

Prepaid Financial Product Disclosures: Interviewer Guide for User Testing

Introduction (2 minutes)

My name is _____ and I work for a company called ICF International. We are a research company that conducts interviews and focus groups on behalf of different organizations across the country. For this specific project, we are working on behalf of the Consumer Financial Protection Bureau. The Bureau is an agency in the Federal government whose goal is to make markets for consumer financial products and services work better for Americans. Above all, this means ensuring that consumers get the information they need to make financial decisions. Today, we are going to be talking about several topics related to prepaid financial products. I want to be clear that I am not an expert in this topic—you can ask me questions, but I may not be able to answer them. This interview will take about 90 minutes, and you may take a break and step out at any time.

Before we begin, did you have an opportunity to read and sign the informed consent document? Do you have any questions about it?

I'd like to remind you of a few things that were on that document.

- We will be videotaping this discussion, to make sure we don't miss anything that you say.
- Behind the glass, there are people observing this interview from both the Consumer Financial Protection Bureau and my company, ICF International.
- Everything that you say in this discussion will be private. Your name will never be used in any of our reports.
- Responding to the questions I ask is completely voluntary. You have the right to not answer any question that you do not wish to answer.

Do you have any questions before we begin?

Section I: Background

Today we are going to spend a lot of time discussing "prepaid cards." I want to start by defining what I mean by a prepaid card, to make sure we are on the same page. What I mean by a prepaid card is a card that you can store money on, that you can use to make purchases and get cash from ATMs, and that you can reload with money. To be clear, a prepaid card is not the same as a traditional debit card linked to a bank checking account. A bank account debit card is linked to your checking account; a prepaid card is not. Instead, you pay in advance to load funds onto a prepaid card, and then use the money you have loaded onto the card. Do you have any questions about what I mean by "prepaid card"? Great.

1. How many prepaid cards do you have?
 - a. What brand(s) of prepaid card(s) do you have?

- b. *If participant has multiple cards, Why did you decide to get more than one prepaid card?*
2. In what ways do you usually use your prepaid card(s)?
 - a. Have you ever loaded funds onto the card(s)? If so, how do you do so?
 - b. *If participant has multiple cards, Do you use each prepaid card for a different purpose? Do you load different types of funds onto each card? (For example, direct deposit and government benefits.)*
3. For the prepaid card(s) that you have purchased, when did you get your prepaid card(s)? *If consumer has multiple cards, probe for a response to this question and those that follow for each prepaid card that the consumer uses.*
 - a. How did you purchase it (e.g., online vs. in a store)?
 - b. When you purchased this card, did you consider any other cards?
 - c. If so, why did you choose this one? What factors did you consider in your decision?
 - d. Where did you get information about those factors when you made your purchase decision? (For example, online, in a store, other sources.)
4. In addition to your prepaid card(s), do you also have a payroll card (that is, a card that your employer provided and loads money onto)?
 - a. *If so, Why did you accept the payroll card? Are there circumstances when you choose to use your prepaid card instead of your payroll card?*
5. Do you have a checking account?
 - a. *If so, Do you use your prepaid card and your checking account for different purposes?*
 - b. *If so, Do you have a debit card associated with the checking account?*
 - a. *If so, How do you decide when to use your prepaid card or debit card?*
 - b. Please tell us about your relationship with your debit card company. How does it compare to your relationship with your prepaid card company?
 - c. *If not, Have you ever had a checking account?*
 - a. *If so, Did you have a prepaid card at the same time?*
 - b. *If so, Did you use your prepaid card and your checking account for different purposes?*
6. Do you have a credit card?
 - a. *If so, Do you use your prepaid card and your credit card for different purposes? How do you decide when to use your prepaid card or credit card?*
 - a. Please tell us about your relationship with your credit card company. How does it compare to your relationship with your prepaid card company?
 - b. *If not, Have you ever had a credit card?*
 - a. *If so, Did you have a prepaid card at the same time?*
 - b. *If so, Did you use your prepaid card and your credit card for different purposes?*

Access to Account Information

7. Do you check how much money is in your prepaid account(s)?
 - a. *If so*, How often?
 - b. *If so*, What method(s) do you use to find out how much money is in your account?
 - a. Do you pay to use these methods? How much?
 - c. What (other) ways could you find out how much money is in your account? *Probe for access by telephone, online, text message/text alert, etc.*
 - a. Do you know if those methods involve fees?
8. Do you check what transactions you have made using your prepaid account(s), like withdrawals and purchases?
 - a. *If so*, How often?
 - b. *If so*, What method(s) do you use to review your transactions?
 - a. Do you pay to use these methods? How much?
 - c. What (other) ways could you find out what transactions you have made using your account? *Probe for access by telephone, online, text message/text alert, etc.*
 - a. Do you know if those methods involve fees?
 - d. *If participant reviews transaction history online*, How far back does your online transaction history go? Would you prefer to have a longer record of your transaction history?
9. Do you regularly receive monthly statements about your prepaid card account(s) or an e-mail with a link to access monthly statements, which show your remaining balance and a list of recent transactions?
 - a. *If not*, Would you want to receive these statements? Would you care whether the statements were delivered to you in paper or electronically? How would you use that information? Would you pay for these statements?
 - a. *If so*, how much?
 - b. *If so*, Do you pay for these statements?
 - c. *If so*, How useful do you find these statements? How do you use the information they provide? Are the statements delivered to you in paper or electronically?
 - d. *If so*, Do you see an advantage to receiving a monthly statement over just having online access to your transaction history? *If so*, What is that advantage?

Overdraft Protection and Credit Features

10. Have you made a transaction (either at an ATM or point-of-sale) for more money than you had in your prepaid card account(s)?
 - a. *If so*, What happened?

- b. *If not*, What do you think would happen if you tried to complete a transaction for more money than you had in your prepaid card account(s)?
11. Have you ever heard of an overdraft program? Under such a program, your card provider might allow you to spend more than is in your account and charge you a fee for doing so.
- a. *If so*, Do any of your accounts offer an overdraft program?
 - i. *If so*, Do you have to “opt in” or actively choose to participate in the overdraft program? Have you done so?
 - 1. *If participant has opted in to the overdraft program*, How many times have you paid the fee associated with your prepaid card’s overdraft program?
 - ii. *If not*, Would you want your account to have an overdraft program? Why or why not?
 - iii. Would you prefer a card that did not offer overdraft at all?
12. *If you currently have a debit card*, Was an overdraft program available on your debit card?
- a. *If so*, Did you choose to participate?
 - b. *If participant chose to participate*, How would you compare your overdraft experience with that card to your experience with your prepaid card?

Liability and Protections

13. What is FDIC insurance? Does it relate to your prepaid card? *If so, how?*
- a. *If participant knows what FDIC insurance is and that it might apply to their account*, Would it matter to you whether or not you had FDIC insurance for the funds stored on your prepaid card account? Why or why not?
14. If a purchase you did not make was charged to your prepaid card account, would you have any way of getting that money back?
- a. Why or why not?
 - b. How do you know?
 - c. *If yes*, What is the process to get your money back? How long would it take?
 - d. Would it make any difference whether or not you had registered your prepaid card?

Section II – Comparison and Review of First Version

All participants will be shown two different versions of a model form: X and Y. The order of the two forms will be varied between participants, to avoid order effects.

Now I would like you to imagine that you are looking to purchase a new prepaid card in a retail store, such as a supermarket or drugstore. You go into the store. You pick up two prepaid cards to compare, and you see some information on the packages. I’m going to hand you copies of that information, and

I'd like you to review them just as you would if you were in a store considering which prepaid card to buy.¹ While you are doing that, I would also like you to "think aloud" – that is, describe what you are thinking as you read. In particular, let me know if you find anything surprising, interesting, or confusing.

Give participant Form X1 and X2 or Y1 and Y2, and give him or her a few minutes to read while thinking aloud. If the participant is quiet for a period of time ask him or her what she is reading, or remind him or her to think aloud—but do not ask any additional prompts or probes. When he or she is finished, continue.

15. If you saw this information on a package, is there anything that would catch your attention or be particularly important to you?
16. Based on the information in these forms, which of these two cards would you like to purchase?
 - a. Why did you choose that card? What makes it a better choice for you?
 - b. Other than the information that is shown here, is there anything else that would affect your decision between the two cards?
 - i. In terms of importance, how would that other factor compare to the information shown here?
 - b. Is there information here that did *not* help you decide?
17. Are there any aspects of the card that you didn't pick that you like better?
 - a. If someone used their card differently, could that one be a better choice? How would they need to use that card to make it a better choice?
18. (*For dynamic forms*) Notice that Fee X is listed on this form, but not that one. What do you think that means?
 - a. Do you think that the other company might still charge you that fee? What makes you say that?
 - b. How could you find out for sure whether or not the other company charges that fee?
 - c. How likely would you be to actually do that?

Take away one of the forms (note: the form that is taken away will be alternated across participants). Now I'd like to ask you some more questions about just this form.

19. Is there anything you found confusing or unclear about this form?

¹ This introduction would be used if the model form being tested was an "on-the-package" model. If an online form was being tested, the introduction would read, "Now I would like you to imagine that you are looking to purchase a new prepaid card online. You go online onto the websites of the companies offering two prepaid cards. You find a page of information about the terms of each card. I'm going to show you what you see on those pages, and I'd like you to review them just as you would if you were at your computer considering which prepaid card to buy." The introduction to Section III would be reworded similarly if an online form were being tested, as would other questions throughout the guide when appropriate.

20. Is there anything that surprised you?
21. What questions would you have after reading this form?
22. Is there any important information you feel should be included on the form that isn't?
 - a. Why is it important for that information to be included here?
 - b. How would you use that information?
23. How does this form compare with others you've seen when shopping for a prepaid card?

Now I'd like to ask you some specific questions about the information presented in this document. But before I do, I want to make sure you understand that I'm not testing you or your knowledge. The reason I'm asking the questions is because I want to see how easy the form is to read and understand. So you are free to look at the form when you're answering the questions.

Based on the information in this form:

24. If you used this prepaid card to get money out of an ATM, would you be charged a fee?
 - a. *If so*, What would be the amount of the fee?
 - b. *(If necessary, point out the phrase "out-of-network")* What does the phrase "out-of-network" mean? How would you know whether a particular ATM was "out of network"?
 - c. If you used the card to get money from an ATM that was "out-of-network", what fees would you have to pay?
 - a. *(If participant does not mention third-party fees)* Are there any other fees you might be charged if you used that ATM? Why or why not?
 - b. *(If necessary)* This says "third party fees may apply." What do you think that means?
25. If you used this prepaid card to make a purchase at a store, would you be charged a fee? If so, what would be the amount of the fee?
 - a. Would the fee always be the same, or would it vary?
 - b. Would it matter whether you used a PIN to make the purchase?
26. If you wanted more information about the fees that this prepaid card charges, what would you do?
 - a. *(If necessary)* How would you find the website or phone number of this company?
 - b. If you were considering purchasing this prepaid card, how likely would you be to seek out more information before making the purchase?
 - i. What information would you be most likely to look for? *(Probe both for fees and for information other than fees)*

27. Do you think the company might charge you any other types of fees that aren't shown here?
- Why or why not? What makes you think that?
 - If so*, Does the fact that you think there may be other fees affect how you would use this form?
 - (If necessary)* If you wanted to find a full list of fees that you might be charged, what could you do?
 - (If necessary)* How likely would you be to seek out this information before buying this card?
 - If the package had a bar code or QR code that you could use to access a full list of fees, would you be any more or less likely to seek them out before buying the card? Why or why not?
 - If the package had a link to a government website with helpful information about prepaid cards, do you think you would visit that site before or after purchasing the card? Why or why not?

The following questions will be asked only if they are appropriate given the version of the form that the participant is reviewing; e.g., if a particular term or phrase is not used in the form, the participant will not be asked about that term or phrase (or will be asked in the subsequent section, when he or she is shown a different version). Depending on the form, these questions will be asked in Section II or III.

28. Look at the "set-up and maintenance" row.
- In your own words, can you explain what the "inactivity" line is telling you?
 - When would you be charged this fee?
29. Look at the "add money" row.
- In your own words, can you explain what the "direct deposit" line is telling you?
 - In your own words, can you explain what the "cash reload" line is telling you?
30. Look at the "make purchases" row. What is the difference between "with signature" and "with PIN"?
31. Look at the "other fees" row.
- In your own words, can you explain what the "ATM decline" line is telling you?
 - In your own words, can you explain what the "refund check" line is telling you?
32. If you wanted to get more information about prepaid cards in general, what would you do?
- Is there any information on this form that would help you find that information?
33. *(For forms with multiple fee structures)* Notice that there are two columns of fees on this form. What is the difference between the two columns?
- Why might someone prefer the fees in one column instead of the other?
 - Is there anything confusing or unclear about the two columns of fees?

34. *(For forms that show the range of the highest and lowest fees charged by different companies)*

Notice that this form includes “fee ranges.” What do you think that is telling you?

- a. Is there anything confusing or unclear about the fee ranges?
- b. Is that information useful to you?
- c. How would you use that information?
- d. Would you need any other information on the form in order to make the fee ranges more useful to you?

Take away the form.

Section III – Comparison and Review of Second Version

Now I’m going to hand you two different forms that might appear on the packaging of prepaid cards. These forms are similar to the first ones I showed you, but a little different. Again, I’d like you to review the information just as you would if you were in a store considering which prepaid card to buy between these two forms. While you are doing that, I would again like you to “think aloud” – that is, describe what you are thinking as you read. In particular, let me know if you read anything that you find surprising, interesting, or confusing.

Give participant Form X1 and X2 or Y1 and Y2, as appropriate. Give him or her a few minutes to read while thinking aloud. If the participant is quiet for a period of time ask him or her what she is reading, or remind him or her to think aloud—but do not ask any additional prompts or probes. When he or she is finished, continue.

35. If you saw this information on a package, is there anything that would catch your attention or be particularly important to you?
36. Based on the information in these forms, which of these two cards would you like to purchase?
 - a. Why did you choose that card? What makes it a better choice for you?
 - b. Other than the information that is shown here, is there anything else that would affect your decision between the two cards?
 - a. In terms of importance, how would that other factor compare to the information shown here?
 - c. Is there information that did *not* help you decide?
37. Are there any aspects of the card that you didn’t pick that you like better?
 - a. If someone used their card differently, could that one be a better choice? How would they need to use that card to make it a better choice?
38. *(For dynamic forms, if not asked in Section II)* Notice that Fee X is listed on this form, but not that one. What do you think that means?

- a. Do you think that the other company might still charge you that fee? What makes you say that?
- b. How could you find out for sure whether or not the other company charges that fee?
- c. How likely would you be to actually do that?

Take away one of the forms (note: the form that is taken away will be alternated across participants).
Now I'd like to ask you some more questions about just this form.

- 39. Is there anything you found confusing or unclear?
- 40. Is there anything that surprised you?
- 41. Are there any questions you would have after reading this form?
- 42. Is there any important information you feel should be included on the form that isn't?
 - a. Why is it important for that information to be included here?
 - b. How would you use that information?
- 43. How does this form compare with others you've seen when shopping for a prepaid card?

Now I'd like to ask you some specific questions about the information presented in this document. Again I want to make sure you understand that I'm not testing you or your knowledge. The reason I'm asking the questions is because I want to see how easy the form is to read and understand. So you are free to look at the form when you're answering the questions.

Based on the information in this form:

- 44. Do you think the company might also charge you any other types of fees that aren't shown here?
 - a. Why or why not? What makes you think that?
 - b. *(For dynamic forms, if not already asked in Section II) If necessary, point out the phrase "we may charge additional fees." What does "we may charge additional fees" mean?*
- 45. What is the difference between what is shown in the first column and what is shown in the second column? *If necessary, explain that the left-hand column shows categories for the fees.*
 - a. Are there any that are confusing?
 - b. Do all of the fees seem to be in the right category?
 - c. If it were up to you, would you add, delete, or change these categories in any way?
- 46. *Point out the text indicating that the provider may charge additional fees.* What do you think this text means?

47. *Point out text indicating that funds are at risk until a customer registers his or her card.* What do you think this text means?
- (If necessary)* What does it mean to “register” a card?
48. This form says that [*point out reference to FDIC insurance*]. In your own words, what does that mean?
- Would this information make you any more or less likely to purchase this card?

Section IV – Form Comparison²

Take away forms. You have looked at a number of different types of forms, all of which were different in some way. Now I am going to ask you to compare the different types of forms to each other. The reason that I’m asking you to do this is because the CFPB has to decide what kinds of requirements to put on prepaid card companies in terms of what information they have to show on the outside of packages.

Give participant Form X1 and Form Y1.

Here are two different forms that you might see on the outside of a prepaid card package. These forms are for the same exact product, so the fees that you would actually be charged are exactly the same. The difference is [*describe the difference between Versions X and Y*].

- Which of these two approaches do you think would be better?
- What do you think are the advantages to Version X? What would be the disadvantages?
- What do you think are the advantages to Version Y? What would be the disadvantages?
- After thinking about it some more, do you still think that _____ is the better approach?

Section V – Priority of Informational Elements

Finally, I’d like to ask you to do something different. I am going to give you a list of possible pieces of information about a prepaid card account. Please look over the list carefully, and then I will ask you some questions about it. *Give participant a full list of information elements and a few minutes to read through the list.*

- Obviously, there is limited space on the outside of a prepaid card package so a company might not be able to provide all this information on the box itself. In order for you to select the best prepaid card for your needs, which of these pieces of information do you think it would be

² This section would only be included if it were appropriate to ask respondents to compare the two different versions of the forms being tested. For example, it would not be included if the two versions were intended to be provided in two different contexts (e.g., an on-the-package disclosure and an online disclosure), or if the differences between the versions were not visually apparent.

important to show on the package? *(If necessary, indicate to participant that all the information would be available elsewhere to customers, just not on the package.)*

- a. *If participant selects more than 10 elements, if the package were limited to 10 items, could you still make your decision? Which 10 items would be the most important to include on the package?*

Section VI – False Close

Interviewer will excuse herself and tell the participant that she is going to speak with the observers to see whether they have any follow-up questions. If observers have follow-up questions or topics to revisit, the remainder of the interview should be spent addressing those questions or topics. Time permitting, the interviewer could also present another version of the form to the participant and ask him or her to compare it to the other forms.

At the conclusion of the interview, the interviewer will thank the participant for their assistance and lead them to the front desk.

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