

**BUREAU OF CONSUMER FINANCIAL PROTECTION**

**PAPERWORK REDUCTION ACT SUBMISSION**

**INFORMATION COLLECTION REQUEST**

**SUPPORTING STATEMENT PART A Supporting Statement – Part A**

**CFPB Generic Information Collection Plan for Studies of Consumers using Controlled Trials in Field and Economic Laboratory Settings**

**(OMB CONTROL NUMBER: 3170-XXXX)**

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**ABSTRACT:** Under the Dodd-Frank Wall Street Reform and Consumer Protection Act, the Consumer Financial Protection Bureau is tasked with researching, analyzing, and reporting on topics relating to the Bureau’s mission, including developments in markets for consumer financial products and services, consumer awareness, and consumer behavior. The Bureau seeks to obtain approval for a generic clearance to collect data from purposive samples through controlled trials in field and economic laboratory settings. This research will be used for developmental and informative purposes in order to increase the Bureau’s understanding of consumer credit markets and household financial decision-making. Basic research projects will be submitted under this clearance.

**1. Circumstances Necessitating the Data Collection**

A core component of the Consumer Financial Protection Bureau (CFPB, Bureau)’s mission is to understand how consumer financial markets work, the avenues for innovation in financial products and services, and potential risks to consumers.<sup>1</sup> In order to achieve this mission, the Dodd-Frank Wall Street Reform and Consumer Protection Act (Act) and other federal consumer financial laws authorize the CFPB to engage in research and general market monitoring activities to assess trends and emerging risks in consumer financial markets.<sup>2</sup> Section 1013(b)(1) of the Act establishes the Office of Research and assigns to it

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<sup>1</sup> CFPB FY 2013 – FY 2017 Strategic Plan, goal 3, <http://www.consumerfinance.gov/strategic-plan/>

<sup>2</sup> DFA Section 1013(b)(1) mandates that the Bureau have research staff whose responsibilities include “[r]esearching, analyzing, and reporting on (A) developments in markets for consumer financial products or services, including market areas of alternative consumer financial products or services with high growth rates and

the responsibility of researching, analyzing, and reporting on topics relating to the Bureau's mission, including developments in markets for consumer financial products and services, consumer awareness, and consumer behavior. The Act also established the Office of Financial Education (OFE) within the CFPB, which is responsible for developing and implementing initiatives intended to educate and empower consumers to make better-informed financial decisions, and, together with the CFPB's Office of Research, for conducting research related to financial education and counseling. Using empirical evidence and rigorous research, the Bureau improves its understanding of consumer financial markets and is able to provide accurate and comprehensive information to consumers, firms, researchers, and policymakers.

The CFPB supports this mission by building an understanding of the markets that the Bureau regulates and the nature of consumer behavior in these markets. Research provides a scientific basis for policy development, supervision and enforcement, regulation, and consumer education and engagement activities pursued by the CFPB.

The CFPB seeks to use this generic information collection plan to collect data from purposive samples (that do not necessarily represent the general public or a population of regulatory interest) through controlled trials in field and economic laboratory settings. The research will be used for developmental and informative purposes, but not directly providing a basis for specific policy at the Bureau.

In general, topics that the Bureau is interested in studying include:

- consumer awareness and decision-making, for example, understanding what financial products or features people are aware of and why they choose one product over another;
- consumer experiences and potential risks to consumers, including traditionally underserved consumers;
- information disclosure and how disclosure may affect behavior;

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areas of risk to consumers; (B) access to fair and affordable credit for traditionally underserved communities; (C) consumer awareness, understanding, and use of disclosures and communications regarding consumer financial products or services; (D) consumer awareness and understanding of costs, risks, and benefits of consumer financial products or services; (E) consumer behavior with respect to consumer financial products or services, including performance on mortgage loans; and (F) experiences of traditionally underserved consumers, including un-banked and under-banked consumers.”

- the effect of educational or other interventions on consumer financial behavior or outcomes;

These topics will usually be in the context of consumer financial product markets, including mortgages, car loans, student loans, installment loans, small dollar loans and credit, debit, and prepaid cards. In addition, research may be related to the CFPB's mission regarding financial education, including evaluating the effectiveness of financial education programs and understanding financial planning behaviors, including savings and spending behavior. The CFPB envisions that the research covered under this generic clearance will be basic research about consumer credit markets and household finance.

When collecting information about consumer credit markets, the CFPB recognizes that there are privacy and data security risks. We outline the ways the CFPB plans to mitigate these risks when collecting data using this generic clearance later in this supporting statement.<sup>3</sup>

## **2. Use of the Information**

The CFPB requests approval from the Office of Management and Budget (OMB) for a generic information collection plan clearance that will allow the Bureau to collect data from purposive samples through controlled trials in field and economic laboratory settings. The specific purpose of this generic clearance is to allow the Bureau to better inform and advance scientific understanding of consumer credit markets and household finance. The Office of Research envisions a program of data collections, and this generic clearance will allow us to monitor and research market developments in a timelier manner. In addition, the CFPB envisions that occasional unique opportunities to answer fundamental research questions about consumer finance will arise with external collaborators, and this clearance

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<sup>3</sup> On June 30<sup>th</sup> 2014, the CFPB published a Privacy Impact Assessment (PIA) for Consumer Experience Research that covers some of the data that will be collected under this generic clearance. Other PIAs will be published by the CFPB in the future that will likely cover data collected under this generic clearance as well. [http://files.consumerfinance.gov/f/201406\\_cfpb\\_consumer-experience-research\\_pia.pdf](http://files.consumerfinance.gov/f/201406_cfpb_consumer-experience-research_pia.pdf)

will allow us to move quickly to take advantage of those situations where the timeline is further outside our control.

The purpose of research conducted under the expected clearance will not be making particular regulatory decisions, evaluating specific policies, or substantially informing a rulemaking. Studies conducted under this generic approval may identify opportunities for enhanced or improved regulatory or other policy actions; however, as noted, the Bureau will not initiate any policy changes based solely or primarily on these research projects. Instead, the CFPB envisions this generic clearance to cover studies with developmental and informative purposes given that research studies under this generic clearance will only include purposive samples that do not necessarily represent the general public or a population of regulatory interest.

The Office of Research will monitor research projects to ensure that projects included under this generic clearance are NOT:

- Nationally representative samples or samples that try to estimate parameters related to populations of regulatory interest.
- Statistics that are intended to be published to the public as an official government statistics to be externally valid and representative of a population of interest.
- Research projects intended to inform particular regulatory decisions or developing or evaluating specific policies (ex: testing of a disclosure form that is intended to later be promulgated in a CFPB rule).

Some examples of the types of studies that the CFPB could envision using this generic clearance for include:

- Working with a credit union to implement a financial education intervention (ex: text messages with financial education content). In addition to using the credit union's administrative data to evaluate such a program, this generic

clearance could be used to allow us to survey a subset of the consumers, to learn more about the effect of the financial education intervention.

- A lab experiment relating to the disclosure of loan terms for an unspecified product. We might test whether the number of attributes of the loans and the total amount of information affects consumers' choices between loans and decisions around repayment.

These projects are intended to be internally valid, but not necessarily externally valid. They are intended to improve our methods and understanding of consumer decision-making.

Research projects under this generic clearance may include pretesting and cognitive interviewing prior to the data collection. The Office of Research will generally pretest questionnaires and other user-interfaces to ensure the collection of reliable information while minimizing respondent burden and costs. Cognitive testing ensures that a question posed to respondents successfully captures the intent of the question and that it makes sense to respondents. It can also be used to better understand research results by providing data about why participants responded to questions the way they did. The Bureau may also rely on pretesting to ensure that necessary computer hardware and software function appropriately.

This generic clearance will allow the Bureau to conduct data collections which will achieve our research project goals with the least amount of burden on the public, and while ensuring strong privacy and data protections throughout these projects. Collections under this clearance will be limited to situations in which sufficient data do not already exist but could be collected through data from purposive, non-representative samples.

### **3. Use of Information Technology**

The CFPB will employ information technology as appropriate to reduce the burden of respondents who agree to participate in its research. Computer-assisted participation will be used when feasible and appropriate, including online studies. In general, the Bureau intends to incorporate electronic data-collection techniques whenever possible, particularly since in many instances they are likely to impose the lowest burden on respondents and may be the

most cost-effective. However, the extent to which the Bureau will use electronic data collection for a given project will be determined by weighing several factors, including response rates and costs. For example, evidence to date suggests that web-only data collections tend to have lower response rates than surveys conducted by mail or phone.<sup>4</sup> The Bureau expects that the most effective mode, including mixed-mode combinations, may also vary with the complexity and sensitivity of the information to be collected.

#### **4. Efforts to Identify Duplication**

The Bureau will conduct controlled trials in field and economic laboratory settings to answer questions that have not yet been satisfactorily addressed in the relevant research literature. In some cases it will be appropriate to replicate previous laboratory and field studies within a new population of interest to the CFPB, such as service members, students, older Americans, or people who utilize specific financial products, such as payday loans or remittances. In these cases, the Bureau will detail the relationship between the proposal and existing studies and will describe how the data collection supports the CFPB's mission. A review of the existing relevant literature will be undertaken before proceeding with a project.

#### **5. Efforts to Minimize Burdens on Small Entities**

All of our research projects will be limited to individual consumers, not businesses, so there will be no impact on small businesses or other small entities.

#### **6. Consequences of Less Frequent Collection and Obstacles to Burden Reduction**

The proposed generic clearance will allow the Bureau to collect a variety of types of data to develop a more complete understanding of consumers' decision-making regarding consumer financial products and the characteristics of markets for these products. This knowledge will improve the Office of Research's ability to inform the Bureau's policy work

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<sup>4</sup> Roger Tourangeau, Fredrick Conrad, and Mick Couper (2013), "The Science of Web Surveys." USA: Oxford University Press.

in developmental and formative ways. Where appropriate, the Office of Research plans to disseminate the results of this research by making versions of the data and analysis available publicly. Therefore, the data to be collected under this proposed generic clearance will not only improve the CFPB's understanding of consumer financial markets, but it will also increase the knowledge available to other policymakers and researchers.

The ability to collect data, through controlled trials in field and economic laboratory settings, allows the Bureau to control both the timing and direction of the research. By contrast, relying on naturally occurring data would leave the timing, content, and sample population outside of our control. These research projects allow us to isolate cause and effect by using randomization to control for variables that are unknowable or un-measurable in natural settings. In addition, these studies may be the best way to explore how consumers would behave in transactions environments that are just emerging and therefore novel.

For these reasons, data collections under this generic are important and valuable to the CFPB. Without these data collections, CFPB policy development will not be as well informed, and the CFPB will not be able to achieve its mission to understand how consumer financial markets work, the avenues for innovation in financial products and services, and potential risks to consumers.<sup>5</sup>

In addition, Congress has mandated that the CFPB, in consultation with the Financial Literacy and Education Commission and consistent with the National Strategy for Financial Literacy, “develop and implement a strategy to improve the financial literacy of consumers that includes measurable goals and objectives.” ((12 USC 5493 Sec. 1013(d)(1)). The CFPB will be unable to carry out this mandate if it does not have information about consumer experiences navigating the financial marketplace and what strategies can in fact improve financial literacy. If the CFPB does not have a clear understanding of what informational and other financial empowerment needs consumers have, and what financial education interventions work, its strategy, goals, and objectives will be without basis. Without periodic information collections on consumer experiences and best practices in financial education,

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<sup>5</sup> CFPB FY 2013 – FY 2017 Strategic Plan, goal 3, <http://www.consumerfinance.gov/strategic-plan/>

the CFPB will not have timely information to adjust its programming to meet consumer needs.”

## **7. Circumstances Requiring Special Information Collection**

Most information collections under this generic clearance will require a single interaction between the agency and respondents, but some information collections could require multiple interactions. For example, some studies may ask for subjects to return to the lab more than once, and this could occur within a single quarter. Note that in such cases the respondent would not typically have any burden beyond that single quarter. The CFPB will work to limit the burden on respondents and ensure that studies only include repeated interactions when the additional information gained is anticipated to be substantial and valuable to the study.

## **8. Consultation Outside the Agency**

In accordance with 5 CFR 1320.8(d)(1), the Bureau published a notice *Federal Register* on April 14<sup>th</sup>, 2014, at 79 FR 20865 allowing the public 60 days to comment on this proposed new generic information collection plan. That period closed on June 13<sup>th</sup>, 2014. Two comments were received in response to the notice in the Federal Register.

Both comments received were from industry associations claiming that the generic clearance process is not appropriate for the type of controlled trials in field and economic laboratory settings described in this document.

We disagree, and believe that the generic clearance process is appropriate for research projects with developmental and informative purposes. One commenter suggested that by nature, these studies would influence and inform the CFPB, even if they were not used to directly to provide a basis for specific policy at the Bureau. The commenter stated that “...research is an iterative and cumulative process. The information learned and data generated by initial studies inform and influence subsequent hypotheses investigated—and ultimately, the substantive policy choices made.” We agree with the commenter’s



characterization of the research process, but we disagree the implication that a generic PRA process is inappropriate. The CFPB is consistently informed by research and market developments from sources both within the Bureau and outside of the agency. The studies covered under this generic clearance will be pursued for developmental and informative purposes, to advance our scientific understanding of consumer credit markets and household finance, not for making regulatory decisions or developing or evaluating specific policies. For this reason, we believe that a generic clearance process is appropriate.

Commenters also suggested that a generic clearance process would allow the CFPB to be less accountable to the Paperwork Reduction Act, but we strongly disagree. Should OIRA approve of the generic clearance, the CFPB would continue to be required to submit “specific information collections . . . to OMB for review, in accordance with the terms of clearance set upon approval of the plan.”<sup>6</sup> In this way, the CFPB would continue to be accountable and continue to have effective regulatory oversight by the PRA process. Should the CFPB propose an information collection that falls “outside the scope” of the clearance, OIRA may require the CFPB to go through the normal clearance process.<sup>7</sup>

One commenter suggested that the Bureau preferred white papers to peer reviewed journals, which would limit public availability of our research. The Bureau feels that peer-reviewed journals and CFPB published white papers are different ways to make its research available to the public, targeted to different audiences. Although public availability of research findings can take longer through the peer-review process, the Office of Research is very committed to publishing as much as possible in these types of journals, as well as making sure that all of our analysis is rigorous and employing best practices in social science research. The CFPB is very committed to making its research public, and wants to be open and transparent about the work that we are doing.

## **9. Payments or Gifts to Respondents**

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<sup>6</sup> Cass R. Sunstein, OMB. Mem., *Paperwork Reduction Act – Generic Clearances* at 2 (May 28, 2010). All OMB memoranda cited in this supporting statement are available at [www.whitehouse.gov](http://www.whitehouse.gov).

<sup>7</sup> *Id.*

In order to support the mission of the CFPB, Bureau researchers are fundamentally interested in questions such as how consumers make choices and how they might respond to changes in the rules and regulations that govern a marketplace. Controlled trials in field and economic laboratory settings are an important tool for addressing these questions. In experiments, the researcher strips away extraneous features of the marketplace, leaving only the essence of the economic environment and the institutions that govern it, placing these factors under the researcher's control.

To ensure that the behaviors exhibited in these environments mirror behavior in other settings, the incentives motivating the behavior must be similar. This is difficult to achieve if subjects are presented with purely hypothetical scenarios since participants' choices may be guided by a variety of motivations.<sup>8</sup> For this reason it is standard practice in the sub-discipline of experimental economics to compensate subjects.<sup>9</sup> Sometimes subjects are paid a fixed amount for their participation, in essence appreciation for their time, but also additional money based on their choices in the study. Participants may be paid different amounts depending on their performance.<sup>10</sup> For each information collection request submitted under this generic plan, the amount of any proposed incentive, and a detailed justification therefore will be submitted.

We plan to pay no more than \$40 per subject for one hour of laboratory interview time, and \$50-75 per subject for a 1 ½ to 2 hour focus group session. If the CFPB plans to exceed these standard rates, the justification will be addressed with OMB on a case-by-case base.

## **10. Assurances of Confidentiality**

CFPB shall treat the information in accordance with applicable federal law, including but not limited to the Bureau's confidentiality rules, 12 C.F.R. Part 1070, and the

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<sup>8</sup> Rachel Croson (2005), "The Method of Experimental Economics," *International Negotiation* 10: 131-148.

<sup>9</sup> Vernon L. Smith (1976), "Experimental Economics: Induced Value Theory," *American Economic Review* 66(2): 274-279.

<sup>10</sup> Colin Camerer and Robin Hogarth (1999), "The Effects of Financial Incentives in Experiments: A Review and Capital-Labor-Production Framework" *Journal of Risk and Uncertainty* 19:7-42.

federal laws and regulations that apply to federal agencies for the protection of privacy, confidentiality, security and integrity.

The CFPB uses best practices of social science research design to inform the notice and consent vehicles. When required and when practicable, the CFPB provides notice to individuals that explain how their information will be used through appropriate vehicles, such as Privacy Notices, Privacy Act Statements or Informed Consent forms. Such notice is typically made available prior to the collection of information and explains whether the information is mandatory or voluntary; whether there are any opportunities to consent to sharing and submission of information; how the information will be secured and when a System of Records is created under the Privacy Act. In some instances, research may be based on observations or on information collected directly from a third party, and notice and consent may not be applicable.

When the CFPB collects information from third parties, commercial sources, and public databases, individuals to whom information may pertain do not have the opportunity to consent to uses, decline to provide information, or opt out. In such cases, it is those third parties' responsibility to provide any opportunity that may be required to consent, decline, or opt out of how their information may be used. As part of the due diligence process, the CFPB reviews the privacy policies or other public disclosures from the third-parties regarding their use of the information to verify that there are no contradictions with the research, and the CFPB encourages the development of notice and consent opportunities. The Bureau also evaluates the potential privacy risk and harm to individuals of specific research relative to that authorized purpose, and vets research proposals to ensure that they serve an authorized purpose.

The information collected under this generic clearance may include direct identifying personally identifiable information (PII). Typically direct identifying PII consists of contact information used to facilitate administration of research, and is separated from response data generated from the research. When the CFPB does use direct identifying PII in analyses, it does so in order to a) match across datasets; b) update data sets; c) weight datasets in order to make generalizations regarding a given population; and d) contact potential recipients of

of our studies to solicit information on consumer experiences with consumer financial products and services.

Conducting field and lab studies implicates privacy concerns because a breach of confidentiality, or re-identification, could result in an individual suffering harm. To reduce the risk of breaches of confidentiality, the CFPB designs recruitment materials so as not to disclose sensitive information about those it seeks to recruit, and uses appropriate security controls to protect information used in research. There is also risk related to misuse of information collected for research. Misuse might involve secondary types of research that are incompatible with the purposes of the initial collection, or a use of the information that individuals do not understand or to which they have not provided consent.

To reduce the risk of misuse, the CFPB minimizes access to PII based on need-to-know and stipulates, in most instances, that contractors that collect data on behalf of the Bureau remove or redact all direct identifying PII, as defined by the Bureau's privacy office, before transmitting data to the Bureau. Any contractor staff assigned to the project also sign confidentiality agreements. When appropriate, research results will be presented in aggregated form to protect the confidentiality of firms or consumers, and any publicly released version of data will use disclosure protection techniques (e.g., rounding, imputation, exclusion of some variables, aggregation of categorical responses) to minimize the risk of releasing personally identifiable or otherwise sensitive information (12 CFR 1070.40 *et seq.*). The Bureau treats the information collected from participating persons and institutions in a manner consistent with our confidentiality regulations, and all data and analyses are subject to legal and privacy review prior to their release.

Field and lab research will be conducted consistent with the Privacy Act and the E-Government Act. The requisite SORNs and PIAs will document the collection, use, disclosure, and retention of PII; the technical, administrative, and physical controls used to minimize privacy risks. The SORNs and PIAs will so be updated to reflect any changes.<sup>11</sup> Specific details regarding information handling will be specified in individual submissions under this generic clearance, but will conform to these broad guidelines.

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<sup>11</sup> The CFPB has two SORNs that will cover field and lab research: CFPB.021 Consumer Education and Engagement Records, 77 FR 60382; and CFPB.022 Market and Consumer Research Records, 77 FR 67802.

## **11. Justification for Sensitive Questions**

Questions about an individual's finances, for example, how much a person makes or how much their mortgage costs each month, are commonly considered sensitive. Nonetheless, Office of Research must sometimes ask such questions in order to understand consumer behavior and recognize financial trends and emergent risks relevant to consumers. The Bureau believes that we are justified in asking these types of sensitive questions because they are central to our mission.

In addition, some people may believe that questions about race or other socioeconomic factors may be considered sensitive. However, the CFPB is mandated to enforce fair lending laws and focus on the risks to vulnerable populations, including service members, older Americans, and lower-income consumers. For this reason, the Bureau often needs to ask these types of sensitive questions. For information collections involving questions of race/ethnicity, the CFPB will ensure that the OMB standards for Classification of Federal Data on Race and Ethnicity (Federal Register, October 30, 1997, Volume 62, Number 210, pages 58781-59790) are followed.

Respondent participation and all activities within the laboratory setting are voluntary, and subjects will be made aware of this fact. All respondents are free to opt-out of a data collection at any time and for any reason. Respondent participation in certain field studies that rely solely on indirect observation may not be voluntary and individual may not receive direct notice. In such cases, the Bureau does not intend to identify those individuals; uses standard social science research practices, including use of research review boards, to minimize risks of negative impacts to the Respondents; and vets field research to ensure they serve an authorized purpose.

The CFPB will ensure that a citation is made to any applicable System of Records Notice (SORN), and a Privacy Impact Assessment (PIA) in the individual submissions under this generic clearance and published research.

**12. Estimated Burden of Information Collection**

The following tables present estimates of the total number of respondents and burden hours for proposed collections. The number of respondents and average burden per response for a specific collection will depend on the methodology used for gathering information. These estimates, as well as the mix of collection methods used, may be adjusted. Further details on estimated respondents and burden will be provided in each approval request. The total number of burden hours estimated under this generic clearance is 17,100 hours.

For lab research studies, the CFPB estimates conducting four data collections in each of the three years. For field research studies, the CFPB expects three data collections in each of the three years, averaging 1,500 people per study and not to exceed 2,500 in any given study. There will be no financial burden on the respondents.

**Burden Hour Estimate for All Data Collections, 3-yr period**

Types of Projects	Subtotal
Lab Studies	3600
Field Studies	13,500
	<b>17,100</b>

**Burden Hour Estimate for Economic Studies in the Lab, 3-yr period**

Number of Projects	Number of Participants in a Project	Hours per Participant	Subtotal
12	200	1.5	3,600
			<b>3,600</b>

**Burden Hour Estimate for Economic Studies in the Field, 3-yr period**

Number of Projects	Number of Participants in a Project	Hours per Participant	Subtotal

9	1,500	1	13,500
			<b>13,500</b>

For each specific collection request submitted under this generic plan, a detailed estimate of the burdens of that particular request will be submitted.

**13. Estimated Total Annual Cost Burden to Respondents or Recordkeepers**

There will be no capital, operating, or maintenance costs to respondents as a result of participation in any information collection submitted under this generic clearance plan.

**14. Estimated Cost to the Federal Government**

For each data collection that falls under this generic clearance, costs to the Federal government will be estimated.

**15. Program Changes or Adjustments**

This is a new data collection.

**16. Plans for Tabulation, Statistical Analysis, and Publication**

The Bureau’s research projects are intended to expand scientific understanding of consumer decision-making in financial domains. Research findings will be published as technical articles that are publicly disseminated as working papers, published in peer-reviewed journals, or published as CFPB white papers. Collection, analysis, and publication of data will span the entire period of the anticipated generic clearance. The Office of Research plans to conduct an ongoing program of research and therefore plans to apply for an extension to the anticipated generic clearance when it expires.

Because of “publication lag,” a typical academic journal article is published one or more years after initial submission. The publication process for CFPB in-house products is shorter than that for external academic publications. Data collection for a professional publication typically takes at least three to four months, and in some cases could be longer.

Data analysis and article preparation typically lasts another three to four months. Thus professional articles in a peer-reviewed outlet of any kind are estimated to be published from 12 months to 36 months from the time that data collection can begin.<sup>12</sup>

Research projects submitted under this generic clearance are not intended to be published to the public as official government statistics that are representative of a population of regulatory interest. In particular, these projects will never involve nationally representative samples. Instead, publications will be along the lines of academic research, exploring consumer decision-making and behavior.

**17. Display of Expiration Date**

No exemption is requested.

**18. Exceptions to the Certification Requirement**

The Bureau certifies that this collection of information is consistent with the requirements of 5 CFR 1320.9, and the related provisions of 5 CFR 1320.8(b)(3) and is not seeking an exemption to these certification requirements.

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<sup>12</sup> P.K. Trivedi (2006), "An Analysis of Publication Lags in Econometrics" *Journal of Applied Econometrics* 8(1): 93-100.