

Debt Disclosure User Experience Test Discussion Guide

A. Introduction – 15 minutes

Thank you for participating in this study today. My name is _____, and I work with the User Experience Team at Fors Marsh Group. We are a private research firm and we are helping the Consumer Financial Protection Bureau. The Consumer Financial Protection Bureau is a federal government agency that was created to help consumers. We are here helping the CFPB gather information to understand consumers' experiences.

Today we will be evaluating forms that consumers receive from debt collectors. I will ask you a series of questions about the forms so I can learn what works well on the forms and what may need to change. Our goal is to make these forms as clear as possible for people who may receive them in the future. Your comments and feedback will help us to improve the forms. I did not create the forms, 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 forms. Difficulties you may run into reflect the design of the forms, 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 the forms.

The entire session should last about 60 minutes. Do you have any questions so far?

Let's cover a couple things before we get started.

We are making a video recording of this session. Only those of us associated with this project will see the recordings, and we will not share your name or personal information. The recordings are really used as a memory aid for me so I can go back later to recall what happened during each session. Your participation is voluntary and you can withdraw at any time.

I am interested in your thoughts and reactions as we proceed. This is important because I can see what you are doing, but I don't know why you are doing it. So I need your help. When we are using the forms, I'd like you to work as you normally would if I was not here, but I would also like you to share anything that is noteworthy or confusing. You don't have to read everything aloud to me. Just do what you normally would do. But please tell me if you are looking for something and what it is and whether you can find it or not. I will ask questions along the way.

There are some people from my team and from the CFPB who are in the other room to observe, take notes, and record your comments. Your candid feedback will be very valuable, so even though people are observing, please speak openly about your opinions and experience. We want to learn from you, so it is important that you share your honest opinions. Audio recordings and transcripts

will be maintained for future research use; however, responses will not be linked to you personally. Your name and other personally identifiable information will be removed from the transcripts and you will not be associated with any particular comment or statement.

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.

Any questions so far?

We are going to track where you are looking as you work.

- This is our eye tracker [point to tracker].
- Let's get you situated in your chair in front of the screen in a good position.
- Please try to refrain from making any large head movements during the session. You do not need to remain perfectly still like a statue, but if you move your head too much, the eye tracker may lose your eyes.
- Let's do a quick task so the computer can find your eyes. Please follow the red circle as it moves on the screen [calibration].

B. Debt Collection Notices – Knowledge Test with Eye Tracking (1 notice –without time-barred debt) – 20 minutes

[Observational and Implicit data (no interruptions): Eye tracking will be conducted for initial familiarization with the form, questions about comprehension/facility with various elements, and eye tracking will end when participants answer the Likert-scale questions. We will assess what participants do/do not read (fixation count), the order that they read and attend to items on the forms, and the duration of processing (length of fixations).] We will also assess accuracy in responses and time to respond.]

[Participants will be presented with a sample g-notice. (See G-Notice 1_2014-5-2 for an example.) G-notices will be updated prior to the UX testing sessions based on feedback from focus groups and cognitive testing. Possible additions to the g-notices include:

Itemization of principal, interest, and fees

Name and address of alleged debtor to whom the notice is sent

Name and address of joint borrowers

Additional information about current owner of the debt if not original creditor (e.g., address, telephone number and other contact information)

Partial SSN of alleged debtor

Account number used by original creditor or truncated account number

Other information identifying the account

Name of original creditor (if different from current owner)

Name of the brand associated with the debt, where different from the original creditor (e.g., Best Buy, not Citibank)

Name of the doctor, medical group, or hospital for medical bills ancillary to their provision of services

Type of debt (e.g., student loan, auto loan)

Date and amount of last payment by the consumer on the debt

Copy of last periodic statement

Date of original contract

Additional information on medical debt (e.g., date of service, service rendered, name of doctor)

Amount of original debt

Charge off information (e.g., balance at charge off, date at charge off)

A note that collectors cannot garnish exempt income

Consumer rights (See Debt Disclosure FG_Section E_Rights Activity_2014-5-5 for example rights)

Other consumer rights related to the FDCPA and debt collection]

Okay, so let's say you received the notice about a debt in collection that we are about to view. I'd like you to take a minute to read it over and familiarize yourself with it (allow up to 1 minute). Just to remind you, I'd like you to work as you normally would if I was not here, but I would also like you to share anything that is noteworthy or confusing. You don't have to read everything aloud to me. Just do what you normally would do. And tell me if you are looking for something and what it is and whether you can find it or not.

Please remove the cover page and take a look at the notice. When you are done taking your initial look, tell me that you are finished.

Now I'd like to ask you a few questions.

1. How much do you owe?
 - a. Does the amount you owe include any interest? If so, how much?
 - b. Does the amount you owe include any fees? If so, how much?
 - c. [If applicable] Who charged the fees on this debt? When?
 - d. [If applicable] Who charged the interest on this debt? When?
 - e. Have you made any payments on the debt?
2. How much did you originally borrow?
3. Who originally lent you the money/extended you the credit?

- a. If you wanted to contact them, where would you find their contact information?
4. What is your account number with the company that lent you the money?
5. What does “brand” mean?
6. What does “charge-off” mean?
7. Who do you owe the money to now?
8. Who is trying to collect the money from you now?
9. Who should you send the payment to?
10. What kind of debt is this?

11. Are there any limits on when collectors can contact you?
12. If you wanted the debt collector to stop contacting you, what could you do?
 - a. Would you call or write?
 - b. What do you think would happen next?
 - c. Would you still owe the money? Could the collector sue you? Could the debt appear on your credit report?
13. If you wanted to limit the time and/or place in which the collector was contacting you, what could you do?
14. Is the collector permitted to call you at work?
15. Is the collector permitted to discuss your debt with anyone?
16. Is the collector permitted to harass you or be abusive to you?
17. Imagine that you received this notice, but did not think you owed the debt. What could you do?
 - a. Could you dispute the debt? How? What would happen next? What do you think would happen to the debt?
18. What if you recognized the debt as one you owed, but some information about the debt was incorrect? What could you do?
 - a. Could you dispute the debt? How? What would happen next? What do you think would happen to the debt?
19. What if you were not sure whether or not you owed it? What could you do?
 - a. Could you dispute the debt? How? What would happen next? What do you think would happen to the debt?
 - b.
20. If you wanted more information about debt collection in general, what could you do?
 - a. How likely would you be to seek out general information or advice about debt collection before paying the debt or contacting the debt collector?
 - b. What information would be most helpful?

[Explicit data: Participants will first rate their experience using the form, and then we will ask open-ended questions about their understanding of various components.]

Post-form Likert Scale Questions

[The 3 questions will be printed on a separate sheet.]

Now I'd like you to answer a few questions. (Administer the post-form Likert scale questionnaire.)

1. How organized is the format of this notice?				
1 – Not at all organized	2 – Slightly organized	3 – Moderately organized	4 – Very organized	5 – Extremely organized

2. How clear is the language in the notice?				
1 – Not at all clear	2 – Slightly clear	3 – Moderately clear	4 – Very clear	5 – Extremely clear

3. How trustworthy is the information provided in this notice?				
1 – Not at all trustworthy	2 – Slightly trustworthy	3 – Moderately trustworthy	4 – Very trustworthy	5 – Extremely trustworthy

Post-form Follow up/Debriefing Questions [Discuss while sitting by the participant.]

1. What is the purpose of the notice you just viewed? [asked while not looking at form]
2. Is there anything in this information that catches your attention or which is particularly important to you?
3. Was there anything that you found confusing or unclear?
4. Was there anything on the notice that surprised you?
5. What is the most useful information to you in this notice?
 - a. Why do you think that [insert participant's response] is the most useful?
6. What on this notice is not necessary?
7. Did you feel overwhelmed by this notice at all?
 - a. If yes, which parts, and why?
8. What questions do you have after reading this?
9. Is there any information you feel should be included on the notice that is not?
 - a. Why is that important to you?
 - b. How would you use that information?
10. How does this notice compare to others you've seen in debt collection?
 - a. What's better/worse?
11. What do you think can be done to make these forms more clear to people like you who may receive them in the mail?
12. If you could change one thing, and one thing only about the form, what would it be?
13. If you could keep one thing the same in the form, what would it be?

C. Aging Debt Notice – 5 minutes

Ok, now I am going to show you another notice. This is a notice about the same debt that we just looked at, but it has some additional information on it. I'd like you to take a minute to read it over and familiarize yourself with it (allow up to 1 minute).

1. Based on the information in this notice, can you be sued on this debt?
2. If you made a partial payment on the debt, what could happen? Could the collector sue you?
3. If you wrote the collector and said you owed the debt, what could happen? Could the collector sue you?
4. Can the debt appear on your credit report?

D. Debt Identification Activity –10 minutes (moderator: monitor time and allow 10 minutes for activity E)

Ok, we have a couple more activities – we are almost done here. Next, I am going to give you a description of a situation, and we'll also read through this together. Imagine that John Smith opened up a credit card at Casey's Department Store in February of 2009. He used this card and made payments regularly for years, but in 2013 John lost his job and stopped making payments. The last bill that John received from Casey's was on May 1, 2014, and it said that he owed \$525 on account number XXXX. Now I'm going to show you another notice—take moment to review this. Once you're done, I'll ask you some questions about this notice.

1. Could this notice refer to the debt that we just read about John having?
2. What information on the sample notice makes you think that?
 - a. Which specific items make you think this *could* be John's debt?
 - b. Which specific items make you think this might *not* be John's debt?
3. If this notice is related to that debt to Casey's, what information would you expect to see on the notice?
4. If John wasn't sure about what this notice referred to or had questions, what could he do?

E. Debt Payment Priority Activity – 10 minutes

Ok, now for our final activity. I am going to show you two different notices that describe two different debts. I want you to imagine that these are both debts that you owe and that you do recognize as being your debts. And I also want you to imagine that you only have \$200 available to pay to a collector. Take a look at the notices and tell me what you would do. Please think aloud as you look over the notices and make your decision. I would like to know what information in the notices lead you to your decision, so please share anything that comes to mind.

- a) How did you use the information in the notice to make this decision?

- b) Which factors did you use to make this decision?
 - a. The amount of the debt? The type? The creditor? The fact that one is time-barred, obsolete, etc.?
- c) Was there other information that you wish you had before making your decision?
 - a. What other info would you have wanted?
 - b. What steps would you have taken to get this additional information?
- d) Would you consider spreading your payment over the two debts? If so, how would you do that?
- e) Could a collector sue you on either of these debts?
- f) Could either of these debts appear on your credit report?

Thank you so much for coming in today. We're all done--those are all the questions I have for you. We really appreciate your time and participation today.