

CONSUMER FINANCIAL PROTECTION BUREAU | JUNE 2023

Office of Servicemember Affairs Annual Report

January – December 2022



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Executive Summary

The Consumer Financial Protection Bureau's (CFPB) Office of Servicemember Affairs (OSA) was created by the 2010 Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank Act).¹ This report analyzes the complaints submitted by servicemembers, veterans, and their families in 2022. In 2022 alone, over 66,400 servicemember complaints were submitted a 55% increase compared to 2021, and a 62% increase compared to 2020.

Section 2 discusses the growth of popular payment apps,² sometimes described as P2P payment platforms, in the marketplace and in the servicemembers community. The report finds that servicemember complaints about payment apps grew from roughly 600 in 2020 to approximately 800 in 2021 and continued to rise to over 1,100 complaints in 2022.³ Many of the reported issues and complaints relate to fraud and scams, suggesting it's a rapidly growing issue within this community.

Section 3 discusses the unique risks servicemembers face from the potential abuse of these payment app services. The report highlights some of the major issues the CFPB identified based on 2022 servicemember complaints about payment apps, and the steps industry can take to address them.

Here are some of our key findings on the unique risks and challenges for servicemembers in using payment apps:

- **Servicemembers submit complaints related to payment apps at a higher percentage than the general population.** In 2022, servicemembers submitted more than 1,100 payment app complaints, one of the fastest-growing complaint types submitted to the CFPB.
- **Members of the military are more susceptible to identity theft, which can heighten the risk of unauthorized access to their payment app accounts.** In 2022, active duty servicemembers reported almost 38,000 cases of identity theft to the Federal Trade Commission (FTC).⁴ A steady income may make servicemembers a target

¹ Pub. L. No. 111-203 (2010), 124 Stat. 1376.

² Payment app service includes non-bank, bank, and credit union providers.

³ Payment app complaints are defined as checking or savings, prepaid card, credit card, or money transfer or service, virtual currency complaints mentioning "Paypal" OR "Zelle" OR "Venmo" OR "CashApp" OR "Cash App"

⁴ Fed. Trade Comm'n, *Military Consumer Identity Theft* (April 25, 2023), <https://public.tableau.com/app/profile/federal.trade.commission/viz/IdentityTheftReports/MilitaryIDTheft>

for scammers looking to tap into bank accounts that are often linked to a payment app. The CFPB has received complaints where servicemembers had their identities stolen and then experienced unauthorized money transfers out of their payment app accounts.

- **Servicemembers report serious financial harm from scams and fraud when using payment apps.** Often during a permanent change of duty station, servicemembers face the need to secure housing, a new automobile, or daycare during a short window, which often requires them to conduct more online transactions. Servicemembers and their families reported that being scammed online using payment apps can result in serious issues – jeopardized housing, lost life savings, cascading financial distress, emotional distress, and embarrassment.
- **Complaints suggest that the companies and financial institutions that provide payment apps often fail to provide timely and substantive resolutions to servicemembers.** In the complaints submitted to CFPB, even when they have a path to recovering lost money, servicemembers stated that they had trouble getting in contact with a customer representative. When they did get in contact, the resolution process was tedious and slow, and coordination with multiple parties was challenging and often failed to address their concerns. Failure to address these concerns in a timely and effective manner can cause additional stress and anxiety for servicemembers, impacting their financial well-being and readiness to carry out their duties.

As the CFPB considers steps to ensure payments are safe and secure, payment app companies can undertake the following recommendations to better align with the expectations of servicemembers and their families:

- **Payment app providers can improve the safety and security of their networks to prevent fraud.** Servicemembers face unique scenarios where they need to send money quickly in order to facilitate a change in duty stations or other service-related needs. Payment app providers can improve the overall safety and security of their products by preventing, identifying, and limiting fraudulent activity, including by removing repeat fraudsters from their system and adopting tools to mitigate fraud during account opening. Where appropriate, they should invest in technology and tools to improve the safety and security of their networks.
- **Payment app providers can improve their responsiveness in the event fraud does occur.** As a baseline matter, payment app providers are bank and non-bank financial institutions subject to Regulation E, and they must comply in accordance with the Regulation E procedures and timeframes for resolving errors. Where fraud involves multiple entities (e.g., non-bank payment apps and banks sending and receiving customer

funds), all parties can coordinate more closely to ensure that problems related to fraud are resolved quickly. By working closely to expedite the process, payment app providers can help reduce the time servicemember are unable to access lost funds. Rapid resolution of these issues can be critical during a permanent change of station and deployments.

- **Payment app providers should tailor reimbursement policies to better recognize the experiences of servicemembers.** Servicemembers, like all consumers, can face difficulties when experiencing fraud on payment app providers. Payment apps should recognize these challenges and take a comprehensive approach to reimbursement when all types of fraud occur.

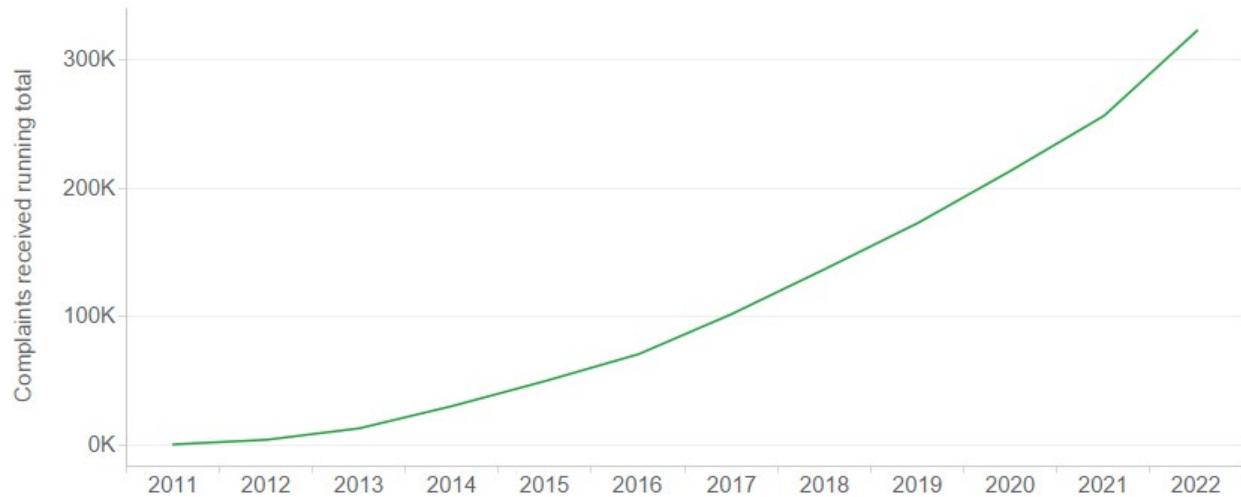
Appendix A of the report examines in-depth complaint data and analysis from active duty servicemembers, veterans, and their families.

Finally, Appendix B describes the actions the CFPB has taken and the results that it has achieved to protect the military community from financial harm. This includes efforts to educate and empower servicemembers, enforce military financial protections, and collaborate with federal, state, and non-government stakeholders to advance military financial well-being.

1. Introduction

The CFPB began accepting consumer complaints in July 2011.⁵ Since then, servicemembers, veterans, and their families (collectively servicemembers, for the purposes of this report) have submitted more than 323,000 complaints (Figure 1).⁶ In 2022 alone, servicemembers submitted more than 66,400 complaints—a 55% increase compared to 2021, and a 63% increase compared to 2020.

FIGURE 1: TOTAL COMPLAINTS PER YEAR SUBMITTED BY SERVICEMEMBERS FROM 2011 - 2022⁷



Servicemembers are expected to keep their finances in order at every step of their military career. The CFPB aims to ensure that servicemembers can handle a wide range of challenging financial situations effectively, and we use the complaint process as a way to gather information about the

⁵ Consumer complaints are submissions that express dissatisfaction with, or communicate suspicion of wrongful conduct by, an identifiable entity related to a consumer's personal experience with a financial product or service. See generally Consumer Fin. Prot. Bureau, *Consumer Response Annual Report* (Mar. 2023), <https://www.consumerfinance.gov/data-research/research-reports/2022-consumer-response-annual-report/>.

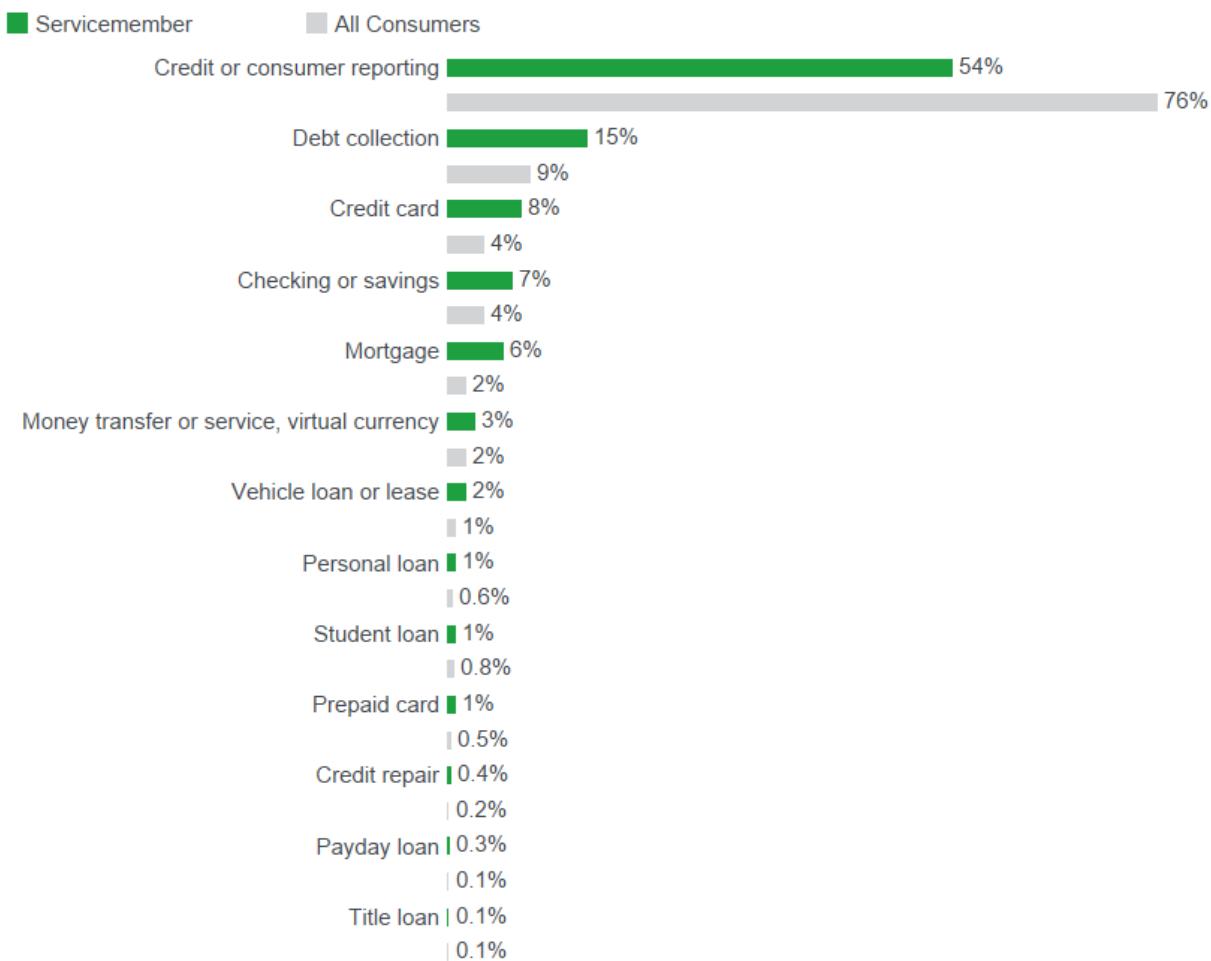
⁶ Complaint data in this Section 1 of this report are current as of May 1, 2023. This report excludes some complaints that the CFPB received, including multiple complaints submitted by a given consumer on the same issue (i.e., duplicates), whistleblower tips, and complaints that the CFPB found were submitted without the consumer's authorization. Complaint numbers are rounded throughout the report; therefore, numbers and percentages may not sum to sub-totals or 100%.

⁷ The CFPB expanded its complaint handling and public Consumer Complaint Database over several years. See generally Consumer Fin. Prot. Bureau, *Consumer Complaint Database Release Notes*, <https://cfpb.github.io/api/ccdb/release-notes.html> for information on when specific products/services were added to the Database.

issues they face, both domestically and abroad. By monitoring these complaints, the CFPB can hold companies accountable for their actions and fulfill its legal obligations.

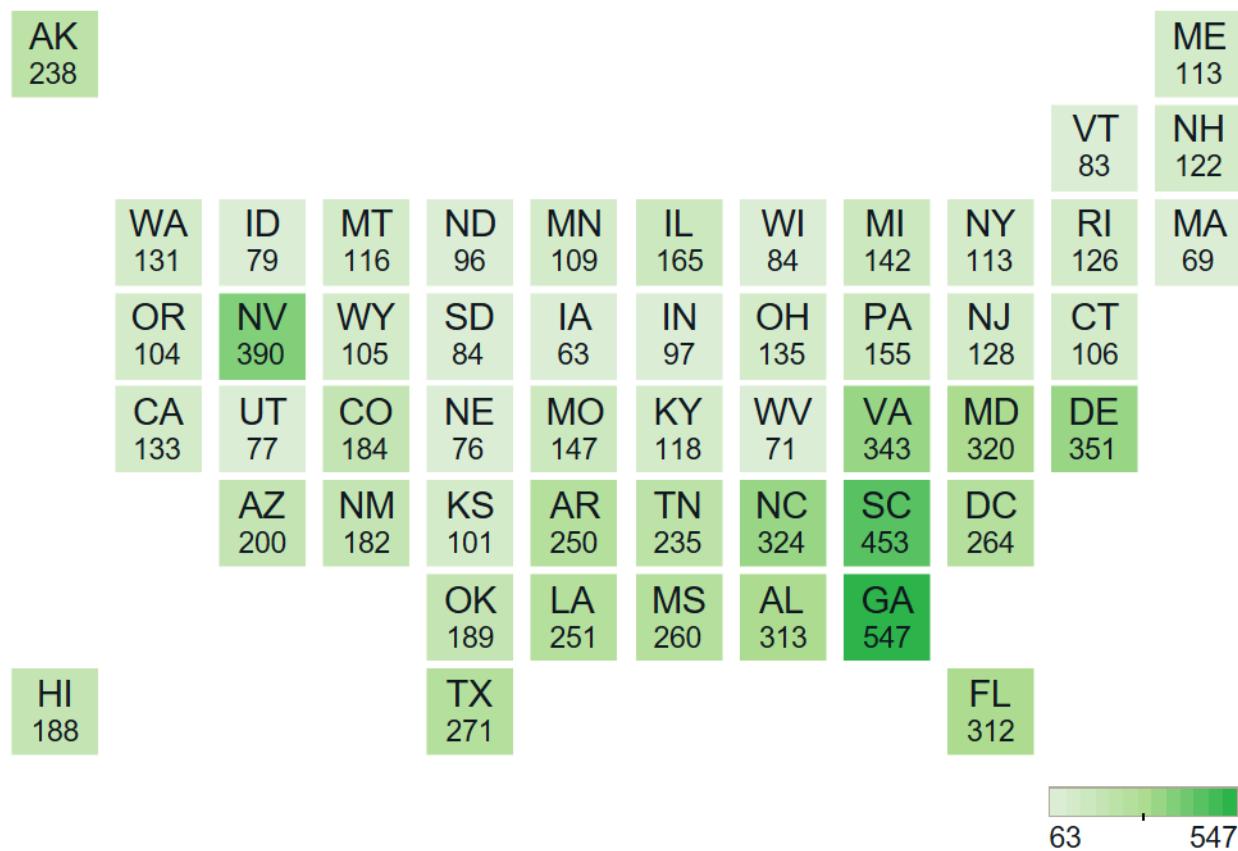
As in prior years, credit reporting remains the top concern among servicemembers, followed by debt collection and credit cards. The percentage of complaints filed by servicemembers exceeded the percentage filed by all consumers for debt collection, credit cards, checking and savings accounts, mortgages, money transfer services and virtual currency, and vehicle loans and lease. Notably, among servicemembers, 6% of complaints were related to mortgages and 2% were related to vehicle loan or lease, compared to 2% and 1%, respectively, for all consumers (Figure 2).

FIGURE 2: SERVICEMEMBER VS ALL CONSUMERS COMPLAINTS BY PRODUCT IN 2022



The CFPB received servicemember complaints from across the United States and from those stationed overseas (Figure 3). States with the highest rate of servicemember complaints on a per capita basis are Georgia (547), South Carolina (453), Nevada (390), Delaware (351), and Virginia (343). States with the lowest rate of servicemember complaints include Iowa (63), Massachusetts (69), West Virginia (71), Nebraska (76), and Utah (77).

FIGURE 3: COMPLAINT SUBMISSIONS BY SERVICEMEMBERS PER 1M PEOPLE



The CFPB received 145 complaints from Puerto Rico and more than 300 complaints from servicemembers living abroad or in other U.S. territories in 2022. For a full detailed breakdown of complaints by geographic location see Appendix A: Figure 15.

In 2022, the CFPB sent complaints to more than 3,200 companies for their review and response. Companies are expected to review the information provided in the complaint, communicate with the consumer as needed, determine what action to take in response, and provide a written response to the CFPB and the consumer. When a company cannot take action on a complaint, they can provide an administrative response that includes a statement or other evidence supporting this response (Figure 4).

FIGURE 4: COMPANY RESPONSE TO SERVICEMEMBER COMPLAINTS IN 2022

Financial Product or Service	Closed with monetary relief	Closed with non-monetary relief	Closed with explanation	Admin response	Company reviewing	Company did not provide a timely response
Credit or consumer reporting	<1%	33.6%	64.7%	1.2%	0%	<1%
Debt collection	<1%	11%	83.5%	1.5%	0%	3.3%
Checking or savings	13.4%	5.8%	77.6%	2.2%	0%	1.2%
Credit card	17.2%	12.8%	65.6%	3.4%	0%	1.0%
Money transfer or service, virtual currency	10.2%	5.4%	81.9%	1.1%	0%	1.3%

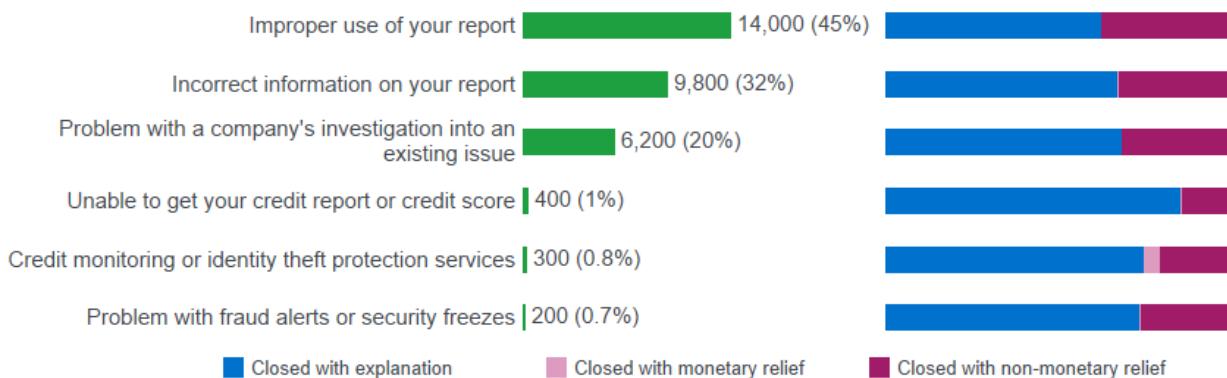
1.1 Credit or consumer reporting

In 2022, the CFPB received approximately 869,000 credit or consumer reporting complaints from all consumers. Servicemembers submitted approximately 35,900 of those credit or consumer reporting complaints in 2022. The CFPB sent approximately 31,400 (or 87%) of these complaints to companies for review and response, referred 2% to other regulatory agencies, and found 10% to be not actionable.⁸ As of May 1, 2023, there were no credit or consumer reporting complaints pending with the consumer and with the CFPB.

⁸ Complaints that are referred to other agencies include complaints about depository institutions with \$10 billion or less in assets or non-depositories that do not offer a consumer financial product or service. Complaints that are not actionable are not sent to the company for a response or referred to other agencies; these complaints include incomplete submissions, withdrawn complaints, and complaints in which the CFPB discontinued processing because it had reason to believe that a submitter did not disclose its involvement in the complaint process.

Companies responded to 99.7% of credit or consumer reporting complaints sent to them for review and response. They closed 65% with an explanation, 34% with non-monetary relief, and 0.2% with monetary relief. They provided an administrative response for 1% of complaints. They did not provide a timely response for 0.3% of complaints. (Figure 5).

FIGURE 5: COMPANY RESPONSES TO CREDIT REPORTING COMPLAINTS BY ISSUE



1.2 Debt collection

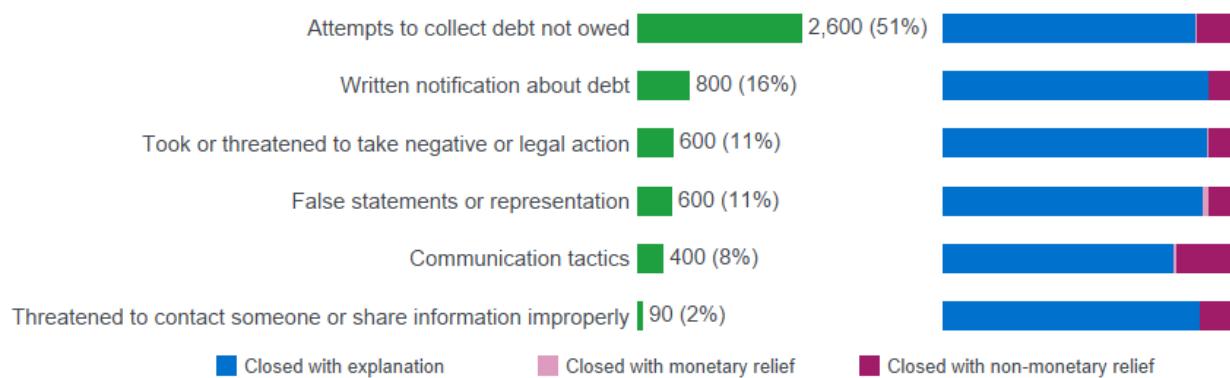
The CFPB received approximately 9,800 debt collection complaints from servicemembers in 2022. We sent approximately 5,400 (or 55%) of these complaints to companies for review and response, referred 35% to other regulatory agencies, and found 10% to be not actionable. As of May 1, 2023, no debt collection complaints were pending with the consumer, and none were pending with the CFPB. Roughly 31% of debt collection complaints were referred to the FTC.

Debt collection companies responded to 96.7% of complaints sent to them for review and response. These companies closed 83% with an explanation, 11% with non-monetary relief, and 0.8% with monetary relief. They also provided an administrative response for 1%. Companies did not provide a timely response for 3% of complaints.

In 87% of debt collection complaints with closure responses in 2022, consumers reported that they attempted to resolve their issue with the company before submitting a complaint to the CFPB. Servicemembers submitted over 9,800 complaints about debt collection—more than in any prior year. “Attempts to collect debts not owed” accounted for over 50% of debt collection complaints with closure responses in 2022 (Figure 6).

Servicemembers accounted for 8.9% of debt collection complaints with closure responses, compared to 11.2% of complaints about debt collectors making false threats or representations and debt collectors threatening legal action (10.7%). Since its inception, the Office of Servicemember Affairs has actively engaged in educational efforts to ensure servicemembers know their rights regarding debt collectors threatening them with legal action, impacts to their security clearances, or calls to their chains of command.⁹

FIGURE 6: COMPANY RESPONSES TO DEBT COLLECTION COMPLAINTS BY ISSUE



1.3 Checking or savings accounts

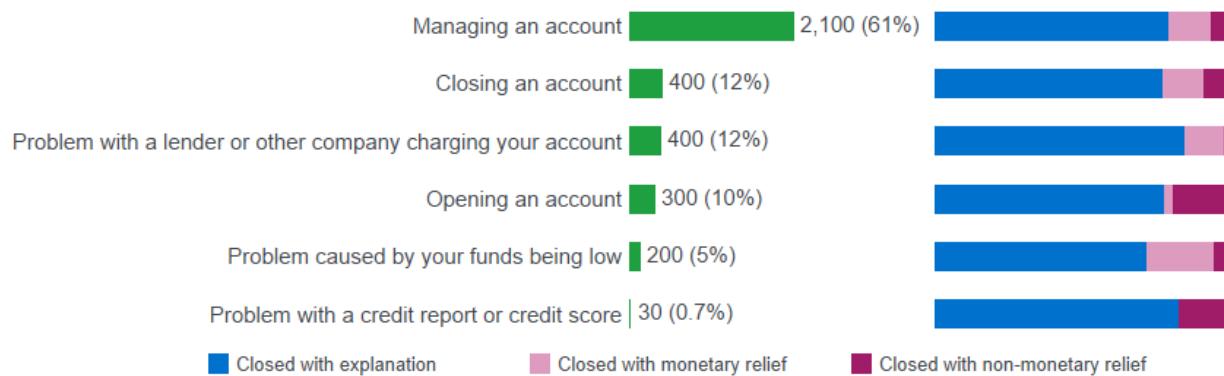
The CFPB received approximately 4,800 checking or savings servicemember complaints in 2022, a 47% increase from the previous year. We sent approximately 3,600 (or 76%) of these complaints to companies for review and response, referred 15% to other regulatory agencies, and found 9% to be not actionable. As of May 1, 2023, no checking or savings complaints were pending with the consumer, and none were pending with the CFPB.

⁹ Consumer Fin. Prot. Bureau, *Servicemembers: Know your rights when a debt collector calls* (Sept. 2016), <https://files.consumerfinance.gov/f/CFPB-Servicemembers-Know-Your-Rights-Handout-Debt-Collection.pdf>

Companies responded to 98.8% of checking or savings complaints sent to them for review and response. They closed 78% with an explanation, 13% with monetary relief, and 6% with non-monetary relief (Figure 7). These companies provided an administrative response for 2% of complaints. They did not provide a timely response for 1% of complaints.

In 95% of checking or savings complaints with closure responses in 2022, consumers reported that they attempted to resolve their issue with the company before submitting a complaint to the CFPB.

FIGURE 7: COMPANY RESPONSES TO CHECKING OR SAVINGS ACCOUNT COMPLAINTS BY ISSUE



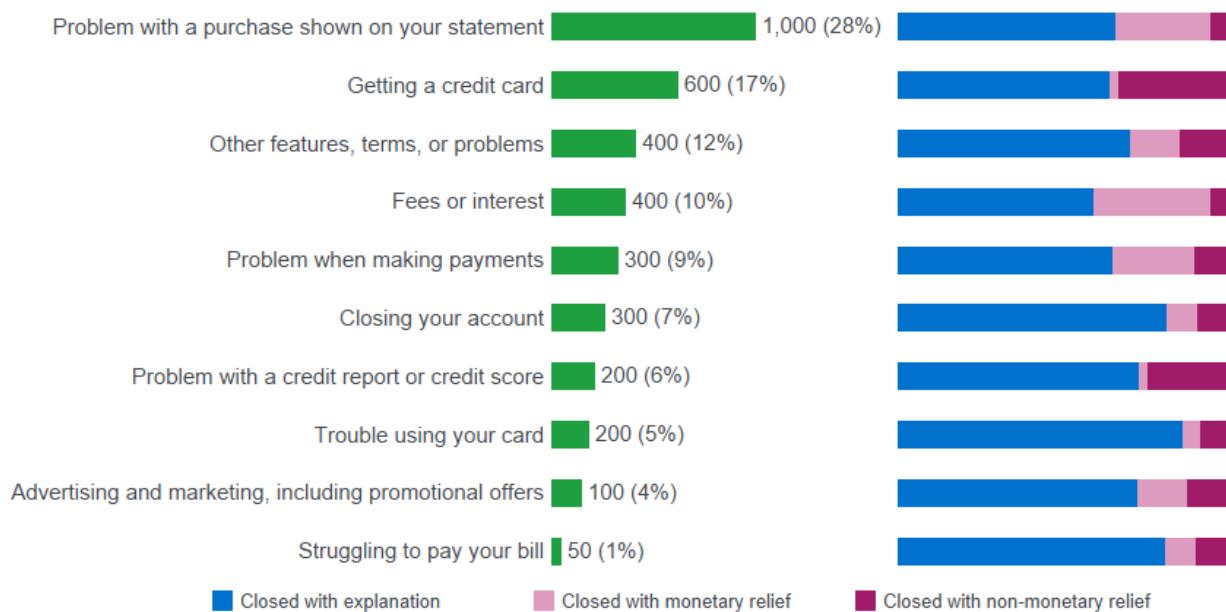
1.4 Credit cards

In 2022, servicemember complaints about credit cards increased 45% compared to 2021, from approximately 3,400 to 5,000 complaints. The CFPB sent approximately 3,700 (or 74.8%) to companies for review and response, referred 19% to other regulatory agencies, and found 6% to be not actionable. As of May 1, 2023, no credit card complaints were pending with the consumer, and none were pending with the CFPB.

Credit card companies responded to 99% of complaints sent to them for review and response. They closed 66% with an explanation, 17% with monetary relief, and 13% with non-monetary relief. These companies provided an administrative response for 3% of complaints (Figure 8). The companies did not provide a timely response for 1% of complaints.

In 94% of credit card complaints with closure responses in 2022, consumers reported that they attempted to resolve their issue with the company before submitting a complaint to the CFPB. The most frequently mentioned issue was “problems with a purchase shown on your statement,” which increased 33% over 2021 and 26% over 2020.

FIGURE 8: COMPANY RESPONSES TO CREDIT CARD COMPLAINTS BY ISSUE



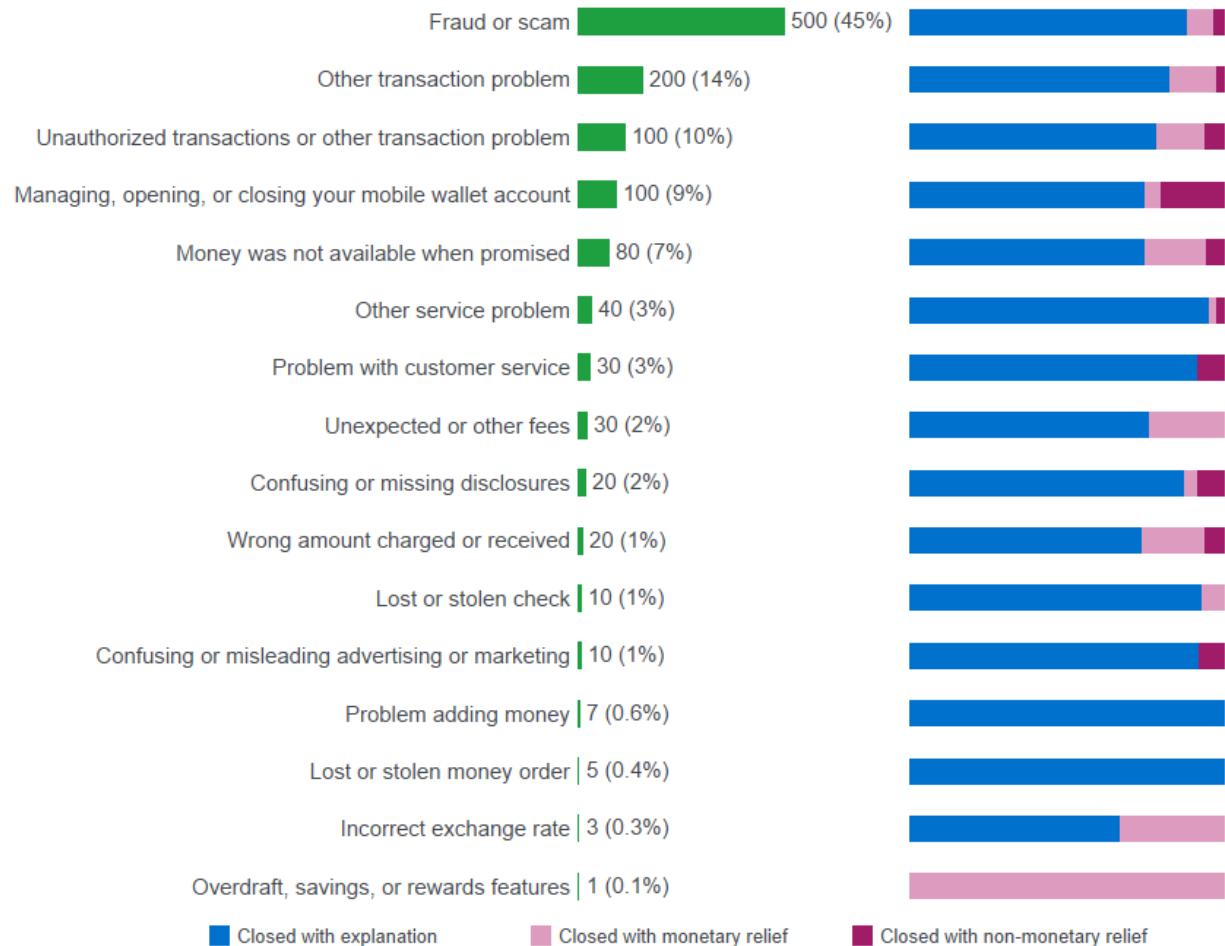
1.5 Money transfer, money services, and virtual currencies

In 2022, the CFPB received approximately 2,100 complaints from servicemembers about money transfers or services and virtual currencies. The CFPB sent approximately 1,200 (or 58.6%) of these complaints to companies for review and response, referred 29% to other regulatory agencies, and found 12% to be not actionable. As of May 1, 2023, no complaints were pending with the consumer, and none were pending with the CFPB.

Companies responded to 98.7% of money transfer or service, virtual currency complaints sent to them for review and response. Companies closed 82% of complaints with an explanation, 10% with monetary relief, and 5% with non-monetary relief. Companies provided an administrative response for 1% of complaints (Figure 9). Companies did not provide a timely response for 1% of complaints.

In 95% of money transfer or service, virtual currency complaints with closure responses in 2022, consumers reported that they attempted to resolve their issue with the company before submitting a complaint to the CFPB.

FIGURE 9: COMPANY RESPONSES TO MONEY TRANSFER, MONEY SERVICES, AND VIRTUAL CURRENCY COMPLAINTS BY ISSUE



2. Growth of payment apps in the marketplace and the servicemember community

2.1 Payment apps in the marketplace

Payment apps allow a consumer to send money to another person without needing to write a check, swipe a physical card, or exchange cash. Depending on the provider, a payment app transfer can be initiated from a consumer’s online bank account portal, prepaid account portal, or mobile application. The onset of the COVID-19 pandemic in the spring of 2020 led to a significant increase in the adoption and usage of payment apps (both bank and non-bank). According to an analysis of data collected in the 2019 and 2020 Federal Reserve payment study, in early 2020, the number of accounts with first-time payment app activity surged by almost 18% from the first quarter to the second quarter of 2020; growth in the number of accounts with activity similarly rose at a high rate of 12.4% over the same period.¹⁰

The Federal Reserve’s 2021 annual *Diary of Consumer Payment Choice* found that 66.4% of all consumers had adopted one or more payment apps.¹¹ A 2022 Pew Research Center survey found that over three-quarters (76%) of adult consumers in the U.S. have used one of the four large common payment app providers.¹² Meanwhile, a 2022 Federal Deposit Insurance Corporation

¹⁰ Board of Governors of the Federal Reserve System (U.S.), *Developments in Noncash Payments for 2019 and 2020: Findings from the Federal Reserve Payments Study*, <https://www.federalreserve.gov/paymentsystems/december-2021-findings-from-the-federal-reserve-payments-study.htm>

¹¹ Kevin Foster, Claire Greene, and Joanna Stavins, 2022, *The 2021 Survey and Diary of Consumer Payment Choice: Summary Results*. Federal Reserve Bank of Atlanta Research Department Data Report, no. 22-2, https://www.atlantafed.org/-/media/documents/banking/consumer-payments/survey-diary-consumer-payment-choice/2021/sdcpc_2021_report.pdf

¹² Monica Anderson, Pew Research Center, *Payment apps like Venmo and CashApp bring convenience – and security concerns – to some users* (2022), <https://www.pewresearch.org/fact-tank/2022/09/08/payment-apps-like-venmo-and-cash-app-bring-convenience-and-security-concerns-to-some-users/>

(FDIC) survey found that almost half of all households (46.4%) used a non-bank payment app in 2021.¹³

In the payment app complaints submitted to the CFPB, the most common self-identified issues are fraud and challenges around dispute resolution.

In 2022, of all the complaints submitted to the CFPB on payment apps sent to companies, the most common complaints were related to fraud. Other federal agencies have reported similar growth, particularly between 2018 and 2021. For example, complaints to the FTC about fraudulent payment apps increased by more than 460% (from 12,476 to 70,175), and associated financial losses increased by more than 360% from \$28.4 million to \$130.9 million.¹⁴ In 2022, 62,137 payment apps-related fraud complaints were submitted to the FTC and total financial losses increased to \$163.4 million.¹⁵ Additional research using internal banking data has shown that fraud is a growing problem in this market and one that often leaves the consumer with little or no recourse.¹⁶

One common type of fraud is induced fraud – which occurs when a consumer is tricked into sending money to a fraudster or otherwise unwittingly facilitating a transaction, generally because the fraudster misrepresents their identity. Unauthorized transfers are also a growing issue seen in CFPB complaints. This type of transaction can occur when the user’s payment app account is accessed without their permission and money is transferred out. Sometimes unauthorized transfers result from a consumer being tricked into providing their login credentials or their credentials being taken fraudulently.

¹³ Fed. Deposit Insurance Corp., 2021 FDIC National Survey of Unbanked and Underbanked Households 4 (2022) 2021 FDIC National Survey of Unbanked and Underbanked Households <https://www.fdic.gov/analysis/household-survey/2021report.pdf>. This survey described “nonbank online payment services” as those “with an account feature that allows you to receive and store money in the account.” Examples of nonbank online payment services are PayPal, Venmo, and Cash App. The survey question instructed households not to consider Zelle, which is a bank-owned P2P payment service.

¹⁴ Federal Trade Commission. Based on the total number of reports and associated financial losses associated made to the FTC’s Consumer Sentinel Network where a payment app or service was used to defraud. See <https://www.ftc.gov/news-events/data-visualizations>

¹⁵ *Id.*

¹⁶ Office of Senator Elizabeth Warren, *Facilitating fraud: How consumers are left high and dry by the banks that created it*, 2 (October 2022), <https://www.warren.senate.gov/download/zelle-report-october-2022>.

2.2 Payment apps in the servicemember community

As the use of payment apps has become more commonplace, servicemember complaints about these platforms have increased considerably. In 2022, complaints mentioning payment apps represented 2.2% of total servicemember complaints sent to companies compared to 1.5% for all consumers (Figure 10).

FIGURE 10: PERCENTAGE OF COMPLAINTS SENT TO COMPANIES ABOUT PAYMENT APPS FOR SERVICEMEMBERS AND ALL CONSUMERS

Status	Payment app complaints sent to companies	Total complaints sent to companies	Percent of total complaints
Servicemember	1,118	51,855	2.2%
All consumers	12,389	819,570	1.5%

In 2022, CFPB sent over 1,100 servicemember complaints mentioning payment apps to companies, up from about 800 in 2021 and 600 in 2020 and more than in 2013 to 2019 combined (Figure 11).

FIGURE 11: PAYMENT APP SERVICEMEMBER COMPLAINTS SENT TO COMPANIES BY PRODUCT AND YEAR

Year	Payment app <i>Money Transfer or service, Virtual Currency</i>	Payment app <i>Checking or savings</i>	Payment app <i>Credit Card</i>	Payment app <i>Prepaid Card</i>	Total
2022	552	408	118	40	1,118
2021	439	233	88	30	790
2020	357	154	97	28	636
2013 - 2019	434	267	183	35	919

The growth of these platforms has allowed bad actors to find fast and easy ways to trick their targets into sending money. According to a recent AARP study, servicemembers are nearly 40% more likely to lose money to scams and fraud than the civilian population, and four out of five report being targeted by scams directly related to their military service or benefits, resulting in financial losses of \$267 million in 2021.¹⁷ As more servicemembers use payment apps as a means of transferring money, they are increasingly experiencing financial loss and harm.

¹⁷ Jennifer Sauer, AARP, *Veterans Battle Surprise Attacks from Fraud and Scams* (Nov. 9, 2021), <https://www.aarp.org/pri/topics/work-finances-retirement/fraud-consumer-protection/fraud-scams-military-veterans/>.

3. Servicemembers face unique risks with payment apps

Payment apps offer a convenient way to transfer funds, particularly for servicemembers who are asked to move frequently and need the ability to send and receive money easily and safely online. CFPB complaints show that servicemembers are relying on payment apps for necessary tasks, such as making a deposit on an apartment rental at their next duty station, securing a temporary vehicle for their family during a move, or selling large personal belongings that they cannot bring with them to a deployed location. These transactions often involve sending money to and receiving money from people across the country, which may be driving the increase in reported scams and fraud.

In 2022, over half of the money transfer or service, virtual currency complaints from servicemembers about these platforms were about fraud or scams (Figure 12). In addition, they often reported issues with customer service, an inability to getting timely resolutions, and feelings of anxiety.

FIGURE 12: P2P SERVICEMEMBER MONEY TRANSFER OR SERVICE, VIRTUAL CURRENCY COMPLAINTS SENT TO COMPANIES BY ISSUES, 2022



3.1 Frequent relocations put servicemembers and their families at higher risk of scams and fraud

Servicemembers who are on active duty are frequently obligated to move every few years. During Permanent Change of Duty Station (PCS) months, they often share their personal and financial information with moving services, housing managers, and utility companies. In 2022, the OSA received reports from various stakeholders about the inability to find suitable housing given the competitive rental housing market. Many servicemembers and their families begin the housing search online and start looking for suitable homes before their PCS date. They're often asked to secure a home by putting down a deposit, without first seeing the property, so that they have a place to live at their new duty station. This increased dependence on online transactions, though, puts servicemembers and their families at a higher risk of scams or fraud.

Given the deployment and geographical mobility of servicemembers, securing housing is not the only transaction that is often started online. CFPB complaints also indicate that payment apps are being used to send money for deposits on automobiles, childcare, furniture, and even pets. Unlike the civilian population, who can normally meet face-to-face or physically inspect the goods or service, servicemembers and their families are often unable to do the same due to their military duties, especially if they're deployed overseas.

In addition, scammers are increasingly listing houses for rent that do not exist. These fraudulent listings often appear legitimate, with detailed descriptions and high-quality photos, leading unsuspecting individuals to send money for a rental deposit or advance payment. As a result, it can be easy to fall victim to these scams and lose a significant amount of money when trying to secure housing.

For instance, one family member of an active duty servicemember shared:

Being in the military, I am usually not afforded the ability to view a location prior to moving there, meet with landlords personally, or tour homes. Because of this, often we have to view properties online through applications like [company]. I received an email and call from the owner letting me know that I had been selected for the property and if I wanted it, the next step would be to sign the lease and submit the deposit of \$1200 and the first months[sic] rent of \$1200. The owner used [payment app service], which I have used in the past and assumed it was a reliable service...

My landlord said he only got 1/3 payments even though I received receipts from [company]. When I called [company], they confirmed the money had left my account.

After a week, I asked the landlord if we could have a conference call with him and his bank, [company], so that I could hear directly from them that they had not received funds. At that point, he stopped answering my emails, texts, and phone calls. When I attempted to call him [date], his phone was disconnected. It's evident I have been scammed. Now I'm out \$2400 which is a significant amount of moving, especially before a move and the holidays.¹⁸

Another family member of a servicemember in a similar situation overseas who was trying to secure housing also reported:

My husband is military and we are currently stationed overseas in [location]. My kids and myself are leaving a few months early (3 weeks) back to the states to get them into school and get settled before my husband comes home. We were looking for houses and we found a house at [location] ...

Our application was approved and we were able to continue the process of reserving the house... He asked us to put down our deposit that was \$1400.00 to reserve the house and that we weren't due to pay the 1st month 's rent until we moved in. So we did ... He had us [payment app service] the money to his wife. ... He sent over the lease agreement that we signed and sent back. A few days later he says that he took everything to his lawyer and everything was fine but the only thing was his lawyer found tenants who were willing to pay 4 months of rent plus the deposit. I immediately let him know that we were not going to be able to put that much down and how \$1400.00 was a struggle for us to get. He waits a few hours to tell us that as long as we can put down the first months[*sic*] rent he'll hold it for us since we already put a deposit down. We agreed and instead of paying 1 month in rent, we decided to pay two (months) since we weren't sure when our BAH would kick in and we did not want to be struggling to pay rent since PCSing[*sic*] is enough to begin with. So we went into my husband's TSP and withdrew the money... Our sponsor goes to see the house ... calls us in a confused panic because there are people living in the home. I then started to contact him multiple times and he has not responded and has not been active since that day.¹⁹

¹⁸ Consumer Complaint, <https://www.consumerfinance.gov/data-research/consumer-complaints/search/detail/6170949>.

¹⁹ Consumer Complaint, <https://www.consumerfinance.gov/data-research/consumer-complaints/search/detail/5904586>.

3.2 Servicemembers face higher risks of identity theft

Susceptibility to identity theft can heighten the risk of unauthorized access to a servicemember's payment app account. The FTC reported that servicemembers are three times more likely to report that someone used a debit card or some other electronic means to take money directly from their bank account.²⁰ In 2022, a review of five years' worth of identity theft data reported to the FTC shows that active duty servicemembers are 76% more likely to report instances of identity theft, where the perpetrator misused an existing bank or credit card account, than the general population.²¹ Frequent PCS and servicemember deployments can increase their vulnerability to such incidents, due to the multiple instances of sharing their and their family's personal information during this time.

Recently, the CFPB published a report emphasizing the adverse effects of identity theft on the financial stability of servicemembers, including debts incurred as a result of identity theft and the presence of invalid debts on credit reports.²² Servicemembers have reported that their information was stolen and then used to access their funds through payment apps. These incidents typically involve unauthorized transfers of money from the servicemember's account without their consent. For example, one servicemember stated:

I am a victim of identity theft. On [date] I received a phone call from [number]. I looked up the number and saw that it was linked to a [bank] website. The person on the phone said he was calling from the bank's fraud department. He said that there was suspicious activity on my account and asked if I made a big purchase the day before. He verified my home address, my phone number, and told me to verify my purchases from the past few weeks. I said yes to all of them because they were purchases I made. The impersonator then proceeded to ask me about a purchase worth \$6,900 on [date]. I said that I did not make that purchase. I immediately logged into my online banking and saw that someone had taken out \$6,900 the day before. I did not spend that much, I did not share my card

²⁰ Emma Fletcher, Federal Trade Commission, *Identity theft causing outsized harm to our troops* (May 21, 2020), <https://www.ftc.gov/news-events/data-visualizations/data-spotlight/2020/05/identity-theft-causing-outsized-harm-our-troops>.

²¹ Terri Miller, Federal Trade Commission, *Military families combat identity theft amid life transitions* (July 2022), <https://consumer.ftc.gov/consumer-alerts/2022/07/military-families-combat-identity-theft-amid-life-transitions>.

²² Consumer Fin. Prot. Bureau, *Servicemember reports about identity theft are increasing* (Jan. 12, 2023), <https://www.consumerfinance.gov/data-research/research-reports/servicemember-reports-about-identity-theft-are-increasing/>.

information with anyone, nor was I notified about that amount being taken out before this person's call to me.

On [date] I went into the physical bank to confirm that my account was frozen, but I was told from the associate that my account was still opened. Within those 2 days this person was continuously taking out money from my checkings [sic] account. I made a claim with the debit card department, [payment app service] department, and the credit card department because everything was compromised. This person was able to take a total of \$24,000 from my checkings [sic] and \$9,500 through [payment app service].²³

Many military personnel also reported that after their personal information was stolen, the thieves use it to gain access to their payment app accounts and/or their linked bank accounts. This then enables the thieves to send money out of that account, causing significant financial loss to the servicemembers. One servicemember stated:

I have been the target of 11 unauthorized and fraudulent transactions that completely drained my checking account. These transactions were placed over a 10 day period through random amounts that left my checking account with negative money, stealing a total of \$3,500. The perpetrator used my banking/debit card information to open up a [payment app service] account to process these fraudulent transactions. [Company] did not flag these highly suspicious and out-of-character activity for my checking account and stated they "could not find proof of fraud" and closed my dispute.²⁴

Servicemembers often describe challenges in detecting these fraudulent transfers in real-time, due to their military duties. Some explicitly note their confusion as to the circumstances that led to the scam or fraud (e.g., saying, "I have no idea how" or "I don't know how" in their narrative.)

Recently, the CFPB published a blog on the challenges some servicemembers may face in getting the free credit report monitoring they're entitled to under the law.²⁵ This is particularly true when they are deployed to areas with limited or no cellular reception or in locations where personal cellular devices are not authorized, making it challenging for them to continuously monitor any changes in their credit report or money sent from their payment app accounts. In such cases, the servicemembers typically stated that they only knew the amount of money lost and some limited

²³ Consumer complaint, <https://www.consumerfinance.gov/data-research/consumer-complaints/search/detail/6062185>.

²⁴ Consumer Complaint, <https://www.consumerfinance.gov/data-research/consumer-complaints/search/detail/5154628>.

²⁵ Consumer Fin. Prot. Bureau, Credit reporting companies should do more to ensure that servicemembers receive the free credit monitoring services they are legally entitled to (Apr. 2023), <https://www.consumerfinance.gov/about-us/blog/credit-reporting-companies-servicemembers-receive-free-credit-monitoring-legally-entitled-to/>

information about where it was sent. In some cases, they are only provided with a phone number, email address, or name associated with the recipient's payment app account. Additionally, servicemembers may be too preoccupied with their military duties to constantly check their payment app or bank accounts in real time when the transaction occurs.

3.3 Issues with payment apps can cause negative impacts on a servicemember's financial well-being

Financial readiness is military readiness. A servicemember who is facing financial losses of thousands of dollars is not focused on their mission, and a servicemember who loses their security clearance because of financial troubles may not be able to serve at all.

Recently, the CFPB released a report that found that nearly one in four consumers with some military service are not financially prepared for a disruption to their main source of income.²⁶ When a servicemember is put into a situation that hurts their financial readiness, such as a substantial loss as the result of fraud, it can ultimately jeopardize their ability to protect our nation and their main source of income to provide for their families. In their complaints, servicemembers, veterans, and their families have described the tremendous financial impacts of fraud-related losses, including lost savings, cascading financial distress, emotional distress, and embarrassment.

If defrauded through a payment app, servicemembers and their families can lose a large portion of their savings and their financial security. During a PCS, many servicemembers and their families already experience high out-of-pocket expenses. A 2022 survey of over 2,000 military families found that the ability to locate housing within their maximum housing allowance was extremely difficult and the average military family had out-of-pocket costs of around \$2,032 during a PCS.²⁷ One complaint below stated the dire impact of losing thousands by using a payment app during a PCS to secure housing in a competitive rental market:

²⁶ Office of Research, Consumer Fin. Prot. Bureau, *Making Ends Meet in 2022: Insights from the CFPB Making Ends Meet survey 18* (Dec. 2022), <https://www.consumerfinance.gov/data-research/research-reports/insights-from-making-ends-meet-survey-2022/>.

²⁷ Blue Star Families and Wells Fargo, *Pulse Check 3* (Sept. 2022), https://bluestarfam.org/wp-content/uploads/2022/10/BSF_PulseCheck_Report_Sep2022.pdf.

The kids and I leave in 3 weeks and we have no home, no savings, and no money to figure this out. We are at a complete loss... I still cannot fathom that we are out of \$4400 with no place to live.²⁸

Once a servicemember reports fraud with their payment app payment accounts, they may experience unexpected consequences, such as having their funds withheld and accounts closed or frozen without prior notice. Servicemembers may have their accounts indefinitely suspended or closed without warning when there is a dispute of unauthorized charges or an open investigation of their account. As a result, some may find their accounts suspended indefinitely, leaving them in a state of uncertainty. When accounts are closed, users may be unable to further escalate the issue or contact customer service since they are technically no longer customers. This can have a significant impact on their daily lives as they are unable to access their funds. For example, one veteran reported:

I had a hacking incident [in 2022], in which my personal checking (through [payment app service]), my [payment app service], and [payment app service] accounts were affected. My [payment app service] and [payment app service] returned the stolen funds to me fairly quickly. I did not actually lose any money through [payment app service], the hackers used my [payment app service] account to move their money through to other people, like a conduit. But in the eyes of [company], the money went though [sic] my account-- so I owe it...

... During this whole process, they have locked my account, and all of my apps. I have a small business and a [company] phone, so the only way I can have and use apps in my phone is through the [company] and [payment app service]. But with the account being locked, it has affected my business, because my phone & business apps are affected.²⁹

Fraud that leads to a negative balance on a payment app service account can lead to improper debt collection. The CFPB have also received complaints from servicemembers who realized the fraudulent transaction and notified their bank to block or stop the transaction only to be faced with a debt collection action. This often occurred because their payment app account showed a negative balance, and they were unable to access the account to address the issue or speak to a customer service representative. For example, in the complaint below, a

²⁸ Consumer Complaint 220822-9270675, <https://www.consumerfinance.gov/data-research/consumer-complaints/search/detail/5904586>.

²⁹ Consumer Complaint 221111-9745222, <https://www.consumerfinance.gov/data-research/consumer-complaints/search/detail/6190058>.

servicemember's account was left with a negative balance after a fraud incident, and they ended up paying the money just to avoid debt collection.

Later I closed my [payment app service] account thinking that we had stopped the scam. [payment app service] emailed me today threatening collections. Because of this threat I will just pay the scammed money, worried that it would affect my credit. I wanted to provide this information to you as it seems unfair to consumers that [payment app service] can do this.³⁰

While payment apps can be a valuable tool in a growing online marketplace, the increasing level of fraud and scams are clearly resulting in financial losses and wasted time for servicemembers, veterans, and military families.

3.4 Servicemembers report difficulties getting issues resolved through payment app companies

Servicemembers who believe they have been the target of scams or fraud can take several actions to seek a resolution. First, they may file a dispute with the company that processed the payment transaction. This is often done through the payment app platform or their financial institution that offers payment apps. Second, they can submit a complaint to the CFPB. Many servicemembers also described reaching out to other entities for assistance, such as law enforcement, the Better Business Bureau, the FTC, and credit reporting companies.

Servicemembers report confusion or surprise that their bank's advertised payment app didn't protect them from all scams or fraud. One servicemember described the confusion they faced after being persuaded to send money to a scammer through the payment app provided by their bank. They assumed the app would have the same protections as their other banking accounts:

Since my bank, [bank], offered [payment app service] and promoted it as an option for sending money, I assumed my bank provided the same protections as they did for fraudulent transactions from my checking, savings, debit card and credit card accounts. I am a victim of fraud and I feel like the bank should refund my money since the [payment

³⁰ Consumer complaint 221021-9619665, <https://www.consumerfinance.gov/data-research/consumer-complaints/search/detail/6113294>.

app service] service they provided offers no options for getting the money back from the scammers no matter how soon you report the fraud.³¹

The consumer was only able to recover the lost money after submitting a complaint with the CFPB. The payment app service stated that the initial denial was correct but agreed to issue a refund as a one-time courtesy.

When it comes to induced fraud, servicemembers wait long periods and often see no monetary relief. Complaints suggest that payment app users are struggling to recover funds from either their bank or payment app provider, especially when the dispute is the result of induced fraud. After being defrauded out of their money by a scammer using a payment app service, servicemember complaints often describe ongoing difficulty in getting timely, substantive, or any monetary relief from payment app service providers or their financial institutions. One servicemember stated in their complaint:

One is the overwhelming challenge it has been (6 weeks and counting, as of today) to get [company] to fairly and transparently review my case, with all of the proof I provided. The[y] have denied the case repeatedly, although never letting me speak to anyone of authority, everything has[sic] behind the scenes in the "escalation dept", and only 200 characters of information can be provided on your own behalf in writing. That's it.³²

In other complaints to the CFPB, many servicemembers have described their frustration when trying to get answers after being scammed or defrauded. For example, one complaint stated:

We have made multiple reports including with [payment app service] however unlike everyone else [payment app service] was absolutely no help and refused to even attempt to find out a way to help. It was almost as if I was another customer of theirs who got caught up in the unfortunate world of fraud. It was as though they had no empathy... that some people in the world are so nonchalant about others mistakes and heartache.³³

Servicemembers often complained that they were required to jump back and forth between parties or deal with long waiting periods to discuss or resolve their concerns. Some servicemembers also listed additional steps they took or planned to take to resolve their problem, including confronting scammers directly or reaching out to media outlets. Unfortunately, servicemembers that were the

³¹ Consumer complaint, <https://www.consumerfinance.gov/data-research/consumer-complaints/search/detail/5992427>.

³² Consumer Complaint, <https://www.consumerfinance.gov/data-research/consumer-complaints/search/detail/6190058>.

³³ Consumer Complaint, <https://www.consumerfinance.gov/data-research/consumer-complaints/search/detail/5904586>.

targets of induced fraud were often not able to get any monetary relief from the payment app that was used.

Even with protections in place, servicemembers are still struggling to get relief. Even though consumer liability protections clearly cover certain transactions³⁴, complaints indicate that servicemembers and veterans who lost money due to unauthorized transfers are still struggling to get their money back during the dispute resolution process. If the claim is timely filed, the company is required to investigate it and determine if an error occurred that requires the company to reimburse the user within certain timeframes.

The slow response time and lack of support from the payment app provider can cause servicemembers, veterans, and their families to miss payments or incur late fees, leading to additional financial hardship. In most of the complaints about fraud and scams with a payment app provider, the servicemembers described being frustrated with the process and the lack of recovery options especially when the product was marketed to them as safe. All these issues can result in serious financial consequences that can jeopardize not just their financial health but also their ability to continue service or keep a security clearance.

3.5 Other payment app risks

Finally, servicemembers who keep money in payment app applications may not have the same protections as traditional deposit accounts. It is important to note that funds stored in payment apps may not be insured by the FDIC, National Credit Union Administration (NCUA), or other insurers.³⁵ Recently the CFPB published an issue paper highlighting the risks to consumers if they choose to leave a balance on certain payment app platforms.³⁶ In traditional banking institutions, depositors have a certain amount of protection with FDIC and NCUA insurance. Depositors will not lose money on their insured funds, up to \$250,000, if their

³⁴ 12 CFR § 1005.6. See also Consumer Fin. Prot. Bureau, *Electronic Fund Transfer FAQs*, www.consumerfinance.gov/compliance/compliance-resources/deposit-accounts-resources/electronic-fund-transfers/electronic-fund-transfers-faqs/.

³⁵ Federal Deposit Insurance Corporation, *FDIC Consumer News: Is Digital Banking for Me?* FDIC Consumer News (April 2020), <https://www.fdic.gov/consumers/consumer/news/april2020.html>.

³⁶ Office of Competition and Innovation and Office of Markets, Consumer Fin. Prot. Bureau, *Analysis of Deposit Insurance Coverage on Funds Stored Through Payment Apps* (June 2023), <https://www.consumerfinance.gov/data-research/research-reports/issue-spotlight-analysis-of-deposit-insurance-coverage-on-funds-stored-through-payment-apps/full-report/>.

institution fails.³⁷ However, storing funds in a payment app does not have the same type of security. Payment app providers have become part of the payment ecosystem used every day by servicemembers, but many may not know that their funds are not protected. If any of these companies were to fail, servicemembers who keep money in these services might lose their funds or have delayed access to any recovered funds. The OSA is closely analyzing this situation to assess the unique risks to servicemembers, veterans, and their families.

³⁷ See <https://www.fdic.gov/resources/deposit-insurance/faq/> and an overview of the similar insurance framework administered by the National Credit Union Association at <https://ncua.gov/support-services/share-insurance-fund>.

Recommendations

- **Payment app providers can improve the safety and security of their networks to prevent fraud.** As discussed above, servicemembers face unique scenarios where they need to send money quickly in order to facilitate a change in duty stations or other service-related needs. Payment app providers can improve the overall safety and security of their products by preventing, identifying, and limiting fraudulent activity, including by removing repeat fraudsters from their system and adopting tools to mitigate fraud at account opening. Where appropriate, they should invest in technology and tools to improve the safety and security of their networks.
- **Payment app providers can improve their responsiveness in the event fraud does occur.** As a baseline matter, payment app providers are bank and non-bank financial institutions subject to Regulation E, and accordingly must comply with the Regulation E procedures and timeframes for resolving errors. Where fraud involves multiple entities (e.g., nonbank payment apps and banks sending and receiving customer funds), all parties can coordinate more closely to ensure that problems related to fraud are resolved quickly. By working closely to expedite the process, payment app providers can help reduce the time that the servicemember cannot access lost funds. Rapid resolution of these issues is critical during a PCS and deployments.
- **Payment app providers should tailor reimbursement policies to better recognize the experiences of servicemembers.** Servicemembers, like all consumers, can face difficulties when experiencing fraud on payment app providers. Payment apps should recognize these challenges and take a comprehensive approach to reimbursement when all types of fraud occur.

Appendix A: 2022 Servicemember Complaints

FIGURE 13: COMPLAINTS BY YEAR AND MILITARY STATUS

Year	Active-Duty (including family)	National Guard and Reserve	Veteran and Retired (including family)	Total Service- member ³⁸
2022	6,109	2,624	38,611	66,398
2021	3,230	1,709	25,356	42,747
2020	3,353	1,512	23,806	40,826
2019	3,790	1,529	20,552	35,964
2018	3,035	1,565	20,314	35,033
2017	2,758	1,601	18,672	31,244
2016	2,113	1,365	12,422	20,913
2015	1,808	1,242	11,699	19,505
2014	1,672	1,152	10,602	17,396
2013	1,034	576	5,431	8,942
Total	29,378	15,165	188,843	323,062

³⁸ This total servicemember complaint count includes those who submitted complaints but did not provide an affiliation status.

FIGURE 14: 2022 COMPLAINTS BY 5 LARGEST PRODUCTS AND YEAR OVER YEAR CHANGES

Product	Active-Duty (including family)	Change from Prior Year	National Guard and Reserve	Change from Prior Year	Veteran and Retired (including family)	Change from Prior Year
Credit or consumer reporting	4,212	129%	1,559	97%	21,015	110%
Debt Collection	584	11%	331	-3%	5,583	7%
Mortgage	154	-11%	138	3%	2,872	-8%
Credit Cards	246	61%	149	43%	2,734	41%
Checking or Savings	285	85%	183	33%	2,889	41%
All other categories	628	62%	264	33%	3,518	16%
Total	6,109	89%	2,624	54%	38,611	52%

FIGURE 15: COMPLAINTS BY STATE, TERRITORY, OVERSEAS LOCATIONS IN 2022

State / Territory/ Overseas Location	Active-Duty	National Guard and Reserve	Veteran and retired	All Servicemember complaints³⁹
Alaska	38	3	87	174
Alabama	113	109	782	1,533
Arkansas	41	25	490	753
Arizona	59	33	947	1,453
California	500	230	2909	5,253
Colorado	122	26	665	1,060
Connecticut	17	16	235	377
District of Columbia	9	10	130	186
Delaware	32	6	168	342
Florida	412	218	4,154	6,708
Georgia	432	273	3,202	5,807
Hawaii	70	5	110	266
Iowa	7	16	123	198
Idaho	9	2	88	142
Illinois	125	57	1,256	2,095
Indiana	9	25	406	655
Kansas	65	10	149	295
Kentucky	43	13	346	525
Louisiana	66	72	693	1,167
Massachusetts	22	22	301	478
Maryland	157	102	1,247	1,933
Maine	2	4	112	152
Michigan	25	56	830	1,419
Minnesota	20	26	425	616
Missouri	72	27	542	902
Mississippi	82	38	450	773
Montana	8	12	62	124
North Carolina	494	62	1,974	3,400
North Dakota	6	4	39	73

³⁹ *Id.*

State / Territory / Overseas Location	Active-Duty	National Guard and Reserve	Veteran and retired	All Servicemember complaints
Nebraska	3	7	88	147
New Hampshire	28	11	97	166
New Jersey	95	80	584	1,134
New Mexico	11	9	222	382
Nevada	55	13	755	1,202
New York	311	97	1,097	2,197
Ohio	42	67	1,015	1,573
Oklahoma	51	31	432	746
Oregon	13	18	286	439
Pennsylvania	152	107	1,008	1,978
Rhode Island	1	7	76	134
South Carolina	593	76	1,177	2,334
South Dakota	8	1	29	74
Tennessee	232	61	827	1,602
Texas	500	266	4,943	7,846
Utah	11	9	175	248
Virginia	477	131	1,629	2,922
Vermont	1	1	39	52
Washington	125	55	564	996
Wisconsin	22	22	304	487
West Virginia	2	7	79	128
Wyoming	1	0	44	61
American Samoa	0	0	2	2
Armed Forces Americas	2	1	0	4
Armed Forces Europe	140	11	41	203
Armed Forces Middle East	0	0	0	2
Armed Forces Pacific	49	5	30	100
Federated Micronesia	0	0	0	1
Guam	3	3	2	8
Northern Mariana Islands	0	0	1	1
Puerto Rico	35	14	75	145
U.S. Minor Outlying Islands	9	1	2	24
US Virgin Islands	1	0	4	5

State / Territory / Overseas Location	Active-Duty	National Guard and Reserve	Veteran and retired	All Servicemember complaints
No State Entered by Consumer	79	11	62	196
Total	6,109	2,624	38,611	66,398

Appendix B: 2022 CFPB military financial protections by the numbers

Enforcing military financial protections

- **\$175 million:** Monetary relief resulting from 39 public enforcement actions that involved harm to servicemembers and veterans, including six enforcement actions for violations of the Military Lending Act (MLA).

Fielding and responding to complaints from military consumers

- **323,062:** Complaints from servicemembers, veterans, and their families handled since the CFPB opened its doors in 2011.
- **66,398:** Complaints from servicemembers, veterans, and their families handled in 2022
- **41,591:** Number of military consumers who received monetary or non-monetary relief since 2011.

Monitoring the market and identifying new risks

- **\$100 million:** Estimated amount of lost savings by members of the National Guard and Reserve who are likely not receiving an interest-rate reduction on their car or personal loan (2007-2018).⁴⁰
- **5x:** Increase in the number of military consumer reports of debts attributed to identity theft between 2014 and 2022.⁴¹

⁴⁰ Charles Goldman and Yael Katz, Protecting Those Who Protect Us: Evidence of activated Guard and Reserve servicemembers' usage of credit protections under the Servicemembers Civil Relief Act. Consumer Fin. Prot. Bureau 30 (Dec. 2022), https://files.consumerfinance.gov/f/documents/cfpb_servicemembers-usage-of-scra-credit-protections_2022.pdf

⁴¹ Consumer Fin. Prot. Bureau. *Servicemember about identity theft are increasing* 6 (Jan. 2023), <https://www.consumerfinance.gov/consumer-tools/educator-tools/servicemembers/servicemember-reports-about-identity-theft-are-increasing/>.

- **1.3 million:** Active duty servicemembers affected by DOD's policy change to end the use of military allotments for purchase, rent, or lease of personal property, based on consultation with OSA (2014).

Educating and empowering servicemembers

- **250,000+:** Total number of users that navigated to the CFPB /servicemembers/ pages. (2018 – present).
- **1.3 million +:** Number of users who have gone to an ask question labeled with the "servicemembers" category of Ask CFPB questions with answers to commonly-asked consumer questions, with dozens of servicemember-specific questions (2018 – present).
- **260,000+:** Total number of users who has viewed a CFPB blog with the “servicemember” topic (2018 – present).
- **98,000+:** Total number of users who has participated in OSA’s Misadventures in Money Management interactive education tool. (2016 – present)