



# DISCUSSION GUIDE

## User Experience (UX) Test Of the Statement of Rights



# Section 1: Introduction

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 helping the Consumer Financial Protection Bureau gather information that will help the government understand how financial companies interact with consumers.

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

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.**

Please make sure to review the Privacy Act Statement that has been provided in hard copy.

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 used as a memory aid for me so I can go back later to recall what happened during each session.

There are some people from my team 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?

[If necessary] Great, we are going to be using these eye tracking glasses so we can see where you are looking while you review the forms. First we need to calibrate the eye tracker so it can find your eyes properly. Please look at the center of this card. Great, we are ready to begin.

## Section 2: Initial experience

[Participants will be presented with a sample Statement of Rights, in an envelope with a sample validation notice (tested in previous rounds). The version of the Statement Rights notice may vary across rounds and across participants; participants may receive notices featuring different rights, and notices may be CFPB-branded or unbranded.]

Okay, let's imagine that you're at your home or office and you're going through your mail. Please open up this envelope and do what you normally would do if you were at home going through it.

Please remove the pages and take a look at the two documents. When you are done, tell me that you are finished.

(Administer the post-form Likert scale questionnaire.)  
[The 3 questions will be printed on a separate sheet.]

Now I'd like to ask you to answer a few questions on this sheet of paper about just this notice in the envelope. *[Direct participants to the validation notice.]*

### Post-form Likert Scale Questions

<b>1. How organized is the format of this document?</b>				
1 – Not at all organized	2 – Slightly organized	3 – Moderately organized	4 – Very organized	5 – Extremely organized

<b>2. How clear is the language in the document?</b>				
1 – Not at all clear	2 – Slightly clear	3 – Moderately clear	4 – Very clear	5 – Extremely clear

<b>3. How trustworthy is the information provided in this document?</b>				
1 – Not at all trustworthy	2 – Slightly trustworthy	3 – Moderately trustworthy	4 – Very trustworthy	5 – Extremely trustworthy

Now, please circle any areas on the form where the language was not clear.

And now I'd like to ask you to answer a few questions on this sheet of paper about just the Statement of Rights. *[Direct participants to the Statement of Rights.]*

Post-form Likert Scale Questions

<b>1. How organized is the format of this document?</b>				
1 – Not at all organized	2 – Slightly organized	3 – Moderately organized	4 – Very organized	5 – Extremely organized

<b>2. How clear is the language in the document?</b>				
1 – Not at all clear	2 – Slightly clear	3 – Moderately clear	4 – Very clear	5 – Extremely clear

<b>3. How trustworthy is the information provided in this document?</b>				
1 – Not at all trustworthy	2 – Slightly trustworthy	3 – Moderately trustworthy	4 – Very trustworthy	5 – Extremely trustworthy

Now, please circle any areas on the Statement of Rights where the language was not clear.

## Section 3: Questions

### Questions on the Validation Notice

Now I'd like you to respond to a few questions about this notice. *[Direct participant to the validation notice.]* Some of the questions can't be answered. It's perfectly fine to say "I don't know" if you don't think there is an answer to the question. Again, imagine that this is a notice you received in the mail.

1. What is the purpose of this notice?
2. Who sent this notice?
3. How much do you owe?
  - a. Does the amount you owe include any interest? If so, how much?
  - b. Who charged the interest on this debt? Over what period?
  - c. Does the amount you owe include any fees? If so, how much?
  - d. Who charged the fees on this debt? Over what period?
  - e. Have you made any payments on the debt? If so, how much? Over what period?
4. How much did you originally owe on this debt?
5. Who originally extended you the credit?
6. What is your account number with the company that extended you the credit?
7. Who do you owe the money to now?
8. Who should you send the payment to?
9. What could you do if you're interested in payment options?
10. Could you use the form to send the payment? How?
11. What kind of debt is this?
  - a. Is there a brand associated with the debt?
  - b. Who is Main Street Store?
12. If you wanted the original creditor's contact information, could you get it? How? [If necessary] Is there any information on the form that speaks to that? What do you think would happen next?
13. If you wanted the debt collector to stop or limit contact with you, could you do that?
  - a. If you wanted more information about that, could you get it?
  - b. Where could you look for that?
  - c. What if you wanted more information about debt collection in general?

- d. Why do you think the website is listed on the form? What kind of website do you think it is? What would you expect to find there?
14. 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?
  - b. What does the word “dispute” mean to you?
  - c. What happens if you write before [date]? What about after [date]?
  - d. What happens if you call?
  - e. Is there is difference in what happens if you write or call?
  - f. Could you use this form to write in? How could you do that?
15. What if you recognized the debt as one you owed, but some information about the debt was incorrect? What could you do?
16. What if you recognized the debt as one you owed, but thought you should pay it to another collector?
17. What if you were not sure whether or not you owed it? What could you do?
18. This line on the document [*point participants to the reference to “statement of rights”*] talks about a statement of rights.
- a. What would you do if you saw that on a document like this?
  - b. If this wording wasn’t here, what would you have done with the second sheet of paper?
  - c. What would you expect to see on a statement of rights?
19. This line on the document [*point participants to the state-specific language*] says to “flip over this page for additional rights you may have under state law.”
- a. What would you do if you saw that on a document like this?
  - b. What would you expect to see on the back?
  - c. How do you think the state rights are different than the other information on the document?
20. This statement on the document [*point participants to the Spanish language statement*] is in another language.
- a. Do you understand this statement?
  - b. [If yes] What does it mean to you?
    - i. Where would you expect to find additional information in Spanish about your rights as a consumer?
  - c. [If not] What do you think it might mean?

- i. Why do you think this statement was included on the notice?
  - ii. Did this statement interfere with your ability to understand the rest of the notice?
21. If you ignored this notice, what do you think would happen?
  - a. Could you be sued?
  - b. Could you be credit reported?

*[Show participant a validation notice featuring time-barred and/or obsolete debt information.]*

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

1. Based on the information in this notice, can you be sued on this debt?
2. Are there any circumstances in which you could be sued? [If they say partial payment and/or acknowledgment in writing, ask] Any other circumstances?
  - a. What does the phrase "acknowledge the debt in writing" mean to you?
3. If you made a partial payment on the debt, what could happen? Could the collector sue you?
4. If you wrote the collector and said you owed the debt, what could happen? Could the collector sue you?
5. Can the debt appear on your credit report?
6. Does knowing this additional information change how you might respond to the notice?

### **Questions on the Statement of Rights**

Now I'd like you to respond to a few questions about just this document. *[Direct participant to the Statement of Rights.]* Some of the questions can't be answered. It's perfectly fine to say "I don't know" if you don't think there is an answer to the question.

1. What is the purpose of this document?
2. Who sent this document to you?
3. How does this relate to the notice that you received in the envelope?
4. If you received these two documents together, how likely would you be to review this document?
  - a. What about the first document we looked at?
  - b. Was there anything on the first document that would make you more likely to look at this one?
5. Why do you think the Statement of Rights was included with the notice?
6. Who created the document?

7. Do you consider this a trustworthy source?
8. What is the source of these rights?
9. What do you think would prompt a collector to send such a document advising consumers of these rights?
10. Do these rights apply to interactions with all debt collectors or just the one who's trying to collect the debt listed in the other notice?
11. If you got this Statement of Rights document, what would you do with it?
  - a. Would you review it? How closely? Why?
  - b. Would you keep it? Why or why not? Where would you keep it?
  - c. If you didn't keep it, and you needed this information later, what would you do?
12. This line on the document [*point participants to the state-specific language*] says to "flip over this page for additional rights you may have under state law."
  - a. What would you do if you saw that on a document like this?
  - b. What would you expect to see on the back?
  - c. How do you think the state rights relate to the other information on the document?
13. Where would you expect to find additional information about your rights as a consumer?
14. Would you be more likely to visit the Bureau's website or call the Bureau's phone number?
15. This statement on the notice [*point participants to the Spanish language statement*] is in another language.
  - a. Do you understand this statement?
  - b. [If yes] What does it mean to you?
    - i. Where would you expect to find additional information in Spanish about your rights as a consumer?
  - c. [If not] What do you think it might mean?
    - i. Why do you think this statement was included on the notice?
    - ii. Did this statement interfere with your ability to understand the rest of the notice?

[If consumer received CFPB-branded Statement of Rights]

16. On a scale of 1-5, with 1 being not at all likely and 5 being extremely likely, how likely would you be to:
  - a. Read this document? Why?
  - b. Keep this document? Why?
  - c. Rely on this document in your interactions with a collector? Why?



- d. Trust this document? Why?
- e. Exercise your rights reflected on the document? Why?

17. The form includes a logo from the CFPB. What is the CFPB? Is it helpful to have the CFPB logo on the Statement of Rights? Why?

- a. How does the CFPB logo affect how you see this document?
- b. Does it make you:
  - i. More or less likely to read the document? Why?
  - ii. More or less likely to keep the document? Why?
  - iii. More or less likely to rely on the document in your interactions with a collector? Why?
  - iv. More or less likely to trust the document? Why?
  - v. More or less likely to exercise your rights? Why?

18. Imagine that this document had no logo on it:

- a. How would that affect how you see this document?
- b. Who would you think it was from? Why?
- c. Would you:
  - i. Be more or less likely to read the document? Why?
  - ii. Be more or less likely to keep the document? Why?
  - iii. Be more or less likely to rely on the document in your interactions with a collector? Why?
  - iv. Be more or less likely to trust the document? Why?
  - v. Be more or less likely to exercise your rights? Why?

19. Imagine that this document had no logo on it but did include the CFPB's website and phone number.

- a. How would that affect how you see this document?
- b. Who would you think it was from? Why?
- c. Would you:
  - i. Be more or less likely to read the document? Why?
  - ii. Be more or less likely to keep the document? Why?
  - iii. Be more or less likely to rely on the document in your interactions with a collector? Why?
  - iv. Be more or less likely to trust the document? Why?
  - v. Be more or less likely to exercise your rights? Why?

*[If consumer received Statement of Rights without CFPB branding]*

20. On a scale of 1-5, with 1 being not at all likely and 5 being extremely likely, how likely would you be to:

- a. Read this document? Why?
- b. Keep this document? Why?
- c. Rely on this document in your interactions with a collector? Why?
- d. Trust this document? Why?
- e. Exercise your rights reflected on the document? Why?

21. Imagine that this document had the logo of an agency of the federal government on it.

- a. How would this affect how you see this document?
- b. Would you:
  - i. Be more or less likely to read the document? Why?
  - ii. Be more or less likely to keep the document? Why?
  - iii. Be more or less likely to rely on the document in your interactions with a collector? Why?
  - iv. More or less likely to trust the document? Why?
  - v. More or less likely to exercise your rights? Why?

22. Note that this document does not include the logo of an agency of the federal government, but it does include the website and phone number of the Consumer Financial Protection Bureau:

- a. How does this affect how you see this document?
- b. Does this change who you think the document is from? Why?
- c. Does this make you:
  - i. More or less likely to read the document? Why?
  - ii. More or less likely to keep the document? Why?
  - iii. More or less likely to rely on the document in your interactions with a collector? Why?
  - iv. More or less likely to trust the document? Why?
  - v. More or less likely to exercise your rights? Why?

## **Questions on Consumer Rights**

Now I'd like you to respond to a few general questions [and you can look at either of the documents to answer them/I'd like you to focus on the statement of rights only]. Again, some of the questions can't be answered. It's perfectly fine to say "I don't know" if you don't think there is an answer to the question.

1. Can you dispute the debt?
  - a. How can you dispute the debt?
  - b. In answering this question, which document (the notice or the Statement of Rights) did you consult? Which is more helpful in helping you figure this out?
2. If you wanted the debt collector to stop contacting you, could you do that?
  - a. What could you do to get them to stop?
  - b. If you wanted more information about how to get them to stop, could you get it?
  - c. Where could you find that information?
  - d. If the collector continues to contact you, what could you do to protect yourself?
  - e. What happens to the debt when you ask the collector to stop contacting you? Can you still be sued on it?
  - f. In answering this question, which document (the notice or the Statement of Rights) did you consult? Which is more helpful in helping you figure this out?
3. If you wanted the debt collector to stop contacting you at certain times, could you do that?
  - a. What could you do to get them to stop contacting you at those times?
  - b. If you wanted more information about how to get them to stop, could you get it?
  - c. Where could you find that information?
  - d. If the collector continues to contact you at those times, what could you do to protect yourself?
  - e. In answering this question, which document (the notice or the Statement of Rights) did you consult? Which is more helpful in helping you figure this out?
4. If you wanted the debt collector to stop contacting you at certain locations, could you do that?
  - a. What could you do to get them to stop contacting you at those locations?
  - b. If you wanted more information about how to get them to stop, could you get it?
  - c. Where could you find that information?
  - d. If the collector continues to contact you at those locations, what could you do to protect yourself?
  - e. In answering this question, which document (the notice or the Statement of Rights) did you consult? Which is more helpful in helping you figure this out?
5. If you wanted the debt collector to stop contacting you by certain methods, could you do that? [If participant is unsure] For example, if you wanted the debt collector to stop contacting you on your work phone, by text message, or by email, could you do that?
  - a. What could you do to get them to stop contacting you through those methods?
  - b. If you wanted more information about how to get them to stop, could you get it?

- c. Where could you find that information?
  - d. If the collector continues to contact you through those methods, what could you do to protect yourself?
  - e. In answering this question, which document (the notice or the Statement of Rights) did you consult? Which is more helpful in helping you figure this out?
6. Can you request information about the original creditor? [If participant is unsure.] For example, could you request the name or address of the original creditor?
- a. If you do request that information, can the collector continue to collect?
  - b. Why or why not?
  - c. In answering this question, which document (the notice or the Statement of Rights) did you consult? Which is more helpful in helping you figure this out?
7. Can the collector contact your [family members, employer, neighbors, friends, coworkers] about your debt?
- a. Why or why not?
  - b. Is there anything that they can ask a [family member, employer, neighbor, friend, coworker] about?
8. Can the collector contact you if you have hired an attorney?
- a. If you have hired an attorney, can you stop the collector from calling you?
  - b. If the collector continues to contact you, what could you do to protect yourself?
9. Can the collector contact you at work?
- a. Should the debt collector know not to call you at work, or is this something you think you should have to tell them? At least the first time?
  - b. If your employer does not allow you to take calls at work, can you stop the collector from calling you at work?
  - c. If the collector continues to contact you at work, what could you do to protect yourself?
  - d. Where could you go to find out whether the collector can contact you at work?
10. Can the collector contact you about a spouse's debt after the spouse has died?
- a. How long must the collector wait before contacting you about a deceased spouse's debt?
  - b. Where could you go to find out more information about what a collector can do after the spouse has died?
11. Are collectors allowed to harass or abuse consumers?
- a. What are some examples of "harassment and abuse"? What else do you think might qualify as harassment or abuse?

- b. What could you do if you experienced “harassment” or “abuse”?
12. Are collectors allowed to use “false, deceptive, or misleading representations”?
- a. What are some examples of “false, deceptive, or misleading representations”?
  - b. What could you do if a debt collector made “false, deceptive, or misleading representations” to you?
13. Are collectors allowed to use “unfair or unconscionable” methods of collection?
- a. What are some examples of “unfair or unconscionable” methods of collection?
  - b. What could you do if a debt collector engaged in an “unfair or unconscionable” method of collection with you?
14. Is there a limit on how many times the collector can contact you?
- a. What do you think that limit is?
  - b. If you wanted to find out what the limit is, could you find that information? Where?
  - c. What could you do if the collector contacted you too many times?
15. Is there a limit on how often the collector can contact you?
- a. What do you think that limit is?
  - b. If you wanted to find out what the limit is, could you find that information? Where?
  - c. What could you do if the collector contacted you too often?
16. What does the phrase “inconvenient time” mean to you?
- a. What do you consider an “inconvenient time?”
  - b. What could you do if a debt collector called you at an inconvenient time?
17. What does the phrase “inconvenient place” mean to you?
- a. What do you consider an “inconvenient place?”
  - b. What could you do if a debt collector called you at an inconvenience place?
18. What do the phrases “inconvenient manner” or “inconvenient method” mean to you?
- a. What do you consider an “inconvenient manner” or “inconvenient method”?
  - b. What could you do if a debt collector contacted you by “inconvenient manner” or “inconvenient method”?
19. Are there any types of assets or income that you can protect from the collector? Which ones?
- a. What could you do to protect that income from the collector?
20. If the debt collector obtained a court judgment against you, are there types of assets or income that cannot be taken to pay the debt? [If participant is unsure]. Sometimes the word “garnishment” is used to refer to money being taken away from you to pay a debt. Have you ever heard this term? If a collector tried to garnish your wages, are there types of wages that the collector cannot garnish?

- a. What could you do if you had income that the collector could not obtain?
21. If a different collector became responsible for collecting this debt, would the information on the Statement of Rights still apply to you?
22. If a different collector was trying to collect a different debt from you, would the information on the Statement of Rights still apply to you?
23. Do you believe there's a chance your debt can be reported to the credit reporting agencies?
24. If you wanted to dispute an item on your credit report, could you? How?
- a. Could you get more information about how to dispute an item on your credit report?
  - b. Where could you go for more information about that?
25. Is there a difference between disputing a debt with your collector and disputing an item that appears on your credit report?
- a. If you disputed the debt with your debt collector, do you think that would also qualify as disputing an item on your credit report?
26. If you wanted to obtain a copy of your credit report, could you? How?
- a. Could you get more information about how to obtain a copy of your credit report?
  - b. Where could you go for more information about that?
27. Can you go to jail for not paying your debt? Where could you go if you wanted the answer to this question?
28. Can a collector take out an advertisement in the newspaper asking you to pay a debt? Where could you go if you wanted to know the answer to this question?
29. Can you sue a collector for violating your rights? Where could you go if you wanted the answer to this question?
30. If a collector sues you for not paying a debt:
- a. Is the proceeding a criminal proceeding or a civil proceeding? What is the difference? Where could you go if you wanted to know the answer to this question?
  - b. Can the collector sue you in any court it wants? Where can it sue you? Where could you go if you wanted the answer to this question?
31. What can you do if you think a debt collector violated your rights?
- a. Could you get more information about what to do if a debt collector violated your rights?
  - b. Where could you get more information about that?

## Section 4: Scenarios

Now we're going to do an activity. I'm going to play you some recordings of phone conversations between debt collectors and consumers. These are not real conversations—these are sample conversations that our staff recorded, but these are examples of conversations that might occur. I'd like to ask you to listen to the conversation, and then I'll ask you a few questions about each one.

[Play pre-recorded sample conversation between a debt collector and a consumer.]

1. Does this debt collector have the right to do this? Why or why not? How do you know that?
2. What can the consumer do in this situation? What options does this consumer have? How do you know that?
3. What can the debt collector do in this situation? What can the debt collector not do? How do you know that?
4. How can the consumer get additional information about this?
5. What could you do if you were the consumer in this situation?

## Section 5: Debriefing Interview

[Debrief questions that can be asked about either document, as needed.]

1. Is there anything in this information that catches your attention or which is particularly important to you?
2. Was there anything that you found confusing or unclear?
3. Where could you go if you wanted additional information about anything on this document?
4. 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?
5. Imagine that you had a friend in debt collection. What information would you be most likely to share with that friend?
6. Did you feel overwhelmed by this document at all?
  - a. If yes, which parts, and why?
7. What questions do you have after reading this?

[Debrief questions to be asked on Statement of Rights.]

1. Are there any rights that are missing?
  - a. If yes, what do you think is missing?
2. Are there any rights that do not belong?
  - a. If yes, which rights and why?
3. Are there any rights that are not necessary?
  - a. If yes, which ones, and why?
4. Are any of the rights surprising to you?
  - a. If yes, which ones and why?
5. How would you describe your overall understanding of your rights?
  - a. Is this different than it was before you saw the materials we just looked at?
6. How did this document affect your understanding that you have rights if you're in debt collection?
7. How did this document affect your understanding of what those rights are?
8. How did this document affect your understanding of where to go if you want more information about your rights?



9. After reading this, do you feel more or less comfortable that you know how to protect your rights?  
That you know the steps you might take to protect your rights?
10. In general, what's more useful [or important] to you: knowing what debt collectors *cannot* do or knowing what you *can* do? Or are they equally important?

*[Present participant with multiple statements of rights containing same information formatted differently]*

1. Tell me about the differences you see in the two forms.
2. Which of these two forms would you prefer? Why?
3. Which of these designs do you prefer? Why?