



Comment Intake—Agency Information Collection Activities
Consumer Financial Protection Bureau
1700 G Street NW
Washington, DC 20552

July 21, 2025

Re: Docket No. CFPB-2025-0027; Agency Information Collection Activities: Comment Request

To whom it may concern:

Americans for Financial Reform Education Fund (AFREF)¹ appreciates the opportunity to comment on the Consumer Financial Protection Bureau’s (CFPB) notice and request for comment on the CFPB’s consumer complaint intake system.² The CFPB is statutorily mandated to collect, investigate, and respond to consumer complaints about financial products and services through a secure online environment in a timely way.³ Congress included the mandatory complaint database to remedy the long-standing failure of other financial regulators to address consumer financial complaints and enforce consumer protection laws. Prior to the enactment of the Dodd-Frank Act, consumers struggled to determine which banking regulator to contact, had difficulty navigating the byzantine maze of complaint processes, and there was almost no publicly available data on the number of complaints or their resolutions.⁴ Nor did regulators act on the few complaints they received. For example, federal banking regulators (the Office of the Comptroller of the Currency, the Federal Reserve, the Federal Deposit Insurance Corporation, and the Office of Thrift Supervision) received about 2,000 complaints a year about unfair credit card debt collection in the early 2000s, but from 1999 to 2008 the four regulators took a total of one (1) informal enforcement action against a credit card issuer related to debt collection.⁵

The CFPB asks whether the “collection of information is necessary for the proper performance of the functions of the CFPB” and the answer remains a resounding yes. The CFPB must continue to maintain the complaints database in its current, publicly accessible form, in order to fulfill its duties

¹ Americans for Financial Reform Education Fund (AFREF) is a nonpartisan and nonprofit coalition of more than 200 civil rights, consumer, labor, investor, faith-based, and civic and community groups dedicated to advocating for policies that shape a financial sector that serves workers, communities and the real economy, and provides a foundation for advancing economic and racial justice.

² Consumer Financial Protection Bureau (CFPB). Agency Information Collection Activities: Comment Request. [90 Fed. Reg. 98](#). May 22, 2025 at 21905.

³ [12 U.S.C. §5534\(a\)](#). (2010).

⁴ Kenney, Jeannine. Consumers Union and Consumer Federation of America. Testimony before the Subcommittee on Financial Institutions and Consumer Credit. Committee on Financial Services. U.S. House of Representatives. “[Financial Consumer Hotline Act of 2007: Providing Consumers with Easy Access to the Appropriate Banking Regulator](#).” December 12, 2007.

⁵ Government Accountability Office. “[Credit Cards: Fair Debt Collection Practices Act Could Better Reflect the Evolving Debt Collection Marketplace and Use of Technology](#).” GAO-09-748. September 2009 at 31 to 32.

and obligations and to provide needed public accountability to assess whether the CFPB is addressing consumer complaints and pursuing needed enforcement to remedy abuses and address emerging issues affecting consumers. The CFPB complaints must also be shared with Congress⁶ and other regulators.⁷ Since 2011, the CFPB's Office of Consumer Response has received more than 10 million complaints,⁸ has worked to get consumers timely responses from more than 6,100 financial companies⁹ and has maintained and operated an effective consumer complaint database that has helped regulators, consumer advocates, and the public flag patterns and practices of misconduct and emerging issues that are harming consumers.

CFPB's consumer complaint intake system helps regulators more easily identify misconduct, scams, and frauds

The CFPB's complaint program allows individuals to seek government support when their financial institutions are not responsive. Currently, the complaints database information can be separated by financial product, geographic location, and demographic information, such as whether the complaint filer is a service member or older adult. This information helps the CFPB prioritize its proposals and better identify whether certain populations are being targeted for scams or fraudulent practices.

Once a complaint is submitted, the CFPB sends them on to CFPB-supervised banks, credit unions, as well as nonbanks that provide financial products and services. Complaints about non-CFPB regulated institutions are passed on to the appropriate prudential federal regulator.¹⁰ Companies can also see complaints through a company portal, and the public is able to access a public version of the complaints in a way that protects individual privacy and keeps company responses confidential.¹¹

Not only does the complaints database allow people to directly and easily share their problems, concerns, and stories, but the Bureau can also use submitted complaints to more efficiently direct investigative, regulatory, and enforcement efforts where there are observed patterns of risk or misconduct. Similarly, the public, including advocates and direct service providers, can also use the complaints database to look for risks and possible patterns of misconduct. Where companies and institutions may not be as motivated to respond to individual complaints, having additional government support and attention on submitted complaints brings another layer of urgency and accountability to the complaint resolution process.

- **Complaints database helped the CFPB hone in on patterns of misconduct targeted toward servicemembers.** In 2023, the total number servicemember, veteran, and military family complaints exceeded 400,000 — including a 27 percent annual increase in complaints from 2022 and nearly doubling since 2021.¹² From these complaints, the Bureau found a pattern of Servicemember Civil Relief Act (SCRA) violations and used these findings as a launching point for research and collaboration with other servicemember organizations, regulators, and agencies to protect servicemembers from SCRA violations.

⁶ 12 U.S.C. §5493(b)(3)(C). (2010).

⁷ 12 U.S.C. §5493(b)(3)(D). (2010).

⁸ CFPB. [Consumer Complaint Database](#). Accessed July 2025.

⁹ CFPB. [Consumer Complaint Program](#). Accessed June 2025.

¹⁰ CFPB. [Consumer Complaint Program](#). Accessed June 25, 2025.

¹¹ CFPB. [Report]. “[Consumer Response Annual Report: January 1 - December 31, 2024](#).” May 1, 2025 at 5-6.

¹² CFPB. Office of Servicemember Affairs. [Report]. “[Office of Servicemember Affairs Annual Report: January – December 2023](#).” September 2024 at 3; CFPB. Office of Servicemember Affairs. [Blog]. “[The CFPB is protecting the military community and providing relief](#).” May 23, 2024.

- **Complaints database helped the CFPB observe patterns of negligence by credit bureaus.** The CFPB has also relied, in part, on a slew of complaints related to credit reporting agencies, banks, and digital payment apps as a starting point to investigate, research, and (where warranted) file enforcement actions accordingly to address misconduct. Some of the most common complaints stem from disputed debts on credit reports, which eventually led to enforcement actions taken against credit bureaus that demonstrated a repeated pattern of failing to correct errors on credit reports.¹³ A Consumer Reports analysis revealed that nearly half of the filed CFPB complaints were related to incorrect information on credit reports. These complaints “increased by more than two and a half times since 2021.”¹⁴ Where individuals have nowhere else to turn when nothing is being done to address disputed credit reporting errors, the ability to submit a public complaint through the database plays a critical accountability role for people that cannot get the credit bureaus to address these problems.
- **Complaints database contributed to the insightful findings and observations about the credit card market, including hidden fees and denied benefits in credit card rewards programs.** In 2023, after receiving 1,200 credit card rewards complaints in a single year, the CFPB issued a spotlight report¹⁵ that featured recurring traps and tricks in credit card rewards programs, including vague and hidden conditions, lost benefits when rewards are devalued, delayed and blocked rewards redemptions, and unilaterally revoked balances.
- **Complaints database clued the CFPB into illegal lending conduct.** Complaints submitted by borrowers helped alert the CFPB to Vanderbilt Mortgage & Finance’s illegal lending practices. The ensuing CFPB investigation revealed that Vanderbilt Mortgage & Finance, the largest lender for manufactured homebuyers, trapped borrowers in unsustainable loans by manipulating its underwriting to approve loans to families that were already struggling to make ends meet, using unrealistically low estimates for living expenses, and making loans to borrowers it knew could not afford to make payments.¹⁶
- **Public complaint narratives also help policy experts, advocates, direct service providers, and the media better understand and expose on recurring problems and concerns.** Consumer advocates, state lawmakers, members of Congress, and direct service providers, have also relied on public complaint narratives to help understand patterns of practice and misconduct. Thanks to public complaints database information over the years, the public, including advocates, and the media, have been able to learn about risks tied to emerging and novel financial products (such as Buy Now Pay Later loans and digital wallets), or repeat patterns of misconduct (such as credit reporting errors, medical debt, and other debt collection abuses), and tricky practices (like surprise overdraft fees and shady auto lending tactics). Sunshine is the best disinfectant and the publicly available data carefully

¹³ CFPB. [Report]. “[Consumer Response Annual Report: January 1 — December 31, 2023](#).” March 2024 at Executive Summary.

¹⁴ Gill, Lisa. “[Credit Report Error Complaints Surge. Here’s Why You Should Check Yours](#).” *Consumer Reports*. February 15, 2024.

¹⁵ CFPB. [Report]. “[The Consumer Credit Card Market](#).” October 2023.

¹⁶ CFPB. [Press release]. “[CFPB sues Vanderbilt for setting borrowers up to fail in manufactured home loans](#).” January 6, 2025.

exposes the people's travails interacting with the financial services industry while protecting sensitive company data and trade secrets.

The CFPB must keep the complaints database intact and publicly accessible for the CFPB to vigorously field submitted complaints. The collection of information is not only necessary for proper CFPB functions, it serves a critical role in the CFPB's ability to strategically target areas potential areas of risk and misconduct. Keeping the information public but redacted also adds a layer of accountability that will help support otherwise helpless individuals when they are potentially hurt by financial institutions, with no other recourse in sight.

Thank you for your consideration to this important matter,

Americans for Financial Reform Education Fund