



Request for Comment Regarding the Bureau's Consumer Complaint Intake System Company Portal Boarding Form

Submitted by mlongacre@csbs.org on Mon, 10/01/2018 - 11:21

*Bureau of Consumer Financial Protection Office of Management and Budget
Attn: OMB Desk Officer
New Executive Office Building, Room 10235
Washington, DC 20503
Docket No. BCFP-2018-00024*

Re: Request for Comment Regarding the Bureau's Consumer Complaint Intake System Company Portal Boarding Form

Dear Office of Management and Budget:

The Conference of State Bank Supervisors ("CSBS" or "state regulators") appreciates the opportunity to comment on the Bureau of Consumer Financial Protection's ("BCFP" or "Bureau") Consumer Complaint Intake System Company Portal Boarding Form (Boarding Form). CSBS is the nationwide organization of state regulators from all 50 states, American Samoa, the District of Columbia, Guam, Puerto Rico, and the U.S. Virgin Islands. CSBS supports the state banking agencies by serving as a forum for policy and supervisory process development, by facilitating regulatory coordination on a state-to-state and state-to-federal basis, and by facilitating state implementation of policy through training, educational programs, and examination resource development.

In addition to chartering and supervising 79 percent of the nation's banks, CSBS member agencies are also the primary regulators of over 20,000 non-depository financial services providers, including residential mortgage lenders and servicers, money service businesses and money transmitters, debt collectors, consumer and small dollar loan lenders, and emerging and established financial technology companies. State regulators and the BCFP exercise coordinated regulatory, supervisory and enforcement authority over certain depository and non-depository institutions through the State Coordinating

Committee (SCC)¹. The SCC is a multi-state regulatory oversight group responsible for the coordination of multi-state, nonbank financial services examinations with the BCFP. The SCC has helped to improve state-to-state and state-to-federal coordination in non-depository supervision in unprecedented ways by eliminating regulatory redundancies and by enhancing the supervisory capacity of state and federal regulators.

State regulators appreciate the importance of the complaint intake and review process, including the Consumer Complaint Intake System Company Portal Boarding Form to sign up companies to access and respond to complaints submitted to the Bureau. When complaints are handled in a timely manner, the potential harm to consumers and further risk of exposure for the company is minimized. Specifically, to reiterate many of our comments made to the Bureau earlier this year on the consumer complaint intake process, we believe the Bureau should²:

- Consider collecting and adding an additional company look-up data field in the Database that would identify an entity's NMLS ID. The NMLS ID is a unique identifier held by each licensed or federally registered entity with a record in the NMLS system. Multiple regulations held by the Bureau, including HMDA and RESPA-TILA require the reporting of NMLS unique identifiers. Providing consumers with the ability to search for a company using the NMLS unique identifier will reduce the potential for consumer confusion given that many companies have similar names. In addition, the collection of the NMLS ID would ensure that complaints are accurately attributed to the subsidiaries of large companies, instead of being automatically routed to the parent company, or another entity in the organizational structure.

We appreciate the opportunity to comment on the BCFP's Boarding Form processes and look forward to the BCFP's continued dedication to coordinating supervisory efforts with state regulators, for it is only through robust coordination that we achieve our shared supervisory mission of protecting consumers in the most efficient and effective manner possible.

Sincerely,

John Ryan
President & CEO

1 The SCC is comprised of members of representatives from six state financial regulatory associations, including: AARMR, CSBS, MTRA, NACCA, NACARA, and NASCUS.

2 See CSBS's 2018 Comment Letter in response to the Bureau's Request for Information (RFI) regarding the Bureau's Consumer Complaint and Consumer Inquiry Handling Processes [BCFP-2018-0014], available [here](#).

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Image



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