



Shining a Light on Consumer Problems

The Case for Public Access to the
CFPB's Financial Complaints Database

U.S. PIRG
Education Fund

FRONTIER GROUP

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CFPB's Financial Complaints Database

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Executive Summary

The public Consumer Complaint Database operated by the Consumer Financial Protection Bureau (CFPB) is a critical tool for understanding consumer problems in the financial marketplace. The database contains more than one million complaints and has proven useful for consumers, academic researchers, watchdog organizations and businesses, while bringing transparency and accountability to companies that provide financial services and products.

Yet today, the future of public access to the Consumer Complaint Database is uncertain, as CFPB Acting Director Mick Mulvaney has indicated that he may block public access to complaint data.¹ And in March 2018, the CFPB issued a formal request for information that could signal the beginning of a process to remove public access.² **To protect consumers, the CFPB should maintain public access to its Consumer Complaint Database and resist attempts to limit its scope or the information it contains.**

The public complaints database provides consumers with a rich trove of information to help them navigate the financial marketplace.

- As of May 2018, the complaints database contained more than one million complaints and 280,000 consumer complaint narratives. It included complaints from all 50 states and from 28,000 zip codes.
- Consumers can review complaints related to dozens of financial products – from checking accounts to credit reports – and nearly 5,000 companies.
- Consumers can see how companies responded to the complaints, using information in the database to determine whether companies responded to the complaints promptly and offered either monetary or non-monetary relief to consumers.

Public complaints allow watchdog groups, academics, and the private sector to highlight problems and help consumers.

- Analyses of public complaint data have employed a wide variety of perspectives and research tools. For example, the Center for Responsible Lending found

that confusion over account balances was a primary factor in problems involving overdraft fees, based on a detailed categorization of complaint narratives.³ A study published in Duke Law School's publication *Law and Contemporary Problems* analyzed complaint language to identify ways that the CFPB could employ text analysis tools to better meet consumer needs.⁴

- Public complaint data has helped reveal problems in the financial services industry. Analyses of complaints indicated problems with TCF National Bank, Wells Fargo and Sallie Mae before each company was cited by regulators for consumer mistreatment.⁵
- Watchdog groups can also use complaints to highlight good practices by financial companies. A U.S. PIRG Education Fund report on overdraft fees found that Citibank had the lowest number of complaints per customer account about issues caused by low account funds.⁶ Further research revealed that Citibank followed several best practices for limiting overdraft customer fees.⁷

Public complaints hold financial services firms accountable and help them serve their customers.

- Websites providing consumer reviews of goods and services have revolutionized consumers' experience of the marketplace, and surveys have found that the vast majority of consumers are influenced by online reviews.⁸ Because consumers rely heavily on online information, putting consumer complaints online is a powerful tool for keeping financial companies accountable.
- Public complaints include certain information about customer experiences that can be particularly revealing – and

that companies can use to improve their practices. For example, the database includes information on whether companies promptly respond to consumer complaints.

- Public complaints can also be useful for companies seeking to improve their business and customer relationships. According to consulting firm Deloitte, companies can analyze complaints and “use the resulting insights to potentially improve their regulatory compliance efforts, customer experience, and their own operational effectiveness.”⁹

Public complaints keep the CFPB accountable.

- The public database is a powerful tool for consumers and the public to conduct their own assessment of consumer treatment in the financial marketplace – and to ensure that the CFPB is faithfully and effectively following through on its mission of protecting consumers.
- Public complaints can indicate problems in the financial marketplace deserving of the CFPB's attention. The CFPB has used the complaint database to justify its own decisions to prioritize work on credit reporting accuracy and debt collection, and the public can similarly use complaint data to assess the CFPB's work.¹⁰
- The transparency afforded by public complaints is important for industry – the database has even been used by industry groups to argue for weaker enforcement. According to *American Banker*, the payday lending industry frequently cites public complaint data in their arguments for less oversight.¹¹ (Ample research indicates that payday loans, in fact, cause enormous pain for consumers.¹²)

By law, two of the primary missions of the CFPB are providing consumers with “timely and understandable information to make responsible decisions about financial transactions,” and ensuring that “markets for consumer financial products and services operate transparently and efficiently to facilitate access and inno-

vation.” The CFPB’s public Consumer Complaint Database helps accomplish both missions. To continue to serve the public, and to ensure that consumers have the protection they deserve in the financial marketplace, the CFPB should maintain an open and accessible Consumer Complaint Database.

Introduction

On September 8, 2016, the CFPB announced that it was imposing a \$100 million fine on Wells Fargo “for the widespread illegal practice of secretly opening unauthorized deposit and credit card accounts.”¹³ Partner regulators raised the total public penalty to \$185 million.¹⁴

The decision followed an investigation that revealed Wells Fargo had systematically mistreated its customers since at least 2011, collecting millions in unauthorized fees and opening hundreds of thousands of credit card accounts without authorization.¹⁵

The CFPB’s announcement revealed consumer mistreatment on a shocking scale. Yet in the years leading up to the announcement, data had been accumulating in a new publicly available information source that gave an indication of what was to come: the CFPB’s Consumer Complaint Database.

Through September 7, 2016, Wells Fargo had been the subject of 45,707 complaints contained in the database, making it the second most-complained-about financial company in the country.¹⁶ Nearly 11,000 of those complaints concerned problems with bank accounts,

and more than 3,000 concerned credit cards.¹⁷ For the CFPB’s internal researchers, those complaints were an early indicator of a problem and helped spark an investigation.¹⁸

Since it went online in 2012, the Consumer Complaint Database has proven itself to be a valuable tool – for consumers to research the businesses they patronize, for researchers to spot problems and trends in the financial marketplace, for businesses to better serve their customers, and for the public to hold the CFPB accountable. Yet today, the future of public access to the Consumer Complaint Database is uncertain. CFPB Acting Director Mick Mulvaney has indicated that he may eliminate public access to complaints.¹⁹ And in March 2018, the CFPB issued a formal request for information that could signal the beginning of a process to remove public access.²⁰

As described below, removing public access to consumer complaints would make American consumers less safe, would harm the ability of financial companies to serve their customers, and would make the CFPB a less transparent and accountable public agency.

The Consumer Complaint Database Is an Essential Tool

The Consumer Financial Protection Bureau (CFPB) was created in the wake of the 2008 financial crisis with the mission of protecting consumers in the financial marketplace. To date, it has followed through on that mission, returning billions of dollars to consumers, cracking down on abuses by financial companies, and implementing new rules to make consumer experiences safer and more transparent.²¹

The CFPB Receives and Acts on Consumer Complaints

One of the primary ways that the CFPB works to protect consumers is by collecting consumer complaints – a function required by law.²² Consumers can submit complaints about problems with financial companies either online at <https://www.consumerfinance.gov/complaint/> or over the phone at (855) 411-CFPB.

The CFPB follows a set process for handling each complaint. First, the CFPB will screen the complaint for certain criteria, including completeness of the information provided and whether the CFPB is the appropriate agency to handle the complaint.²³ If the complaint passes initial screening, the CFPB sends the complaint to the company in question.²⁴ The company then has 15 days to acknowledge receipt of the complaint, and 60 days to provide a final response. The CFPB may take investigative action in cases where the company does not provide a timely response, or in cases in which the consumer disputes the response.²⁵

The CFPB's complaint system has proven valuable for individual consumers to get help with financial problems. Through May 2017, nearly 200,000 consumers had received relief through the CFPB's complaint system, either in the form of monetary relief or non-monetary relief (for example, a debt collection company ceasing collection efforts).²⁶

The Public Database Compiles Consumer Complaints

The CFPB’s complaint system is important not just for consumers to get help with individual problems, but also to provide data that sheds light on problems and trends in the financial marketplace. The online complaint portal for the Consumer Complaint Database launched in June 2012.²⁷

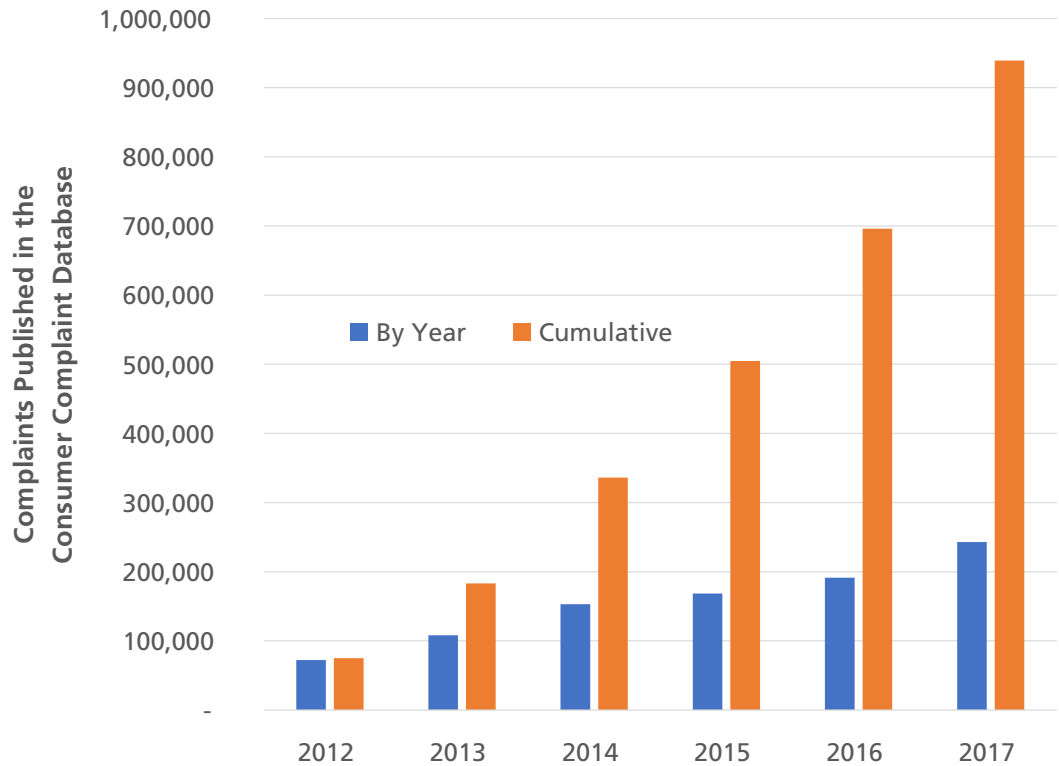
While the CFPB reviews all complaints that it receives, complaints must meet certain criteria for being published online. In fact, only about two-thirds of complaints that the CFPB receives are published online.²⁸

Complaints are only published after the complained-about company confirms a commercial relationship with the consumer, or after 15 days, whichever occurs first. Complaints are not published in the

database “if, among other reasons, the company suspects the complaint was submitted in furtherance of a fraud or it indicates to the Bureau that it does not have a commercial relationship with the consumer.”²⁹ Before publication, complaints are also scrubbed of any personal or potentially identifying information.

Each complaint in the online database includes basic information about the complaint, including the date the complaint was received, the company involved, the nature of the complaint, and the consumer’s general geographic location. Complaints also include information on how the complaint was resolved, such as whether the complaint was “closed with monetary relief” or “closed with explanation.” If the consumer explicitly consents, their “consumer narrative” – a description of the problem in the consumer’s own words – will be published with their complaint.

Figure 1. Complaints Published in the Consumer Complaint Database by Year³³



The CFPB has continually worked to improve its complaint system, both for consumers submitting complaints and for those making use of the data. For example, in April 2017, the CFPB streamlined and reorganized product and issue options, and updated its complaint form to be “more intuitive for consumers.”³⁰ And, in November 2017, the CFPB updated the public website for filtering and visualizing complaints, making the system easier to use for less technical users.³¹ These ongoing improvements make a good database better.

The Complaint Database Provides a Unique Window into the Financial Marketplace

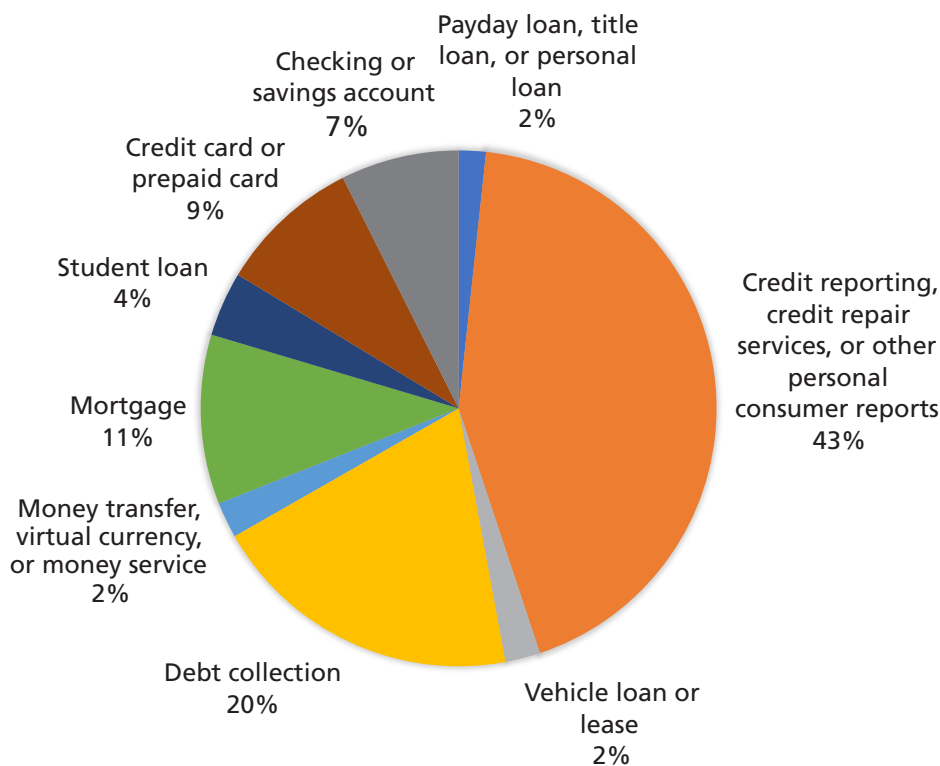
The CFPB’s complaint system has become an important resource for consumers seeking resolution to their problems with financial companies – and the CFPB’s public database provides a unique data tool for those seeking to understand the financial marketplace. The number of

complaints recorded in the database has increased every year since it was founded – in 2017, there were 242,000 complaints published, an average of 20,000 per month.³²

As of May 2018, the CFPB’s public complaint database included:³⁴

- More than 1 million complaints.
- 280,000 consumer complaint narratives.
- Complaints submitted from all 50 states and from 28,000 zip codes.
- 192,000 complaints that led to consumer relief, whether monetary or non-monetary (e.g., a debt collector agreeing to cease contact).
- 80,000 complaints from older Americans, in which the consumer has voluntarily tagged that he or she is 62 or older.
- 73,000 complaints similarly tagged by self-identified servicemembers and veterans, and their spouses and dependents.

Figure 2. Consumer Complaints by Product Category (Complaints since April 2017)³⁵



The Complaint Database Complements, But Does Not Replace, Other Sources of Information on Consumer Issues

The database also contains complaints on dozens of financial products. The Consumer Complaint Database organizes its complaints by nine general product categories, and 47 different sub-products.

The CFPB Consumer Complaint Database is an important tool for understanding the market. But it should not be used to ignore or disregard problems found through other information sources.

For example, payday loans account for a relatively small number of complaints compared to other financial products – a fact that has been used by the payday lending industry to argue for weaker enforcement.³⁶ Ample research, however, indicates that payday loans cause enormous pain for consumers. According to Pew Charitable

Trusts, 12 million Americans take out payday loans every year and spend \$9 billion on fees.³⁷ The CFPB has written that payday lenders “are pushing borrowers into debt traps or forcing them to cede control of their financial decisions.”³⁸ And the Pentagon has condemned predatory payday lenders as harmful to servicemembers.³⁹ The low number of complaints – despite evidence of harmful problems – may be a result of payday borrowers being unaware of their rights.

The Consumer Complaint Database can be a powerful indicator of problems in the financial marketplace, but it is not the only one. Policymakers should take care to base decisions on a full and thoughtful understanding of the market.

Four Ways the CFPB's Public Complaint Database Protects Consumers

1. Public Complaints Are a Powerful Tool for Financial Consumers

The CFPB Consumer Complaint Database contains a vast trove of data that consumers can use to help navigate the financial marketplace. Allowing public access to such information helps the CFPB achieve its statutory obligation of providing consumers with “timely and understandable information to make responsible decisions about financial transactions.”⁴⁰

The CFPB website provides its own description of the utility of complaint data for consumers: “In our Consumer Complaint Database, you can access reliable data on how many and what kinds of complaints companies receive from us and how different companies handle those complaints. Our database is also searchable so you can find and read about experiences consumers are having with companies as you make decisions about financial products and services for yourself and your family.”⁴¹

Consumers on the CFPB's complaint website can find data on complaints about dozens of financial products, and complaints related to experiences with nearly 5,000 companies.⁴² The sheer volume of accumulated complaints provides consumers with the ability to focus their search to look at how a particular company handled certain issues, which may affect whether or not they would like to do business with them, and also allows consumers to see the trends of specific problems faced by similar individuals in the financial marketplace.

For example, a military servicemember looking to open a checking account could use the database to help find a new bank or credit union. On the website <https://www.consumerfinance.gov/data-research/consumer-complaints/> the servicemember could begin by using filters to show only the relevant complaints. As of May 2018, the database revealed the following number of complaint results for each narrowing of criteria:

1. Unfiltered complaint database (1,044,507 complaints)
2. Filtered by tag for “Servicemember” (63,286 complaints)
3. Filtered by sub-product for “checking account” (2,060 complaints)

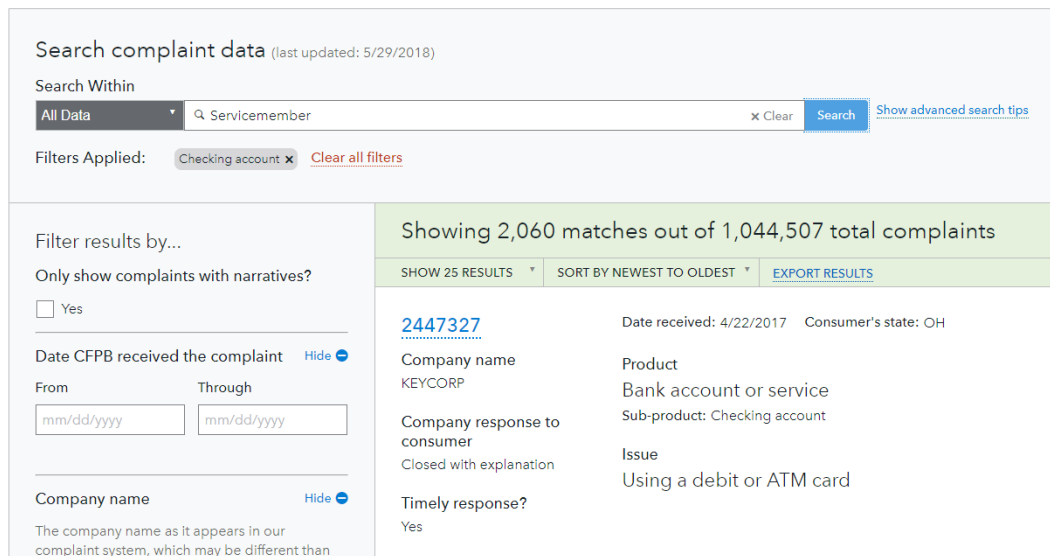
At this point, the servicemember could filter results for specific companies. He or she could also filter for specific areas of concern, including “account opening, closing, or management” (765 complaints), “deposits and withdrawals” (698 complaints), or “problems caused by my funds being low” (292 complaints). These complaints and associated narratives could shed light on issues encountered by other servicemembers, like unexpected fees when withdrawing money on an overseas base or encountering fraudulent activity while deployed.

For example, one consumer explains that while traveling on military duty, his or her checking account saw a “large

loss of funds” resulting from “unauthorized transactions.”⁴³ The consumer, who “even went as far as to furnish and provide my military orders to help with the investigation,” filed a complaint with the CFPB after his or her claim was denied.⁴⁴ The complaint was ultimately closed with monetary relief.⁴⁵

Consumers navigating the Consumer Complaint Database can use a wide variety of information to inform their financial decisions. Key pieces of information include:

- The number of complaints a company has received for a specific financial product.
- The timeliness with which a company responds to complaints, shedding light on a company’s level of responsiveness and customer service.
- The number of complaints about a company that were resolved with monetary or non-monetary relief.



Search complaint data (last updated: 5/29/2018)

Search Within: All Data | Q Servicemember | x Clear | Search | [Show advanced search tips](#)

Filters Applied: **Checking account** x | [Clear all filters](#)

Filter results by...

Only show complaints with narratives?
 Yes

Date CFPB received the complaint [Hide](#)

From: Through:

Company name [Hide](#)

The company name as it appears in our complaint system, which may be different than

Showing 2,060 matches out of 1,044,507 total complaints

SHOW 25 RESULTS | SORT BY NEWEST TO OLDEST | [EXPORT RESULTS](#)

2447327

Date received: 4/22/2017 | Consumer's state: OH

Company name KEYCORP	Product Bank account or service
Company response to consumer Closed with explanation	Sub-product: Checking account
Timely response? Yes	Issue Using a debit or ATM card

The CFPB’s Consumer Complaint Database contains a vast trove of data and narratives, including complaints tagged by military servicemembers. Consumers can filter and search complaints to find data and experiences related to almost any financial question.

- Complaint narratives that tell individual customer experiences. Narratives can contain helpful information on dealing with specific problems and can shed light on a company’s professionalism.
- Experiences specific to two of the CFPB’s target populations: servicemembers and older Americans. Such complaints are tagged and can be filtered for in the complaint database.

The public nature of the complaint system provides another important service to consumers: the ability to share their stories and use their experiences to help other consumers. According to the CFPB, approximately 59 percent of consumers who submit a complaint online have clicked the checkbox indicating that they want to publish the narrative description of their experience.⁴⁶

Because the complaint database provides consumers with the ability to post and read complaints online, CFPB Acting Director Mick Mulvaney has compared the database to Yelp, telling a banking industry conference in 2018 that “I don’t see anything in here that says I have to run a Yelp for financial services sponsored by the federal government.”⁴⁷ The reference to Yelp was presumably pejorative, but, as described above, the CFPB verifies account relationships, gives firms a chance to comment, and only posts complaints after that vetting process and company review – steps that are not commonly taken by online review sites like Yelp.

Moreover, some observers – such as Blair Levin of the Brookings Institution and Larry Downes of Georgetown University – have argued that “we need more, not fewer, government Yelps.”⁴⁸ The Consumer Complaint Database, they wrote in the *Washington Post*, can “empower consumers to make better-informed decisions,” encourages “market forces that

reward better business practices,” and is an example of “the data-driven, high-performance government services that constituents deserve.”⁴⁹

Indeed, the CFPB is not alone among government agencies in providing online access to consumer complaints. The National Highway Traffic Safety Administration and the U.S. Consumer Product Safety Commission also publish searchable complaint databases.⁵⁰

2. Public Complaints Allow Watchdog Groups, Academics, and the Private Sector to Highlight Problems and Help Consumers

Researchers from a wide variety of non-governmental organizations frequently use complaint data to spotlight problems in the financial products market, and then make their findings available to the public and the media.

Outside researchers can apply a wide variety of expertise, perspectives and research tools to analysis of consumer complaints, producing reports that shed important light on problems and trends in the financial marketplace:

- In 2016, the Center for Responsible Lending (CRL) manually reviewed complaint narratives related to bank overdraft fees, showing that nearly one in five of those complaints expressed confusion over account balances. CRL concluded that many complaints were related to “bank practices that make it difficult for consumers to know balance availability, transaction timing, or whether or not overdraft transactions would be paid or declined.”⁵¹

- In 2017, a study published in the Duke Law School journal *Law and Contemporary Problems* analyzed the language contained in narratives from a psychological perspective.⁵² The study found that narratives typically express either “anger and frustration” or “sadness and fear.”⁵³ It concluded that the CFPB could employ text analysis tools to better meet the needs of consumers who submit complaints.⁵⁴ Such data-mining (of public fields only) has also been used in U.S. PIRG Education Fund reports analyzing complaints in the database.⁵⁵
- In 2013, consulting firm Deloitte analyzed public complaint data and made suggestions for how businesses could benefit from the data. Deloitte suggested that financial companies could “use the resulting insights to potentially improve their regulatory compliance efforts, customer experience, and their own operational effectiveness.”⁵⁶

Media coverage of such analyses can expand the reach of the complaint database.⁵⁷ Consumers who read such media coverage may be better able to understand how to responsibly and safely use financial products.

As evidenced by the CFPB’s own practices, complaints can also be useful for monitoring the financial services industry and spotting problems. For example, *The New York Times* reported that a “wave of complaints about Wells Fargo helped spur the [CFPB] investigation and exposure of the bank’s sham accounts.”⁵⁸ Complaint analyses by watchdog groups and other researchers have identified problems in the financial products industry, sometimes revealing problems before the CFPB published its own findings. For example:

- Reports published in 2013 and 2016 by U.S. PIRG Education Fund and Frontier Group observed that TCF National

Bank was the subject of a high volume of complaints, including the highest number of complaints per account for “problems caused by my funds being low.”⁵⁹ In 2017, the CFPB sued TCF National Bank for “tricking consumers into costly overdraft service.”⁶⁰

- A 2013 analysis by consulting firm Beyond the Arc found that student loan company Sallie Mae was the subject of a high number of loan repayment complaints that were resolved with monetary relief for the consumer. Beyond the Arc concluded that this finding “should be a red flag to the company, as it mostly likely will be to regulators at the CFPB.”⁶¹ The next year, following a joint investigation by the CFPB, the Department of Education and the Justice Department, Sallie Mae reached a \$60 million settlement with the Justice Department “to resolve allegations of charging military servicemembers excessive rates on student loans.”⁶²

Outside groups have also used complaint data to highlight good practices by financial companies. U.S. PIRG Education Fund’s study on overdraft fees found that Citibank had the lowest number of complaints (normalized by customer accounts) related to issues caused by low account funds.⁶³ Further research revealed that Citibank employed several practices to protect its customers from unfair overdraft fees.⁶⁴

Finally, outside researchers can use public complaints to monitor specific companies in the wake of consumer abuse or mistreatment. A group of three U.S. senators used public data to release a report in April 2018 finding that “consumers filed 21,921 complaints in the six months after Equifax announced the massive breach of consumer data – nearly double the amount of complaints related to Equifax in the six months preceding the announcement.”⁶⁵

3. Public Complaints Hold Financial Services Firms Accountable and Help Them Serve Their Customers

The risk that customers will share negative experiences online can be a powerful incentive for companies to treat their customers well. A 2017 consumer survey found that 97 percent of consumers looked online for local businesses that year, and a separate survey found that 88 percent of respondents were “influenced by an online customer service review when making a buying decision.”⁶⁶

Complaints published in the Consumer Complaint Database can shed light on company practices – and can be used by companies to improve their business. Information available through the database includes:⁶⁷

- Whether a high percentage of complaints to a company resulted in monetary or other relief. As of May 2018, 19 percent of complaints were closed with relief of some kind.
- Whether a company provides timely responses to complaints. As of May 2018, 97 percent of complaints received a timely response.
- Whether consumer complaint narratives reveal a pattern of indifference or lack of consideration by companies. The database contains more than 280,000 public complaint narratives.

Public complaints can also be useful for companies seeking to improve their business and customer relationships. According to consulting firm Deloitte, companies can analyze complaints and “use the resulting insights to potentially improve their

regulatory compliance efforts, customer experience, and their own operational effectiveness.”⁶⁸ Steven Ramirez, CEO of consulting firm Beyond the Arc, told Consumers Union that the public database “can be useful to financial services companies because it is the one source of data that is comparative across institutions.”⁶⁹

By giving consumers information about company behavior, the public complaint database creates a more transparent and efficient financial services market, one in which companies are rewarded for good service. In this way, the public database helps the CFPB achieve one of its statutory objectives: Ensuring that “markets for consumer financial products and services operate transparently and efficiently to facilitate access and innovation.”⁷⁰

4. Public Complaints Keep the CFPB Accountable

The public Consumer Complaint Database is a powerful tool for consumers and the public to conduct their own assessment of consumer treatment in the financial marketplace – and to ensure that the CFPB is faithfully and effectively following through on its mission of protecting consumers.

The public complaints database can help the public assess whether the CFPB is taking appropriate action against specific companies. Time and again, including in previously cited examples involving TCF National Bank and Sallie Mae, consumer complaints indicated problems that the CFPB eventually acted on. Had the CFPB not acted, those complaint assessments could have been used to question its inaction.

Public complaints can also indicate which areas of the financial marketplace the CFPB should focus on. The CFPB

has previously cited complaints in setting its policy priorities. In explaining its focus on improving credit reporting accuracy, the CFPB noted that “[o]ver 75 percent of consumer reporting complaints that the CFPB receives relate to consumer reporting accuracy.”⁷¹ And in prioritizing debt collection, the CFPB noted that it receives “its highest volume of complaints—around 80,000 per year—from consumers in the area of collections.”⁷²

The transparency afforded by public complaints is important for industry as well – and industry groups have even used the database to argue for weaker enforcement. According to *American Banker*, the payday lending industry frequently cites public complaint data in arguing for less oversight.⁷³ (See “The Complaint Database Complements, But Does Not Replace, Other Sources of Information on Consumer Issues,” page 8.)

Top Myths about the Consumer Complaint Database

The Consumer Complaint Database has faced attacks since it was launched.⁷⁴ Many arguments for eliminating the database, or walling it off from public view, have been based on misleading claims or misunderstandings of how the database works.

Myth: The Consumer Complaint Database “erodes customer privacy.”⁷⁵

Fact: The CFPB uses extensive precautions to protect consumer privacy. Consumer complaint narratives are scrubbed of any identifying information before publication.⁷⁶ The CFPB also limits location data that could be used to identify the consumer. For complaints with narratives submitted from zip codes with a population of less than 10,000, the CFPB only publishes a 3-digit zip code, and in cases where the 3-digit zip code has a population of less than 20,000, the CFPB does not disclose any zip code data.⁷⁷

Myth: The Consumer Complaint Database contains “unreliable and misleading information.”⁷⁸

Fact: The complaint database is a trustworthy and nuanced source of consumer information.

- The CFPB takes steps to confirm a commercial relationship between consumers and the company before complaints are published.⁷⁹ Companies are given an opportunity to dispute the veracity of the complaint or whether a commercial relationship existed.⁸⁰

- Companies can select from a list of standardized complaint responses that enable them to give their side of the story. Available responses include “[c]ompany believes complaint is the result of an isolated error” and “[c]ompany disputes the facts presented in the complaint.”

- Each complaint is published with information entered by CFPB staff that adds important context to the complaint and any accompanying narrative. For example, each complaint is published with information regarding its ultimate resolution, such as whether the complaint was closed with monetary or non-monetary relief.

- The CFPB prevents publication of duplicate complaints to ensure that single incidents are not given disproportionate weight in the database.⁸¹

Myth: Complaints that do not result in relief are not helpful to “make informed choices.”⁸²

Fact: Complaints that only reveal consumer error or confusion also provide important information for understanding the financial services marketplace. Such complaints can help reveal situations in which consumers need more accurate or user-friendly information about financial products or areas where consumers would benefit from financial education.

Conclusion: Keep the CFPB Consumer Complaint Database Public

The CFPB's Consumer Complaint Database contains critical information about the state of the financial marketplace – data that have been used to shed light on problems and trends facing consumers, to educate consumers, and to reveal instances when the CFPB has acted to address complaints and protect consumers from mistreatment.

The public nature of the database is essential to its function and to the CFPB's mission to protect consumers. By law, two of the primary missions of the CFPB are providing consumers with “timely and understandable information to make responsible decisions about financial transactions,” and ensuring that “markets for consumer financial products and services operate transparently and efficiently to facilitate access and innovation.” The current structure of the Consumer Complaint Database ensures that complaint information is made available to the public quickly and in an understandable manner, and that the financial services industry operates transparently.

To continue to serve the public, and to ensure that consumers have the protection they deserve in the financial marketplace, the CFPB must maintain an open and accessible Consumer Complaint Database.

In addition, the CFPB should continue efforts to improve the database and increase its accessibility, including by:

- Expanding efforts to educate consumers about the complaint system.
- Surveying financial institutions and borrowers with both resolved and unresolved complaints in order to better hone the effectiveness of the CFPB database.
- Developing free smartphone applications (apps) for consumers to access information about how to complain about a firm and how to review complaints in the database.
- Ensuring that complaint data can be easily matched with data from the Fed-

eral Financial Institutions Examination Council, for example by logging each bank's unique RSSD ID code with every complaint.

- Allowing more granular tagging and sorting of complaint data, including by allowing users to tag specific fee types in their complaints.
- Listing company subsidiaries with complaints and grouping them with their parent company in searches. Subsidiaries are often the firms with which consumers actually interact and grouping them with parent companies will enable consumers to better apply the information in the CFPB database to their own experiences and to the choices they make in the marketplace.

Notes

1 Stacy Cowley, “Consumer Bureau Looks to End Public View of Complaints Database,” *The New York Times*, 25 April 2018.

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