# Company Portal Manual

Version 3.0

April 2017



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### 1. Overview

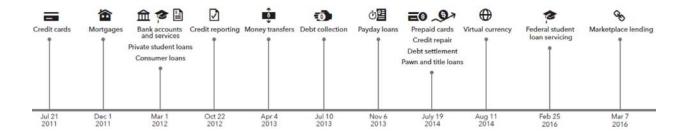
#### 1.1 About Consumer Response

The Dodd-Frank Wall Street Reform and Consumer Financial Protection Act of 2010 directs the Consumer Financial Protection Bureau (CFPB or "the Bureau") to facilitate the coordinated collection, monitoring, and response to consumer complaints about financial products and services.

The CFPB's Office of Consumer Response (Consumer Response) answers consumers' questions and sends consumers' complaints directly to financial companies. We work with companies to get the consumer a response, generally within 15 days. We know that every complaint we receive gives us, and companies, insights into problems that consumers experience in the marketplace.

The CFPB's phased-in approach to taking complaints has allowed Consumer Response to develop strong foundations over time. By applying the lessons learned through previous complaint rollouts, Consumer Response has improved its intake process, enhanced communication with companies, and ensured the system's ease-of-use and effectiveness for consumers. Based on feedback from consumers and companies, as well as its own observations, Consumer Response identifies new opportunities to improve its processes and implements changes.

The roll out schedule has been as follows:



#### 1.2 About the Company Portal

The Company Portal ("the portal") serves as the primary interface between Consumer Response and companies, facilitating a coordinated response to consumer complaints. Consumer Response routes complaints to companies through the portal where companies can easily and securely read and respond to complaints. Companies can also select from a structured list of optional, public company response categories for publication in the Consumer Complaint Database.

After system launch, registered users can access the Company Portal from the following new URL: https://portal.consumerfinance.gov/company

Note: Registered users who navigate to the past URL (https://secure.consumerfinance.gov/) will be automatically redirected to the new URL.

#### 1.3 Complaint process

- 1. Consumer submits a complaint about a consumer financial product or service by web, telephone, mail, fax, email, or another agency refers the complaint to the CFPB. Consumers who submit complaints directly to the CFPB's website can opt to have their complaint narrative published in the Consumer Complaint Database.
- 2. Consumer Response screens the complaint for completeness and sends it to the company identified by the consumer via the secure portal for response or refers it to the appropriate regulator.

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- 3. Company reviews the complaint, communicates with consumer as appropriate, and determines what action to take in response.
- 4. Company responds to the consumer and the CFPB via the portal.
- 5. OPTIONAL: Company selects from a structured list of public company response categories.
- 6. CFPB invites the consumer to review the company's response by logging into the secure Consumer Portal or calling the CFPB's toll-free number.
- 7. Consumers are given the opportunity to provide feedback to the CFPB about the complaint process.
- 8. Complaints are published in the Consumer Complaint Database when the company responds to the complaint confirming a commercial relationship with the consumer, or after the company has had the complaint for 15 days, whichever comes first. With consumers' consent, scrubbed complaint narratives will be published when the company selects an optional public response or after the company has had the complaint for 60 calendar days, whichever comes first. Complaints can be removed if they do not meet all of the publication criteria.
- 9. Complaint data and information is shared with other offices within the CFPB, including but not limited to Enforcement and Supervision, as necessary.

## 2. Privacy

All companies given access to consumer data share responsibility for protecting the information. Though the portal is itself secure, it contains consumers' personal information, which must be safeguarded by all of the parties with whom the CFPB shares personally identifiable information (PII) and otherwise sensitive information.

To provide a secure environment for portal users, two-step verification with a numeric code sent via email will be required at initial login. Re-verification will be required every 90 days thereafter or when a new IP address is used to access the portal.

You should maintain a high level of confidentiality, protection, and respect for all of the information you encounter. Specifically, you should:

- Not access, discuss, or otherwise disclose PII for any purpose not related to official duties;
- Secure all physical copies of PII in a locked drawer, cabinet, cupboard, safe, or other secure container when not in use;
- Never leave PII unattended. PII should be properly protected by establishing access restrictions, logging out of systems, or locking computers when not in use;
- Confirm the need to create duplicate copies of PII to perform a particular task with your supervisor and properly dispose of the duplicates when they are no longer needed; and
- Shred or use another secure method to dispose of PII instead of recycling.

#### It is your **company's responsibility** to:

- 1. Immediately report any suspicion of lost or compromised information to the CFPB via email at CFPB\_StakeholderSupport@cfpb.gov. Please add this e-mail to your address book along
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with the following e-mail addresses to ensure you receive our e-mails: CFPB\_ConsumerResponse@cfpb.gov and noreply-notice@cfpb.gov,

- 2. Deactivate users or notify Consumer Response promptly when an authorized POC no longer requires access to the portal by submitting a request through the Support tab with the name, phone number, and email address of the person(s) who should no longer have access to the portal.
- 3. Report the receipt of a complaint not related to your company immediately upon discovery by responding Incorrect Company or Alerted CFPB (for more information on the difference between these responses, see the *Company response definitions* section) and safeguarding complaint data to prevent misuse or redisclosure.

A failure to implement any of these privacy-enhancing practices will be considered a breach of your responsibilities as an authorized user of the portal and may result in, among other actions, a revocation of access.

## 3. Getting started

### 3.1 Supported browsers

To protect the security of PII and otherwise sensitive information, CFPB websites, including the portal, are only compatible with certain browsers.

Icon	Supported browser	Download source
	Internet Explorer version 11*	Microsoft
9	Microsoft Edge for Windows 10	Microsoft
	Most recent stable version	Mozilla Firefox
9	Most recent stable version	Google Chrome
	Most recent stable version	Apple Safari

<sup>\*</sup>Versions 10 and below are not supported

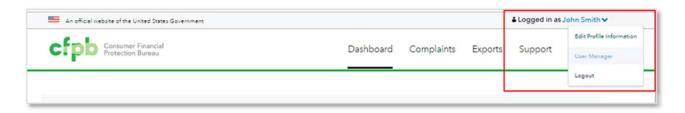
The CFPB strongly recommends that companies use one of the supported browsers listed above to avoid the technical challenges associated with unsupported browsers. The portal is not mobile-enabled.

<sup>\*</sup>Compatibility Mode and Compatibility View in Internet Explorer are not supported

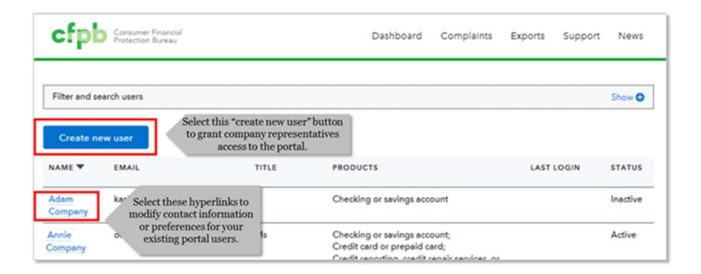
# 3.2 Requesting access for yourself and others

Your company should maintain an authorized point of contact (POC) for Consumer Response. Consumer Response provisions the initial authorized point of contact during the company boarding process. After a company is boarded, changes to access for authorized points of contact are made by submitting support tickets through the portal.

Authorized POCs will now be able to grant other company representatives access to the portal by creating a user account through his or her own portal account. As the images below display, the authorized point of contact should select "User Manager," located in the drop down menu underneath their login name, to access a page through which they can modify existing user accounts for company representatives or create new users. Please note that an authorized POC cannot modify another authorized POC's account.



As shown in the image below, the authorized point of contact can create new users or modify information about existing users (except for another authorized POC), including contact information, communication preferences, financial products or services access, export capabilities, and active / inactive status. New users will receive an e-mail with instructions to access the portal and create a password.



If you need to update the authorized point of contact, you can request the change by submitting a request through the Support tab via the Open a New Support Ticket link on the Portal and including the company name, the new authorized point of contact's name, phone number, and email address. The email address provided to Consumer Response will be used for logging into the Portal.

### 4. Account login

### 4.1 Logging in

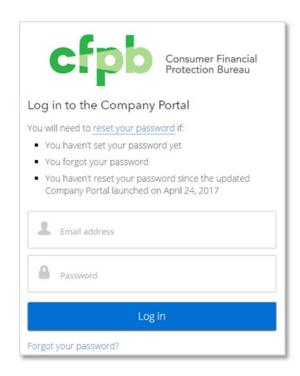
Once you have a Portal account, you can access the Portal through the Company Portal URL.

#### https://portal.consumerfinance.gov/company

As displayed on the right, the landing page will have fields for your username and password. While the same username will work to log in to the upgraded portal, passwords are required to be stronger than in the prior version of the portal to better protect the security of your customer's data.

## Your password must meet the following requirements:

- Password length of at least 12 characters
- At least one lower case character
- At least one upper case character
- At least one number
- At least one special character

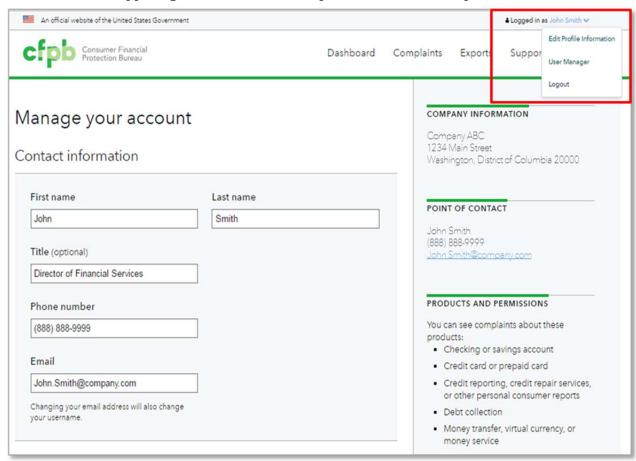


After you have entered your username and password, select the "Log in" button to access the portal. Note that session timeouts will occur after one hour of inactivity.

Additionally, the updated Company Portal includes two-step verification to enhance security within the portal. Every 90 days or upon login from a new IP address (whichever comes first), you will receive an email to the email address on file with a numeric code when you initially enter your username and password. To access the portal, enter the numeric code; the screen will redirect you to the company dashboard. You will not need to complete the two-step verification process for 90 days or until accessing the portal from a different IP address.

#### 4.2 Updating your account information

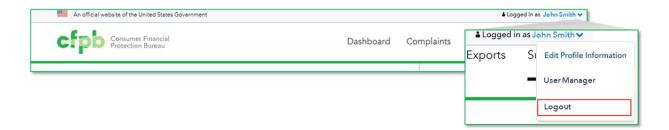
To update your account information, including name, email, and phone number, select your user name in the upper right-hand corner of the portal and select "edit profile information."



You will then be directed to the page, shown above, to enter your desired information updates in the contact information and account information fields. In addition to updating your account information on this page, you may also update your communication preferences on this page to receive regular digests via email. When complete, select "save."

### 4.3 Logging out

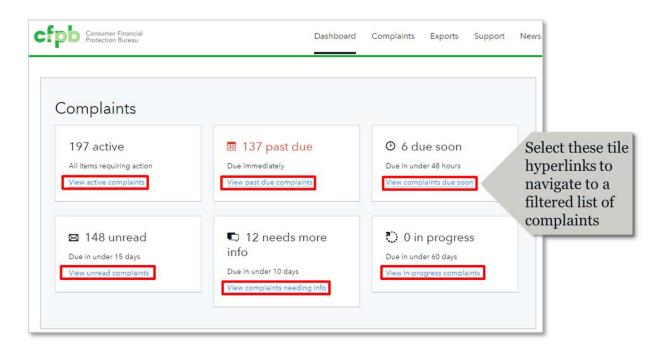
As part of your responsibility to protect information, log out when you are no longer using the portal. To logout, select your user name and click "Logout" from the drop-down menu. Users will also be logged out automatically after 60 minutes of system inactivity.



## Portal dashboard and navigation

#### 5.1 Portal dashboard

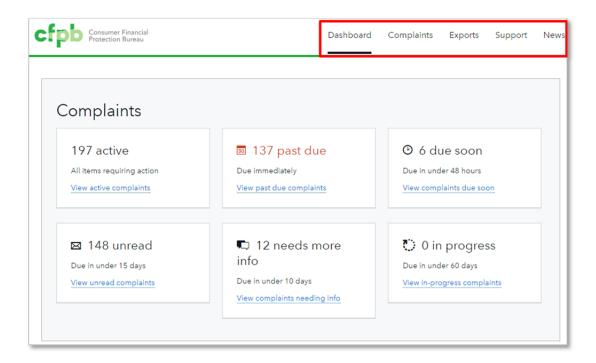
Once you log into the portal, you will reach the Portal dashboard, a new portal feature that displays a series of tiles with key information for company users. Each tile contains a hyperlink to a filtered list of complaints related to the topic of each tile for easy access and follow-up. The tiles and topics are listed below in the image of the portal dashboard. All portal users will have access to the Portal dashboard. Hyperlinks for users with limited product access will only navigate to complaints associated with the limited product access for that user.



- Active: Complaints that are open and require action
- Past due: Complaints that have exceeded the 15 day limit by which a company must provide an in progress or the 60 day time limit by which a company must provide a final response to a consumer complaint
- Due soon: Complaints that are due for company response within two days
- Unread: Complaints that have not been viewed
- Need More Info: Complaints that need more information and the additional information is due within 10 days
- In Progress: Complaints where the response has been initiated but not completed, and where the complaint is due within 60 days of when the company received the complaint

### 5.2 Portal navigation

From the default dashboard page, you can navigate to other sections of the portal by using the ribbon on the top right corner of the screen as shown in the image below.



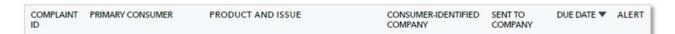
- Dashboard: The dashboard page, as described above, contains links to key complaint information requiring action by the company
- Complaints: The complaints page contains a list of active and archived complaints in a sortable and searchable format. You can access individual complaints by selecting an individual complaint ID hyperlink
- Exports: The exports page contains an export tool and a list of historical exports. You can sort across active and archived complaints and include complaint summaries and attachment lists in your export
- **Support**: The support page contains a link to the company portal manual, the support ticket feature, and a list of current and historical support tickets that you can access by selecting an individual ticket ID hyperlink
- News: The news page contains a list of news articles related to Consumer Response or the Company portal. You can filter news articles based on tile, text, and publication date

## 6. Complaint management

#### 6.1 Viewing complaints

Once you have logged into the portal you will be able to view all of your company's complaints. Lists of active complaints show the following information about each complaint:

- Complaint ID. Previously "case number," this is the unique number assigned to the complaint. Note that Complaint IDs are distinct from IDs used in the public Consumer Complaint Database ("CCDB");
- Primary consumer. The name of the consumer as listed in the complaint;
- Product and issue. The product and issue as reported by the consumer;
- Consumer-identified company. The company provided by the consumer;
- **Sent to company.** Date and time the complaint was forwarded to your company via the portal. Note that all times reflect Eastern Time (ET);
- **Due date.** Date by which a response is requested.
- Alert. The status assigned to a complaint if the complaint is past due, due soon, unread, or requires more information.



#### 6.2 Complaint IDs

The updated portal uses a different numerical convention than the previous portal. If your company received any complaints prior to the portal upgrade, you will notice two formats for complaint IDs—one format for complaints received in the legacy portal prior to the upgrade (previously referred to as case numbers) and another for "Complaint ID." Complaint ID numbers will be applied to all cases submitted on or after the upgrade.

- Legacy case numbers: consist of six numbers denoting the year, month, and day (YYMMDD) followed by a sequential six digit number padded with leading zeros, which resets every 24 hours (XXXXX). For example, a legacy case number could look like "161014-000001."
- **Complaint IDs**: All cases will be provided with a Complaint ID number, whether submitted prior to or after the upgrade. The ID consists of six numbers denoting the year, month, and day (YYMMDD) followed by a sequential seven (at minimum) number (XXXXXXX). For example, a Complaint ID number could look like "170525-1234567."

While listed under the "Complaint ID" column, complaints submitted before the upgrade will still display the legacy case number format in the complaint list and in the complaint details. Complaints submitted after the upgrade will only receive a Complaint ID number. Both legacy case numbers and Complaint IDs will be searchable in the Company Portal. Note that "Complaint IDs" in the Company Portal are distinct from those used in the public Consumer Complaint Database.

#### 6.3 Complaint statuses

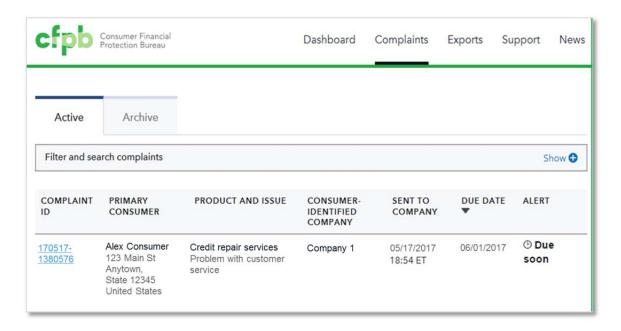
Each complaint has a status that reflects action taken to date or the most recent response category provided. A complete list of response categories and their definitions is included in section 8.4. Statuses you will see reflected on the complaint details page include:

Status	Description	Catalyst
Pending Action by Company	Complaint has been forwarded to your company by Consumer Response and is awaiting a timely response within 15 calendar days of the date the complaint was sent to your company	Consumer Response
In progress	An interim responsive explanation to consumer and the CFPB, indicating that the complaint could not be closed within 15 calendar days and that the final responsive explanation to consumer will be provided through the company portal at a later date	Company
Provided administrative response	Indicates that your company provided an administrative response to CFPB, including one of the following response category types: "alerted CFPB," "duplicate complaint," "incorrect company," or "sent to regulator."	Company
Provided closure response	A final response to the consumer, indicating that your company provided one of the following response category types: "closed with explanation, "closed with monetary relief," or "closed with non-monetary relief."	Company

### 7. Complaint Lists

Your company's complaints are located on two tabs under the Complaints page—Active and Archive. The legacy tab, "Under Review," has been consolidated into these two tabs. All complaints that are open or for which additional information has been requested fall into the Active tab. All closed complaints for which the company has provided a response fall into the Archive tab.

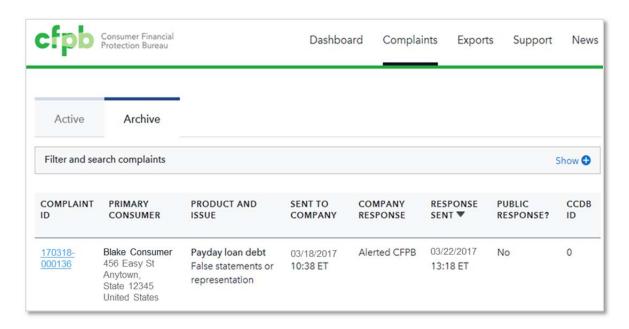
#### 7.1 Active complaints



The image above displays the complaints listed under the Active tab. Complaints found here include those with the following alerts:

- **Unread**: Complaints that are appearing in your portal for the first time with the status "Sent to company," which require a timely response within 15 calendar days
- **Due soon**: Complaints which require a response from your company in under 48 hours
- **In progress**: Complaints to which your company has submitted an initial response and which are awaiting a closure response
- Past due: Complaints to which your company has failed to provide a timely response. Your company must respond to any complaints with a "Past due" status on the Active tab immediately. Consumer Response shares information about delinquent responses within the Bureau
- Needs more info: Complaints for which Consumer Response has requested additional information. Your company must respond to requests for additional information appearing on the Active tab within 10 calendar days of receipt

### 7.2 Archived complaints



The image above displays the complaints listed under the Archive tab. The Archive tab shows complaints to which your company has already provided a final response and do not require

additional information or a response. Complaints found here include the following response types. More information about company response categories can be found in Section 8.4.

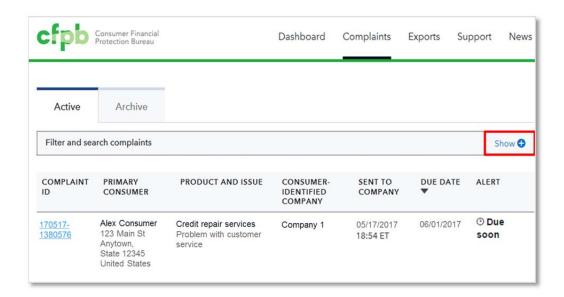
- Closed with explanation;
- Closed with monetary relief;
- Closed with non-monetary relief;
- Alerted CFPB:
- Duplicate CFPB complaints reported;
- Incorrect company; and
- Sent to regulator

By clicking on the case number from the list on the Archive tab, you can view the case details, including your company's initial response. Most of the information associated with complaints found on the "Archive" tab is read-only.

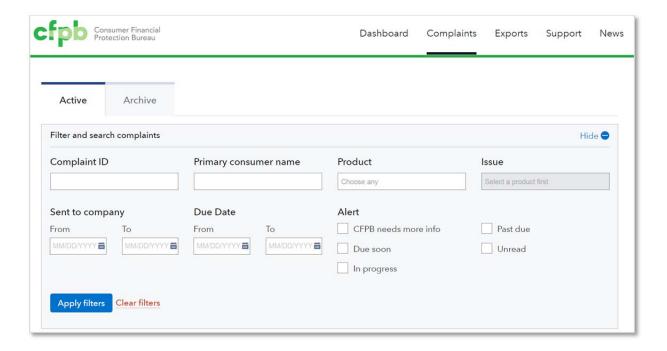
Companies can also access the Archive tab to view or add a company public response. If not provided at the time of the final closing response of Closed with monetary relief, Closed with non-monetary relief, or Closed with explanation, a public company response can be selected anytime up to 180 days after the complaint is routed to the company. Once selected, the company public response cannot be withdrawn. The company public response can be selected, and will be published if selected, on all complaints, not just those where the consumer consented to publication of the complaint narrative. The company will not have the opportunity to select a public response for any complaint where the initial or final closing response is delinquent.

#### 7.3 Complaint filter and search

On both the Active and Archive tabs of the Complaints page, you can filter and search complaints based on a variety of criteria by selecting the "Show" hyperlink as displayed below.



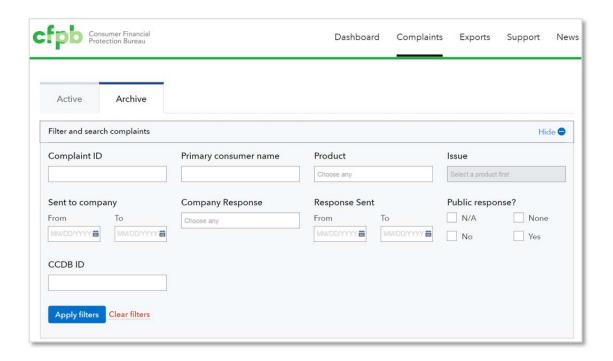
As shown in the image below of the expanded filter and search tool, you can filter and search active complaints by:



- Complaint ID;
- Primary consumer name;

- Product;
- Issue:
- Sent to company date (range);
- Response sent (range);
- Due date; and
- Alerts.

As shown in the image below of the expanded filter and search tool, you can filter and search archive complaints by:

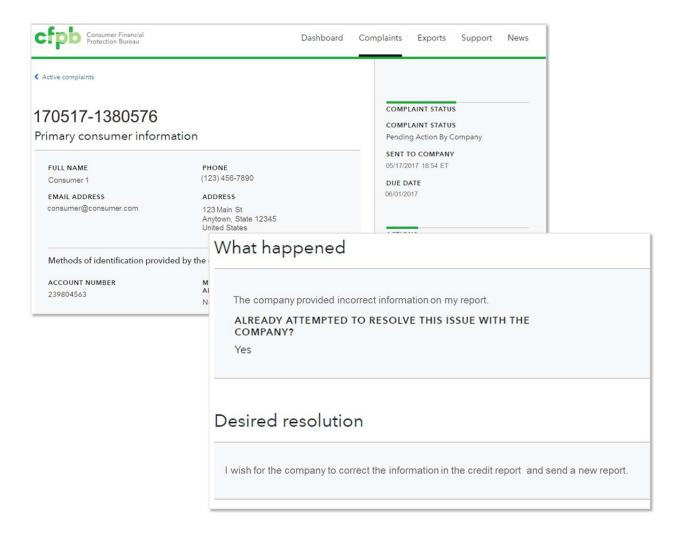


- Complaint ID;
- Primary consumer name;
- Product;
- Issue;
- Sent to company and response sent date (range);
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- Company response;
- Public response; and
- CCDB ID

### 7.4 Complaint details

By clicking on the complaint ID of any complaint, you can view the details of that complaint as shown in the image below. The complaint ID number is listed at the top of the complaint details page.

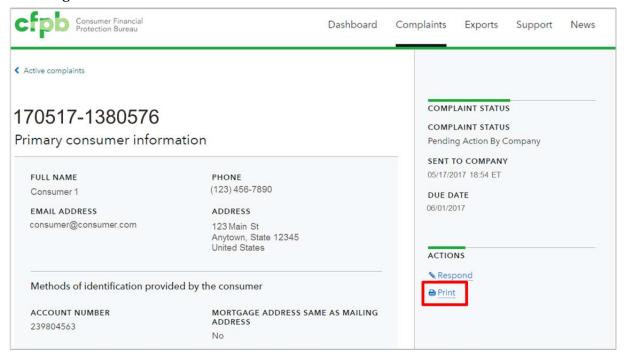


#### Complaint details include:

- Primary consumer information. Name, contact information, and preferences for the consumer submitting the complaint and information indicating whether the person associated with the account is or was a servicemember or dependent or spouse of a servicemember, as shown in the screenshot above.
- Product information. Type of product or service and type of issue for which the complaint is submitted, as well as the consumer-identified company name, as shown in the screenshot above.
- What happened. Consumer's narrative description of what happened, issue, date of the incident, and monetary loss (if any), as shown in the screenshot above.
- Desired resolution. Consumer's description of what he/she considers a fair resolution to the complaint, as shown in the screenshot above.
- Response recipients. The consumer and the individual(s) who will receive the company response, as shown in the screenshot above, if applicable.
- **Initial response**. If your complaint is active and an initial response has been provided, it will be displayed here, including response type, explanation for why additional time was needed, and the date the initial response was sent.
- Returned response. If you provided an initial response returning a complaint to CFPB
  which CFPB determined should be returned to your company, the return information will be
  displayed here, including response and the date on which the complaint was returned to
  your company.
- **Company response.** After your company has provided a response, it will be displayed here, including the response type, response date, and supporting information.
- Company public response. If your company elects to provide a public response after
  providing a response to the consumer, it will be displayed here, including the response type,
  response to the complaint, and response sent date.
- Attachments. Documents related to the complaint as provided by the consumer or the company related to the complaint.

#### 7.5 Printing complaint details

As shown in the image below, you can print complaint details by clicking the "Print" hyperlink on the right panel or at the bottom of the complaint details (depending on the size of your screen). As part of your responsibility to protect PII and otherwise sensitive information using privacy-enhancing practices, secure, shred, or use another secure method to dispose of papers containing PII.



## 8. Responding to complaints

#### 8.1 Providing a timely response

The CFPB requests that your company provide a response to each complaint through the portal **within 15 calendar days** of the complaint being sent to your portal. Note that CFPB response time requirements do not replace or necessarily satisfy certain statutory or regulatory requirements (other than those found in section 1034(b), 12 U.S.C. 5534(b) of the Dodd-Frank Wall Street Reform and Consumer Financial Protection Act of 2010). When a complaint cannot be closed within 15 calendar days, your company may indicate that your work to close the complaint is "In progress" and provide a final responsive explanation to the consumer through the portal within 60 calendar days of the complaint being sent to your portal.

### 8.2 Elements of a response

The CFPB requires that all portal users provide, at a minimum, a response with the following elements:

- **Steps you've taken to respond to the complaint.** Detail the substance of your response, including a description of your communications with the consumer, and attach copies of all responsive written communications to the consumer.
- Communication(s) from the consumer. Describe communications received from the
  consumer in response to the steps you've taken and attach copies of all written
  communications received from the consumer in response.

- Follow-up actions or planned follow-up actions. Describe any follow-up actions you are taking or plan to take in continuing response to the complaint.
- **Category that captures your response.** Select the category that summarizes your response. Options include:
  - In progress;
  - Closed with explanation;
  - Closed with monetary relief;
  - Closed with non-monetary relief;
  - Alerted CFPB;
  - **Duplicate CFPB complaint reported;**
  - **Incorrect company**;
  - Sent to regulator.

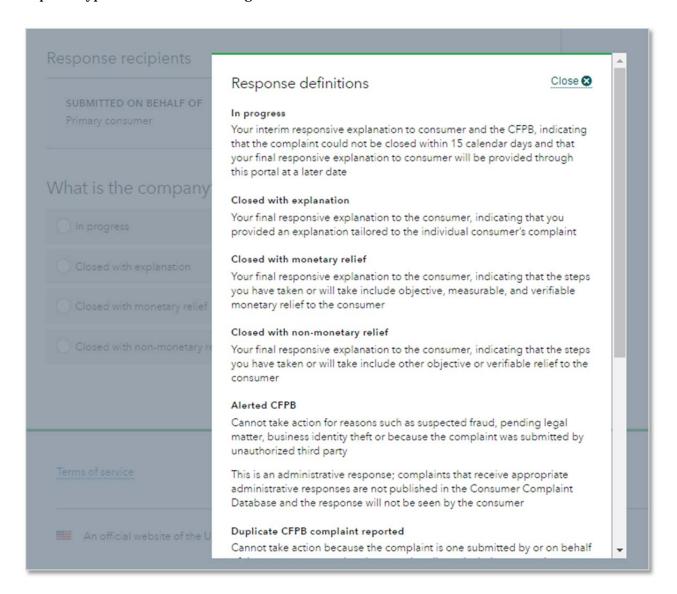
See *Complaint statuses* for definitions.

### 8.3 Response categories

A company user can provide one of eight responses from two response categories for a complaint. You can find these response options at the bottom of an active complaint's complaint details as displayed in the image below.



You can quickly access response definitions be selecting the "Response definitions" hyperlink at the top right of the company response section. You can scroll through the pop-up to review any response type, as shown in the image below.



#### 8.4 Response category definitions

The responses in this section are used to categorize a response that is provided to the CFPB and sent to the consumer for review. For purposes of categorizing your response, "relief" is defined

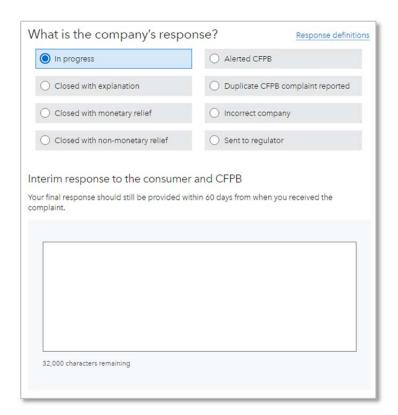
by the CFPB as objective, measurable, and verifiable relief to the consumer as a direct result of the steps you have taken or will take in response to the complaint. Relief can be monetary or non-monetary.

Choose one of the following categories that capture your response:

#### In progress

Your interim responsive explanation to the consumer and the CFPB, indicating that the complaint could not be closed within 15 calendar days and that your final responsive explanation to the consumer will be provided through the portal at a later date.

This option is only available for complaints on the Active tab within 15 calendar days after the complaint was sent to your company. If you select "In progress," the complaint will remain on the Active tab awaiting your response until 60 calendar days from the date the complaint was sent to your company to allow your company the opportunity to provide a final responsive explanation to the consumer through the portal.

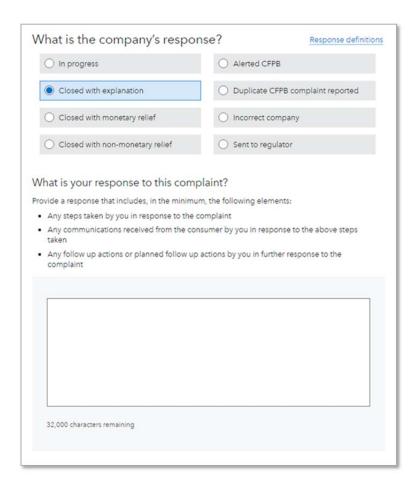


#### Closed with explanation

Your final responsive explanation to the consumer, indicating that you provided an explanation tailored to the individual consumer's complaint. For example, a response is "Closed with explanation" if you provide an explanation that substantively meets the consumer's desired resolution or explains why no further action will be taken by your company.

"Closed with explanation" would not be used if you have provided specific, verifiable monetary or non-monetary relief to the consumer in response to the complaint.

After you select and submit "Closed with explanation" in response to a complaint on the Active tab, the complaint moves to the Archive tab.

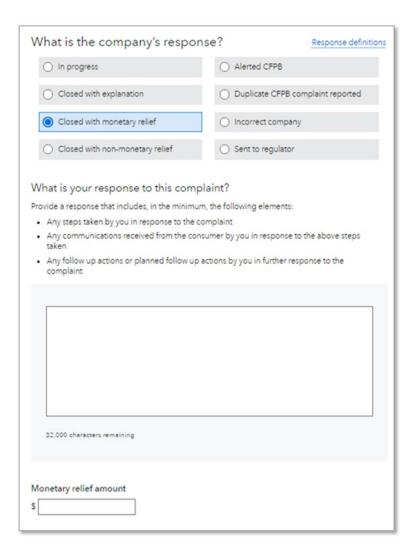


#### Closed with monetary relief

Your final responsive explanation to the consumer, indicating that the steps you have taken or will take include objective, measurable, and verifiable monetary relief to the consumer.

For purposes of categorizing your response, "monetary relief" is defined by the CFPB as objective, measureable, and verifiable **monetary** relief to the consumer as a direct result of the steps you have taken or will take in response to the complaint. The monetary relief must be a quantifiable number. If monetary relief has been or will be provided, describe the relief and enter the dollar amount of that relief.

After you select and submit "Closed with monetary relief" in response to a complaint on the Active tab, the complaint moves to the Archive tab.



#### Closed with non-monetary relief

Your final responsive explanation to the consumer, indicating that the steps you have taken or will take include other objective or verifiable relief to the consumer.

Below is an illustrative, non-exhaustive list of examples of non-monetary relief:

- Foreclosure alternative *without* direct monetary value to the consumer;
- Ceasing debt collection telephone calls or other company-to-consumer contacts;
- Correcting submissions to a credit bureau;

- Changing account terms;
- Changing solicitation practices or materials;
- Restoring/removing a credit line;
- Reopening of account;
- Prospective rate changes; or
- Addressing formerly unmet customer service issue.

An explanation alone, without substantive action consistent with the above, should not be included in this category.

After you select and submit "Closed with non-monetary relief" in response to a complaint on the Active tab, the complaint moves to the Archive tab.

What is the company's respon	SE? Response definitions
O In progress	○ Alerted CFPB
O Closed with explanation	O Duplicate CFP8 complaint reported
O Closed with monetary relief	O Incorrect company
Closed with non-monetary relief	O Sent to regulator
What is your response to this complaint?  Provide a response that includes, in the minimum, the following elements:	
Any steps taken by you in response to the complaint	
<ul> <li>Any communications received from the consumer by you in response to the above steps taken</li> </ul>	
Any follow up actions or planned follow up actions by you in further response to the complaint	
32,000 characters remaining	
What relief was provided?	
32,000 cherecters remaining	

### Administrative response categories

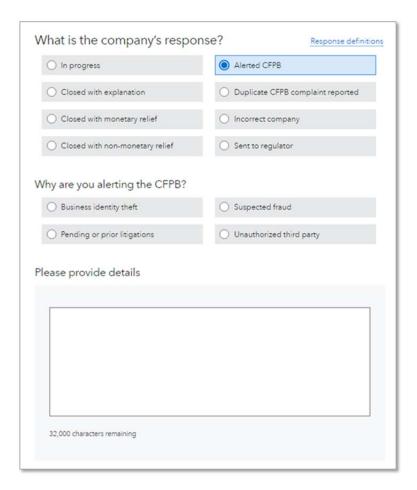
The responses in this section are provided to the CFPB to categorize complaints when further review by the CFPB may be needed. Complaints that receive appropriate administrative responses are not published in the Consumer Complaint Database.

#### Alerted CFPB

Used when you cannot take action due to 1) suspected fraud, 2) pending legal matter, or 3) complaint submitted by unauthorized third party.

- If you select this response because you suspect fraud, including business identity theft or scams, include a statement and attach any evidence supporting this response.
- If you select this response due to a pending legal matter, attach a copy of the filed complaint with your response.
- If you select this response because the complaint was submitted by an unauthorized third party, include a statement supporting this response.

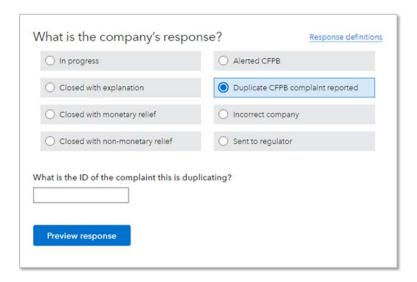
Statements in support of these response selections are reviewed by Consumer Response.



#### Duplicate CFPB complaint reported

Used when you cannot take action because complaint is a duplicate of a complaint you have 1) already received from the CFPB and 2) responded to via the portal.

A "duplicate" complaint is one submitted by or on behalf of the same consumer that does not describe or include any new issue, instance, or information. You must provide the original complaint number with your response.



#### Incorrect company

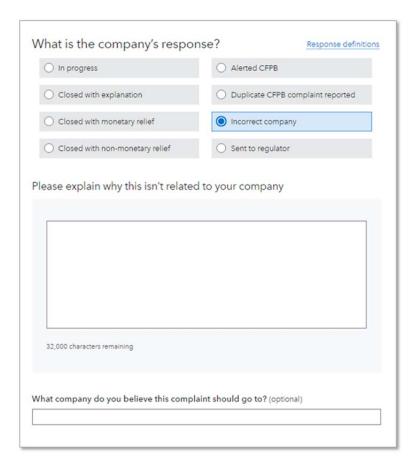
Used when your company cannot take action because complaint is not related to your company.

Example(s): Complaint incorrectly routed to your company or complaint from consumer with no current or prior commercial relationship with your company.

If you suspect fraud, including business identity theft or scams, use **Alerted CFPB** and support your response as described in section 6.2.3.2 under Alerted CFPB.

Once this response is selected the complaint details are no longer viewable on your portal (the complaint is listed but the hyperlink is unopenable) and your response is reviewed by Consumer Response.

You must destroy any complaint data within five (5) days after identification to prevent misuse or disclosure.



#### Sent to regulator

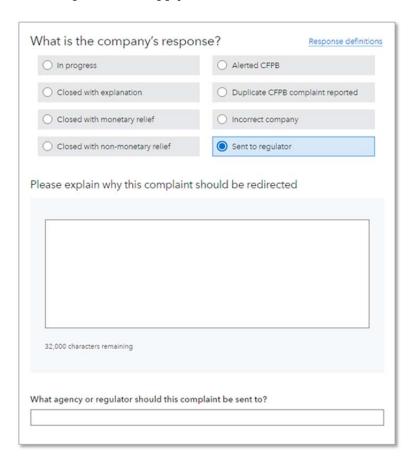
Used when you cannot take action because complaint is about a product or issue that needs to be routed to another regulator.

Note that you do not need to alert the regulator through any other channel. Once you submit this response through the portal, the CFPB will review and route the complaint to the regulator indicated in your response.

Any complaint for which you select the response category "Sent to regulator" and indicate that the complaint is about a business product or service and outside of purview of the CFPB must include answers (in complete sentences) to these questions in the text box provided:

1. If the complaint is about a debt, is the consumer personally liable for the extension of credit or debt at issue? AND

- 2. Does any consumer regulation under the purview of the CFPB apply to this complaint? AND
- 3. Does the application, customer agreement, or contract for the product at issue specifically state that no consumer protections apply?



#### Providing a "Past due" response

If you do not respond within 15 calendar days, the status of the complaint becomes "Past due" within the Active tab. The portal dashboard displays a tile for past due complaints, and you can filter the Active tab by complaints with "Past due" alerts. You are still required to respond to complaints that are past due, however, you will not be able to select an "in progress" status for past due complaints.. You will not have the opportunity to select a company public response for any complaint where the initial or final closing response is delinquent.

### 8.5 Requesting exemptions from public disclosure

The Freedom of Information Act (FOIA), 5 U.S.C. § 552(a)(3)(A), gives any person the right to request access to documents in the possession of the CFPB. Additionally, the Privacy Act enables an individual to request records about himself or herself (or about another individual for whom the requester serves as a guardian or authorized representative). Documents your company provides through the portal in response to a complaint that is under investigation are sent to the CFPB for evaluation. If they become the subject of a FOIA or Privacy Act request, the CFPB will follow the CFPB's FOIA and Privacy Act requirements to evaluate them. In some cases, the CFPB will notify you of the request and offer you an opportunity to object to the CFPB's disclosure of such documents.

To help the CFPB's review of your documents in response to a FOIA request, you may label for the CFPB those documents that you believe in good faith are subject to FOIA Exemption 4, U.S.C. § 552(b)(4). In the event that the CFPB receives a request for documents so designated, then the CFPB will follow the procedures set forth in its FOIA regulations, at 12 C.F.R. Subpart B, § 1070.10 et. seq.

Note that any information provided as part of your company's initial response to a complaint (i.e., when responding to a complaint in the Active tab of your portal) is transmitted directly to the consumer without CFPB prescreening. You should not submit documents you would consider privileged or confidential commercial or financial information through the portal in your initial response. Information you provide with your initial response will be viewable by the consumer as a matter of course.

If your company would like to provide the CFPB with documentation you believe to be covered by a FOIA exemption, you must submit a support ticket in the portal indicating the complaint ID number and attaching the information you believe the exemption applies to. For more

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<sup>&</sup>lt;sup>1</sup> See 12 C.F.R § 1070.10 et seq. and 12 C.F.R. § 1070.50 et seq.

information about submitting a support ticket, reference Section 12.2. If you have general questions about the CFPB's FOIA program, email CFPB\_FOIA@cfpb.gov.

# 8.6 Withholding complaints from publication

The CFPB retains its discretion to withhold complaints from publication upon request from consumers, companies, or CFPB personnel, including, but not limited to, when one or more of the following are true – the complaint:

- was fraudulently submitted on behalf of the consumer,
- was submitted without the actual knowledge of the consumer,
- would reveal confidential trade secret information,
- involves a whistleblower or tipster, and disclosure could impact a law enforcement proceeding,
- was referred by the CFPB to another regulator

### 9. Complaint exports

### 9.1 Export complaints

The authorized point of contact has access to export complaints and view complaint export history using the export tool. The authorized point of contact can grant or restrict export permissions for company users by editing their user profiles as shown in the image below. Refer to section 3 "Portal access" for more information on accessing user profiles as an authorized point of contact.

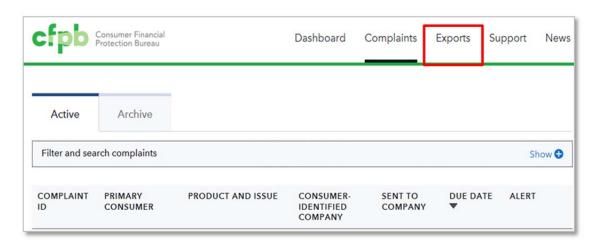


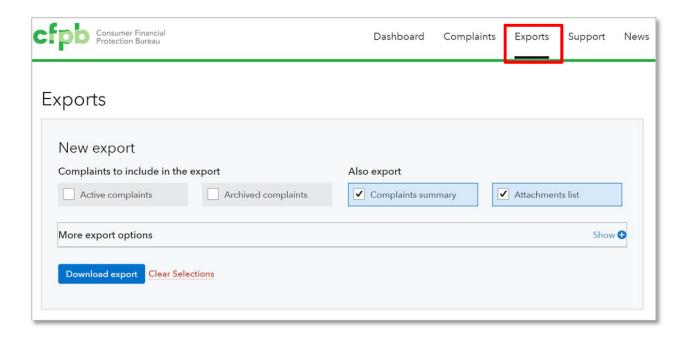
If you have permission to export, you can export complaints by navigating to the Exports tab. You can expand export options by selecting "Show." Similar to the portal's filter and search functionality, you can customize your export based on a variety of export options, including: complaint type (active or archived complaints), complaint summary, attachments list, specific products and issues, and date ranges for "Sent to company" and "Due date."

- Authorized users can download your company's complaints and case details in a customizable, non-formatted data file (.csv). The portal's expanded filter options enable users to refine the export to focus on a subset of complaints, for example, exporting based on "Sent to company" date, minimizing file sizes and export times. Filtered exports are delivered in individual non-formatted data files of about 100 complaints per file. Additional options are available for larger exports.
- Users granted access will see a "Download Export" button at the bottom of the export tool to download the case details and a file listing attachments for complaints in the portal.
   Attachments must be downloaded and printed separately.
- You can export data based on filters (i.e., product, issue, etc.) and tab (i.e., Active, Archive).
- You can also filter to "Include only unread complaints" when "Active complaints" is selected.

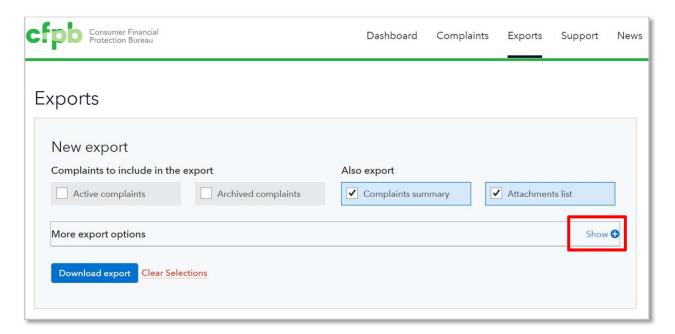
If you need every data element for each complaint specific to a product, you can get this information in one spreadsheet by choosing the appropriate product at the bottom of the page. The Exports tab to the right of the Complaints tab contains the history of all exports a user has downloaded.

1. Select the Exports tab to navigate to the export tool as shown in the image below.

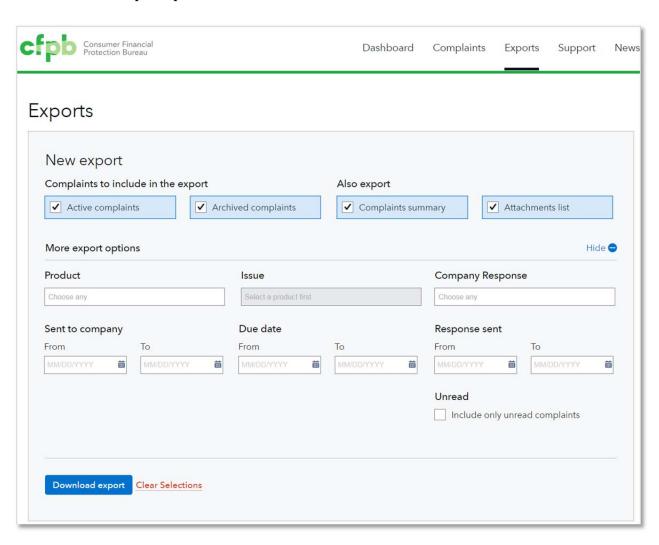




2. Select the "Show" button at the bottom right corner of the export tool to expand export options as shown in the image below.

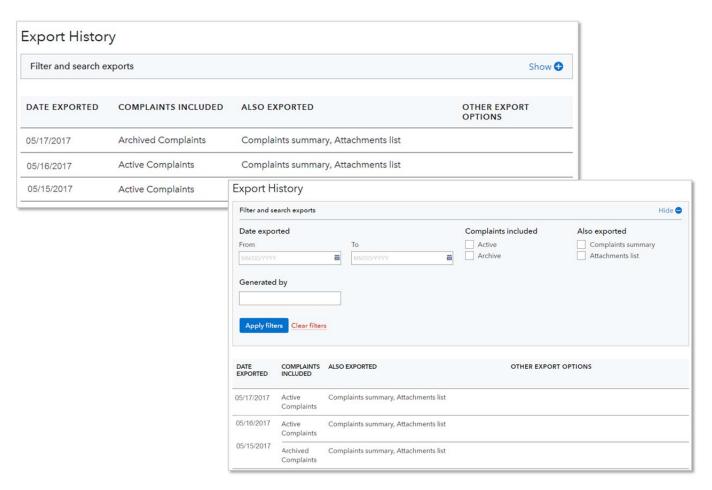


3. Select the features or factors that you want included in your export. The image below shows the available export options.



### 9.2 Export history

As shown in the images below, at the bottom of the "Exports" page, the "Export History" section lists all previous exports allowing you to view previously exported data sets. The search tool at the top of the "Export History" section allows you to search through results for previous exports. The authorized point of contact can see all export history records for all company users. If granted export capabilities, company users can only see their own export history (their own previously exported data sets).



### Publication of consumer narratives and company public response

Complaints are published after a company confirms a commercial relationship with the consumer and responds In progress, Closed with explanation, Closed with monetary relief, or Closed with non-monetary relief or after a company has had the complaint for 15 calendar days, whichever comes first.

Pursuant to a policy statement dated March 19, 2015, the CFPB provides consumers who submit their complaints directly to the CFPB the opportunity to consent to publication of their complaint narratives in the Consumer Complaint Database.

The CFPB began publication of consumer complaint narratives on June 25, 2015.

- Whether or not consent is given has no impact on how the CFPB handles the complaint.
- The Company Portal does not indicate whether the consumer has consented to publication of the complaint narrative.
- The consumer may withdraw consent at any time and the narrative will be removed from the Consumer Complaint Database.
- The CFPB applies a robust personal information scrubbing standard and methodology to remove personal information from the complaint to minimize the risk of reidentification.
- With consumers' consent, scrubbed complaint narratives are published when the company selects a public response or after the company has had the complaint for 60 calendar days, whichever comes first.

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The consumer may withdraw consent by calling the CFPB.

After providing a final response of Closed with explanation, Closed with monetary relief, or Closed with non-monetary relief:

- Company Portal users will have the option to select from a structured list of public company response categories.
  - If selected, the recommended public company response would be eligible to be published in the Consumer Complaint Database. If no option is selected, no public company response will be published.
- The company public response option will be available whether or not the consumer consented to publishing his or her narrative.
- Company Portal users can select this optional public company response at the time of the final response of Closed with explanation, Closed with monetary relief, or Closed with non-monetary relief, and any time up to 180 days after the complaint is routed to the company. Once selected and submitted, the company will not be able to edit the public response directly using the Company Portal.
- The company will not have the opportunity to select an optional public response for any complaint where the initial or final closing response is delinquent.

The narrative policy statement can be found at:

 $http://files.consumer finance.gov/f/201503\_cfpb\_disclosure-of-consumer-complaint-narrative-data.pdf$ 

The narrative scrubbing standard can be found at:

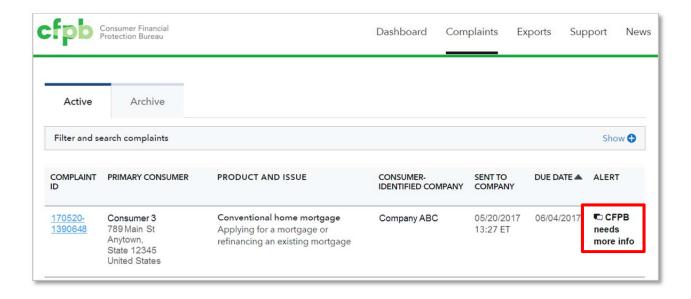
http://files.consumerfinance.gov/a/assets/201503\_cfpb\_Narrative-Scrubbing-Standard.pdf

# 10.1 Optional company public response categories

Category	Description displayed in Consumer Complaint Database
Third party	Company believes complaint caused principally by actions of third party outside the control or direction of the company
Isolated error	Company believes complaint is the result of an isolated error
Discontinued policy or procedure	Company believes complaint relates to a discontinued policy or procedure
Opportunity for improvement	Company believes complaint represents an opportunity for improvement to better serve consumers
Company acted appropriately	Company believes it acted appropriately as authorized by contract or law
Misunderstanding	Company believes the complaint is the result of a misunderstanding
Unable to verify facts	Company can't verify or dispute the facts in the complaint
Factual dispute	Company disputes the facts presented in the complaint
No public response	Company has responded to the consumer and the CFPB and chooses not to provide a public response

# 11. Responding to a request for additional information

Consumer Response may ask the consumer and or your company to provide additional information or documentation about the complaint. Responses to these information requests are due within 10 calendar days.



Your response to requests for additional information including attachments and communications between your company and Consumer Response via the portal are not forwarded to the consumer or displayed in the Consumer Portal. Where necessary, however, the substance of these communications may be incorporated into a summary provided to the

consumer. In some cases, Consumer Response refers complaints to its colleagues in the Bureau for further review.

Never send any complaint documentation or PII to CFPB outside of the portal unless directed to do so by the CFPB. In these instances, documentation should only be sent through encrypted email directly to the contact provided by us and never by standard email, mail, or fax.

# 11.1 Providing additional information requested

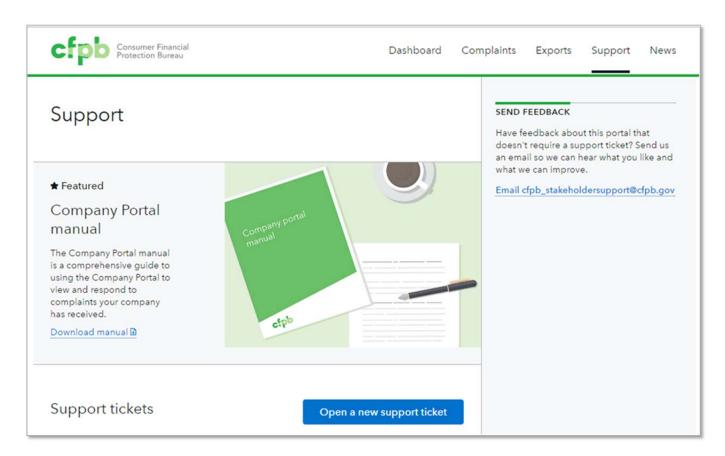
If your complaint response lacks sufficient detail or requires additional supporting documentation, we may request that you provide additional information, which is due within 10 calendar days of the request. Complaints requiring additional information appear on the Active tab with an alert stating "CFPB needs more information" or "unread." To view the specifics of the request and details of a complaint, click on the complaint ID number. The most recent request from CFPB will appear under the "CFPB request for more information" section toward the bottom of the page. Your responses to requests for additional information along with those requests will also appear in the complaint details page.

Your response to requests for additional information will be considered as part of the Consumer Response review but will not suspend or close an investigation.

### 12. Support

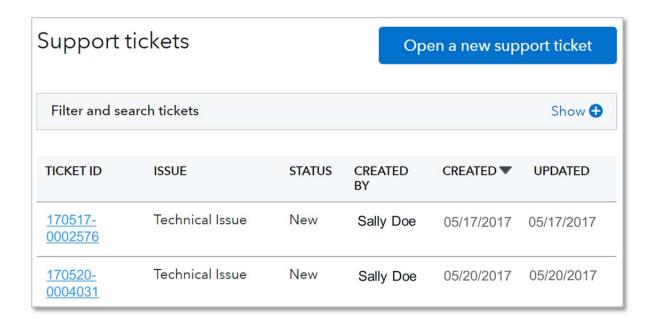
### 12.1 Company Portal manual

On the Support tab (previously Help tab), the Frequently Asked Questions and Glossary items have been replaced by the Company Portal Manual. For additional help, submit a support ticket or send feedback by emailing CFPB\_StakeholderSupport@cfpb.gov. The image below shows the options for help provided under the Support tab.

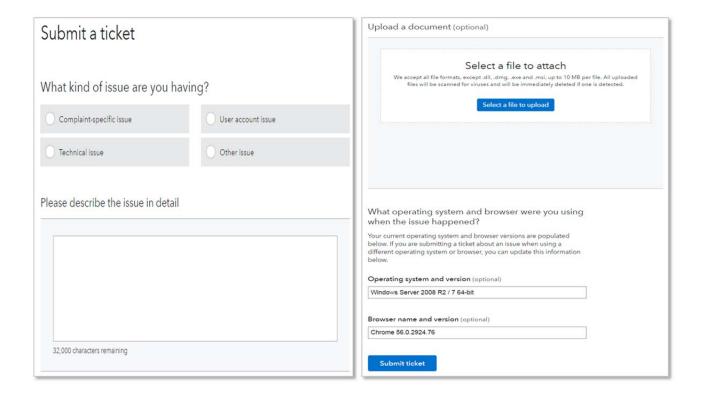


#### 12.2 Submit a ticket

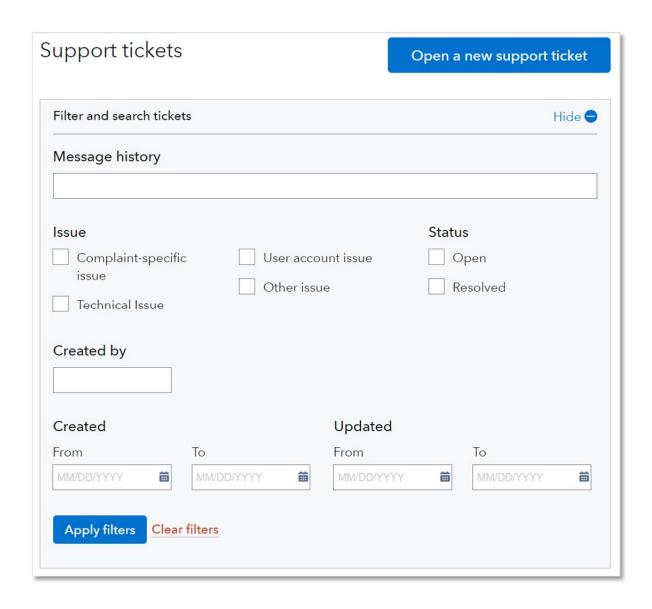
Click the "Open a new support ticket" button on the Support tab to report error messages and other technical issues or to ask a specific question. The image below displays the support ticket button on the top right.



Complete the issue form, shown in the images below, by selecting a ticket category (complaint-specific issue, technical issue, user account issue, or other issue), providing as much detail as possible in the text box, attaching any images or supporting documentation, and clicking the "Submit ticket" button. Note that the portal will automatically detect and populate the "Operating system and version" and "Browser name and version" fields.



After submission, you will receive a ticket ID number to track your issue. Consumer Response will review your ticket and respond via the portal as quickly as possible. Click your ticket ID under the "Support tickets" section of the Support tab to track the ticket and see responses. Similar to the filter and search functionality for complaints and exports, you can search and filter support tickets by message history, issue, ticket submitter, and creation and update dates as shown in the image below.



### 12.3 Viewing support tickets

Review the "Support ticket" section of the Support tab to track, review, and update any of your question or issue tickets. Ticket statuses are:

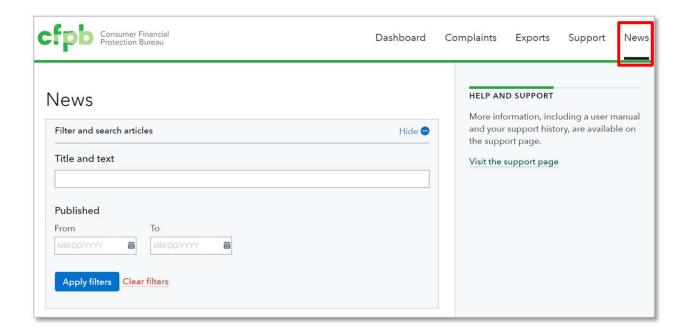
- New. Ticket is submitted.
- **In progress**. Issue cannot be resolved immediately.

- Pending information. Consumer Response responded with a question or request for more information.
- **Information provided**. You responded to a request for more information.
- Closed. Ticket is resolved.

Click on a ticket ID to respond to requests for more information. Message history shows automated emails and, most importantly, responses from Consumer Response. Click the "Select files to upload" button to provide images and other information requested. You can also see the details of your ticket, including the status, creation date, and update date. Only authorized POCs, however, will be able to view the "created by" field. You will receive an email when your ticket is updated or closed.

### 13. News

You can keep up with Consumer Response news and announcements through the portal. Announcements will no longer appear at the top of the portal in red text. Instead all news articles will be available in a filterable and searchable list on the News tab as shown in the image below. Additional information about the announcement (if any) along with previous announcements and other news articles can be found under the News tab.



### 14. Glossary of key terms

**Authorized point of contact**: The point of contact (POC) authorized company representative with which Stakeholder Support engages to administer the portal on behalf of the boarded company

**Complaint**: Consumer complaints are submissions that express dissatisfaction with, or communicate suspicion of wrongful conduct by, an identifiable entity related to a consumer's personal experience with a financial product or service

**Complaint ID**: Unique number associated with an individual consumer complaint (previously referred to as "case number" in prior version of the system). Note that this ID is distinct from IDs used in the public Consumer Complaint Database

**CCDB ID:** The unique identification number assigned to complaints published in the Consumer Complaint Database.

**Days**: All days are calendar days and are based on the date the complaint was sent to the company unless otherwise stated

**Due date**: Date by which a response from your company is requested

**Monetary relief**: Objective, measurable, and verifiable monetary relief to the consumer as a direct result of the steps you have taken or will take in response to the complaint

**Past due**: Status of a complaint for which a timely response was not provided

**Personally identifiable information or PII**: Any information that identifies or may be used to identify, contact, or locate an individual, including personal financial information

**Response category**: Category that summarizes your response, including Closing responses ("In progress", "Closed with explanation," "Closed with monetary relief," and "Closed with non-monetary relief") and Administrative responses ("Alerted CFPB," "Incorrect company," "Duplicate CFPB complaint reported," and "Sent to regulator")

**Sent to company**: Date and time the complaint was forwarded to your company via the portal

**Status**: The description of where a complaint is in the process based on actions by your company or the CFPB

**Tabs**: Pages within the portal used to organize your company's complaints. Together the Active and Archive tabs list all of the complaints forwarded to your company via the portal

**Timely response**: A response to the CFPB via the portal provided within 15 calendar days of the date the complaint was sent to your company that includes, at a minimum, steps you've taken to respond to the complaint, communications from the consumer, your follow-up actions or planned follow-up actions, and the category that captures your response

**User**: An individual authorized by your company and approved by Consumer Response to have access to your company's portal. New users will receive an e-mail with instructions to access the portal and create a password.