

**REQUEST FOR APPROVAL UNDER THE “GENERIC INFORMATION
COLLECTION PLAN TO CONDUCT COGNITIVE RESEARCH AND
PILOT TESTING” (OMB CONTROL NUMBER: 3170-0055)**

PART A. GENERAL INFORMATION

1. **Title of the Information Collection (Study):** Making Ends Meet Survey Pilot

2. **Study Abstract:**

The survey will solicit information on the consumer’s experience related to household financial shocks and how households respond to those shocks, including the use of credit products that do and do not appear in traditional credit bureau agency records, using our internal Consumer Credit Panel database (CCP). The purpose of the pilot is to determine 1) whether the CCP can be used as an effective sampling frame for surveying consumers who use credit products that do not appear in the CCP, and 2) whether repeated surveys of consumers who appear in the CCP yield a sufficient response rate to make panel surveys a viable research tool. In addition, the project will include several variations in procedural aspects of the survey to study the effects of these variations on response rates.

3. **Type of Collection:**

a. **Will there be an informed consent?** Yes No N/A

Second page of survey includes privacy act statement and paperwork reduction act statement.

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

Cognitive Laboratory Study Pilot Testing

Other, Explain _____

c. **Will interviewers or facilitators be used?** Yes No N/A

4. **Personally Identifiable Information:**

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

1. **If yes, explain direct identifying PII and/or other PII and relevant uses.**

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

1. **If Applicable, has a System or Records Notice (SORN) been published?**

Yes No

2. **If Yes, provide SORN title and *Federal Register* citation for the SORN** Title:

c. 1. **Has the Privacy Impact Assessment (PIA) been published?**

Yes No Not Applicable

2. If Yes, provide link to PIA. If No, please describe that status of the PIA.:

Consumer Experience Research PIA

http://files.consumerfinance.gov/f/201406_cfpb_consumer-experience-research_pia.pdf

PART B. JUSTIFICATION

1. Purpose of the Study and Intended Uses of the Data:

The purpose of the pilot is to determine 1) whether the CCIP can be used as an effective sampling frame for surveying consumers who use credit products that do not appear in the CCIP, and 2) whether repeated surveys of consumers who appear in the CCIP yield a sufficient response rate to make panel surveys a viable research tool. In addition, the project will include several variations in procedural aspects of the survey to study the effects of these variations on response rates.

2. Payments or Gifts (Incentives) to Respondents:

Survey recipients will receive a cash payment, as an inducement to complete and return the survey questionnaire. Recipients who fail to respond to the initial survey solicitation may receive an additional cash inducement of a similar amount. Cash payments will be provided along with the mailing of the survey questionnaire and reminders.

Meta-analyses of mail surveys find that incentives given initially with the questionnaire yield significantly higher response rates than do incentives contingent on return of the survey or no incentives; furthermore, monetary incentives produce a stronger effect than non-monetary incentives.^{1,2} Many recurring federally-funded surveys use monetary incentives, including the Survey of Consumer Finances, the Survey of Income and Program Participation, and the National Survey of Drug Use and Health, and self-administered surveys such as the Survey of Doctorate Recipients, the National Survey of Recent College Graduates, and the National Survey of Mortgage Borrowers.³ Incentives have consistently been found to improve response rates across a variety of survey topics and modes.^{4,5} Incentives have been found to be cost-effective in different modes, often reducing the effort required to contact and interview sample persons or reduce the number of follow-up mailings.^{6,7,8}

¹ Allan H. Church, "Estimating the Effect of Incentives on Mail Survey Response Rates: A Meta-Analysis," *Public Opinion Quarterly* 57, no. 1 (1993): 62-79.

² Phil Edwards, Ian Roberts, Mike Clarke, Carolyn DiGuseppi, Sarah Pratap, Reinhard Wentz, and Irene Kwan, "Increasing Response Rates to Postal Questionnaires: Systematic Review," *British Medical Journal* 324 (2002):1183-1189.

³ Fan Zhang, "Incentive Experiments: NSF Experiences," NSF Working Paper, 2010.

⁴ Eleanor Singer (2002), "The Use of Incentives to Reduce Nonresponse in Household Surveys." In R.M. Groves, D.A. Dillman, J.L. Eltinge, and R.J.A. Little (eds), *Survey Nonresponse*. New York: Wiley, pp. 163-177.

⁵ Eleanor Singer, and Cong Ye (2013), "The Use and Effects of Incentives in Surveys." *The Annals of the American Academy of Political and Social Science*, 645 (1):112-141.

⁶ Martha Berlin et al. (1992), "An Experiment in Monetary Incentives." *Proceedings of the Survey Research Methods Section, American Statistical Association*, pp. 393-398.

First Survey wave: \$5-15
 Second Survey wave: \$5-15
 Total for two surveys: \$10-30

3. Assurances of Confidentiality and Justification for Sensitive Questions:

Second page of survey includes a Privacy Act Statement. Further, the survey as well as the cover letters state that responses to the survey are confidential pursuant to the Bureau’s regulations at 12 C.F.R. 1070.41, Non-disclosure of confidential information,

4. Estimated Burden of Information Collection:

Information Collection	No. of Respondents	Frequency (Response per Respondent)	Total Annual Responses	Average Response Time (hours)	Total Burden Hours
First Survey, send to 2,000 people, 25% response rate	500	1	500	.25	125
Second Survey, send to 2,000 people, 25% response rate	125	1	125	.25	25
Totals:	500*	////////////////	625	////////////////	150

*Respondents to the Second Survey are a subset of those who respond to the First Survey.

5. Federal Costs (estimated annual cost to the Federal government):

\$ 241,011

PART C. STATISTICAL METHODS

1. Respondent Universe and Selection Methods:

The CFPB will randomly sample consumers from the Consumer Credit Information Panel and supply the persistent consumer identifiers for the selected consumers to Experian. The sampling process may include sampling schemes other than simple random sampling, including stratification or oversampling populations of interest (such as consumers with low credit scores and consumers of different age groups). The initial survey sample is anticipated to be sent to approximately 2,000 people (with a 25% response rate, we expect 500 participants) with a follow-up survey sent approximately 5 months later to respondents from the initial survey (with a 25% response rate, we expect 125 participants).

2. Information Collection Procedures:

In identifying the survey panel, the CFPB will select the consumers to receive a survey from the de-identified credit records in the CCIP and send the persistent consumer identifier for each of

⁷ Eleanor Singer, John Van Hoewyk, and M. Patricia Maher (2000), “Experiments with Incentives in Telephone Surveys.” *Public Opinion Quarterly*, 64 (2): 171-188.

⁸ Gwen L. Alexander et al. (2008), “Effect of Incentives and Mailing Features on Recruitment for an Online Health Program.” *American Journal of Preventive Medicine*, 34 (5): 382-388.

these consumers to the Contractor. The Contractor will match the persistent consumer identifier to the consumer contact information that it maintains, prepare files for the survey vendor, provide customer response services including opt out, compile and depersonalize the results, and send the depersonalized results to the CFPB.

The study is expected to take place over two waves of surveys, with each wave consisting of a paper survey, cover letter, incentive, reminder postcard and an online survey component. Wave One will be the initial survey sent to up to 2,000 consumers. Wave Two is a separate follow-up survey that will only be administered to Wave One respondents (approx.500 participants). We expect 125 participants to respond is Wave Two.

3. Testing of Procedures or Methods:

This project is a test of procedures and methods. This request is limited to pilot testing the survey instrument and methodology, and the results of the pilot will not be combined with those from the full study. A new information collection request will be submitted before pursuing the full survey study.

4. Contact Information for Statistical Aspects of the Design:

Brian Bucks

Scott Fulford

PART D. CERTIFICATION 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;
- (h) It uses effective and efficient statistical survey methodology; and
- (i) It makes appropriate use of information technology.

**PART E. 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 collection is not intended to be published to the public as an official government statistic to be externally valid and representative of a population of interest. The results are intended to be internally valid, not necessarily externally valid.
- (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 CFPB program performance evaluation.
- (h) The results are not intended to be generalizable or otherwise draw inferences beyond the survey population

