National Community Reinvestment Coalition

National Consumer Law Center (on behalf of its low-income clients)

National Consumers League

National Fair Housing Alliance

New Yorkers for Responsible Lending

Oregon Consumer Justice

Oregon Consumer League

ProgressNow Colorado

Prosperity Indiana

Public Citizen

Public Counsel

Public Good Law Center

RISE Economy

SC Appleseed Legal Justice Center

Texas Appleseed

Texas Watch

Tzedek DC

Unidos

Virginia Citizens Consumer Council

William E. Morris Institute for Justice

Woodstock Institute