

June 23, 2025

Consumer Financial Protection Bureau (CFPB)

Submitted electronically via Regulations.gov and via the RegInfo.gov portal.

RE: Agency Information Collection Activities – Qualitative Feedback on Bureau Service Delivery [Docket No. CFPB-2025-0028]

Dear CFPB,

A government agency that is charged with the duties of protecting consumers and serving the public should solicit and receive feedback through a variety of channels – this should not be a controversial idea, but in the current context, it is necessary to remind the current CFPB leadership of the Bureau's purpose and the role feedback plays in fulfilling that purpose. The CFPB provides extremely valuable resources, information, and services to consumers, the financial industry, and the public at large. Soliciting and receiving feedback will support the CFPB's responsibility to carry out its duties in an effective and efficient manner. We urge the CFPB to continue the qualitative feedback collection methods identified in the Request for Comments, and to resume other feedback methods that we have found value in over the years.

The feedback methods identified in the Request for Comments are extremely low burden and accessible for commenters and can provide insightful qualitative feedback on the CFPB's activities. Virtually every business in the U.S. utilizes some form of these feedback methods for exactly those reasons. It makes all the sense in the world for CFPB to continue using these accessible, low-burden methods.

For example, the Information Collection Plan includes the CFPB's email signup form that allows subscribers to identify the types of content most interesting to them. Woodstock Institute and many of our partner organizations are subscribed to the CFPB's various email lists, but we've noticed that the email updates have stopped. Those emails were a useful way for us and the general public to learn about comment periods, new publications,

timely consumer resources, or other CFPB actions that impact our work and the communities we serve. The CFPB should resume its regular email updates.

In addition to light burden feedback methods, like those identified in the Request for Comments, we urge the CFPB to proactively solicit feedback via more "high touch" channels – those requiring more time and attention while also providing a proportional increase in the quality and detail of feedback collected. For example, meetings with direct service providers in different states can help inform the CFPB about issues consumers are facing and how the service providers and their clients utilize CFPB resources. Service providers have direct, on-the-ground contact with the impacted consumers that they serve, and can utilize that experience to synthesize information for the CFPB and identify trends in their service area. Woodstock and other nonprofit organizations serving Illinoisans have found great value in these kinds of meetings with CFPB staff in the past.

In addition, Woodstock urges CFPB to utilize "high touch" feedback channels to get more information on the user experience design (or "UX design") and the accessibility of their data tools. Woodstock's researchers are power-users of Home Mortgage Disclosure Act (HMDA) data, but we also believe that data should be accessible and readily usable by organizations that don't have deep expertise in data analysis. We're well positioned to speak to how CFPB's offerings could be further optimized to be as effective as possible.

Soliciting feedback consistently across a variety of channels will help the CFPB accomplish its statutory purpose effectively and efficiently. Without such feedback, it is much more difficult to know what is and is not working in the CFPB's services and information offerings. Input from consumers and from nonprofits providing direct services will help CFPB staff focus their energies on solving problems that are urgent or most impactful, contributing to the agency's efficiency.

Since the CFPB opened, it has provided a wide array of useful resources, data tools, and services to the public. We urge the current administration to honor the high quality of CFPB services, continue offering these public services, and to solicit feedback from the public to help improve and optimize those services. We appreciate the opportunity to offer comment on this matter. Should you have any questions or need further information, please contact Woodstock's Senior Regulatory Policy Associate, Jane Doyle, at jdoyle@woodstockinst.org.

Sincerely,

Woodstock Institute