

Request for Approval under the “GENERIC CLEARANCE FOR QUALITATIVE CONSUMER EDUCATION, ENGAGEMENT, AND EXPERIENCE INFORMATION COLLECTIONS”

(OMB Control Number: 3170-0036)

1. TITLE OF INFORMATION COLLECTION: User Testing of Innovative Financial Products and Services Designed to Help Assist Consumers Manage Their Spending

2. PURPOSE: The Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (Pub. L. 111-203) established the Office of Financial Education (OFE) within the Consumer Financial Protection Bureau. OFE is responsible for developing and implementing initiatives intended to educate and empower consumers to make better-informed financial decisions.

As part of meeting this mandate, OFE is testing innovative tools and approaches to help consumers navigate financial challenges and achieve their own financial goals. This effort is focusing on, among other issues, the difficulties that some consumers face in organizing and managing their finances, especially keeping their spending within their self-determined budget. The information collection portion of this project aims to gather user feedback from consumers on innovative features of financial products and services that help users understand and manage their spending decisions.

Through this Request for Approval under the “Generic Clearance for Qualitative Consumer Education, Engagement, and Experience Information Collections,” the CFPB seeks approval to conduct user testing via a national online survey panel of mock-ups of financial product features related to user spending and budgeting.

OFE has engaged a contractor, Behavioral Labs, Inc., to undertake this research. The contractor will subcontract with RAND Corporation to conduct user testing with 500 consumers to determine their thoughts about several prototypes of credit card display screens and mobile applications with features designed to help consumers manage their spending in accordance with their budgets.

The information collected through these processes will increase the CFPB’s understanding of the effectiveness of product features in helping consumers managing their budgets and spending. This information will also be used by the CFPB to inform financial product designers and financial educators about features, programs, and practices that improve financial decision-making skills and outcomes for consumers.

3. DESCRIPTION OF RESPONDENTS: This information collection will utilize RAND Corporation’s American Life Panel (ALP), an online panel that consists of 5000 members ages 18 and older who are regularly interviewed over the Internet for research purposes. The ALP’s respondents were originally recruited from the University of Michigan’s Survey Research Center respondents to the Monthly Survey as of January 2002. Each month, the MS interviews approximately 500 households, of which 300 households are a random-digit-dial sample and 200 are re-interviewed from the random-digit-dial sample surveyed six months earlier. At the end of the interviews, respondents were asked to participate in the RAND panel. They could do so using their own computer or a laptop provided by RAND. This eliminates the bias found in many Internet survey panels, which include only computer owners. To ensure panel representativeness, RAND has expanded the ALP panel by inviting members of Stanford University and Abt SRBI’s National Survey Panel to join. These panel members were originally recruited door-to-door and offered laptops and/or Internet access if they did not have it already. For testing purposes, RAND also allowed panel members to refer other members over age 18 living in their

household, as well as a limited number of family and friends.

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

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

- | | |
|------------------------------------------------------------------------------|--------------------------------------|
| <input checked="" type="checkbox"/> Web-based or other forms of Social Media | <input type="checkbox"/> Telephone |
| <input type="checkbox"/> In-person | <input type="checkbox"/> Mail |
| <input type="checkbox"/> Small Discussion Group | <input type="checkbox"/> Focus Group |
| <input type="checkbox"/> Other, Explain _____ | |

b. Will interviewers or facilitators be used?

- Yes No Not Applicable

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?

- 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?

From the American Life Panel described above, RAND will draw a random sample of panel members to create the 500-member sample for this information collection.

6. INFORMATION COLLECTION PROCEDURES

Please summarize the procedures that will be used to collect data from respondents.

The contractor will be conducting user testing of versions and features of innovations with individual users. This will be done by embedding screens depicting potential iterations of a display card and mobile application into the monthly RAND American Life Panel (ALP) online survey. A total of 500 respondents will participate in the online survey. Respondents will be presented with images and gifs of prototype features, and would provide feedback through the survey module. RAND will provide aggregate summarized reports of responses from the prototype modules. Respondents will be shown different versions of prototypes. In general, user tests will be short, free text responses from respondents as they examine screens of prototype features.

The prototype features to be tested are mock-ups of features that would appear on a credit card display screen or on a mobile application screen on a smartphone. Respondents will be shown different versions of the mock-ups that would demonstrate how spending and budget information would be displayed.

Respondents will be shown features with sample financial data in the mock-ups; no actual financial data or consumer PII will be collected or used in the prototyping.

7. PERSONALLY IDENTIFIABLE INFORMATION:

- a. **Is personally identifiable information (PII) collected?** Yes No
PII containing direct-identifiers (name and contact information) will only be collected for the purpose of recruiting respondents. Other than first names to facilitate conversation, no PII containing direct identifiers will be requested during the interviews. No PII containing direct identifiers will be linked to data (respondent answers) collected during the survey or interview. CFPB will only be provided aggregate data stripped of direct identifying PII. Any PII collected in the course of conducting the study will be appropriately protected and stored in a secure location.

- 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 or Records Notice (SORN) been published?**
 Yes No Not Applicable
If applicable, what is the Federal Register citation for the SORN? 77 FR 60382.

- d. **If applicable, what is the link the Privacy Impact Assessment (PIA)?**

Market Research in the Field PIA

http://files.consumerfinance.gov/f/201412_cfpb_market-research-in-the-field-v1.pdf

and Market Analysis of Administrative Data Under Research Authorities

http://files.consumerfinance.gov/f/201312_cfpb_pia_admin-data-research.pdf

8. INCENTIVES:

- a. **Is an incentive provided to participants?** Yes No

- b. **If Yes, provide the amount or value of the incentive?** \$ 14.00.

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

Survey respondents will receive \$14.00 for participating in a 20-minute online survey. RAND pays ALP participants incentives of \$20 per 30-minute survey, or approximately \$0.70 per survey minute. The respondents in this information collection will answer a 20-minute survey and thus will receive \$14.00 to reimburse them for their time.

9. ASSURANCES OF CONFIDENTIALITY:

- a. Will a pledge of confidentiality be made to respondents? Yes No

b. If Yes, please cite the statute, regulation, or contractual terms supporting the pledge.

The consent forms state that “no individual participant will be identified or linked to the results. All information obtained in this study will be kept strictly confidential to the extent permitted by applicable law”.

10. JUSTIFICATION OF SENSITIVE QUESTIONS (if applicable):

Not applicable.

11. BURDEN HOURS:

Category of Respondent	Number of Respondents	Frequency	Number of Responses	Response Time (hours)	Burden (hours)
Survey Respondents	500	once	500	20 minutes	167
Totals	500	once	500	20 minutes	167

12. **FEDERAL COST:** The estimated annual cost to the Federal government is \$_15,000____.
(Note that this is part of a much larger contract and the cost of this information collection is an approximation).

13. CERTIFICATION:

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

- The collection is voluntary.
- The collection is low-burden for respondents.
- The collection is non-controversial and does not raise issues of concern to other federal agencies.
- Information gathered will not be used for the purpose of substantially informing influential policy decisions.
- The collection is not statistically significant; the results are not intended to be generalizable beyond the survey population.
- The results will not be used to measure regulatory compliance or for program evaluation.

Appendices:

Appendix A: Consent Forms

Appendix B: User Testing Information Collection Questions

Appendix C: Sample Product Feature for User Testing