REQUEST FOR APPROVAL UNDER THE "GENERIC CLEARANCE FOR DEVELOPMENT AND OR TESTING OF MODEL FORMS, DISCLOSURES, TOOLS, AND OTHER SIMILAR RELATED MATERIALS" (OMB CONTROL NUMBER: 3170-0022)

1. **TITLE OF INFORMATION COLLECTION:**

   Debt Collection Disclosure Testing: Consumer Bill of Rights

2. **PURPOSE:**

   We will conduct one-on-one interviews, including user experience testing, in which we will assess if consumers understand the model forms and how the forms should be improved.

3. **DESCRIPTION OF RESPONDENTS**:

   We will recruit adults 18 years of age and older which will include adults who have had debt collected upon in the past two years or who have debt that is actively being collected upon and adults who have not been contacted by any debt collectors, attorneys, collection firms, or others trying to get them to pay a debt.

4. **TYPE OF COLLECTION (ADMINISTRATION OF THE INSTRUMENT):**

   a. **How will you collect the information?** (Check all that apply)

[X] Web-based or other forms of Social Media	[X] Telephone
[X] In-person (1-on-1 sessions)	[ ] Mail
[ ] Small Discussion Group	[ ] Focus Group
[ ] Other, Explain ______________________	

   b. **Will interviewers or facilitators be used?**

   [X] Yes [ ] No [ ] Not Applicable

   c. **What type of disclosure or model form is being tested?**

[ ] Mortgage	[ ] Student Loan	[ ] Electronic Disclosure
[ ] Credit Card	[ ] Pre-paid Cards	[ ] Check Cashing
[ ] Remittances	[X] Debt Collection	[ ] Checking Accounts
[ ] Payday Loans	[ ] Other (Explain): ___________________	

5. **FOCUS GROUP OR SURVEY:**

   If you plan to conduct a focus group or survey, please provide answers to the following questions:

   a. Do you have a customer list or something similar that defines the universe of potential respondents and do you have a sampling plan for selecting from this universe?
   [X] Yes [ ] No [ ] Not Applicable

b. If the answer is yes, please provide a description below. If the answer is no, please provide a description of how you plan to identify your potential group of respondents and how you will select them?

Individuals who have opted into contact databases maintained by Fors Marsh Group and other facilities where we will conduct sessions will be notified via email or phone about the opportunity to participate. Individuals who express an interest in participating will be emailed the web-based screener. If they qualify based on responses to the web-based screener, they will be contacted by phone and administered the phone-based screener. Individuals who qualify based on responses from the phone-based screener will be scheduled. Only the recruiter will see direct identifying PII, and direct identifying PII is not shared with the researchers. Direct identifying PII is kept private at all times and is stored separately from data.

6. **PERSONALLY IDENTIFIABLE INFORMATION:**

a. **Is personally identifiable information (PII) collected?** [X] Yes [ ] No

b. If Yes, is the information that will be collected included in records that are subject to the Privacy Act of 1974? [X] Yes [ ] No [ ] Not Applicable
If applicable, provide name and link to the Privacy Impact Assessment (PIA):
Name: Consumer Experience Research
Link: http://files.consumerfinance.gov/f/201406_cfpb_consumer-experience-research_pia.pdf

c. If Applicable, has a System or Records Notice been published?
[ ] Yes [ ] No [ ] Not Applicable
If yes, cite the SORN. Title: CFPB.022 Market and Consumer Research Records_
_77_ FR __ FR 67802_____.

7. **INCENTIVES:**

a. Is an incentive provided to participants? [X] Yes [ ] No

b. If Yes, provide the amount or value of the incentive? $_75__.

c. If Yes, provide a statement justifying the use and amount of the incentive.

While sessions will last 60-90 minutes, participants are required to arrive 10 minutes early to sign in, and to ensure sessions begin on time. Upon completion of the session, participants are required to sign out and receive their incentive. Thus, they are in the office for about 75-120 minutes. Further, many participants have to travel 30-60 minutes to and from the facility. In our experience, a $75 incentive for a 60-minute session allows for successful recruitment by reducing the amount of time required to recruit (i.e., it is more difficult and takes longer to recruit participants when we offer a lower incentive) and simultaneously increasing the attendance rate.

When considering the potential estimated time and cost of participating in this test, such costs as childcare, transportation, and potential lost wages could result in a high no show rate. For example, a conservative estimated child cost of $25, transportation cost $35, and potential lost wages of $18 amounts to an estimated $78 cost of participation. The bases of our participant cost analysis are outlined below.

Summary of Estimated Participant Costs

• Child Care: $25 ($10 per hour / per child with up to 1 hour commuting + 1.5 hours at test site = 2.5 hours of child care)

• Transportation: $35 (2015 Federal mileage rate of 57.5 cents per mile @ an average of 60 miles).

• Lost Wages: $18 (Federal minimum wage of $7.25 per hour x (1 hour commuting + 1.5 hours at test site) = 2.5 hours of potential lost wages)

Total: $78 (Estimated participant cost)

Child Care: We found that nationally the babysitting rate is typically around $8 - $12 per hour with an average of $10 per hour. While some participants will have multiple children who will require childcare, others will have none. Therefore, we are taking a conservative estimate of only one child.

Transportation: We used the IRS mileage rate of 57.5 cents per mile with a potential of 60 miles of travel.

Lost Wages: We have no specific data on the hourly wage of potential participants; therefore, in order to estimate the potential lost wages of participants, we took a very conservative approach and based this estimate on the Federal minimum wage.

In summary, given the difficulties of recruiting the desired population and the potential costs of participation, we believe that $75 is the minimum incentive necessary to recruit and retain the desired test population. There is also a concern that if the incentive is not attractive enough to participants, there may be a high no show rate and the test would need to be redone in order to obtain quality results. Redoing the test would be much costlier than an effective incentive. For example, at the $75 incentive level, total incentives would be $3,000 (40 participants x $75) verses a test redo at a cost of approximately $167,000.

8. BURDEN ESTIMATES:

Information Collection	Number of Respondents	Frequency	Number of Annual Responses	Average Response time (hours)	Burden Hours
Web-based Screener	140	1x	140	.08	11
Phone-based Screener	80	1x	80	.05	4
User Experience Sessions	40*	1x	40	1.25	50
Totals	**140****	/////////////////	**260**	///////////////////////	**65**

Notes: * Four sessions with 8 to 10 participants. **Respondents to the Phone-based screener and One-on-One sessions are a subset of those to the Web-based screener.

9. **FEDERAL COST:** The estimated annual cost to the Federal government is $_167,228_.

10. CERTIFICATIONS

PURSUANT TO 5 CFR 1320.9, AND THE RELATED PROVISIONS OF 5 CFR 1320.8(b)(3) :

By submitting this document, the Bureau certifies the following to be true:

(a) It is necessary for the proper performance of agency functions;
(b) It avoids unnecessary duplication;
(c) It uses plain, coherent, and unambiguous terminology that is understandable to respondents;
(d) Its implementation will be consistent and compatible with current reporting and recordkeeping practices;
(e) It indicates the retention period for recordkeeping requirements;
(f) It informs respondents of the information called for under 5 CFR 1320.8(b)(3):
  (i) Why the information is being collected;
  (ii) Use of information;
  (iii) Burden estimate;
  (iv) Nature of response (voluntary);
  (v) Nature and extent of confidentiality; and
  (vi) Need to display currently valid OMB control number;
(g) It was developed by an office that has planned and allocated resources for the efficient and effective management and use of the information to be collected.

CERTIFICATION FOR INFORMATION COLLECTIONS SUBMITTED UNDER A GENERIC INFORMATION COLLECTION PLAN

(a) The collection is voluntary.
(b) The collection is low-burden for respondents and low-cost for the Federal Government.
(c) The collection is non-controversial and does not raise issues of concern to other federal agencies.
(d) The results are not intended to be disseminated to the public.
(e) Information gathered will not be used for the purpose of substantially informing influential policy decisions.
(f) The collection is targeted to the solicitation of opinions from respondents who have experience with the topics or issues being studied.
(g) The results will not be used to measure regulatory compliance or for program evaluation.
(h) The results are not intended to be generalizable or otherwise draw inferences beyond the surveyed population.

Page intentionally blank