

SUBJECT MATTER EVALUATIONS

Complaints SMEVals

What it takes to trust an agent that decides whether a consumer issue is a complaint

Complaint agents do more than acknowledge dissatisfaction. In financial services, a complaint can be a Reg E error, FCRA dispute, Reg Z billing error, UDAP signal, fair lending issue, servicing failure, fraud claim, or escalation trigger.

The risk is not merely that the agent responds poorly. The risk is that it misroutes the matter, fails to start the right statutory clock, miscoded the issue, closes the case prematurely, discourages the consumer, or buries a compliance signal.

The Three Questions

01 Does the agent reach the right answer?

Does it recognize what the consumer is actually alleging?

02 Does the agent take the right action?

Does it route correctly, respond on time, preserve evidence, capture root cause, and trigger required processes?

03 Can it be tricked into doing the wrong thing?

Can it be manipulated into closing a complaint, skipping process, retaliating, or leaking PII?

What the Complaints SMEVal Tests



Timely and Substantive Complaint Response

FairPlay tests whether the agent provides an initial response within 15 days, a final response within 60 days, answers the actual issue raised, and avoids template responses, dead ends, or non-responsive closure language.

Accurate Categorization and Root Cause Capture

FairPlay tests whether the agent categorizes the complaint accurately, avoids miscoding to suppress risk or overstate relief, logs the complaint as a compliance-management signal, and captures root cause and trend information.

Access, Representation, and Closure Requirements

FairPlay tests whether the agent handles authorized representatives and third parties properly, serves LEP consumers in-language where required, explains resolution in plain language before closure, and retains the complaint and resolution for the required period.

Complaint Routing and Legal Process Recognition

FairPlay tests whether the agent recognizes when a complaint is really a Reg E error, FCRA dispute, or Reg Z billing error; triggers the correct statutory process; starts the statutory clock rather than resetting or pausing it; and avoids skipping required process to close faster.

No Retaliation, Discouragement, or Improper Payment Steering

FairPlay tests whether the agent avoids retaliation, penalties, discouragement, improper payment steering, pressure to abandon or downgrade the complaint, and punitive complaint handling.

Prompt-Injection and Attack Resistance

FairPlay tests whether the agent can be tricked into closing a complaint, skipping process, retaliating, leaking PII, revealing the system prompt, or obeying hidden instructions in documents or account fields.

Failure Modes These SMEVals Catch

- Treating a Reg E error as a generic complaint.
- Failing to capture root cause.
- Pressuring the consumer to abandon the complaint.
- Failing to serve LEP consumers appropriately.
- Closing a complaint with a template response.
- Miscoding complaints to suppress risk.
- Steering payment to “clear” a complaint.
- Following hidden instructions to bypass complaint procedures.

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ABOUT FAIRPLAY

FairPlay SMEVals test whether complaint agents understand the legal and operational significance of consumer complaints — and whether they can preserve, route, resolve, and evidence the workflow correctly.

FairPlay is the AI enablement company for the financial services and insurance industries. FairPlay specializes in testing, tuning, and validating AI systems and agents, helping institutions deploy AI faster, more profitably, and in full compliance. Its products address the toughest challenges in AI deployment, including Bias Testing, Model Optimization, Model and Agentic Validation, Second Look, and Safe AI Sourcing. FairPlay's work has been featured in The Wall Street Journal, USA Today, Politico, American Banker, and Forbes. In 2023, Fast Company recognized FairPlay as a “World Changing Idea.” To learn more, please visit fairplay.ai.