

Request for Approval under the “Generic Clearance for the Collection of Qualitative Feedback on the Service Delivery of the Consumer Financial Protection Bureau” (OMB Control Number 3170-0024)

1. Title of Information Collection

Consumer Focus Groups and Subsequent Usability Testing (Two Rounds) Relating to Proposed Telephone Survey Exploring Consumer Awareness of and Perceptions Regarding Dispute Resolution Provisions in Credit Card Agreements

2. Purpose

The Consumer Financial Protection Bureau (the “CFPB”) seeks approval from the Office of Management and Budget (“OMB”) to conduct two ninety-minute focus groups of twelve participants each (twenty-four participants total). The focus groups would be used to revise a draft telephone survey, which would then be usability-tested with nine individuals over the telephone. The then-revised draft telephone survey would then be subsequently tested with an additional nine participants in a second and final round of usability testing (eighteen participants total for usability testing).

The proposed testing will help the CFPB finalize questions for a separately-proposed national telephone survey of credit card holders. That telephone survey will, in turn, inform a broader CFPB study and report to Congress regarding mandatory pre-dispute arbitration agreements, which is required under Section 1028(a) of the Dodd-Frank Wall Street Reform and Consumer Protection Act, Public Law No. 111-203 Title XIV. The proposed focus groups will utilize group discussions, as well as hand-distributed written surveys. The proposed usability testing will involve telephone calls with individuals, exploring participants’ understanding of the revised telephone survey questionnaire.

As part of its statutorily mandated study of mandatory pre-dispute arbitration provisions, the CFPB proposed conducting a national telephone survey of 1,000 credit card holders via a June 7, 2013 Federal Register notice. In documents relating to the notice, the CFPB listed twelve draft questions that it proposed asking consumers in the national telephone survey. In doing so, the CFPB explained that it would retain a contractor to assist it with drafting the survey instrument, through the use of focus groups and user testing.

Shortly after publishing the June Federal Register Notice, the CFPB retained ICF International to assist it with finalizing the proposed survey document for submission to OMB. ICF International’s responsibilities include focus group testing to revise the language of the proposed survey – particularly to obtain a better understanding of the extent of consumers’ knowledge of the pertinent issues, as well as the vocabulary used by consumers when they discuss them. ICF International is also charged with user-testing the proposed survey questions before they are used with the nation-wide survey.

Accordingly, the CFPB and ICF International have drafted a Proposed Focus Group Moderator Guide (Attachment A), and an associated hand-distributed written survey (Attachment B) for use

with the proposed focus groups. Those documents would be used to revise the draft telephone survey proposed by the CFPB in its June Federal Register Notice before its retention of ICF International. The revised telephone survey would then be usability tested through two rounds of usability testing. The Interviewer Guide for usability testing is included as Attachment C and an initial draft of the survey document that will be tested is included as Attachment D. Before usability testing, however, this survey document will be revised based on the findings from the proposed two rounds of focus group testing. Similarly, it will be revised after the first round of usability testing before the second round of usability testing.

The CFPB does not anticipate using the focus group or usability testing for any independent empirical findings or to provide independent, substantial input regarding influential policy decisions. Approval for the subsequent telephone survey would be sought separately from OMB after the CFPB revises its proposal to account for input from the focus groups and usability testing (in addition to other guidance from ICF International and two rounds of public comment relating to the proposed survey itself).

3. Description of Respondents

ICF International will subcontract with a research facility, which will provide facilities for the focus group as well as pre-screened participants for the focus group meetings. The proposed respondent demographics that will be sought from the research facility are described in the proposed Participant Screener for Credit Card Focus Groups (Attachment E) and Participant Screener for Credit Card Usability Testing (Attachment F).

In that regard, of the twelve respondents for each of the two groups:

- All participants must possess credit cards that they use for personal expenditures;
- At least half must have participated in the decision to enroll in a new credit card in the last two years;
- None may have (a) worked for a bank or other financial institution, the real estate industry, or the mortgage industry; (b) worked for consumer rights non-profits relating to the aforementioned industries; or (c) participated in a focus group in the last six months; and
- They must be able to articulate how they chose their most frequently used credit card.

Regarding age, of the twelve:

- At least three must be between the ages of 18-35;
- At least three must be between the ages of 36-50; and
- At least three must be over 51 years old.

Also, of the twelve between five and eight must either self-identify as being:

- Hispanic or Latino origin;
- Black or African-American;
- Asian;
- Native Hawaiian or other Pacific Islander; or
- American Indian or an Alaska Native.

Regarding education, of the twelve:

- At least three should identify as having a high school degree or less as their highest educational level;
- At least four should identify as having “some college work.”

And the group of twelve should include at least five males and five females.

The research facility will also be used to identify two sets of nine individuals for use with the two rounds of subsequent usability testing:

- All participants must possess credit cards that they use for personal expenditures;
- At least five must have participated in the decision to enroll in a new credit card in the last two years; and
- None may have (a) worked for a bank or other financial institution, the real estate industry, or the mortgage industry; (b) worked for consumer rights non-profits relating to the aforementioned industries; or (c) participated in a focus group or interview in the last six months.

Regarding age, of the nine participants for each round:

- At least two must be between the ages of 18-35;
- At least two must be between the ages of 36-50; and
- At least two must be over 51 years old.

Also, of the nine between four and six must either self-identify as being:

- Hispanic or Latino origin;
- Black or African-American;
- Asian;
- Native Hawaiian or other Pacific Islander; or
- American Indian or an Alaska Native.

Regarding education, of the nine:

- At least two should identify as having a high school degree or less as their highest educational level;
- At least three should identify as having “some college work.”

And the group of nine should include at least three males and three females.

4. Type of Collection (Check all that apply)

- | | |
|--|---|
| <input type="checkbox"/> Customer Comment Card/Complaint Form | <input type="checkbox"/> Customer Satisfaction Survey |
| <input type="checkbox"/> Usability Testing (e.g., Website or Software) | <input type="checkbox"/> Small Discussion Group |
| <input checked="" type="checkbox"/> Focus Group | <input type="checkbox"/> Other: Interviews |

5. Focus Group or Survey

- 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?**

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.**

The research team will engage a focus group testing facility to conduct recruitment. These facilities will utilize recruitment screeners (Attachments E and F) and will be fully oriented to the project and the recruitment goals prior to beginning their work. Facilities will screen participants from a pre-recruited database of people who have indicated their interest in being involved in qualitative research studies.

The participation goals described in the recruitment screeners are intended to ensure a mix of participants in terms of age, race/ethnicity, gender, and education. Because this research is qualitative and results will not be generalized to a larger population, proposed testing groups are not required to match a larger population distribution. With that said, the CFPB and ICF International believe that it is possible that consumers' knowledge, understanding, and attitudes about their credit card accounts may differ based on these demographic variables, and therefore seek the inclusion of a variety of perspectives.

6. Personally Identifiable Information

- a. **Is personally identifiable information (PII) collected?** Yes No

The CFPB expects that participant screening will have been conducted by the research facility contracted by ICF International to facilitate the testing well before the research facility has been approached by ICF International. In that regard, research facilities generally pre-screen a broad range of candidates for future use. In any event, ICF International and the CFPB will not have access to personally identifiable information regarding the test participants and will not seek it out. The CFPB similarly expects that distribution of incentive payments will be conducted by the subcontractor.

The proposed informed consent form for the proposed focus group testing (Attachment G) assures participants that participation is “[t]otally voluntary” and that :

- “We will not disclose personal information about you, except as described in this form, unless legally authorized or required by law to do so”;
- “Your name will not be used in any written reports or presentations for this project”; and
- “audio and video recordings [of the focus groups] may be shared with the employees of the Consumer Financial Protection Bureau and authorized contractors who have a need

for the information for official business purposes. All such persons are under obligation to protect the privacy of the information in the recordings.”

Similar information is provided to participants at the beginning of telephone usability testing (see Attachment C).

The CFPB has specified in its contract with ICF International that ICF International, its employees, its subcontractors, and its subcontract employees will not disclose to any third party, or otherwise use, any information it obtains or prepares in the course of performance under the contract, including personally identifiable information, without first receiving written permission from the CFPB.

b. **If Yes, is the information that will be collected included in records that are subject to the Privacy Act of 1974?** Yes No Not Applicable

c. **If Applicable, has a System of Records Notice been published?**
 Yes No Not Applicable

7. Gifts or Payments

Is an incentive (e.g., money or reimbursement of expenses, token of appreciation) provided to participants? Yes No

ICF International will provide an incentive payment of \$75 to each focus group participant, to compensate them for an estimated two-and-a-half hours of time (one-and-a-half hours in the focus group, plus an average of an hour in travel to and from the group). The incentive payment is aimed to help recruit a demographically and geographically diverse group of consumer respondents. In that regard, the contractor has contacted several focus group research facilities in the Washington D.C. metropolitan area, and all have indicated that they would not be able to successfully recruit for the groups if the incentive were lower than \$75. Depending on the location of the facility, for instance, a cross-section of inner-city and suburban participants may need to travel a considerable distance to participate.

ICF International will provide an incentive payment of \$40 for each usability testing participant, to compensate them for an estimated one hour of time. Again, this amount is based on research conducted by ICF International with potential research facilities.

8. Administration of the Instrument

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

- | | |
|---|---|
| <input type="checkbox"/> Web-based or other forms of Social Media | <input checked="" type="checkbox"/> Telephone |
| <input checked="" type="checkbox"/> In-Person | <input type="checkbox"/> Mail |
| <input type="checkbox"/> Other | |

b. Will interviewers or facilitators be used?

Yes No Not Applicable

9. Burden Estimates

Each focus group respondent will participate in a 1.5 hour focus group session, including taking time to fill out a written (qualitative) survey during the interview.

Each participant in the usability testing will participate in a one-hour telephone conversation.

<u>Information Collection</u>	<u>Number of Respondents</u>	<u>Participation Time</u>	<u>Burden Hours</u>
Participant Screener	108	5 Minutes	9
Focus Group Participants	24	1.5 Hours	36
Usability Testing Participants	18	1 Hour	18
Total:			63

10. Federal Cost

The cost to the CFPB for the portion of its contract with ICF International that relates to the proposed focus group testing is \$25,923. There are no additional costs to the Federal Government.

11. Certification

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

- The collection is voluntary.
- The collection is low-burden for respondents and low-cost for the Federal Government.
- The collection is non-controversial and does not raise issues of concern to other federal agencies.
- The results are not intended to be disseminated to the public.
- Information gathered will not be used for the purpose of substantially informing influential policy decisions.
- The collection is targeted to the solicitation of opinions from respondents who have experience with the program and may have experience with the program in the future.
- The results will not be used to measure regulatory compliance or for program evaluation.