

<b>REQUEST FOR RECORDS DISPOSITION AUTHORITY</b>		JOB NUMBER <i>NI-587-12-4</i>	
To: NATIONAL ARCHIVES & RECORDS ADMINISTRATION 8601 ADELPHI ROAD COLLEGE PARK, MD 20740-6001		Date received <i>12/06/11</i>	
1. FROM (Agency or establishment) Consumer Financial Protection Bureau		NOTIFICATION TO AGENCY  In accordance with the provisions of 44 U.S.C. 3303a, the disposition request, including amendments, is approved except for items that may be marked "disposition not approved" or "withdrawn" in column 10.	
2. MAJOR SUBDIVISION Chief Operating Officer			
3. MINOR SUBDIVISION Consumer Response Center			
4. NAME OF PERSON WITH WHOM TO CONFER Ekita Mitchell	5. TELEPHONE NUMBER 202-435-7565	DATE <i>24 April 14</i>	ARCHIVIST OF THE UNITED STATES <i>[Signature]</i>
6. AGENCY CERTIFICATION I hereby certify that I am authorized to act for this agency in matters pertaining to the disposition of its records and that the records proposed for disposal on the attached <u>3</u> page(s) are not needed now for the business for this agency or will not be needed after the retention periods specified; and that written concurrence from the General Accounting Office, under the provisions of Title 8 of the GAO Manual for Guidance of Federal Agencies,  <input checked="" type="checkbox"/> is not required <input type="checkbox"/> is attached; or <input type="checkbox"/> has been requested.			
DATE <i>12/6/2011</i>	SIGNATURE OF AGENCY REPRESENTATIVE <i>Steven L. Coney</i>		TITLE Records Officer
7. ITEM NO.	8. DESCRIPTION OF ITEM AND PROPOSED DISPOSITION	9. GRS OR SUPERSEDED JOB CITATION	10. ACTION TAKEN (NARA USE ONLY)
	Records Schedule for the Office of Consumer Response Consumer Response, Consumer Response System (see attached)  CFPB Approvals  Office of Consumer Response  <i>Concun 12/2/2011</i> <hr/> (Date)  Office of General Counsel  <i>Concun 12/6/2011</i> <hr/> (Date)		

Records Schedule for the Consumer Response/Right Now System: Sub-item 'c' revised per appraisal meeting with NARA (revision date 02-21-2012) (SLC)

Attachment to SF 115

Consumer Financial Protection Bureau (CFPB), RG 587

Division of the Chief Operating Officer – Office of Consumer Response

### **Office of Consumer Response – Consumer Response System (CRS) Records Schedule**

Background: Records created and received by this office relate to the mission-critical functions and the internal administration of the Bureau required for compliance with the governing principles of the Dodd–Frank Wall Street Reform and Consumer Protection Act of 2010:

- 1) Consumers are protected from unfair, deceptive, or abusive acts and practices and from discrimination;
- 2) Federal consumer financial law is enforced consistently without regard to the status of a person as a depository institution; and
- 3) Markets for consumer financial products and services operate transparently and efficiently to facilitate access and innovation.

One of CFPB's primary functions is to collect, assess and respond to consumer complaints regarding certain financial products and services. Currently, seven Federal agencies and numerous state agencies receive these complaints. The Dodd–Frank Act directs CFPB to facilitate the centralized collection, monitoring and response to these complaints. To support these mission-critical functions, the CFPB Office of the Chief Operating Officer, Office of Consumer Response (CR) creates and receives records and information in paper and electronic formats in the course of CFPB interaction with consumers of financial products and financial institutions.

Through CR, the CFPB receives and, as appropriate, responds to, routes, addresses, manages, and analyzes consumer contacts through a centralized system that integrates content of and communications with consumers, regulated entities and other government agencies. CR receives consumer complaints and concerns by phone, fax, web portal, and surface mail, and captures the information in the Consumer Response System (CRS).

The Office of Consumer Response operates a Consumer Response System (CRS) which consists of a case management system, consumer call centers and online consumer web portals.

Through the CRS, the CFPB assigns a case number to each complaint and forwards complaints to the appropriate company for review and resolution via a company web portal. The company response is recorded in the CRS and provided to the consumer for review through a web portal, where the consumer has the option to dispute and comment on the resolution as reported by the company. The CRS captures of the consumer's response. Some complaints may warrant further evaluation by the CFPB, including potentially collecting additional information from the company or the consumer, and conducting additional analysis. The CFPB conducts trend and other analysis to determine if CFPB supervision or enforcement activities are warranted. The CFPB may transfer complaints to CFPB Supervision, Fair Lending, Enforcement and other

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offices within CFPB for additional review. The CFPB may also refer complaints to other federal or state agencies.

The CR maintains consumer contact centers, where consumers may call, fax or send mail regarding a complaint. The contact centers are operated under contract with a consultant, Vangent. Vangent maintains records of the contact centers and is governed by its contract with CFPB to appropriately create, manage and schedule records according to the CR records schedules.

The CR hosts several web portals where consumers may file a complaint, review company responses and respond to CR at predefined points of interaction in the CRS.

### Item 1. CFPB Consumer Response System (CRS)

~~a. Inputs: Completed complaint forms received by phone, fax, web, or surface mail for data entry into the Consumer Response System (CRS). The information is either uploaded from the web intake form, copied from CD-ROM's and thumb-drives or other acceptable portable electronic mechanisms, or manually keyed into the system from consumer telephone calls to the contact center or from paper forms and other paper correspondence faxed or mailed to the contact center. The input records are in such formats as paper, scanned images/PDF copies of the hardcopy records, completed web intake forms, data on CD-ROM, or any acceptable formats that contain records in support of a consumer complaint. Additional consumer complaint information is contained in recorded consumer phone calls, which may be transcribed or electronically converted to text within the CRS.~~

GRS  
20.2

~~**Disposition: TEMPORARY.** Cut off input records after verification in the system. Destroy/delete the input records in no less than 90 but in no more than 120 days after the information has been converted to an electronic medium in the CRS and verified.~~

#### b. Master Files:

b.1. Consumer Complaints: Data in the CRS is derived from scanned images of forms and correspondence, web intake forms, and electronic copies of responses, analysis, and other correspondence from companies and consumers. Data includes unique identifiers, codes, and descriptors categorizing each complaint or inquiry, as well as case numbers, name, address, account numbers (such as credit card and loan account numbers), Social Security Numbers (for credit reporting related complaints), company names and addresses, case resolution and investigation status, and case supervision and enforcement recommendation identifiers, among other identifiers. The CRS contains personally identifiable information (PII) and records in the CRS are subject to the CR Policy relating to PII.

**Disposition: TEMPORARY.** Cut off files at the end of each calendar year in which a consumer case file is closed. Destroy/delete 25 years after cutoff.

**Note:** "Closed" is defined as a resolution of a consumer complaint and is also defined as the transfer of a case to the CFPB Office of Supervision and Enforcement for further financial institution supervision or enforcement action.

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b.2. "Tell Us Your Story:" Data in the CRS is derived from on-line narratives completed by consumers, telling the CFPB about consumer financial issues and concerns. Unlike with the consumer complaint forms in the CRS, the consumer is not required to provide specific personally identifiable information or specific financial information. The CFPB may use this feedback data for trend analysis, establishment of financial education materials, and for evaluation by the supervision and enforcement functions.

**Disposition: TEMPORARY.** Cut off files at the end of each calendar year in which the "Story" was received. Delete 15 years after cutoff.

b.3. Quality Control Records. Quality and consistency data that is based on CFPB analysis of CFPB responses to consumer complaints, response rates by CFPB to the consumer, response rates by financial institutions, as well as reporting and testing of staff and contractor performance. Data is used to identify improvements in written and verbal CFPB responses to consumers.

**Disposition: TEMPORARY.** Cut off files at the end of each calendar year in which the analysis was conducted. Delete 5 years after cutoff.

c. Outputs: Reports, financial trend analysis, supervision and enforcement recommendations, and other records created to meet a specific mission-critical need of the CFPB. This item does not apply to routine system queries.

1. Mission-critical reports, analysis, supervision and enforcement recommendations, and related mission-critical records.

**Disposition: PERMANENT.** Cut off files at the end of each calendar year. Transfer to the National Archives 15 years after cutoff.

~~2. Routine ad-hoc master file and database extracts~~

~~**Disposition: TEMPORARY.** Delete when the agency determines that it no longer needs the extracted information for administrative, legal, audit, or other operational purposes.~~

~~**Disposition is covered by GRS 20, item 5**~~

~~d. Documentation: Technical descriptions of the files, file specifications, code books, record layouts, user guides, and output specifications, and other records required for maintenance of system and access/use of data.~~

~~**Disposition: TEMPORARY.** Destroy or delete when system is obsolete or superseded, or when no longer needed to access or interpret system data, whichever is later.~~

~~**Disposition is covered by GRS 20, item 11a(1)**~~