

OFFICE OF CONSUMER RESPONSE

# Narrative Scrubbing Standard



Consumer Financial  
Protection Bureau

March 2015

# What we publish

Each week, the CFPB receives thousands of complaints about financial products and services. Complaints help with our work to supervise companies, enforce federal consumer financial laws, and write better rules and regulations.

We share complaints with the public to improve the financial marketplace. On our public Consumer Complaint Database, we publish information such as the subject and date of the complaint and the company's response. With your consent we may publish your "What Happened" complaint narrative, after we take steps intended to remove personal information. We do not share your personal information with the public.

## How we protect your personal information

If you consent<sup>1</sup> to the publication of your complaint narrative in the public Consumer Complaint Database, your narrative will be carefully reviewed before it is published.

Narratives are screened to ensure they meet specified publication criteria. Narratives are also carefully reviewed to identify personal information, which we take steps to remove through a process we call "scrubbing." Narratives that cannot be scrubbed according to our [standard](#) will not be published.

## Complaint screening

We evaluate complaints to qualify for narrative publication. The criteria we use include:

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<sup>1</sup> If you change your mind, you can withdraw your authorization at any time by calling the CFPB at (855) 411-2372. If your description is already in the database, it will be removed the next time the database is updated. However, the CFPB will not be able to remove it from any copies of the database that have been downloaded in the interim.

- Complaint is submitted on the CFPB website,
- Consumer has provided consent to publish,
- Consumer is provided a company response or the company did not respond in a timely manner,
- Complaint is not a duplicate submission,
- Complaint is not designated “Withhold from Publication”<sup>2</sup> or “Do Not Send to Company.”<sup>3</sup>

## Scrubbing process

We scrub personal information from your complaint narrative by performing a rigorous three-step procedure. First, we run your narrative through a computer program to identify personal information. This computer review is designed to scrub much of your personal information. Second, a trained human reviewer reads your narrative to scrub additional personal information that our computer program may have missed. Third, a quality assurance specialist reviews your narrative to look for any personal information that the computer and previous human review may have missed. If the quality assurance specialist determines that your personal information was not scrubbed according to our [standard](#), your narrative will be reprocessed and corrected before publication.

## Withholding scrubbed narratives

Through the scrubbing process, we identify narratives that for one reason or another cannot be adequately scrubbed according to our [standard](#) (for example: a narrative in another language). These types of narratives are not published.

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<sup>2</sup> CFPB retains its discretion to withhold complaints from publication upon request from consumers, companies, or CFPB personnel, including, but not limited to, when one or more of the following are true – the complaint:

- was fraudulently submitted on behalf of the consumer,
- was submitted without the actual knowledge of the consumer,
- would reveal confidential trade secret information,
- involves a whistleblower or tipster, and disclosure could impact a law enforcement proceeding,
- was referred by the CFPB to another regulator.

<sup>3</sup> “Do Not Send to Company” are complaints that the consumer requested not be sent to the company.

## Privacy incident response

While we take extensive care to scrub personal information, a risk remains that something will be missed and be published on the Consumer Complaint Database. We take these situations seriously and we will remove your narrative from the Consumer Complaint Database if we have inadvertently published your personal information. If you believe personal information was published on the Consumer Complaint Database, you can report it by calling the CFPB at (855) 411-2372.

## Our standard for removing personal and other sensitive information

We remove information from your narrative that could be used to identify you. We also remove offensive language.

### Information we scrub

**Personal information:** Names, ages, your legal representation, physical characteristics or personal descriptors (for example: race, ethnicity, sexual orientation, nationality, immigration status, character traits, number of children, religion, and disabilities), detailed military/veteran information (for example: ranks, awards, and degrees of disability), and medical conditions (for example: “high blood pressure”, “fibromyalgia”, and “broke my arm”).

**Company names:** Names of businesses not directly connected to the company you are submitting your complaint about.

**Location and contact information:** Addresses, phone and fax numbers, emails, IP addresses, sensitive websites and URLs, countries, proper place names, and locations descriptive below the State level (for example: cities and counties).

*ZIP Code: We will publish your five-digit ZIP code, except where the population in your ZIP code contains fewer than 20,000 people. In these cases, we will publish either the first three digits of your ZIP code or no ZIP code data, depending on the population of your area.*

**Employment (including student status):** Names of employers, occupations, student status (for example: graduate student and valedictorian).

**Date and time information:** Dates (except for the year), times, and references to specific holidays.

If you provide dates with more than one year within the same narrative (for example: “I bought my house on 4/20/2010 and missed my first mortgage payment on 7/1/2013.”), we scrub both dates (including the years) to protect you from someone that might use the added context of the date range information to identify you.

**Sensitive numbers<sup>4</sup>:** Social security, account, credit or debit card, confirmation, case (for example: medical, financial, and administrative numbers), and vehicle (for example: license plate and VIN numbers).

**Dollar amounts:** We round dollar amounts to prevent others from using exact dollar amounts to identify you. Rounding also preserves the informational value that dollar amounts provide.<sup>5</sup>

**Offensive language:** We scrub abusive, vulgar, offensive, threatening, or harassing language.

We may scrub other information as appropriate, such as other unique identifying numbers or characteristics. We may also scrub information that could identify other people you mention in your complaint.

## Sample scrubbed narrative

Here is a fictional narrative showing before and after scrubbing.

**Un-scrubbed narrative:** We took out a private education loan for our daughter Jane Doe while she was attending the ABC University in Centertown, MA. This loan went into default after she transferred to a community college in Port City, MA. Our lender received notice that she was no longer a full-time student in 01/01/2011. Then our younger son John Doe became very sick and we could no longer make the monthly payments on our daughter’s loan. We tried to set up a new payment plan to get us back on track, but the servicer won’t negotiate. We’ve been paying what we can but we still haven’t reduced any of the principal on the loan.

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<sup>4</sup> Percentages (e.g., interest rates and APR) are not considered sensitive and will not be scrubbed from the “What Happened” narrative.

<sup>5</sup> Smaller amounts will be rounded using smaller increments and larger amounts using larger increments. For example, \$53.45 would be rounded to \$53 and \$122,053 would be rounded to \$120,000.

**Scrubbed narrative:** We took out a private education loan for our daughter XXXX while she was attending the XXXX University in XXXX, MA. This loan went into default after she transferred to a community college in XXXX, MA. Our lender received notice that she was no longer a full-time student in XX/XX/2011. Then our younger son XXXX became very sick and we could no longer make the monthly payments on our daughter's loan. We tried to set up a new payment plan to get us back on track, but the servicer won't negotiate. We've been paying what we can but we still haven't reduced any of the principal on the loan.

## Your complaint helps other consumers

Your "What Happened" complaint narrative helps the Bureau improve the financial marketplace and protect other consumers. If you consent to the publication of your narrative, we will take the steps described above to scrub personal information. If you do not consent to the publication of your narrative, we will not publish it. Whether you choose to publish your complaint narrative will not affect how we handle your complaint.