

December 28, 2017

Office of Management and Budget  
Attention: OMB Desk Officer  
New Executive Office Building  
Room 10235  
Washington, DC 20503

**Re: Submission for OMB Review – Generic Information Collection Plan for Consumer Complaint and Information Collection System;**

**Docket No. CFPB-2017-0036**

To Whom it May Concern:

On behalf of the 2.2 million credit union members we represent, the Heartland Credit Union Association (HCUA) appreciates the opportunity to comment on the Consumer Financial Protection Bureau's (CFPB) proposal to renew the Office of Management and Budget (OMB) approval for an existing information collection titled, "Generic Information Collection Plan for Consumer Complaint and Information Collection System."

Prior to moving forward with any additional data collection or expansion of the compliant system, the CFPB should address ongoing issues to ensure consumers are protected with a system that provides a safe and accurate catalogue of complaints. As HCUA supports the ability for consumers to obtain information on consumer financial products and services, we continue to have concerns with the CFPB's complaint database overall. Particularly, there are concerns with the CFPB's inability to verify the legitimacy and accuracy of complaints and concerns with its ability to differentiate between complaints and inquiries. Additionally, HCUA is concerned with the CFPB's inability to ensure consumer privacy and data security as it continues to collect an unprecedented amount of personal data.

While credit union related complaints through the CFPB is extremely low, the public data released about them should be as accurate as possible. Accordingly, we urge both the OMB and the CFPB to further analyze the feedback provided about the complaint database over the last several years and to directly address outlined concerns before engaging in any additional data collection.

As always, we appreciate the opportunity to review this issue. We will be happy to respond to any questions regarding these comments.

Sincerely,



Brad Douglas  
President/CEO