



Whitepaper

**Whatever the Case may be...**  
*a timely response will set you free*

*Compliance and the Positive Customer Experience*

**KIVA**  
GROUP, INC.

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## Introduction

When it comes to handling customer inquiries, service issues or escalated complaints, meeting or ideally exceeding expectations is the key to a happy customer.

The stakes associated with delivering great customer service have been ratcheted up in recent years with the creation of the Consumer Finance Protection Bureau (CFPB). The CFPB was established by the passing of the Consumer Protection Act often referred to as Dodd-Frank. One major role established for the CFPB is the management of Unfair, Deceptive, or Abusive Acts or Practices (UDAAP) complaints.

Improper handling of complaints can, and have, led to significant fines for financial institutions as well as incalculable damage to an institution's reputation. Fines attributable to the mortgage debacle peaking in 2008 have been incredible, and collectively, for the largest institutions, total in the billions of dollars. Now, community institutions face these punitive fines which, on a relative basis, can be just as severe.

Fines aside, avoiding risk to your financial institution's reputation just might be the most important reason for implementing a case management system to automate the handling of customer service and complaints. Automating the process of servicing, communicating and resolving issues and complaints will aid in avoiding the expense of fines and possible damage to reputation, but perhaps most importantly it will ensure that customers get the best customer experience that the entire organization can deliver.

This whitepaper highlights the challenges of complying with regulations, as well as creating a positive customer experience, and outlines strategies and approaches to consider when selecting and implementing a case management system.

## Overview

Managing service issues and the resulting steps of communicating and resolving the issues are critical to maintaining customer relationships. However, complaints can originate not only from interactions with current customers but also from consumers doing business with your institution for the first time. With the advent of the CFPB, complaints may be made to the agency with no interaction occurring directly between your organization and the individual. Therefore, while monitoring the CFPB Complaint Management database is required for some institutions, it is a good idea for all institutions so that a complaint response follows CFPB guidelines.

Collectively we refer to managing issues, complaints and customer communications as Case Management. As you start the process of thinking through the implementation of a case management solution consider the following:

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- An issue or complaint can originate from an interaction with almost anyone in the organization.
- Service issues, inquiries and complaints are best handled expeditiously.
- The associated detail and supporting information needs to get to the right servicing point quickly.
- Tracking of cases requires a strong audit process to ensure compliance regulations and service level objectives are met.
- Institutions will want to analyze complaints so that adjustments to business practices can be developed and implemented to prevent future issues, and to improve the customer experience.

The requirements for a case management solution need to address these six major features.

- Submission
- Workflow
- Activity Tracking
- Case governance
- Customer response management with complaint resolution and closure
- Dashboards for individual work queues and case management analysis for managers (management and compliance areas)



*“An effective compliance management system should ensure that a supervised entity is responsive and responsible in handling consumer complaints and inquiries. Intelligence gathered from consumer contacts should be organized, retained, and used as part of an institution’s compliance management system.”*

From the CFPB  
Supervision and  
Examination Manual



## Submission

### *Capturing all supporting details*

In this paper we are considering two major originating sources of complaints. One is internal through your institution's existing interaction channels and the other is a UDAAP complaint coming from monitoring the CFBP UDAAP database. The internal complaint can originate through an interaction with an employee, a written communication, or some form of electronic message coming through one of the many channels a customer may use to interact with the institution. To complete the submission of a complaint there often will need to be a discussion with the customer to get all the information necessary to complete the investigation phase. Accessing real-time information contained in existing customer records allows you to populate the data into the case record. Asking a customer for information you already have will just make things worse and perhaps even generate another complaint.

The general information requirements for submitting a complaint are:

- Complaint origin indicator - UDAAP complaint or one generated internally
- Name of consumer
- Customer or non-customer
- Customer identifier
- Personal or business
- Primary contact information
- Line of business - product
- Category or nature of the complaint
- Summary of the complaint
- Priority level for the complaint
- Status of the complaint (e.g. - Opened, being researched, customer engagement, closed, final approval)
- Staff member for the complaint
- Date and time the complaint received
- Employee submitting the complaint
- Location the complaint was received
- How the complaint was received – phone, e-mail, letter, text, etc.
- Has the customer requested not to be contacted(might be one originated by CFPB)?
- Did someone submit the complaint on behalf of someone else?
- Any attachments from the consumer



## Workflow

*Getting the right information to the right place at the right time*

Electronic routing of a case and managing response times is an important consideration for delivering a “Wow” customer experience. Having a flexible rules-based routing component for the workflow feature of your case management solution is the key component in an automated process.

Based on the category of the issue/complaint, particular staff members should be able to be assigned or defaulted. While most cases will have a specific individual as the assignee, there will be times when the staff member will need to be selected from a list. For example, a mortgage loan application problem might be routed to the manager of that group. The manager can reassign the handling of a complaint based on the content and existing workloads of this team. Given the importance of response times you should consider having workflow options for reassigning complaints if a staff member is not currently available. You don’t want a severe and high priority case sitting in someone’s inbox while they are on vacation.

Copying people on complaints is an important aspect for managing and auditing workflow. For example, most organizations will want a copy of any complaint to go to a compliance officer. As complaints are processed through the organization, each person who has been assigned the complaint should be recorded in assignment history with the date and time of the assignment.

Another important aspect of workflow will be rules for when intervention or escalation is required based on response times. For example, if a complaint case is very severe and has not been moved in four hours, then a notification will be sent to all the pertinent players including compliance. You will want to operate well within the CFPB guidelines.

Finally, real-time status of a case should be available through all the channels that a customer uses. If the customer is accessing his account balances through his mobile device, he should see a message indicating that he can check on the status of his complaint by clicking on a hyperlink.

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*“Regulatory compliance has been a driving force behind business strategy and technology investment since soon after the [2007] financial crisis. Compliance requirements permeate nearly all aspects of the business, obliging banks to embed compliance as a core component of operations, processes and technology.”*

**From CEB Tower Group, 2014 Retail Banking Top 10 Retail Technology Trends**

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## Activity Tracking

*Tracking interactions in real-time*

Recording all activities is especially important for interactions with the customer as well as for staff members who are assigned responsibilities in the resolution and communication process. Every institution has turnover, so complete documentation is critical. Employees taking over a case need to pick up where other staff left off. Time is of the essence and you certainly don’t want to go back to a customer with a repeat request for information.

Consider the following attributes for each activity that you record:

- Type of activity
- Employee who is recording the activity
- Date and time
- Subject line for the activity
- Categorization of the activity for reporting purposes as well as detailed notes
- Any pertinent attachments

Within the activity processing function there should be a calendaring function that includes ticklers, alerts and escalation functions. This is critical to the automation of business rules such as timeliness requirements.

A summary view of the activities within a case provides the ability to drill down to review or update an activity. This summary view should provide the following detail for each activity:

- Date and time
- Employee
- Type of activity – phone call, e-mail sent, etc.
- Subject line for the activity



## Case Governance

*Automated oversight and control on a real-time basis*

Triggers should be set to make sure that a case does not get bogged down in the workflow. One trigger might be the length of time that a complaint can be stagnant without any activity being recorded. The time allotted may be different based on the severity level of the issue/complaint. If a trigger is tripped, notification can go to one or more people; for example the individual owning the current activity, a supervisor, or a compliance officer.

Compliance will also need to review a list of all complaints. A multi-attribute filter will allow them to get to the specific complaint or set of complaints they want to audit.



## Customer Response Management with Complaint Case Closure

*Ensuring the positive customer experience*

Compliance management is likely to have the last word on closing cases, especially if the case involves a formal complaint. There will potentially be several individuals who need to designate that a case is closed. Certainly the staff member is one and perhaps a manager for the product/location area involved in the process. This needs to be a rules-based process. For example,

*Quickly and professionally resolving customer issues is a gateway to building loyal customers. Moving the customer from a complainant to being an evangelist for your institution can result from a positive case management resolution experience.*

the rules for closing out a mortgage origination case will be different than a complaint about an employee service problem in a branch.

A follow-up survey will be important to confirm the closure of a case, and the customer's satisfaction with the outcome. This can be done through the customer's channel of choice. The survey should be available through every channel that the customer uses. Bad feedback from a survey can trigger more interaction with the customer on the case. Quickly and professionally resolving customer issues is a gateway to building loyal customers. Moving the customer from a complainant to being an evangelist for your institution can result from a positive case management resolution experience.



## Dashboards for Case Management Analysis

*Providing real-time views for compliance and service delivery*

The business lines, compliance management and executive management will want answers to some of the following questions regarding the creation and handling of complaint/issues cases:

- Is there a particular bank process that is leading to the generation of complaints?
- Is there a product problem?
- Do I have a departmental leadership problem?
- Do I have an operational or technology problem?
- Do we need more product training?
- What is the average duration of a case from submission to closure?
- What is the satisfaction level of our customers with our resolution process?
- Are we resolving cases more quickly and are there less of them?
- Are we trending in the right direction?

Providing real-time dashboard views of activities and status ensures that all responsible staff members are informed and positioned to intervene should circumstances require.

## Summary

It may be counter intuitive, but resolving customer issues quickly and professionally may be the best way possible to deepen a customer relationship. If they didn't know beforehand, they will now know how much you care and how well you respond. Taking a customer from complainant to evangelist will be extremely challenging without deploying the right support technology.

In today's multi-channel world the customer support needs to be available on the customer's channel of choice. Customers are coming at you through multiple channels and you want to give them the same exceptional experience at each point; fewer and fewer interactions occur face-to-face.

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However, by keeping customers posted on the status of their cases with every interaction within every channel, you will convey the message that everyone in your institution is on their case. The handling of their case can turn out to be the experience that keeps them as a customer for many years to come.

Building your regulatory requirements tracking and reporting as part of your customer care processes provides a winning combination for your customers and your institution.

For help on implementing a case management solution for your institution, contact us at [info@kivagroup.com](mailto:info@kivagroup.com).

### About KIVA Group, Inc.

KIVA Group is a global provider of customer interaction and experience management software for financial institutions. The Company's CRM/CEM, unified sales and service, and unified delivery channel solutions help institutions create a consistent, personalized experience for customers across channels—with every interaction. The KIVA Respect™ open technology platform and multi-channel applications connect customer, product, sales and service information to give institutions an unprecedented ability to manage the whole customer relationship. With KIVA's software, organizations gain access to the current and historical interaction information they need – across multiple data sources – to provide exceptional service as well as identify and capture new sales opportunities. Please contact us to obtain additional information and/or to schedule a demonstration of the Respect software.

