

OFFICE OF CONSUMER RESPONSE

# Evaluation of Narrative Scrubbing Standard and Process



Consumer Financial  
Protection Bureau

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# Background

On March 19, 2015, the CFPB issued a final policy statement to provide guidance on how the Bureau will publicly disclose unstructured complaint narrative data via the Consumer Complaint Database.

Consumers submitting complaints directly to the CFPB have the option to publish their description of what happened in the Consumer Complaint Database. Consumers are informed that while the Bureau conducts a series of automated and manual reviews to remove personal information, a risk remains that something will be missed and publicly released. Consumers can withdraw their consent at any time by calling the CFPB at (855) 411-2372.

The final policy statement can be found at:

[http://files.consumerfinance.gov/f/201503\\_cfpb\\_disclosure-of-consumer-complaint-narrative-data.pdf](http://files.consumerfinance.gov/f/201503_cfpb_disclosure-of-consumer-complaint-narrative-data.pdf)

The narrative scrubbing standard can be found at:

[http://files.consumerfinance.gov/a/assets/201503\\_cfpb\\_Narrative-Scrubbing-Standard.pdf](http://files.consumerfinance.gov/a/assets/201503_cfpb_Narrative-Scrubbing-Standard.pdf)

The Bureau withheld narratives from the public until it was satisfied that its standards and methodology met all applicable privacy concerns. The Bureau contracted with an independent vendor (Booz Allen Hamilton) to conduct a third party review of the Bureau's scrubbing system to assess effectiveness against privacy risks to consumers. Booz Allen Hamilton finalized and provided the study and assessment to the Bureau on June 22, 2015. The Bureau determined that, with informed consumer consent acknowledging any remaining privacy risk, its standards and methodology protected consumers.

On June 25, 2015, the Bureau began publication of consumer narratives to the Consumer Complaint Database. Narratives are scrubbed of personal information, and we have consumers' consent to share them. We also added companies' public responses to complaints, where companies have chosen to publish one.

The Bureau intends to periodically reassess the scrubbing process by testing a significant number of scrubbed complaint narratives, making improvements in the methodology where needed and guided by the goal of simultaneously maximizing data utility and individual privacy.

# Third party review of scrubbing process

The Bureau's integrated scrubbing system includes a computer-based automated step and quality assurance steps performed by human reviewers. Booz Allen Hamilton performed an independent assessment of the accuracy of the scrubbing process and the risk that personally identifiable information (PII) could exist in a published complaint narrative.

The risk that personally identifiable information could exist in a published complaint narrative is measured as the PII Leakage Rate. Leakage is a technical term that refers to the amount of high-risk identifiers such as names, addresses and bank account numbers that are published in the Consumer Complaint Database.

The Bureau considers a Leakage Rate of less than 1% for high-risk identifiers as an acceptable level of risk. Based on the third party review, the Bureau's scrubbing system as currently implemented meets this threshold with a PII Leakage Rate of 0.5%.

The two identifiers that were not scrubbed related to the address of a bank that a consumer went to and a medical condition.

## Third party review documentation

The attached, independent third-party review, as completed by Booz Allen Hamilton, consists of a Scrubbing Process Evaluation Approach and Final Results, Findings and Recommendations. Booz Allen Hamilton used the Bureau's logo to indicate these deliverables were provided to the CFPB.