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An Overview of the Analytical Flaws and Methodological Shortcomings of the CFPB's Survey of Consumer Experiences with Debt Collection

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Introduction

On January 12, 2017, the Consumer Financial Protection Bureau (CFPB) released the report *Consumer Experiences with Debt Collection: Findings from the CFPB's Survey of Consumer Views on Debt*. This report claims to “substantially expand the understanding of debt collection in the United States by providing the first comprehensive and nationally representative data on consumers’ experiences and preferences related to debt collection.”^[1] The CFPB chose to promote the findings of this survey with misleading materials, including a press release entitled, “CFPB Survey Finds Over One-In-Four Consumers Contacted By Debt Collectors Feel Threatened,” along with a lengthy prepared statement delivered by Director Richard Cordray at a live event in Washington, D.C.^[2]

ACA International unequivocally condemns fraudulent, abusive, and unethical debt collection practices and welcomes the opportunity to work with government agencies to stop bad actors that harm consumers and tarnish the reputation of legitimate, professional debt collectors.

Nevertheless, the CFPB’s report on consumer experiences, along with the attendant press release and related remarks from Director Cordray, appear to intentionally overstate the survey’s weaker findings in an effort to broadly paint the debt collection industry in a negative light. Many of the claims in this report are empirically weak, conceptually unclear, and overtly exaggerated. Furthermore, media coverage of the report, which has largely tracked the CFPB’s own misleading press release, has failed to adequately address these limitations.

Executive Summary

- » The CFPB survey report, related press release, and remarks from Director Cordray highlight key findings that are primarily focused on the most negative results of the consumer survey, unfairly represent debt collection as a predatory industry, and are generally presented without critical explanatory context.
- » While the CFPB touts its consumer experience survey data as the “first comprehensive and nationally representative data,” its overall sample of individuals with experience with the debt collection industry is remarkably small. Of the 2,132 survey respondents, only 682 individuals (32%) report being contacted by a debt collector. Despite this, the CFPB continually couches its findings in relation to all American consumers with debt collection experience.
- » Rather than report its findings with any degree of statistical certainty, the CFPB describes the survey report as a “descriptive” exercise to “highlight patterns that may be of policy interest” and “to sketch, from consumers’ perspectives, the broad experience of debt collection.” The CFPB further cautions that this descriptive sketch “does not present standard errors or statements about the statistical significance of the differences” across groups.
- » For areas of particular importance to the debt collection industry, the CFPB survey asked consumers about their experience without defining the legal regulations that govern some interactions. Specifically, the report notes that disputes are not specifically defined and

“consumers’ perspectives on whether they had disputed a debt may differ from the definition of dispute used by a given creditor or collector or what may constitute disputes pursuant to the FCRA and FDCPA.” The same issue arises when the report addresses consumers who ask debt collectors to stop contact. Despite the FDCPA requiring consumers to submit a request to stop contact in writing, the CFPB reported findings for the 87% of respondents who “said they made the request by phone or in person only.”

- » The presentation of data lacks clarity and lends itself to overestimating the prevalence of certain findings. By focusing almost entirely on percentages throughout the report, coupled with a near-total absence of raw numbers or sample sizes for individual questions, the CFPB offers only limited context for interpreting responses or situating them within the larger sample.
- » Many of the findings highlighted in the CFPB’s press release and related remarks from Director Cordray rely on the presentation of a percentage that obscures the total number of responses for a given question. For example, the CFPB reports that “three-in-four consumers report that debt collectors did not honor a request to cease contact.” A more accurate description of this finding would note that the 75% of consumers who reported continued contact after a request to cease communication are a subset of the 42% who requested contact to cease; this 42% is itself a subset of the 32% of the total sample that have been contacted about a debt in collection. Thus, the “three-in-four consumers” actually represents roughly 215 of the 2,132 consumers surveyed, or only 10% overall.
- » In differentiating the experience of consumers when interacting with creditors versus third-party debt collectors, the CFPB relies on a faulty measurement to support its claims.

While the CFPB notes that “consumers reported more favorable experiences with creditors than debt collectors along many of the dimensions surveyed,” the CFPB acknowledges the possibility of consumer confusion, pointing out that “it may also be that consumers do not perceive regular billing statements sent by creditors as collection efforts even if the statement includes a delinquent balance.” As such, the CFPB appears to be making a fundamentally flawed distinction between creditors and third-party debt collectors.

CFPB Consumer Experience Survey

The CFPB begins its report with a list of “key findings.” These findings are primarily focused on the most negative results of the consumer survey and are generally presented without much-needed context. The CFPB found that “about one-in-three consumers with a credit record (32 percent) indicated that they had been contacted by at least one creditor or collector trying to collect one or more debts during the year prior to the survey” and that “more than half of consumers (53 percent) who were contacted about a debt in collection in the past year indicated that the debt was not theirs, was owed by a family member, or was for the wrong amount.” Additionally, the CFPB notes that “roughly one-quarter (27 percent) of consumers who were contacted about a debt in collection reported having disputed a debt with their creditor or collector in the past year.”

The CFPB also found that “more than one-third of consumers (37 percent) contacted about a debt in collection indicated that the creditor or debt collector that had contacted them most recently usually tried to reach the consumer at least four times per week,” that “close to two-thirds of consumers (63 percent) contacted by a creditor or debt collector said they were contacted too often,” and “forty-two percent of consumers with collection experience in the past year said they had asked at least one creditor or collector to stop contacting them” while only a quarter report that the contact actually stopped.

Below we will address these and other findings. Of

particular note are limitations of the survey instrument itself and the resulting data that the CFPB outlines in the report. Additionally, ACA has specific concerns with how the survey findings are presented in the CFPB's report and press releases. Our concerns regard the use of potentially misleading language, the presentation of data, and the absence of context for many of the findings.

Limitations of the CFPB Consumer Experience Survey

The CFPB claims that its survey results represent “the first comprehensive and nationally representative data” on consumer experiences with debt collection. However, these claims about the representativeness and overall quality of the data are undermined by an array of caveats found throughout the report. While the report, and associated press release, makes authoritative statements about consumers' experience with debt collection, the CFPB prefaces its findings by noting that:

These results are intended to be descriptive and to highlight patterns that may be of policy interest as they add to the Bureau's and other researchers' understanding of consumers' experiences with the debt collection process. Differences across groups may reflect a variety of factors that may be correlated with demographic or credit characteristics. This report does not attempt to disentangle the underlying sources of these differences. In addition, although the analysis sought to ensure reasonable sample size in calculations, the report does not present standard errors or statements about the statistical significance of the differences.^[1]

This limitation is reiterated once again on page 48 of the report:

This report draws on nationally representative data from the Bureau's Survey of Consumer Views on Debt to sketch, from consumers' perspectives, the broad experience of debt collection in the United States.

That the CFPB begins its “comprehensive” report

by minimizing the findings as simply a “descriptive” exercise and a “sketch” while simultaneously acknowledging that there are perhaps differences across social groups that may impact their experiences, yet no effort was made to “disentangle the underlying sources of these differences,” fundamentally undercuts the authority of the claims made in the report. Furthermore, the acknowledgement that no “standard errors or statements about the statistical significance of the differences” are reported leaves the reader without any basis for determining the degree to which the findings are representative of the population as a whole.

Additionally, the report has caveats regarding participants' responses and the interpretation of the data throughout the report. These caveats begin on page 4 of the report where it is noted that “as with any survey data, the results reflect the self-reported responses of survey participants and should be considered as such throughout this report.” These self-reported responses are perhaps based on misunderstandings of fundamental definitions and practices relative to the debt collection experience. Although an entire section of the consumer survey focused on disputes, footnote 8 states that “the consumers' perspectives on whether they had disputed a debt may differ from the definition of dispute used by a given creditor or collector, or what may constitute disputes pursuant to the Fair Credit Reporting Act (FCRA) or Fair Debt Collection Practices Act (FDCPA).” Whether or not a dispute falls within the parameters of the FCRA or FDCPA is a nontrivial distinction, particularly when evaluating the behavior of debt collectors to inform a rulemaking.

Several times throughout the report, the CFPB notes that respondent confusion about the survey questions or topics may have biased their results. Footnote 20 cautions that “results for auto title loans are not shown, however, because of potential confusion from some respondents between this loan product and auto-purchase loans which leads us to believe that the share of consumers with auto title loans may be biased upward.” In the discussion of contacts by debt collectors, footnote 27 warns that “consumers' estimates of the frequency of contacts may be subject to uncertainty, particularly for attempted phone

contacts before a creditor or debt collector had initially reached a consumer, when a consumer may not have known who was attempting to contact them. Once a creditor or collector had reached a consumer, however, consumers may be reporting on attempted, as well as successful, contacts if they identified the caller. The survey does not purport to distinguish between these varying scenarios in its questions or analysis.” As contact by debt collectors was a key finding emphasized by the report, and is expected to be a key component of any forthcoming debt collection rules, it would behoove the CFPB to have a greater degree of certainty in respondents’ estimates before publicly disseminating them and internally relying on them.

Related caveats are made when the report addresses the survey question on debt collectors communicating with consumers in their preferred language.

Footnote 34 notes that “analysis of responses to this question suggests that the question may have been interpreted by some consumers as referring to the tone and tenor of the communications, rather than a consumer’s preference for a language other than English.” Similarly, on page 36 when discussing how the consumer could be reached, the report finds that “many respondents appear to have interpreted the questions to be about ways they would like to be reached by a creditor or collector,” rather than indicating generic contact preferences.

The CFPB also differentiates between creditors and debt collectors, finding that “consumers reported more favorable experiences with creditors than debt collectors along many of the dimensions surveyed.” However, footnote 32 notes “it may also be that consumers do not perceive regular billing statements sent by creditors as collection efforts even if the statement includes a delinquent balance.” Once again the CFPB is confronted with a measurement issue, with respondents interpreting delinquent notices from creditors as simply bills, with the distinction becoming clearer once an account has gone to a debt collection firm.

The CFPB also overstates a key difference between creditors and debt collectors, asserting that “a creditor has an existing relationship with a consumer that it may want to maintain, whereas collectors are not

seeking to retain the consumer’s business.” This statement obscures the fact that, although debt collectors are not trying to maintain an ongoing relationship with a consumer, they are incentivized to retain an ongoing relationship with their client. Besides the desire as professional service providers to deliver quality customer service and treat all consumers respectfully, debt collectors have clients who often set high standards regarding consumer interaction. In fact, many creditors who rely on third-party debt collection services demand mandatory compliance training and robust complaint-handling procedures, holding collectors accountable in the event of poor performance. Thus, third-party debt collectors understand that negative treatment of consumers directly impacts the relationship with their clients and may result in the reduction in the volume of accounts placed with the debt collector, monetary penalties, or termination of the relationship altogether.

The multiple instances where the CFPB found that consumers misinterpreted or were confused by the survey questions suggests that the survey itself might be a flawed instrument, a point that ACA International stressed to the CFPB before the survey was approved and sent to consumers. At a minimum, the many instances of potential consumer confusion reported by the CFPB demonstrate that additional research would be in order to address such uncertainties before releasing the report.

Challenges to the CFPB’s Presentation and Discussion of Data

The ways in which the data are presented throughout the report are also a cause for concern, particularly when the method of presentation lacks clarity or lends itself to overestimating the prevalence of certain findings. An initial point of concern is the CFPB’s reporting of percentages throughout the report. With an almost total absence of raw numbers or sample sizes reported for individual questions, there is limited context for interpreting responses or situating them within the larger sample. Table 1 replicates the same table from the CFPB’s report, but includes raw numbers for each category as closely as they can be calculated given the information available. By including the raw numbers,

the percentages of responses are contextualized within the survey sample, allowing for a much clearer understanding of the findings being reported. For example, when the CFPB reports that “almost one-third of consumers (32 percent) reported being contacted over the past year by a creditor or debt collector about a debt,” the inclusion of raw numbers enables a reader to clearly see that the percentage represents roughly 682 consumers out of the 2,132 sampled.

Table 1. Distribution of Number of Debts Consumers were Contacted about in the Prior Year

Number of debts in collection consumers contacted about	All consumers surveyed	Only consumers contacted about a debt in collection
None	68% (N=1,450)	0% (N=0)
One	9% (N=192)	27% (N=184)
Two to Four	18% (N=384)	57% (N=389)
Five or more	5% (N=106)	16% (N=109)
Total	100% (N=2,132)	100% (N = 682)

* Values in columns should be consistent across rows. Inconsistencies in values across rows are presumably due to rounding in the presentation of data by the CFPB. As raw data is presently unavailable, ACA cannot determine the source of said inconsistencies.

There are several instances where the practice of reporting only percentages, without including a clear sample size, renders the findings almost incomprehensible. Table 3 on page 15 of the CFPB report shows the percent distribution of the number of debts consumers were contacted about, by annual household income. The supporting text states that “consumers with relatively low incomes were more likely to report having experienced debt collection efforts in the prior year. About half of consumers (52 percent) with (self-reported) annual household income less than \$20,000 reported that they had been contacted about repaying a debt in collection.” The

first two rows of this table are presented below (for full table, see appendix):

Annual household income	None	One debt	Two or more debts
Less than \$20,000	48	14	38

Based on the report, there is no way to ascertain how many consumers are represented by the percentages in the table; the CFPB does not report how many respondents or what percentage of respondents fall within a given income category. Thus, all that can be taken from the figure is that 38% of some unknown sub-sample of consumers earn less than \$20,000 and were contacted by a debt collector about two or more debts. This practice continues throughout the report, obscuring the overall scope of the findings and depriving them of contextual meaning.

The lack of clarity is particularly confounding for those tables in the report that present comparisons between groups. Table 7 (distribution of the types of loans consumers were contacted about), Table 8 (distribution of the types of past-due bills in collections), Table 10 (consumers citing an issue and who disputed a debt in collection), and Table 13 (consumers sued) each report findings by annual household income, credit score, age, race, and ethnicity. These findings are from the small sample of consumers contacted by a debt collector, yet that is no way to ascertain the size of the population in each category. Even more problematic are the comparisons made between groups in these tables. For example, in the description of findings for Table 7, the report notes that “consumers under age 35, non-whites, and those with non-prime credit scores were more likely to report having been contacted about student loan debt.” Yet, as indicated at the beginning of the report, it “does not present standard errors or statements about the statistical significance of the differences.” As such, one cannot know if the differences reported between groups are statistically significant phenomena or merely a result of random variation in the sample.

As noted above, Table 10 shows consumers citing

an issue and who disputed a debt in collection by annual household income, credit score, age, race, and ethnicity. Table 11 shows reasons for disputing debt for all consumers who disputed a debt and for consumers who cited one reason for dispute. In addition to the lack of sample sizes for each category and a lack of clarity in the percentages shown, it appears the CFPB is not even certain that the variables are measuring the correct concept. Specifically, footnote 24 states that “the survey did not specifically define disputes” and that “consumers’ perspectives on whether they had disputed a debt may differ from the definition of dispute used by a given creditor or collector or what may constitute disputes pursuant to the FCRA and FDCPA.” It is quite problematic that a survey purporting to evaluate consumer experiences with the debt collection industry fails to present questions that accurately represent the terms by which that industry is regulated.

Similarly, the note on Table 11 states that the “sum in the first row exceeds 100 percent because consumers could dispute more than one aspect of the collection.” This is elaborated on in the text of the report, where the CFPB claims “these reasons are not mutually exclusive: a consumer who believed the debt was not his or hers may also have reported that, therefore, the creditor or collector did not have a right to collect the debt.” This methodological approach has the effect of artificially inflating one category or the other.

Another of the findings highlighted in the CFPB press release was one-in-seven (15%) consumers contacted about a debt report being sued by a debt collector (Table 12 in the CFPB report). To provide additional context, Table 2 shows both the numbers of consumers contacted by a debt collector who were sued and those who were not sued. Roughly 103 consumers report being sued. The remaining 85% of consumers (roughly 580 individuals) contacted by a debt collector were not subject to a lawsuit, though this was not highlighted by the report.

Table 2. Consumers Sued and Not Sued,

by Number of Debts Contacted About

Number of debts in collection	Consumers who were sued	Consumers who were not sued
One	6% (N=11)	94% (N=173)
Two to Four	14% (N=54)	86% (N=335)
Five or more	35% (N=38)	65% (N=71)
Total	15% (N=103)	85% (N=580)

*Values calculated using figures from column 3 of Table 1.

A series of the survey findings centered on contact with debt collectors, perceptions of contact as excessive, and consumer requests that debt collectors cease contact. The CFPB highlighted the finding that “more than one-third of consumers (37 percent) contacted about a debt in collection indicated that the creditor or debt collector that had contacted them most recently usually tried to reach the consumer at least four times per week and 17 percent reported that the creditor or collector usually tried to reach them at least eight times per week.” They further noted that “close to two-thirds of consumers (63 percent) contacted by a creditor or debt collector said they were contacted too often.” These findings are shown in Tables 15 and 16 of the CFPB report. To provide additional context for how often consumers reported being contacted as well as perceptions of excessive contact, Table 3 shows the distribution of contact frequency for consumers contacted about a debt in collection and consumers indicating they had been contacted too often, by contact frequency in both percentages and raw numbers.

Table 3. Distribution of Contact Frequency for

Consumers Contacted About a Debt in Collection and Consumers Indicating They Had Been Contacted Too Often, by Contact Frequency

Contact frequency	Consumers contacted about a debt in collection	Consumers who said they were contacted too often
Less than once per week	33% (N=225)	22% (N=50)
One to three times per week	30% (N=205)	74% (N=152)
Four to seven times per week	20% (N=136)	88% (N=120)
Eight or more times per week	17% (N=116)	91% (N=106)
Total	100% (N=682)	63% (N=430)

* Sample sizes calculated based upon available values and percentages reported in the CFPB report.

It is worth noting that 63% of consumers report being contacted three times per week or less and roughly 47% of those consumers reported that they felt they were contacted too often. The report also found the consumers with more than one debt in collection were more likely to be contacted multiple times per week. The CFPB found that these same consumers were also more likely to report that they felt they were being contacted too often, yet also observed that a “consumer who is contacted about multiple debts is likely to experience a higher overall frequency of calls, and this may make the consumer more likely to perceive any number of calls from any one collector as ‘too often.’” Perhaps in the future the CFPB, and readers of its report, would be better served by Bureau efforts to disentangle the relationship between the number of debts in collection relative to the number of calls received by a consumer. As the data are presented in the CFPB report, without additional context or explanation, the reader is left to assume that debt collectors are simply harassing consumers.

This implication of harassment is compounded by the finding, highlighted in the CFPB press release, that “three-in-four consumers report that debt collectors did not honor a request to cease contact.”

This statement and the finding it is based upon are problematic in several ways. First, the 75% of consumers who reported continued contact are a subset of the 42% who requested contact cease (roughly 215 consumers); this 42% is itself a subset of the 32% of the total sample that have been contacted about a debt in collection (roughly 286 consumers). Thus, the CFPB’s public statement that “three-in-four consumers” were continuously contacted by debt collectors after requesting contact be ceased is an overt exaggeration. Second, the report found that of those consumers who requested debt collectors stop contact “eighty-seven percent said they made the request by phone or in person only.” Footnote 28 clarifies “under the FDCPA, collectors are generally required to cease most communications upon receiving a written request from the consumer.” Again, the CFPB has implied harassing behavior on the part of debt collectors, yet de-emphasized their adherence to the regulations that govern the debt collection industry, a tactic that serves to characterize the debt collection industry as problematic.

As previously noted, the CFPB led its press release on the survey report with the headline “Consumer Financial Protection Bureau Survey Finds Over One-In-Four Consumers Contacted By Debt Collectors Feel Threatened.” These findings are presented in Table 23 of the original report. Table 4 presents the same data with the addition of sample sizes for each response category and for consumers contacted by either creditors or debt collectors.

When evaluated in the context of the series of

Table 4. Consumers' Characterizations of Contacts with Creditors and Collectors

	All consumers contacted about a debt in collection	Consumers contacted by creditors	Consumers contacted by debt collectors
Provided accurate information	55% (N=375)	77% (N=121)	49% (N=211)
Provided options to pay the debt	53% (N=361)	60% (N=94)	49% (N=211)
Communicated in preferred language	79% (N=539)	81% (N=127)	79% (N=340)
Stated reason for contact was collection	86% (N=587)	88% (N=138)	87% (N=374)
Addressed questions clearly and accurately	49% (N=334)	66% (N=104)	44% (N=189)
Treated you politely	54% (N=368)	66% (N=104)	50% (N=215)
Contacted too often	63% (N=430)	59% (N=93)	64% (N=275)
Called before 8 a.m. or after 9 p.m.	36% (N=246)	34% (N=53)	34% (N=146)
Threatened	27% (N=184)	16% (N=25)	28% (N=120)
Total	N=682	N=157	N=430

* Sample sizes calculated based upon available values and percentages reported in the CFPB report.

questions about consumer experiences with debt collection, the response category of “threatened” represents the category where the smallest number of consumers responded affirmatively. In raw numbers, only 184 respondents indicated that they felt threatened, and while ACA is unequivocally opposed to debt collectors engaging in unlawful, threatening behavior, the CFPB results represent an extreme minority of all survey respondents. Furthermore, the survey question asks consumers to “think about the creditor or debt collector that most recently contacted you about this debt. Did they threaten you?” This question is problematic as it fails to differentiate between whether the consumer experienced a lawful warning that could be perceived as a threat (e.g., the possibility of adverse credit reporting) and an outright illegal threat (e.g., threat of personal harm). Finally, as the Bureau chose not to report statistical significances between categories, it would appear that its headline data-point is an exaggerated interpretation of a weak

finding used solely to sensationalize the report.

Issues with the Survey

ACA International has had long-standing concerns about the CFPB survey and submitted comments strongly opposing the survey on May 5, 2014. Among those concerns, the survey was not designed to distinguish between the different types of participants in the varied debt collection market. Although each type of market participant is distinguishable from the others and unique, the survey ultimately used by the CFPB did not allow for responses that separate the different types of market participants. As such, the conclusions drawn from the responses cannot reasonably support effective and nuanced rulemaking that is needed to properly regulate the debt collection market.

Furthermore, the survey is devoid of any mention of,

or specific questions regarding, several areas that would be informative to the CFPB as it considers rulemaking for the debt collection industry. For example, there are no questions that mention or relate to the proposed survey participant's use of information, advice or services of credit repair organizations or high-volume consumer attorneys. Likewise, there is no mention of for-profit or not-for-profit credit counseling agencies. Importantly, in the "*Disputing a debt in collection*" section of the survey, there are no questions relating to the level of specificity provided by the survey participant when disputing the debt, whether the survey participant provided information or documentation relevant to the dispute to the debt collector, or whether a third-party submitted the dispute on the survey participants behalf. As such, the survey results fail to include important data that is necessary to support evidence-based rulemaking for the debt collection market.

Conclusion

ACA International is committed to supporting the highest standards of ethical business conduct in the debt collection industry and unequivocally condemns fraudulent, abusive and unethical debt collection practices. Nevertheless, the recent CFPB report on consumer experiences with debt collection, along with the CFPB's related press release and remarks from Director Cordray, have failed to provide either proper context for their findings or a clear analysis of the data. Indeed, the CFPB's report acknowledges that there was no statistical analysis of the data reported and that no conclusions about the statistical significance of between group differences can be drawn. Taken together, these issues undermine the CFPB's characterization of the report as the "first comprehensive and nationally representative data on consumers' experiences and preferences related to debt collection" and severely limit the utility of its findings.

There are more than one billion consumer contacts made by the debt collection industry annually.^[3] The credit and collection industry is one of the most highly regulated industries by both federal and state laws, and consumers have rights and protections under the law. As a result, legitimate debt collectors are focused on compliance and treat consumers lawfully and with

respect. By potentially manipulating inconclusive results to promote the incorrect perception of debt collectors as predatory, this report obscures the important work that the majority of collection agencies do every day to support the finance industry by working with consumers to meet their financial obligations.

As this white paper shows, the data obtained by the CFPB through the consumer survey is insufficient at best and fundamentally flawed at worst. As a result, the survey data cannot be used as the basis to properly inform the Bureau's debt collection rulemaking efforts. The lack of utility and reliability of the survey's findings clearly demonstrate that the CFPB must conduct further study and analysis of the debt collection market before it will be positioned to issue evidence-based, comprehensive rules to regulate this complex industry.

Sources

- [1] Consumer Financial Protection Bureau. 2017. "[Consumer Experiences with Debt Collection Findings from the CFPB's Survey of Consumer Views on Debt.](#)"
- [2] Consumer Financial Protection Bureau. 2017. "[CFPB Survey Finds Over One-In-Four Consumers Contacted By Debt Collectors Feel Threatened.](#)"
- [3] Adams, Josh. 2016. "[Methodological and Analytical Limitations of the CFPB Consumer Complaint Database.](#)" ACA International White Paper

Appendix – Original Tables from CFPB Report as Cited in ACA's Response

TABLE 1: DISTRIBUTION OF NUMBER OF DEBTS CONSUMERS WERE CONTACTED ABOUT IN THE PRIOR YEAR (PERCENT)

Number of debts in collection contacted about	All consumers	Consumers contacted about a debt in collection
None	68	—
One	9	27
Two to four	18	57
Five or more	5	16

TABLE 3: DISTRIBUTION OF THE NUMBER OF DEBTS CONSUMERS WERE CONTACTED ABOUT, BY ANNUAL HOUSEHOLD INCOME (PERCENT)

Annual household income	None	One debt	Two or more debts
Less than \$20,000	48	14	38
\$20,000-\$39,999	58	8	33
\$40,000-\$69,999	70	10	20
\$70,000 or more	84	5	11

TABLE 7: DISTRIBUTION OF THE TYPES OF LOANS CONSUMERS WERE CONTACTED ABOUT, BY ANNUAL HOUSEHOLD INCOME, CREDIT SCORE, AGE, RACE, AND ETHNICITY (PERCENT)

Consumer characteristic	Credit card	Auto	Student
Annual household income			
Less than \$20,000	41	18	33
\$20,000-\$39,999	44	19	28
\$40,000-\$69,999	47	17	24
\$70,000 or more	46	17	25
Credit score			
Non-prime	47	21	34
Prime	34	8	12
Age			
Less than 35	38	18	47
35-49	45	15	28
50-61	45	20	22
62 or older	52	19	8
Race			
White	44	16	24
Non-white	44	20	37
Ethnicity			
Hispanic	54	16	27
Non-Hispanic	42	18	29

Note: Estimates are for consumers who were contacted about a debt in collection. Sums across columns may exceed 100 percent because consumers could report having been contacted about multiple types of debts.

TABLE 10: CONSUMERS CITING AN ISSUE AND WHO DISPUTED A DEBT IN COLLECTION, BY ANNUAL HOUSEHOLD INCOME, CREDIT SCORE, AGE, RACE, AND ETHNICITY (PERCENT)

Consumer characteristic	Consumers who cited an issue with a debt in collection	Consumers who disputed a debt in collection
All consumers contacted about a debt in collection	53	27
Annual household income		
Less than \$20,000	56	22
\$20,000-\$39,999	52	29
\$40,000-\$69,999	49	26
\$70,000 or more	53	36
Credit score		
Non-prime	52	24
Prime	55	37
Age		
Less than 35	46	18
35–49	58	29
50–61	49	27
62 or older	59	40
Race		
White	52	28
Non-white	55	25
Ethnicity		
Hispanic	48	23
Non-Hispanic	54	28

Note: Estimates are for consumers who were contacted about a debt in collection.

TABLE 11: DISTRIBUTION OF REASONS FOR DISPUTING DEBT FOR ALL CONSUMERS WHO DISPUTED A DEBT AND FOR CONSUMERS WHO CITED ONE REASON FOR DISPUTE (PERCENT)

Disputed whether ...	it was your debt	the amount was right	it had already been paid	the creditor or collector had the right to collect
All consumers who disputed a debt	47	71	40	47
Consumers who reported a single reason for dispute	27	50	10	13

Note: Estimates are for consumers who disputed a debt in collection. Sum in the first row exceeds 100 percent because consumers could dispute more than one aspect of the collection.

TABLE 12: CONSUMERS SUED, BY NUMBER OF DEBTS CONTACTED ABOUT (PERCENT)

Number of debts in collection	Consumers who were sued
One	6
Two to four	14
Five or more	35
All consumers contacted about a debt in collection	15

Note: Estimates are for consumers who were contacted about a debt in collection.

TABLE 15: DISTRIBUTION OF CONTACT FREQUENCY FOR CONSUMERS CONTACTED ABOUT A DEBT IN COLLECTION (PERCENT)

Contact frequency	Consumers contacted about a debt in collection
Less than once per week	33
One to three times per week	30
Four to seven times per week	20
Eight or more times per week	17

TABLE 16: CONSUMERS INDICATING THEY HAD BEEN CONTACTED TOO OFTEN, BY CONTACT FREQUENCY (PERCENT)

Contact frequency	Consumers who said they were contacted too often
Less than once per week	22
One to three times per week	74
Four to seven times per week	88
Eight or more times per week	91
All consumers contacted about a debt in collection	63

TABLE 17: CONSUMERS WHO REQUESTED CONTACT STOP, BY NUMBER OF DEBTS IN COLLECTION (PERCENT)

Number of debts in collection	Consumers who requested contact stop
One	29
Two or more	47
All consumers contacted about a debt in collection	42

Note: Estimates are for consumers who were contacted about a debt in collection.

TABLE 23: CONSUMERS' CHARACTERIZATIONS OF CONTACTS WITH CREDITORS AND COLLECTORS (PERCENT)

	All consumers contacted about a debt in collection	Consumers contacted by creditors	Consumers contacted by debt collectors
Provided accurate information	55	77	49
Provided options to pay the debt	53	60	49
Communicated in preferred language	79	81	79
Stated reason for contact was collection	86	88	87
Addressed questions clearly and accurately	49	66	44
Treated you politely	54	66	50
Contacted too often	63	59	64
Called before 8 a.m. or after 9 p.m.	36	34	34
Threatened	27	16	28

Note: Estimates for all consumers contacted about a debt in collection include those who indicated they did not know whether the most recent contact was from a creditor or debt collector.