

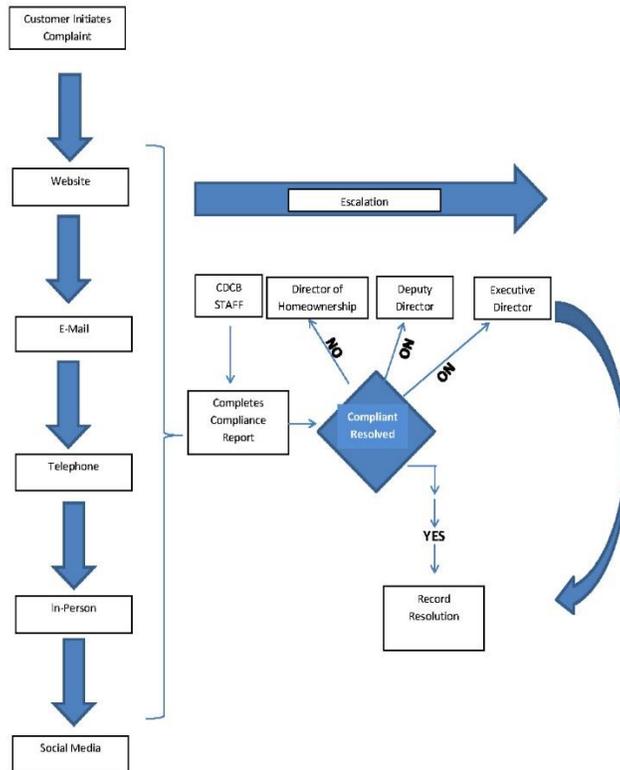


## Consumer Complaint Policy

**December 1, 2019**

It is Community Development Corporation of Brownsville’s (“CDCB”) policy to resolve all customer complaints to our best ability. Our procedure is designed to allow a customer to file a complaint in any manner convenient and accessible to him or her. CDCB has also implemented a complaint form link on its website. This link can be found at: [www.cdcbbrownsville.org](http://www.cdcbbrownsville.org).

### Deputy Director Responsible for Ultimate Resolution



### **Personnel Responsible for Initial Complaint Processing**

Director of Homeownership must be notified immediately by the CDCB staff who receives the complaint. Once the complaint has been logged notification of this complaint must be sent to the Deputy Director so he/she may oversee the complaint resolution process. A report will be sent quarterly to the Executive Director of all complaints registered along with information related to the resolution of the customer complaint.

### **Consumer Financial Protection Bureau (“CFPB”) Complaint Database**

With the inception of the CFPB complaint portal, CDCB must now review the CFPB Complaint Database to ensure that there are no unresolved complaints lodged with the bureau. The consumer may have filed multiple complaints. Each source must be identified and resolved.

The Deputy Director must check the CFPB complaint database at least weekly. If complaints are filed with the CFPB it is the Deputy Directors responsibility to respond in a timely manner to these complaints.

### **Qualified Written Request (“QWR”)**

HUD instructs borrowers with issues relating to mortgage loans to write a “Qualified Written Request” to the customer service department. These complaints must be addressed to the borrower, but also must be responded to in writing to the HOC in which the property is located if you can verify that a copy of the complaint was forwarded to HUD.

A Qualified Written Request is defined as a written correspondence, other than notice on a payment coupon or other payment medium supplied by CDCB, that includes or otherwise enables CDCB to identify the name and account of the borrower, and includes a statement of the reasons for the belief of the borrower, to the extent applicable, that the account is in error or provides sufficient detail to CDCB regarding other information sought by the borrower.

### **Proactive Complaint Resolution**

Fair Lending Complaints, especially, are resolved to the customer’s satisfaction through our “Complaint Resolution Process”. Once a complaint is lodged, it is up to CDCB to resolve it, not the customer.

### **Complaint Resolution Process**

The following are the steps CDCB will take to effectively deal with the complaint management process to resolve each customer’s complaints:

### **Person Receiving Complaint**

1. The customer may file a complaint with any employee and in any formats convenient to him or her including:
  - a. Telephone
  - b. E-mail
  - c. Written letter
  - d. Facsimile
  - e. Social Media
2. The employee should also identify whether the complaint constitutes a Qualified Written Request (“QWR”), a Notice of Error or Request for Information, as defined by the CFPB and follow the CFPB guidelines related to the management of QWR’s.
3. Upon receipt of a complaint, the employee must immediately complete the Complaint Report Form (Exhibit One) and notify the Director of Homeownership.

### **Director of Homeownership**

1. Where the complaint is a QWR or a Notice of Error or Request for Information, provide the borrower with written acknowledgement of receipt of the complaint within five (5) business days, including a proposed Resolution Date, not to exceed 30 days.
  - a. If the matter can be researched and resolved prior to the 5<sup>th</sup> business day, receipt of the complaint does not require a written acknowledgement of receipt.
2. Ask questions to identify and analyze the problem when completing a complaint report. Obtain the customer's ideas concerning possible alternative solutions.
3. Listen to the customer and acknowledge his or her complaint. Customers do not register complaints with only a casual interest in their disposition. Complaining involves some inconvenience and possibly expense. Loyal customers with strong feelings are often involved.
4. Develop empathy or show concern for the customer. Personalize the response.
5. Provide a copy of the form to the complaining individual and to the Deputy Director
6. If not previously indicated in a written acknowledgement notice, indicate a proposed Resolution Date to Customer, not to exceed 30 days from the date of initial receipt.
7. Enter into CDCB Complaint Log (Exhibit Two).

### **Deputy Director**

1. Resolve the complaint according to company ethics, compliance, administration, credit or predatory lending policy as well as CFPB and any investor requirements.
2. Decide in a fair manner what you are responsible for and initiate some positive action to remedy the situation.
3. Follow through with the proposed resolution. When it cannot be immediately resolved, keep the customer informed of progress and notify promptly when a settlement has been reached.
  - a. Provide the borrower with a written resolution response within 30 business days of initial receipt of the complaint.

- i. If the resolution has not been reached as the 30<sup>th</sup> business day approaches, provide the borrower written notification of a 15-business day extension for resolution, including a reason for the extension. The extension notice must be issued before the initial 30 business day period expires.

EXHIBIT ONE

**Community Development Corporation of Brownsville**

**Complaint Report**

Complaint Received By \_\_\_\_\_ Date \_\_\_\_\_

**Name of Complainant** \_\_\_\_\_

Description of Complaint

Date Complaint Must be Resolved \_\_\_\_\_

Manager Responsible for Resolution \_\_\_\_\_

Complaint Resolution

Date Completed \_\_\_\_\_

