

Justification for Non-material/Nonsubstantive Change to Currently Approved Collection
Consumer Financial Protection Bureau
Information Collection Request
Consumer Response Intake Form

The Consumer Financial Protection Bureau (CFPB) submits this memorandum to provide justification for changes to the form associated with information collection 3170-0011 Consumer Response Intake Form (Intake Form), approved by OMB on November 18, 2011.¹ These revisions are reflected on previously-approved information collection media (i.e., telephone script, “paper” form, and web form) and do not represent a new collection instrument. For ease of discussion, all references will be to the provided screenshots of the web version of the form.

In revising the student loan form, hundreds of previously-submitted student loan complaints were reviewed. The proposed changes to the Intake Form for student loan complaints include plain language improvements and re-worded questions for clarity.

More specifically, the following changes will be made to the Intake Form:

1. **Rewording Subject Matter Primarily at Issue.** As with all product-specific versions of the Intake Form, the student loan complaint form includes certain options that identify consumers’ primary concerns. In reviewing several hundred consumer complaints, it became clear that some consumers had difficulty distinguishing between the two options: “Repaying your loan” and “Problems when you are unable to pay.” For clarification, consumers with concerns related to student loan repayment will be prompted to select the plain language option “Dealing with my lender or servicer.” The issue “Problems when you are unable to pay” will be shortened to “Can’t repay my loan.” These minor changes will be flanked by the appropriate revisions to helper text.²
2. **Sub-Issues for Clarification.** In order to bring structure to concerns raised by consumers, as they relate to the primary issues (described above), a series of sub-issues will follow the primary issues. In reviewing the hundreds of complaints submitted, certain patterns and similarities in consumer concerns were identified. By taking these identified concerns and making them sub-issues, the revised form relieves the consumer of the burden of providing an unstructured, manually entered report of such concerns. These sub-issues will appear in drop down menus associated with the primary issues.³

¹ Originally approved as a Department of Treasury/Department Offices form, the approved information collection was transferred to the Consumer Financial Protection Bureau on November 21, 2011. ICR Reference Number 201111-3170-004.

² See Attachment A, page 1.

³ See Attachment A, pages 2-4.

File a student loan complaint

We'll forward your issue to the company, give you a tracking number, and keep you updated on the status of your complaint.

1. **What happened?**
2. Desired resolution
3. My information
4. Product information
5. Review



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My loan is *

- Federal loan (Stafford, Direct, consolidation, PLUS, Perkins)
- Non-federal loan (Private, alternative, other student loan)
- I am not sure

Describe what happened so we can understand the issue. Include the name and location of your school. *

4000 characters remaining

Which of these best describes your issue? *

- Getting a loan
Denial, confusing advertising or marketing, sales tactics or pressure, financial aid services, recruiting, fraudulent loan
- Can't repay my loan
Deferment, forbearance, default, bankruptcy, payment plan, refinancing
- Dealing with my lender or servicer
Making payments, getting information about my loan, managing my account

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4000 characters remaining

Which of these best describes your issue? *

- Getting a loan
Denial, confusing advertising or marketing, sales tactics or pressure, financial aid services, recruiting, fraudulent loan
- Can't qualify for a loan
- Qualify for a better loan than the one offered
- Can't repay my loan
Deferment, forbearance, default, bankruptcy, payment plan, refinancing
- Dealing with my lender or servicer
Making payments, getting information about my loan, managing my account

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4000 characters remaining

Which of these best describes your issue? *

- Getting a loan
Denial, confusing advertising or marketing, sales tactics or pressure, financial aid services, recruiting, fraudulent loan
- Can't repay my loan
Deferment, forbearance, default, bankruptcy, payment plan, refinancing
 - Can't decrease my monthly payments
 - Can't temporarily postpone making payments
 - Can't get other flexible options for repaying my loan
- Dealing with my lender or servicer
Making payments, getting information about my loan, managing my account

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Deferment, forbearance, default, bankruptcy, payment plan, refinancing
- Dealing with my lender or servicer
Making payments, getting information about my loan, managing my account
 - Trouble with how payments are being handled
 - Don't agree with the fees charged
 - Received bad information about my loan
 - Need information about my loan balance or loan terms
 - Keep getting calls about my loan
 - Having problems with customer service