July 15, 2026

The Honorable Russell Vought
Acting Director
Consumer Financial Protection Bureau
1700 G St. NW, Washington, DC 20552

Dear Acting Director Vought:

We write to request information about the Consumer Financial Protection Bureau's (CFPB) recent changes to its Consumer Complaint Portal. Though portrayed as efforts to "increase [the] effectiveness" of the complaint process, the changes have made it more difficult for consumers to submit complaints, and appear to have been made specifically at the urging of credit reporting companies (CRCs).[1] We are concerned that these updates are designed to reduce the overall amount of complaints submitted to the agency for the benefit of major CRAs, and at the cost of consumers who may now be discouraged from submitting complaints due to the heavy-handed and intentionally misleading statements now displayed on the system.

The CFPB is statutorily obligated to collect, monitor, and respond to consumer complaints regarding financial products and services,[2] and allows consumers to submit complaints via an online Consumer Complaint Portal. Credit reporting-related complaints are the biggest source of complaints to the agency.[3] In 2025 alone, the CFPB received more than 5.8 million complaints about credit reporting or other consumer reporting—an over 100 percent uptick from the prior year.[4] In total, credit reporting complaints account for approximately 85% of all complaints reported to the CFPB.[5] Notably, credit reports are one of the most critical financial tools available to consumers: a good credit report can help individuals obtain more favorable interest rates from a lender, and a poor credit report can make it harder to rent a house or buy a car. From interest rates to housing, utilities, and employment opportunities, the importance of an individual's credit report and its accuracy cannot be overstated.[6]

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1 Consumer Financial Protection Bureau, "The CFPB is Correcting Flaws to Restore Integrity and Utility to the Consumer Complaint System," press release, June 24, 2026, https://www.consumerfinance.gov/about-us/newsroom/the-cfpb-is-correcting-flaws-to-restore-integrity-and-utility-to-the-consumer-complaint-system/

2 Letter from Ranking Member Warren and Senator Kim to Acting Director Russell Vought, February 25, 2025, https://www.banking.senate.gov/imo/media/doc/kim_warren_letter_to_vought_on_cfpb_complaint_database.pdf; NCLC, "CFPB Takes Further Steps to Suppress Consumer Complaints," June 25, 2026, https://www.nclc.org/cfpb-takes-further-steps-to-suppress-consumer-complaints/.

3 National Consumer Law Center, "CFPB Takes Further Steps to Suppress Consumer Complaints," press release, June 25, 2026, https://www.nclc.org/cfpb-takes-further-steps-to-suppress-consumer-complaints/.

4 Consumer Financial Protection Bureau, "Consumer Response Annual Report: January 1 - December 31, 2025," March 2026, p. 7, https://files.consumerfinance.gov/f/documents/cfpb_2025-cr-annual-report_2026-03.pdf#page=7.

5 National Consumer Law Center, "CFPB Takes Further Steps to Suppress Consumer Complaints," press release, June 25, 2026, https://www.nclc.org/cfpb-takes-further-steps-to-suppress-consumer-complaints/.

Consumer complaints to the CFPB reflect persistent, widely recognized inaccuracies in the work of the credit reporting industry. A 2024 study by Consumer Reports, for example, discovered that 44 percent of individuals had "found at least one error on their [credit] report" and 34 percent "found errors related to their personal information," with 27 percent finding that those errors were "serious enough to potentially affect their creditworthiness."[7] For that reason, the CFPB has historically taken enforcement actions against the major credit reporting companies that utilize shoddy or illegal data collecting practices,[8] issued supervisory guidance relating to inaccuracies,[9] and consistently maintained its consumer complaint systems, as mandated by the *Dodd-Frank Wall Street Reform and Consumer Protection Act*.[10]

Yet the CFPB, under your leadership, has instead taken steps to erode the agency's Consumer Complaint Program–including by making changes to the Consumer Complaint Portal.[11] On June 24, 2026, the agency published a press release highlighting the changes, which include "increasing the efficiency of the complaint process," "educating consumers about how to address errors on their credit reports," and "aligning the complaint process with statutory obligations.[12] In reality, these changes do the exact opposite.

Today, when individuals click into the CFPB website's complaint submission portal, they are immediately met with a bold text warning that alerts them that they "MUST FIRST DISPUTE INACCURATE OR INCOMPLETE INFORMATION ON THEIR CREDIT REPORT WITH THE CREDIT REPORTING AGENCY" and asking if they have waited 45 days before submitting a complaint.[13] "IF NOT," the portal says, "DO NOT SUBMIT YOUR COMPLAINT HERE AT THIS TIME."[14] There is no legal requirement that consumers first dispute a credit reporting complaint with a CRC, or wait 45 days before reaching out to the CFPB.[15] Though the Fair Credit Reporting Act establishes a non-mandatory process through which consumers can dispute errors in their credit reports to CRCs, as the National Consumer Law Center notes, "the

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6 Consumer Financial Protection Bureau, "What is a credit report?" https://www.consumerfinance.gov/ask-cfpb/what-is-a-credit-report-en-309/.

7 Consumer Reports, "More Than a Quarter of People Find Serious Mistakes in Their Credit Reports, Study Shows," Lisa L. Gill, April 30, 2024, https://www.consumerreports.org/money/credit-scores-reports/serious-mistakes-found-in-credit-reports-a1061511185/.

8 Consumer Financial Protection Bureau, "CFPB Sues Experian for Sham Investigations of Credit Report Errors," press release, January 7, 2025, https://www.consumerfinance.gov/archive/newsroom/cfpb-sues-experian-for-sham-investigations-of-credit-report-errors/.

9 85 FR 77987 (Dec. 3, 2020).

10 Dodd-Frank Wall Street Reform and Consumer Protection Act, Public Law 111-203.

11 Consumer Financial Protection Bureau, "The CFPB is Correcting Flaws to Restore Integrity and Utility to the Consumer Complaint System," press release, June 24, 2026, https://www.consumerfinance.gov/about-us/newsroom/the-cfpb-is-correcting-flaws-to-restore-integrity-and-utility-to-the-consumer-complaint-system/.

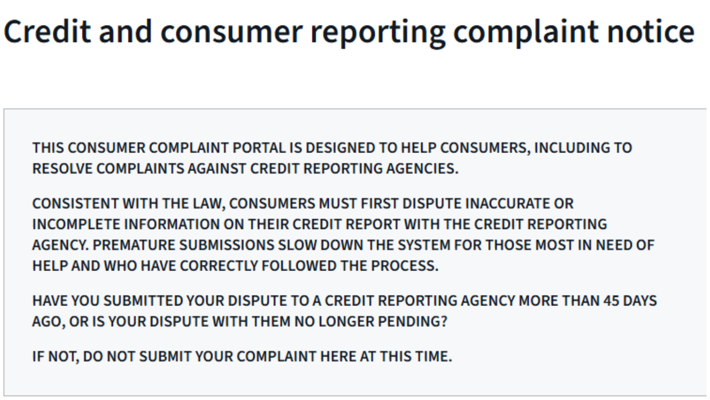
12 *Id.*

13 Consumer Complaint System

14 Consumer Financial Protection Bureau, "Credit and consumer reporting complaint notice," https://www.consumerfinance.gov/complaint/credit-and-consumer-reporting-complaint-notice/

15 National Consumer Law Center, "Comments Opposing Changes to the CFPB Complaint Portal That Discourage Credit Reporting Complaints," March 2, 2026, https://www.nclc.org/wp-content/uploads/2026/03/2026.03.02_Comments_re-changes-to-CFPB-complaint-intake-form.pdf

CFPB complaint provision in the Consumer Financial Protection Act (CFPA) … includes nothing about requiring consumers to contact a CRC or other covered company before complaining to the CFPB."[16] Additionally, individuals are already likely to have attempted to complain about their credit report to the relevant CRC before registering a complaint with the CFPB: For most individuals, lodging a complaint with the CFPB is a task of last resort – initiated after being ignored or dismissed by the CRC.[17] In other words: the CFPB's new screening alert does not align with the statute, nor does it reflect the reality of many individuals who file complaints. It could, however, seriously discourage consumers from submitting credit reporting complaints in the first place.

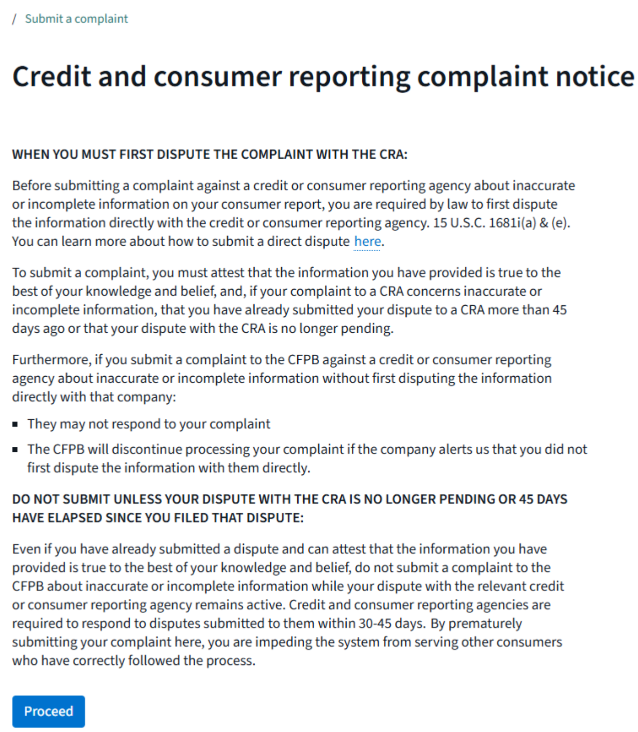

Credit and consumer reporting complaint notice

THIS CONSUMER COMPLAINT PORTAL IS DESIGNED TO HELP CONSUMERS, INCLUDING TO RESOLVE COMPLAINTS AGAINST CREDIT REPORTING AGENCIES.

CONSISTENT WITH THE LAW, CONSUMERS MUST FIRST DISPUTE INACCURATE OR INCOMPLETE INFORMATION ON THEIR CREDIT REPORT WITH THE CREDIT REPORTING AGENCY. PREMATURE SUBMISSIONS SLOW DOWN THE SYSTEM FOR THOSE MOST IN NEED OF HELP AND WHO HAVE CORRECTLY FOLLOWED THE PROCESS.

HAVE YOU SUBMITTED YOUR DISPUTE TO A CREDIT REPORTING AGENCY MORE THAN 45 DAYS AGO, OR IS YOUR DISPUTE WITH THEM NO LONGER PENDING?

IF NOT, DO NOT SUBMIT YOUR COMPLAINT HERE AT THIS TIME.


/ Submit a complaint

Credit and consumer reporting complaint notice

WHEN YOU MUST FIRST DISPUTE THE COMPLAINT WITH THE CRA:

Before submitting a complaint against a credit or consumer reporting agency about inaccurate or incomplete information on your consumer report, you are required by law to first dispute the information directly with the credit or consumer reporting agency. 15 U.S.C. 1681i(a) & (e). You can learn more about how to submit a direct dispute here.

To submit a complaint, you must attest that the information you have provided is true to the best of your knowledge and belief, and, if your complaint to a CRA concerns inaccurate or incomplete information, that you have already submitted your dispute to a CRA more than 45 days ago or that your dispute with the CRA is no longer pending.

Furthermore, if you submit a complaint to the CFPB against a credit or consumer reporting agency about inaccurate or incomplete information without first disputing the information directly with that company:

- They may not respond to your complaint
- The CFPB will discontinue processing your complaint if the company alerts us that you did not first dispute the information with them directly.

DO NOT SUBMIT UNLESS YOUR DISPUTE WITH THE CRA IS NO LONGER PENDING OR 45 DAYS HAVE ELAPSED SINCE YOU FILED THAT DISPUTE:

Even if you have already submitted a dispute and can attest that the information you have provided is true to the best of your knowledge and belief, do not submit a complaint to the CFPB about inaccurate or incomplete information while your dispute with the relevant credit or consumer reporting agency remains active. Credit and consumer reporting agencies are required to respond to disputes submitted to them within 30-45 days. By prematurely submitting your complaint here, you are impeding the system from serving other consumers who have correctly followed the process.

Proceed

Second, if they do choose to proceed, the individual must assert that they submitted to the CRC and that 45 days have lapsed. This is, again, not a legal requirement for filing a credit reporting-related complaint:

16 *Id.*, p. 7.
17 *Id.*, p. 8.

If the individual makes it through the CFPB's new screening questions, they are once again confronted with a new obstacle: before even submitting a complaint, the individual must verify their identity via email, and also by mobile phone number, in accordance with a newly established two-factor authentication requirement.[18] The CFPB has not explained how the Bureau will accommodate consumers, such as older Americans, unhoused individuals, or persons with disabilities, who do not have a mobile phone or an email address. Nor has the CFPB explained how it will accommodate third parties who assist consumers on a professional basis such as credit counseling staff, housing counselors, and legal services providers, for whom it would not be appropriate to use their own email addresses or mobile numbers, even if their clients lack the same.

On top of the bold-faced warnings and misleading statements on the portal itself, the CFPB also claimed in its press release regarding the updates to the consumer complaint system that it would be "exploring additional steps to support its efforts to monitor and safeguard the complaint system from users who attempt to abuse the complaint process."[19] Notably, the press release did not contain any evidence of such "abuse," or provide additional information as to how the agency intends to differentiate between "abuse" and serious, truthful complaints[20]—the result of which only heightens the apprehension already associated with the complaint database's new campaign of heavy-handed and misleading statements.

Rather than updates to "restore Integrity and Utility to the Consumer Complaint System," the changes, in fact, appear closely tied to the CRCs and their affiliates. On January 27, 2026, the Consumer Data Industry Association (CDIA) and its members, Experian, Equifax, and TransUnion, sent a letter asking the CFPB to:[21]

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18 Consumer Financial Protection Bureau, "The CFPB is Correcting Flaws to Restore Integrity and Utility to the Consumer Complaint System," press release, June 24, 2026, https://www.consumerfinance.gov/about-us/newsroom/the-cfpb-is-correcting-flaws-to-restore-integrity-and-utility-to-the-consumer-complaint-system/.

19 *Id.*

20 National Consumer Law Center, "CFPB Takes Further Steps to Suppress Consumer Complaints," press release, June 25, 2026, https://www.nclc.org/cfpb-takes-further-steps-to-suppress-consumer-complaints/.

21 Consumer Data Industry Association, Comments Regarding Consumer Response Intake Form, Docket No. CFPB-2025-0042, OMB Control Number 3170-0011, January 27, 2026,

- Place a notice at the beginning of the complaint process telling consumers they must first contact a CRC and wait for its response/
- Restrict the submission of multiple complaints from an IP address.
- Implement two factor authentication using a phone number.
- Restrict the number of complaints from a phone number.
- Allow CRCs to remove a complaint from the complaint totals if they think the consumer did not contact them first.

The CFPB appears to have already instituted two changes which seem similar to what CDIA requested. And the CFPB's June 24 press release notes that the agency is "continuing to work, including with the Credit Reporting Agencies," on the consumer complaint process.[22]

Instead of spending time strengthening the CFPB – an agency that has served as a financial watchdog and returned over $21 billion to consumers cheated by big banks and corporations—you and President Trump have spent the last year and a half finding ways to gut the agency's enforcement capabilities, hack away at its workforce, and slash enforcement activity. Your decision to roll out an updated consumer complaint system that discourages consumers from seeking assistance from the agency is yet another step in this troubling trend. We therefore ask the following questions regarding the updates to the consumer complaint system, and ask that you respond to them by July 30.

1. Did the CFPB decide to update its consumer complaint system due to demands proposed by the Consumer Data Industry Association (CDIA)—an association representing three major credit reporting agencies, Experian, Equifax, and TransUnion?
    a. What conversations or communications did the CFPB have with CDIA, or any of its members, regarding the CFPB's complaint system?
    b. Provide copies of all communications between CFPB employees, CDIA employees, and any of CDIA's members regarding consumer complaints from January 21, 2025 to present.
2. Identify the specific statute or regulation that requires consumers to complete the following actions before submitting a complaint to the CFPB. If no statute or regulation requires consumers to take these actions, why did the CFPB include them on the portal?
    a. "CONSUMERS MUST FIRST DISPUTE INACCURATE OR INCOMPLETE INFORMATION ON THEIR CREDIT REPORT WITH THE CREDIT REPORTING AGENCY"?
    b. "HAVE YOU SUBMITTED YOUR DISPUTE TO A CREDIT REPORTING AGENCY MORE THAN 45 DAYS AGO, OR IS YOUR DISPUTE WITH THEM NO LONGER PENDING"?
    c. "Before submitting a complaint against a credit or consumer reporting agency about inaccurate or incomplete information on your consumer report, you are

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https://www.regulations.gov/comment/CFPB-2025-0042-0003.

22 Consumer Financial Protection Bureau, "The CFPB is Correcting Flaws to Restore Integrity and Utility to the Consumer Complaint System," press release, June 24, 2026, https://www.consumerfinance.gov/about-us/newsroom/the-cfpb-is-correcting-flaws-to-restore-integrity-and-utility-to-the-consumer-complaint-system/.

required by law to first dispute the information directly with the credit or consumer reporting agency."

   d. "To submit a complaint, you must attest…if your complaint to a CRC concerns inaccurate or incomplete information, that you have already submitted your dispute to a CRC more than 45 days ago or that your dispute with the CRC is no longer pending."
   e. "DO NOT SUBMIT UNLESS YOUR DISPUTE WITH THE CRC IS NO LONGER PENDING OR 45 DAYS HAVE ELAPSED SINCE YOU FILED THAT DISPUTE."

3. The CFPB stated that it would be "exploring additional steps to support its efforts to monitor and safeguard the complaint system from users who attempt to abuse the complaint process."[23] What do these additional steps entail?
   a. How does the CFPB intend to differentiate between "abuse" and serious, truthful complaints?
   b. What evidence does the CFPB have at its disposal to demonstrate the prevalence of such "abuse," other than an increase in complaint volume?
4. Given the CFPB's stipulation regarding two-factor authentication, how will the CFPB accommodate consumers, such as older Americans, unhoused individuals, or persons with disabilities, who do not have a mobile phone or an email address?
   a. How will the CFPB accommodate third parties who assist consumers on a professional basis such as credit counseling staff, housing counselors, and legal services providers, for whom it would not be appropriate for them to use their own email addresses or mobile numbers but their clients may lack the same?

Sincerely,

Andy Kim
United States Senator

Elizabeth Warren
Ranking Member
Committee on Banking, Housing, and Urban Affairs

23 *Id.*