

## **Prepaid Account Disclosures: Interviewer Guide for User Testing**

### **Introduction ( 5 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 accounts. 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.
- If you have not already done so, please read the Privacy Act Statement that has been provided in hard copy. (See Privacy Act Statement at end of document.)

Do you have any questions before we begin?

Today we are going to discuss "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 account. A bank account debit card is linked to your checking or savings 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.

## I. Background (15 minutes)

1. How many prepaid cards do you currently have?
  - a. What brand(s) of prepaid card(s) do you have?
    - i. When did you purchase your prepaid card(s)?
    - ii. How did you purchase them (e.g., online vs. in a store)?
  - b. *If participant has multiple cards*, Why did you decide to get more than one prepaid card?
  - c. *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 of wages; receiving government benefits.)
2. 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)? *If yes*:
  - i. Were you given the choice of not using a payroll card? *If yes*, what other options were you given? *If yes*, why did you choose to use it?
3. In addition to your prepaid card(s), do you also have a government benefits card (that is, a card that the government provides and loads money onto)? *If yes*:
  - i. Were you given the choice of not using the government benefits card? *If yes*, what other options were you given? *If yes*, why did you choose to use it?
4. In what ways do you usually use your prepaid card(s)?
  - a. Have you ever loaded funds onto the card(s)? *If yes*:
    - i. How do you load funds? Have you ever loaded cash onto your card?
    - ii. Have you ever used a reload pack or reload card to load funds?
    - iii. Have you ever loaded money using direct deposit?
    - iv. Have you used any other methods to reload your prepaid card?
    - v. Are you charged a fee for loading funds? *If yes*, How much?
  - b. Do you keep track of the balance on your prepaid card(s)? *If yes*:
    - i. How do you keep track of your balance? [*Probe for access by telephone, online, text message/text alert, etc.*]
    - ii. How often do you check your balance?

- iii. Are you charged a fee for checking your balance?
  - c. Do you ever call customer service for your prepaid card(s)?
    - i. *If no*, Why not?
    - ii. *If yes*, are you charged a fee for calling customer service? *If yes*, How much?
  - d. Do you ever go long periods without using your prepaid card(s)? *If yes*:
    - i. How long do you typically go without using your prepaid card(s)?
    - ii. Have you ever been charged a fee for not using your prepaid card(s) during these periods? How much?
  - e. Do you ever go back and review the transactions you made using your prepaid card(s), like withdrawals and purchases?
    - i. *If yes*, How often?
    - ii. *If yes*, What method(s) do you use to review your transaction?
      - 1. Are you charged a fee for checking your transactions? *If yes*, How much?
      - iii. Are there other methods you could use to review the transactions you made using your prepaid card(s)? [*Probe for access by telephone, online, text message/text alert, etc.*] *If yes*, Do you think you would be charged a fee for using these other methods?
  - f. Have you ever needed a replacement card? *If yes*:
    - i. Are you charged a fee for getting a replacement card? *If yes*, How much?
- 5. Before you buy a prepaid card, are you aware of what the fees are? (*If needed, clarify, we are not talking about the purchase price.*) *If yes*:
  - a. How do you know what the fees are?
- 6. After you buy a prepaid card, how do you remember what fees are charged?
  - a. *If participant mentions he/she look them up*: Where do you look them up?
  - b. Have you ever gone online to learn more about the terms and fees for your prepaid card? *If yes*:
    - i. On what kind of device did you access this information (mobile, tablet, desktop)?
    - ii. Were you able to find all the information you were looking for?

## Overdraft Protection and Credit Features

7. 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 yes, probe for details of how that transpired and what were the consequences.*
  - 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)?*
8. 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 yes, Do any of your prepaid accounts offer an overdraft program?*
    - i. *If yes, Do you have to actively choose to participate in the overdraft program? If yes, Have you chosen to participate? What did you have to do to sign up for it?*
      1. *If participant has opted in to the overdraft program, How does it work? Are you charged a fee for using the overdraft program? If yes, How much is the fee? How many times have you paid the fee associated with your prepaid card's overdraft program?*

## Liability and Protections

9. What is FDIC insurance? Does it relate to your prepaid card(s)? *If yes, how?*
10. *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 in your prepaid card account? Why or why not?*
11. 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 did 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?

## II. Short-Form Disclosures for Prepaid Accounts (30 minutes<sup>1</sup>)

I would like you to imagine that you are in a retail store, such as a supermarket or drugstore, and are planning to purchase a prepaid card. You pick up a prepaid card package, and on the back of the

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<sup>1</sup> Note: Interviews are 90 minutes in duration. This Interviewer Guide contains a comprehensive set of questions; participants will be asked some of the questions in this guide in an interview not to exceed 90 minutes.

package you see a form with some information. I'm going to hand you a copy of the form you see on the back of the package, and then I am going to ask you some questions about the information in that form.

Your comments and feedback will help the team improve the form. I did not design the form, so please do not feel like you have to hold back on your thoughts to be polite to me. We're interested in both your positive and negative reactions to the designs. Difficulties you may run into reflect issues with the designs, not your skills or abilities. Please keep in mind that I am not testing you or your knowledge. Rather, you are helping us to see how we can improve this experience.

I am interested in your thoughts and reactions as we proceed. This is important because I will hear your replies to my questions, but I won't know the reasons behind your replies. So I need your help. For the rest of this interview, I would like you to "think aloud." That is, I would like you to describe the parts of the form that you are looking at, any reactions you might have, and what you are thinking about as you answer my questions.

There are no right or wrong answers, and your comments and opinions will only be used in combination with the feedback that we get from other people.

It will also be fine for you to tell me that, based on the information provided, you don't know the answer to any question I ask. Do you have any questions before we continue?

*Give participant Model Form for Short Form Disclosures for Prepaid Accounts With Overdraft Services and Other Credit Features (version of A-10(c), which may charge for overdraft or credit-related features). Begin asking the following set of questions after approximately 30 seconds. **During this set of questions, do not ask any probes other than those in the protocol except when necessary to clarify their answer. Do not point their attention to anything on the form, or "assist" them in any way.***

1. Is there a monthly fee for having this card? *If yes:*
  - a. How much is the fee?
  - b. Would the fee you were charged always be the same, or might it sometimes vary?
    - i. Why do you think that?
    - ii. *If participant thinks the fee might vary:* What might make this fee vary? Could the fee be higher than what is shown on the form?
    - iii. *If participant thinks the fee might vary, probe for emotional reactions. Is this a worrisome facet or are they unphased?*
2. If you used this prepaid card to buy something at a store, would you be charged a fee? *If yes:*
  - a. How much is this fee?
  - b. Would the fee you were charged always be the same, or might it sometimes vary?
    - i. Why do you think that?

- ii. *If participant thinks the fee might vary:* On what basis might this fee vary? *If participant does not say the basis upon which the fee could vary,* What does “with sig” mean? What does “with PIN” mean?
      - iii. *If participant thinks the fee might vary, probe for emotional reactions. Is this a worrisome facet or are they unphased?*
3. If you used this prepaid card to get money out of an ATM, would you be charged a fee?
- a. *If yes,* How much is the fee?
  - b. *If yes,* Could this fee vary? *If yes,* on what basis could this fee vary? *If participant does not say the basis upon which the fee could vary,* What does the phrase “in-network” mean? What does the phrase “out-of-network” mean? How could ATM withdrawals made in-network or out-of-network affect the fee charged?
    - i. *If participant thinks the fee might vary, probe for emotional reactions. Is this a worrisome facet or are they unphased?*
4. If you put more money onto your card, would you be charged a fee for doing it? *If yes:*
- a. How much is the fee?
  - b. Would the fee you were charged always be the same, or might it sometimes vary?
    - i. Why do you think that?
    - ii. *If participant thinks the fee might vary:* Do you have any ideas on what might make this fee vary? Could the fee be higher than what is shown on the form?
  - c. The form says you would be charged a fee for “Cash reload.” Can you explain what that means? Would it apply if you were reloading your card in a bank/ at an ATM/ in a retail store? Would you be charged for reloading your card through direct deposit?
5. If you wanted to check your account balance by using an ATM, would you be charged a fee for doing so? *If yes:*
- a. What do you think this charge would be?
  - b. Could this fee vary? *If yes,* on what basis could this fee vary? *If participant does not say the basis upon which the fee could vary,* What does the phrase “in-network” mean? What does the phrase “out-of-network” mean? How could ATM balance inquiries made in-network or out-of-network affect the fee charged? How would you find out whether an ATM is in-network or out-of-network?
6. If you contacted customer service, would you be charged a fee for doing so? *If yes:*
- a. How much is the fee?
  - b. Would the fee you were charged always be the same, or might it sometimes vary?

7. If you went for a while without using this prepaid card, would you be charged a fee? *If yes:*
  - a. What do you think this charge would be?
  - b. Would the fee you were charged always be the same, or might it sometimes vary?
  - c. How long would you have to go without using the card to be charged this fee?
  - d. How often would you be charged this fee?
  - e. If you used the card again, would you continue to be charged that fee?
8. Is there a fee or cost for purchasing this card? *If yes:*
  - a. How much is the fee?
  - b. If you didn't see a fee listed on the form for how much this card cost, how would you find that out? In your experience buying prepaid cards, how do you usually find out how much the card costs?
9. If you lost your card and needed to request a new card, would you be charged a fee for a new card?
  - a. *If yes:* How much is that fee?
  - b. Why do you say you [would/would not] be charged a fee?
  - c. *If participant says a fee could be charged for card replacement:*
    - i. Could the amount of that fee vary?
    - ii. How do you know it could vary?
    - iii. How would you find out the amount of the fee and the reasons the replacement fee could vary?
10. If you wanted to pay a bill by having this prepaid card company send a check on your behalf, would you be charged a fee?
  - a. *If yes,* How much is that fee?
  - b. Why do you say you [would/would not] be charged a fee?
  - c. Would the fee you were charged always be the same, or might it sometimes vary?
11. Can the amount charged for any of the fees shown on this form vary? *If yes:*
  - a. How do you know?
  - b. Could the fees be higher than what is shown on this form?

- c. Do you have an idea on what basis any of the fees shown on this form might vary?
  - d. Does this form tell you how to find out about how fees might vary? *If yes, How?*
12. Are there any services that are offered for free? *If yes:*
- a. Are there other services besides “Per purchase” and “ATM withdrawal in-network” that are free? *If yes, Which other services are offered for free?*
13. Do you think the company might charge you any other types of fees that aren’t shown here?
- a. Why or why not? What makes you think that?
  - b. *If participant thinks other fees may be charged:*
    - i. How many other fees could you be charged?
    - ii. Do you have any ideas what other fees might be charged that aren’t shown here?
    - iii. If you wanted to get more details about the fees that this card charges, what would you do?
      - 1. *If participant indicates that they would go online to get this information: How would you get the web address for this information? If participant indicates that they would telephone to get this information: How would you get the telephone number for this information?*
      - 2. Are there any other ways that you could get more details about the fees that this card charges?
    - iv. If you wanted to find a full list of fees that you might be charged, does the form tell you where to get this information? *If yes, Where does the form say you can find information about all the fees and services for which you can be charged?*
    - v. Do you have a smartphone on which you can access the internet? *If yes:*
      - 1. If you were shopping in a store and picked up this prepaid card, how likely would you be to use your phone to go online for more information about these fees? Why?
      - 2. Would you rather call an 800 number to find out information about the fees, or go online to find the information?
14. If you wanted to get more details about the fees that this card charges, what would you do?
- a. *If participant indicates that they would go online to get this information: How would you get the web address for this information?*



- b. Are there any other ways that you could get more details about the fees that this card charges?
- 15. Do you know what it means to “register” your prepaid card? *If yes*, Please explain what it means.
  - a. What impact do you think registering your card has on your account? Are there any benefits to registering your card?
  - b. Does this form talk about registering the prepaid card? *If yes*:
    - i. What does it say?
    - ii. Can you explain what it means that registering your card “protect[s]” your money? Protection against what?
- 16. This form says that the prepaid card does not provide FDIC insurance. In your own words, what does that mean?
  - a. Would this information make you any more or less likely to purchase this card? Explain?
  - b. If the form didn’t say anything, would you want to know if the prepaid card did provide FDIC insurance?
- 17. If you wanted to get more information about prepaid cards in general, what would you do?
  - a. Is there any information on this form that would help you find that information? *If yes*:
    - i. Where is that information?
    - ii. Do you have an idea what type of website this is? *If yes*: What?
    - iii. Do you have an idea what the CFPB is? *If yes*: What is it?
    - iv. Do you have an idea of whether this information could help you? What gives you that idea?

### **Overdraft Protection and Credit Features**

- 18. Imagine that you tried to use this card at a store to make a purchase for more money than you had loaded on the card. What do you think would happen?
  - a. *If participant indicates that the transaction would be declined*: Why do you say that? Is it based on something you saw on the form, or just your personal experience?
  - b. *If participant indicates that the transaction would go through*: Why do you say that? Is it based on something you saw on the form, or just your personal experience?

- i. Would you be charged any fee if this happened? How much is the fee?
    - ii. *If participant sees reference to “overdraft fee” or “credit-related fees” on the form:* As you pointed out, this form says that if you try to make a purchase for more money than you have loaded on the card, the purchase will go through and you will be charged this overdraft fee (*point to the fee*). Do you think this is a feature that automatically comes with the card, or is it a feature that you would have to sign up for separately?
    - c. *If participant indicates that the transaction would neither be declined nor accepted:* Why do you say that? Is it based on something you saw on the form, or just your personal experience?
      - i. *Probe beliefs.* If you wanted to use this service, is there anything you would need to do? *If yes,* What would you need to do?
19. Does this prepaid card offer an overdraft feature? *If no,* What makes you think the card does not offer an overdraft feature? [*Then skip to next question.*] *If yes,* does this prepaid card charge for this overdraft feature? *If yes:*
- a. What do you think this charge would be for? *If don’t know,* How would you find out?
  - b. Do you know how much the fee is? *If no,* How would you find out what you would be charged?
  - c. Do you know if this fee would apply to you? *If no,* How would you find out?
  - d. Do you think the card automatically comes with overdraft features or do you think you would have to do something to get this feature? *If thinks have to do something:* What would you have to do to get this feature?
  - e. Do you think the overdraft feature would be immediately available or would you have to wait to get this feature? *If have to wait:* Do you know how long you would have to wait? Do you know why you would have to wait?
  - f. How would you find out more information about getting overdraft on your prepaid card if you were interested?
20. Does this prepaid card offer a credit feature? *If no,* Why makes you think this card does not offer a credit feature? [*Then skip the rest of this question.*] *If yes,* does this prepaid card charge for this credit feature? *If yes:*
- a. What do you think this charge would be for? *If don’t know,* How would you find out?
  - b. Do you know how much the fee is? *If no,* How would you find out what you would be charged?
  - c. Do you know if this fee would apply to you? *If no,* How would you find out?

- d. Do you think the card automatically comes with credit features or do you think you would have to do something to get this feature? *If thinks have to do something:* What would you have to do to get this feature?
- e. Do you think the credit feature would be immediately available or would you have to wait to get this feature? *If participant thinks has to wait:* Do you know how long you would have to wait? Do you know why you would have to wait?
- f. How would you find out more information about getting credit on your prepaid card if you were interested?

Please continue to imagine that you are in a retail store planning to purchase a prepaid card. You pick up a new prepaid card package, and on the back of the package you see a form with some information similar to the one we have just been talking about. I'm going to hand you a copy of this form and ask you some questions about it.

*Give participant Model Form for Short Form Disclosures for Prepaid Accounts Without Overdraft Services and Other Credit Features (version of A-10(d), which does not offer or charge for overdraft or credit-related features). Begin asking the following set of questions after approximately 5 seconds.*

- 21. Does this prepaid card offer an overdraft feature? *If no,* What makes you think the card does not offer an overdraft feature? [*Then skip to next question.*] *If yes,* does this prepaid card charge for this overdraft feature? *If no,* skip to next question. *If yes:*
  - a. What do you think this charge would be for? *If don't know,* How would you find out?
  - b. Do you know how much the fee is? *If no,* How would you find out what you would be charged?
  - c. Do you know if this fee would apply to you? *If no,* How would you find out?
  - d. Do you think the card automatically comes with overdraft features or do you think you would have to do something to get this feature? *If thinks have to do something:* What would you have to do to get this feature?
  - e. Do you think the overdraft feature would be immediately available or would you have to wait to get this feature? *If have to wait:* Do you know how long you would have to wait? Do you know why you would have to wait?
  - f. How would you find out more information about getting overdraft on your prepaid card if you were interested?
- 22. Does this prepaid card offer a credit feature? *If no,* What makes you think the card does not offer a credit feature? [*Then skip to next question.*] *If yes,* does this prepaid card charge for this credit feature? *If no,* skip the rest of this question. *If yes:*
  - a. What do you think this charge would be for? *If don't know,* How would you find out?

- b. Do you know how much the fee is? *If no*, How would you find out what you would be charged?
- c. Do you know if this fee would apply to you? *If no*, How would you find out?
- d. Do you think the card automatically comes with credit features or do you think you would have to do something to get this feature? *If thinks have to do something*: What would you have to do to get this feature?
- e. Do you think the credit feature would be immediately available or would you have to wait to get this feature? *If have to wait*: Do you know how long you would have to wait? Do you know why you would have to wait?
- f. How would you find out more information about getting credit on your prepaid card if you were interested?

[End of Overdraft Protection and Credit Features]

Let's now go back to discussing the first form. I'd like to ask about some of your general impressions of the information on the form.

- 23. Overall, is there anything you found confusing or unclear about this form?
- 24. Do you have any questions about the form?
- 25. Is there anything that surprised you?
- 26. 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?
- 27. How does this form compare with others you've seen when shopping for a prepaid card?

*Take away the prototypes.*

### **III. Long-Form Disclosures for Prepaid Accounts (30 minutes)**

*Use Alternative 1 for half the participants and Alternative 2 for the other half.*

Alternative 1 (website): Now I would like you to continue to imagine that you are in the retail store and are still planning to purchase a prepaid card. You have just finished reviewing the information on the form on the back of the prepaid card package that we just discussed. On that form, you saw the website address of the prepaid card company and looked up that website on your smart phone. I'm going to hand you a copy of the information you see on the website [*or participant is provided with an actual smart phone*], and then I am going to ask you some questions about that information. As you are answering, I would like you to "think aloud" – that is, I want you to describe what you are

thinking as you are answering. In particular, let me know if you find anything surprising, interesting, or confusing.

Alternative 2 (hard copy): Now I would like you to imagine that you purchased the prepaid card with the information on the back of the card that we just discussed. After you purchased it, you opened the package and found a document with some information. I am going to hand you a copy of this document and then I am going to ask you some questions about that information. As you are answering, I would like you to “think aloud” – that is, I want you to describe what you are thinking as you are answering. In particular, let me know if you find anything surprising, interesting, or confusing.

Like before, we are interested in both your positive and negative reactions to the designs. Difficulties you may have reflect issues with the designs, not with your skills or abilities. Please keep in mind that I am not testing you or your knowledge. Rather, you are helping us to see how we can improve this experience. It is also fine for you to tell me that, based on the information provided, you don’t know the answer to the question asked.

*Give participant Sample form for Long Form Disclosures for Prepaid Accounts (version of A-10(e)). Begin asking the following set of questions after approximately 30 seconds. **During this set of questions, do not ask any probes other than those in the protocol except when necessary to clarify their answer. Do not point their attention to anything on the form, or “assist” them in any way.***

1. How is this form different from the short form that we just discussed?
2. How is this form similar to the short form that we just discussed?

Now I’d like to ask you some specific questions about the information on the form.

3. Is there a fee for purchasing this card? *If yes:*
  - a. How much is this fee?
4. Is there a monthly fee for having this card? *If yes:*
  - a. How much is this fee?
  - b. Would the fee you were charged always be the same, or might it sometimes vary?
    - i. Why do you think that?
    - ii. *If participant thinks the fee might vary:* What might make this fee vary? Could the fee be higher than what is shown on the form? Could the fee be higher than what is shown on the form?
5. If you put more money onto your card, would you be charged a fee(s) for doing it? *If yes:*
  - a. How much is the fee?
  - b. Would the fee you were charged always be the same, or might it sometimes vary?

- i. Why do you think that?
    - ii. *If participant thinks the fee might vary:* What would make this fee vary? Could the fee be higher than what is shown on the form? Could the fee be lower than what is shown on the form?
  - c. Who is imposing this charge? *If participant doesn't mention it,* In addition to the prepaid card fee, might you be charged an additional fee by another company?
6. If you used this prepaid card to spend money in the United States, would you be charged?
- a. *If yes,* How much is the fee?
  - b. *If no,* Under what circumstances would you not be charged?
  - c. *If yes,* Would the fee you were charged always be the same, or might it sometimes vary?
    - i. Why do you think that?
    - ii. *If participant thinks the fee might vary:* On what basis might this fee vary? *If participant does not say the basis upon which the fee could vary,* Would you be charged for paying a bill online by check? Can you explain what that service is?
7. If you used this prepaid card to get money out of an ATM, would you be charged a fee? *If yes:*
- a. How much is the fee?
  - b. *If yes,* Could this fee vary? *If yes,* on what basis could this fee vary? *If participant does not say the basis upon which the fee could vary,* What does the phrase "in-network" mean? What does the phrase "out-of-network" mean? How could ATM withdrawals made in-network or out-of-network affect the fee charged? Would you be charged a fee for getting cash from a teller at a bank? How much would you be charged?
8. If you used this prepaid card to get money through a teller at a bank, would you be charged a fee? *If yes:*
- a. How much is the fee?
9. If you contacted customer service by telephone, would you be charged a fee for doing so? *If yes:*
- a. How much is this fee?
  - b. Would the fee you were charged always be the same, or might it sometimes vary?
10. If you wanted to check your account balance by using an ATM, would you be charged a fee for doing so? *If yes:*
- a. What do you think this charge would be?

- b. Could this fee vary? *If yes, on what basis could this fee vary? If participant does not say the basis upon which the fee could vary, What does the phrase “in-network” mean? What does the phrase “out-of-network” mean? How could ATM balance inquiries made in-network or out-of-network affect the fee charged?*
11. If you lost your card and needed to request a new card, would you be charged a fee for a new card?
- a. *If yes: How much is the fee?*
  - b. Why do you say you [would/would not] be charged for card replacement?
  - c. *If participant says a fee could be charged for card replacement:*
    - i. Could the amount of that fee vary?
    - ii. How do you know it could vary?
    - iii. Under what circumstances could it vary?
12. If you went for a while without using this prepaid card, would you be charged a fee? *If yes:*
- a. What do you think this charge would be?
  - b. Would the fee you were charged always be the same, or might it sometimes vary?
  - c. How long would you have to go without using the card to be charged this fee?
  - d. How often would you be charged this fee?
  - e. If you used the card again, would the fee continue?
13. If you used this prepaid card to spend money outside of the United States, would you be charged? *If yes:*
- a. For what would you be charged?
  - b. How much would you be charged?
  - c. Under what circumstances would you be charged?
  - d. Who is imposing this charge? *If participant doesn't mention it, In addition to the prepaid card fee, might you be charged an additional fee by another company?*
  - e. Would the fee you were charged always be the same, or might it sometimes vary?
14. Does this prepaid card provide FDIC insurance?
- a. What does that mean to you?

15. Does this form tell you the name of the prepaid card company? *If yes:*
- a. What is the name of the prepaid company?
16. Does this form tell you how you can get in touch with the prepaid card company? *If yes,*
- a. How can you get in touch with the prepaid company?
  - b. What are some reasons why you might want to get in touch with the company?
17. If you wanted to get more information about prepaid cards in general, what would you do?
- a. Is there anything on this form that would help you to find more information about prepaid cards in general? *If yes:*
    - i. Where is that information?
    - ii. Do you have an idea what type of website this is? *If yes:* What?
    - iii. Do you have an idea of whether this information could help you? What gives you that idea?
18. If you wanted to make a complaint about your prepaid card, what would you do?
- a. Is there anything on this form that might help you to make a complaint?
  - b. *If participant mentions consumerfinance.gov website,* Do you have an idea what type of website this is? Are you familiar with this website?
19. Do you think the prepaid card company might charge you any other types of fees that aren't shown here?
- a. Why or why not? What makes you think that?
  - b. *If participant thinks other fees may be charged:*
    - i. How many other fees could you be charged?
    - ii. Do you have any ideas what other fees might be charged that aren't shown here?
    - iii. If you wanted to find a full list of fees that you might be charged, does the form tell you where to get this information? *If yes,* Where does the form say you can find information about all the fees and services for which you can be charged?
    - iv. Do you have a smartphone on which you can access the internet? *If yes:*
      1. If you were shopping in a store and picked up this prepaid card, how likely would you be to use your phone to get more information about these fees? Why?



Before we stop discussing this form, I'd like to ask about some of your general impressions of the information on the form.

20. Overall, is there anything you found confusing or unclear about this form?
21. Do you have any questions about the form?
22. Is there anything that surprised you?
23. 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?

*Take away the prototype.*

#### **IV. Payroll Card Accounts and Government Benefit Card Accounts (10 minutes)**

*Use Alternative 1 (payroll card) for half the participants and Alternative 2 (government benefit card) for the other half.*

##### Alternative 1:

I would like you to imagine that you just got a new job. Your new employer would like to deposit your wages onto a prepaid card, and he has given you this form to review. The form contains information about the prepaid card.

[Please imagine that you are reviewing this form from the comfort of your own home OR Please imagine that you are reviewing this form in your new employer's office as your new employer waits for your response.] [In some cases: Image that you do not have a bank account.]

I am going to ask you some questions about the information on this form. As you are answering, I would like you to "think aloud" – that is, I want you to describe what you are thinking as you are answering. In particular, let me know if you find anything surprising, interesting, or confusing.

*Give participant Model Form for Short Form Disclosures for Payroll Card Accounts (version of A-10(b)). Begin asking the following questions after approximately 5 seconds. **During this set of questions, do not ask any probes other than those in the protocol except when necessary to clarify their answer. Do not point their attention to anything on the form, or "assist" them in any way.***

Alternative 2: I would like you to imagine that you have applied to receive benefits from the government. For example, maybe you applied for social security or for unemployment insurance payments if you lost your job. You just got this information to review from the government as part of that application process. Similar to the form you just reviewed, it is information about a prepaid card. In this case, it is about receiving your government benefits on a prepaid card that the government would provide to you.

As you are answering, I would like you to “think aloud” – that is, I want you to describe what you are thinking as you are answering. In particular, let me know if you find anything surprising, interesting, or confusing.

*Give participant Model Form for Short Form Disclosures for Government Benefit Accounts (version of A-10(a)). Begin asking the following questions after approximately 5 seconds. **During this set of questions, do not ask any probes other than those in the protocol except when necessary to clarify their answer. Do not point their attention to anything on the form, or “assist” them in any way.***

Please take a moment to read the sentences at the very top of the form in the shaded box.

1. What do you think these sentences are trying to say?
2. Do you think you would have to accept your [wages/benefits] on a prepaid card? *If yes: Why? If no: Why not?*
3. How do you feel about receiving your [wages/benefits] on a prepaid card? On this particular card? *[if needed, probe for positive/negative/neutral feelings.]*
4. Why do you feel this way?
5. Did the information about the fees and other information in the form lead you to feel this way?
6. Do the statements make you feel positive, negative, or neutral about receiving your wages/benefits on a prepaid card?
7. After reading these sentences, do you have any questions? *If yes, To whom would you direct your questions?*

*Take away the prototype.*

## **V. Model Clause for Single-Use Non-Reloadable Card/Reload Packet (5 minutes)**

I would like you to imagine again that you are in a retail store, such as a supermarket or drugstore, and are planning to purchase a prepaid card. I’m going to hand you a copy of the information you see on a certain package, and I am going to ask you some questions about that information. As you are answering, I would like you to “think aloud” – that is, I want you to describe what you are thinking as you are answering. In particular, let me know if you find anything surprising, interesting, or confusing.

*Show half the participants a package with the warning clause and half the participants a package without the warning clause. Give participant Model Clause for Single-Use Non-Reloadable Card/Reload Packet Form A. Begin asking the following questions after approximately 5 seconds. **During this set of questions, do not ask any probes other than those in the protocol except when necessary to clarify their answer. Do not point their attention to anything on the form, or “assist” them in any way.***

1. Have you ever seen a card/product like this before?
2. What is this product? What is it used for?

3. Is this product a prepaid card?
  - a. How do you know that this product [is/is not] a prepaid card?
4. If you were looking to purchase a prepaid card, is this product something you would consider?
5. What does this form tell you about the product?
6. Do you think the card/product provider might charge you any other types of fees that aren't shown here?
7. What do you think would happen if you lost this card/package before using it? What would you do if you lost it?

*Take away the prototype.*

## **VI. Short Form Disclosure for Prepaid Accounts Purchased Online (5 minutes)**

I would like you to imagine that you are online researching purchasing a prepaid card. I am going to hand you a copy of the information you see on your screen [from/on] the website of one of the cards you are looking into and then I am going to ask you some questions about that information. As you are answering, I would like you to “think aloud” – that is, I want you to describe what you are thinking as you are answering. In particular, let me know if you find anything surprising, interesting, or confusing.

*Give participant Model Form for Prepaid Card Fee for Online Purchases Form B. Begin asking the following questions after approximately 5 seconds. **During this set of questions, do not ask any probes other than those in the protocol except when necessary to clarify their answer. Do not point their attention to anything on the form, or “assist” them in any way.***

1. Is there a fee or cost for purchasing this card? *If yes:*
  - a. Why do you think that there [is/is not] a fee for purchasing this card?
  - b. *If yes,* How much is this fee?
2. If you were buying this card in a store instead of online, how would you know the purchase price?

*Take away the prototype.*

## **VII. Short Form Disclosures Prepaid Accounts with Multiple Service Plans (10 Minutes)**

Now I would like you to again 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 and pick up a prepaid card package, and on the back of the package you see some information. Again, I’m going to hand you an example of the information you may see on the back of a package, and then I am going to ask you some questions about that information.

I want to remind you that I'm not testing you or your knowledge. The reason I'm asking the questions is because I want to see how easy it is to read and understand the form on the package. You are free to look at the package when you're answering the questions. It is also fine for you to tell me that based on the information provided, you don't know the answer to one of my questions.

*For this section of testing, you will ask participants to (1) examine individually and then compare two different three-column multiple service plan model forms (Model Form for Short Disclosures for Prepaid Accounts With Multiple Service Plans (version of A-10(f) and Form C). Then, you will ask participants to (2) examine a two-column multiple service plan model form (Form D). Some participants may be asked to do both (1) and (2) or only (1) or (2). (NB: Individual interviews will not exceed 90 minutes.)*

*Give participants Model Form for Short Disclosures for Prepaid Accounts With Multiple Service Plans (version of A-10(f) or Form C. Begin, and give them approximately 30 seconds to review before beginning the following questions.*

A-10(f) and Form C testing:

1. *Point to the top section of the form, which shows three separate fee plans. This form is a bit different from the other forms that I showed you. Do you see the difference? If yes, What is different about this card?*
2. *At the top of the form, it says ["pay-as-you-go," "monthly plan," and/or "annual plan"] and there are numbers below each one of these three headings. What do those heading mean? What is the difference between those three numbers?*
3. *If you got this card, would you be charged a monthly fee?*
  - a. *If yes: If you did not want to pay a monthly fee, would there be any way for you to avoid having to pay one? If yes, How?*
4. *Imagine that you signed up for the "pay-as-you-go" plan [or "monthly plan" or "annual plan"].*
  - a. *If you used this card to buy something at a store, would you be charged a fee? If yes, What would that fee be?*
  - b. *If you used this card to get money from an ATM, would you be charged a fee under the "pay-as-you-go" plan [or "monthly plan" or "annual plan"]? If yes, What would that fee be?*
  - c. *Are there differences in other charges for the "pay-as-you-go" plan [or "monthly plan" or "annual plan"]? If yes, Which ones?*
5. *Overall, is there anything you found confusing or unclear about this form?*
6. *Is there anything that surprised you?*
7. *What questions would you have after reading this form?*
8. *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?
9. How does this package compare with others you've seen when shopping for a prepaid card?
10. This card offers three possible fee plans. If you got the card and did not tell the company which of the three plans you wanted, which plan do you think would apply?
- a. Why do you say that?
11. Have you ever seen a card that offers multiple fee plans like this one?
- a. Have you ever used a card that offered multiple fee plans?

Now I am going to hand you an example of the information you may see on the back of another prepaid card package that offers the same multiple payment plan options. Then I am going to ask you some questions about that information.

*Give participant whichever form not given for the questions you just asked: Model Form for Short Disclosures for Prepaid Accounts With Multiple Service Plans (version of A-10(f)) OR Form C. Begin, and give them approximately 30 seconds to review before beginning the following questions.*

12. At the top of the form, it says ["pay-as-you-go," "monthly plan," and/or "annual plan"] and there are numbers below each one of these three headings. What is the difference between those three numbers?
13. If you got this card, would you be charged a monthly fee?
- a. *If yes:* If you did not want to pay a monthly fee, would there be any way for you to avoid having to pay one? *If yes, how?*
14. Imagine that you signed up for the "pay-as-you-go" plan [or "Monthly plan" or "Annual plan"].
- a. If you used this card to buy something at a store, would you be charged a fee? *If yes, what would that fee be?*
  - b. If you used this card to get money from an ATM, would you be charged a fee under the "pay-as-you-go plan" [or "Monthly plan" or "Annual plan"]? *If yes, what would that fee be?*
  - c. Are there differences in other charges for the "pay-as-you-go" plan [or "Monthly plan" or "Annual plan"]? *If yes, Which ones?*
15. Overall, is there anything you found confusing or unclear about this form?
16. Is there anything that surprised you?
17. What questions would you have after reading this form?
18. 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?

Now I'd like to ask you to compare the two forms.

19. Did you like one form better than the other? *If yes:*

- a. Which form did you like best?
- b. Why did you like that form best? Why didn't you like the other form as much?
- c. Is there anything you would improve on the form you like best?

*Take away the prototypes.*

Form D testing:

Now I am going to hand you an example of the information you may see on the back of another prepaid card package that offers a different kind of multiple payment plan. Then I am going to ask you some questions about that information.

*Give participant Form D. Begin, and give them approximately 30 seconds to review before beginning the following questions.*

- 20. At the top of the form, it says [Plan X/Plan Y] and there are numbers below each one of these headings. What do those heading mean? What is the difference between those numbers?
- 21. If you got this card, would you be charged a monthly fee?
  - d. *If yes:* Under what circumstances would you be charged a monthly fee? If you did not want to pay a monthly fee, would there be any way for you to avoid having to pay one? *If yes, How?*
- 22. Imagine that you signed up for [Plan X/Plan Y].
  - d. If you used this card to buy something at a store, would you be charged a fee? *If yes, What would that fee be?*
  - e. If you used this card to get money from an ATM, would you be charged a fee under the [Plan X, Plan Y]? *If yes, What would that fee be?*
  - f. Are there differences in other charges for the [service plan option]? *If yes, Which ones?*
- 23. Overall, is there anything you found confusing or unclear about this form?
- 24. Is there anything that surprised you?
- 25. What questions would you have after reading this form?

26. 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?
27. How does this package compare with others we talked about before?
28. This card offers two possible fee plans. If you got the card and did not tell the prepaid card company which of the two plans you wanted, which plan do you think would apply?
- a. Why do you say that?

*Take away the prototypes.*

### **VIII. False Close (10 minutes)**

*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.*

## **Privacy Act Statement [referred to on page 1]**

### **5 U.S.C. 552(a)(e)(3)**

The information you provide through your responses to ICF will assist the study sponsor, the Consumer Financial Protection Bureau (“CFPB”), in gathering information to understand consumers’ experiences to topics related to prepaid accounts.

The CFPB will not obtain or access any directly identifying information from ICF about study participants. Video recording of the one-on-one interviews will not be provided to the CFPB. The CFPB will only obtain, and access, de-identified results and aggregated analyses of those results.

Information collected on behalf of the Bureau by ICF will be treated in accordance with the System of Records Notice (“SORN”), CFPB.022, <https://www.federalregister.gov/articles/2012/11/14/2012-27582/privacy-act-of-1974-as-amended>. This information will not be disclosed as outlined in the Routine Uses for the SORN. Direct identifying information will only be used by ICF to facilitate the interview and will be kept private except as required by law.

This collection of information is authorized by Pub. L. No. 111-203, Title X, Sections 1013 and 1022, codified at 12 U.S.C. §§ 5493 and 5512.

Participation in this exercise is voluntary, you are not required to participate or share any identifying information with ICF, including name and email address, and you may withdraw participation at any time. However, if you do not include the requested information, you may not participate in the interview.