



Office of Inspector General

Board of Governors of the Federal Reserve System
Bureau of Consumer Financial Protection

Executive Summary, 2019-FMIC-C-008, June 3, 2019

Bureau Efforts to Share Consumer Complaint Data Internally Are Generally Effective; Improvements Can Be Made to Enhance Training and Strengthen Access Approval

Findings

Overall, the Office of Consumer Response (Consumer Response) effectively shares consumer complaint data within the Bureau of Consumer Financial Protection (Bureau). To increase the incorporation of complaint data in the Bureau's work, Consumer Response can better educate users about the internal complaint-sharing tools. Consumer Response can also enhance access controls to ensure that access to complaint data, which can contain sensitive consumer information, is limited to only users who need such information to perform their job functions.

Almost all the internal complaint-sharing tool users we interviewed reported using complaint data to inform their work. Consumer Response offered more training on the complaint-sharing tools to Division of Supervision, Enforcement and Fair Lending (SEFL) users as compared with other divisions because SEFL has the largest number of users. Expanding outreach and training to other divisions could increase opportunities for users in other divisions to incorporate consumer complaints in their work.

Additionally, Consumer Response established processes for Bureau users to access the complaint-sharing tools through which sensitive consumer information can be accessed. However, Consumer Response inconsistently approved access to two complaint-sharing tools and did not assess whether users needed continued access to one tool or to network drive folders containing complaint reports. Consumer Response can better limit access to sensitive consumer information by improving its processes to approve access and to review continued access to the complaint-sharing tools. During our evaluation, Consumer Response began taking actions to improve its access processes.

Recommendations

Our report contains recommendations designed to further enhance the effectiveness of Consumer Response's internal complaint-sharing efforts and to strengthen access controls over complaint data containing sensitive consumer information. In his response to our draft report, the Assistant Director of Consumer Response concurs with our recommendations and describes actions to address them. We will follow up to ensure that the recommendations are fully addressed.

Purpose

The objectives of this evaluation were to examine (1) the extent to which Consumer Response's consumer complaint-sharing efforts help to inform the work of internal stakeholders and (2) Consumer Response's controls over internal access to shared complaint data, which can contain sensitive consumer information.

Background

Pursuant to the Dodd-Frank Wall Street Reform and Consumer Protection Act, the Bureau collects consumer complaints on financial services and products. The effective sharing of complaint information can help the Bureau understand the problems consumers are experiencing in the financial marketplace and identify and prevent unfair practices.

Consumer Response is responsible for collecting, managing, and sharing complaint data to drive its work and that of the Bureau. It created internal complaint-sharing tools to help Bureau users efficiently search complaint data, identify issues, and use the data to inform their work. Our evaluation covered the use of and access to the following complaint-sharing tools: Complaint Analytics (including Explorer), Advanced Analytics, and complaint reports produced by Consumer Response. We analyzed user data for 2017 and 2018.

The Bureau began receiving consumer complaints in July 2011 and had received 1.7 million consumer complaints as of December 20, 2018.