Justification for Non-material/Nonsubstantive Change to Currently Approved Collection Consumer Financial Protection Bureau Consumer Response Intake Form OMB No. 3170-0011

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. These revisions will be reflected in previously-approved information collection media (i.e., telephone script, "paper" form, and web form) and do not represent a new collection instrument.

- (1) Transfer of Financial Products and Services from Paper Version to Web Version of Form. The CFPB's Office of Consumer Response (Consumer Response) will expand its web-based consumer complaint handling to include money orders, travelers checks, prepaid products, small-dollar consumer loans (title lending, pawn lending, and installment loans), refund anticipation checks, deposit advances, debt settlement, credit repair, and foreign exchange currencies. These products and services have been available for selection on the "paper" version of the Intake Form as originally approved under information collection 3170-0011 and, therefore, the revision to the CFPB's website present no substantive change to the collection. We expect the number of respondents will be within range of the anticipated number provided in the original OMB submission.
- (2) **Improved Paper Version of Intake Form.** Moreover, the "paper" version of the Intake Form will be improved so that certain financial product and service offerings collapse into general categories such as "credit reporting," "student loan," and "prepaid card." These categories reflect intuitive, plain language improvements that have been informed by hundreds of written submissions, by mail and fax, and will aid in efficient complaint handling. Overall, the paper version will be simpler, less cluttered, and easier to understand.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 Numbers 201106-1505-005. 201111-3170-004.

² For screenshots of these revisions, see Attachment A.

³ The updated paper Intake Form is included as Attachments B.