BUREAU OF CONSUMER FINANCIAL PROTECTION

PAPERWORK REDUCTION ACT SUBMISSION

INFORMATION COLLECTION REQUEST

SUPPORTING STATEMENT PART A
DEBT COLLECTION QUANTITATIVE DISCLOSURE TESTING

(OMB CONTROL NUMBER: 3170-XXXX)

OMB TERMS OF CLEARANCE: Not applicable. This is a new collection. There are no terms of clearance at this time.

ABSTRACT:

The Dodd-Frank Wall Street Reform and Consumer Protection Act and other federal consumer financial laws authorize the Consumer Financial Protection Bureau (CFPB or Bureau) to engage in consumer protection rule writing. This PRA clearance request seeks approval from the Office of Management and Budget (OMB) to conduct a web survey of 8,000 individuals as part of the Bureau's research on debt collection disclosures.

The survey will explore consumer comprehension and decision making in response to debt collection disclosure forms. The survey will oversample respondents who have had experience with debt collection in the past.

JUSTIFICATION

1. Circumstances Necessitating the Data Collection

The Dodd-Frank Wall Street Reform and Consumer Protection Act (Pub.L. 111–203) and other federal consumer financial laws authorize the Consumer Financial Protection Bureau (CFPB or

Bureau) to engage in consumer protection rule writing. The Bureau relies on empirical evidence and rigorous research to improve its understanding of consumer financial markets for regulatory purposes.

On November 12th, 2013, the CFPB issued an advance notice of proposed rulemaking concerning debt collection (78 FR 67847). This information collection request is to collect data in support of CFPB rule-writing concerning debt collection. The main law that governs debt collection and protects consumers is the 1977 Fair Debt Collection Practices Act (FDCPA). 15 U.S.C. § 1692 In 2010, the Dodd–Frank Wall Street Reform and Consumer Protection Act (Pub.L. 111–203) revised the FDCPA, making the Bureau the first agency with the power to issue substantive rules under the statute. The Bureau may also address concerns related to debt collection using its authority under the Dodd-Frank Act to issue regulations concerning unfair, deceptive, or abusive acts or practices and to establish disclosures to assist consumers in understanding the costs, benefits, and risks associated with consumer financial products and services.

The FDCPA establishes the rights, liabilities, and responsibilities of participants in the debt collection system, including third-party debt collectors, debt buyers, and consumers. Among other things, the FDCPA was enacted to "eliminate abusive debt collection practices by debt collectors, [and] to insure that those debt collectors who refrain from using abusive debt collection practices are not competitively disadvantaged."

To achieve these purposes, the FDCPA: (1) prohibits debt collectors from engaging in abusive, deceptive, or unfair practices; (2) imposes restrictions on debt collectors' communications with consumers and on their communications with others to locate consumers; and (3) mandates a debt dispute process under which collectors provide consumers with basic information about their alleged debts, consumers have the right to dispute their alleged debts, and collectors must verify disputed debts before continuing to collect on them.

The FDCPA requires that debt collectors make certain disclosures as part of the collection process. Most notably, Section 809 of the FDCPA requires debt collectors to provide "validation notices" (sometimes called "g-notices") to consumers at the start of the collection process. These notices contain information about the debt collection process, such as the consumer's right to dispute the debt, as well as information about the debt being collected, such as the name of the debt's owner and the amount owed.

Certain other disclosures are also required by the FDCPA. For instance, Section 807(11) requires what is commonly called the "mini-Miranda" warning. In the collector's initial communication, it requires that collectors state that they are calling to collect a debt and that any information obtained during the course of the call may be used to collect that debt. For all communications, it also requires that debt collectors disclose that the communication is from a debt collector.

As part of a potential upcoming rulemaking implementing the FDCPA, the CFPB is considering whether additional information should be added to the validation notice to help consumers recognize whether they owe the debts. The CFPB also is considering whether additional information about consumer rights under the FDCPA should be disclosed to consumers at the time the validation notice is given. The CFPB further is considering whether consumers should receive disclosures in validation notices or subsequent communications regarding time-barred debts (i.e., debts that are older than the applicable state statute of limitations) or obsolete debts (i.e., debts that fall outside the generally 7-year reporting window included in the Fair Credit Reporting Act) or if other disclosures should be provided.

2. Use of the Information

The CFPB will use information gathered as part of this research study to help assess whether it can improve the clarity of forms used during debt collection to facilitate consumer decision making. Insights from this survey may provide information about how consumers respond to disclosures that can be leveraged to inform the development of future consumer disclosures.

The CFPB plans to conduct a web-based survey that would test a number of outstanding questions related to disclosures the Bureau is developing in conjunction with its debt collection rulemaking, especially with regard to "time-barred" and "obsolete" debt. This survey will test outstanding issues regarding the disclosures on a large sample of consumers possessing a broad range of demographic characteristics, oversampling consumers who indicate that they have experience with debts in collection.

The CFPB has retained a contractor to conduct the proposed research; the contractor will subcontract with a survey research firm to assist with administration of the web survey. The study will be conducted in English and will use the subcontractor's proprietary online panel. The survey will not involve ongoing data collection; it is a one-time web survey. Participation will be voluntary.

The CFPB plans to share aggregated findings from the survey with the public as appropriate, for example, in a future study on debt collection or in connection with any potential rulemakings related to debt collection.

3. Use of Information Technology

The survey will be a web-based data collection effort. Respondents will be recruited from GfK's KnowledgePanel, an online panel. Panelists will receive an email containing a personalized URL (e.g., www.researchsurvey/123456) for the web survey that includes a unique, non-sequential identifier for secure login. Upon clicking on the URL that our contractor will host, the respondent will be directed to the survey. They will be asked to read a validation notice and then answer questions based on a hypothetical situation. The web instrument will automatically guide the respondent through the survey questions. Respondents may save their responses and suspend/resume the survey where they left off. At any time, respondents will be able to refer to the validation notice.

Collecting data electronically will help to reduce errors and improve data reliability by:

- Providing paradata, helping us understand how people interact with the survey (i.e. how often they refer to the validation notice and for how long, and whether they return to previous questions during the survey);
- Providing uniform question sequencing;

- Automatically skipping questions, where appropriate, based on prior answers to questions;
- Randomizing disclosure forms to participants; and
- Rejecting invalid responses or data entries.

Additionally, the subcontractor may collect data on the length of the survey and unit and item non-response rates. This type of information can be used to improve the data collection process.

4. Efforts to Identify Duplication

The proposed consumer survey will not duplicate empirical research that the CFPB has identified to date. The debt collection disclosure form alternatives that will be tested through the survey are currently being developed, informed by previous qualitative research performed under OMB Control # 3170-0055, Generic Information Collection Plan to Conduct Cognitive Research and Pilot Testing under and information collection titled "Debt Collection Disclosure Testing Quantitative Study, Pretesting of Survey Questions." No empirical studies to date have quantitatively tested consumers' comprehension and decision making around these debt collection disclosure form alternatives. Moreover, the quantitative testing will not be duplicative of the qualitative form testing study. The qualitative study uses much smaller sample sizes to identify any large trends in consumers' reactions to specific aspects of the forms (e.g., the forms' formatting and layout). The quantitative form testing study will test consumers' comprehension and decision making using updated versions of the forms with a much larger and representative sample.

The CFPB will continue to monitor empirical research and related work by Federal Regulatory agencies and other researchers to ensure that the CFPB's research techniques reflect the most current knowledge and best practices.

5. Efforts to Minimize Burdens on Small Entities

Not applicable. The data collection will not burden small entities because the survey will only collect information from individuals.

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

Each surveyed individual will only participate once.

If the survey was not implemented, the CFPB would be limited in its ability to provide an analysis of how the debt collection disclosure form alternatives facilitate consumers' comprehension and decision making.

By implementing the survey, the CFPB will be able to test for differential patterns in form comprehension and decision making across different types of disclosures. If the survey was not implemented, the CFPB would not be able to assess these critical questions.

7. Circumstances Requiring Special Information Collection

There are no special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 C.F.R. 1320.5(d)(2).

8. Consultation Outside the Agency

In accordance with 5 C.F.R. 1320.8(d)(1), the Bureau published a *Federal Register* notice (FRN) allowing the public 60 days to comment on this proposed new, collection of information. Further, and in accordance with 5 C.F.R. 1320.5(a)(1)(iv), the Bureau has published a notice in the *Federal Register* allowing the public 30 days to comment to OMB on the submission of this information collection request. Further, as noted above the questions in this survey were pre-tested in pilot testing conducted under OMB Control #3170-0055.

The CFPB received 9 responsive comments during the 60-day notice period. Commenters included industry groups, consumer advocates, academics, and private citizens. Commenters were generally supportive of research into debt collection disclosures.
We also thoughtfully considered the areas of improvement that the commenters proposed, and we address those comments below.

Disclosure Notices

Several commenters expressed concern that the PRA submission materials did not include the disclosure notices and text to which survey respondents will be asked to respond. After careful consideration, the Bureau has concluded that the information contained in the Bureau's proposed Information Collection is sufficient to allow meaningful comment on the disclosure testing research project, including the research methodology and survey instrument. The Bureau aims in this research project to better understand consumer comprehension and decision making in response to debt collection disclosure forms. The information collection for which the Bureau is seeking OMB approval at this time is for the testing project itself, not the specific content of the draft disclosure forms. The Bureau believes that the specifics of particular test forms are not needed to comment on the general research methodology and survey instrument.

The Bureau has previously released examples of possible consumer disclosures as part of the Outline of Proposals Under Consideration for the Small Business Review Panel for Debt Collector and Debt Buyer Rulemaking. The Bureau has received and continues to receive feedback from stakeholders on these examples and related topics, and these disclosures continue to be under consideration and development. Any disclosures that become part of a rulemaking will be released at a later date and will be subject to public notice and comment.

Use of Hypothetical Scenario in Survey Questions

Commenters also expressed concern about the applicability of hypothetical questions to real world decisions. In connection with this study, the Bureau has, among other things, performed qualitative testing of disclosure forms and pretesting of survey questions. The Bureau has also explored different research methodology options with expert contractors and visiting scholars.

Most consumers have limited experience with debt collection, so asking about a hypothetical scenario can help the Bureau learn about consumer decision-making around debt collection while attracting a large enough respondent pool to test disclosures between groups with statistical confidence. In addition, for this research study, the Bureau is striving for internal validity, not external validity. In other words, the Bureau is interested in relative differences between groups in disclosure comprehension, depending on the disclosure that each group receives; the Bureau does not intend to rely on this research project to understand incidence rates in the population. Given the research design the Bureau plans to employ, the hypothetical nature of the questions should have similar effects (if any) on participants in all experimental groups, and therefore would be a common factor across groups. Comparing relative responses across groups, as opposed to measuring the incidence rate of comprehension for a particular group, should render any effect of the hypothetical nature of the questions irrelevant for the Bureau's purposes.

In fact, using "vignettes" (also called factorial or decision scenarios) to ask survey questions is a common methodology in the social sciences. Evidence suggests that what people express on web surveys is associated with their actual behavior in the real world,[1][2] and external validation of the vignette method suggests responses are somewhat consistent among different demographic groups.[3] For example, evidence suggests that how people respond in surveys using the vignette method of questioning is related to how they behave in field studies, although there are biases, including in the reporting of more prosocial behavioral norms compared to behavior in the real world.[4] There may also be biases in survey responses based on automatic processes which affect

[1] Couper, Mick, Singer, Eleanor, Conrad, Frederick, and Groves, Robert. 2010. "Experimental Studies of Disclosure Risk, Disclosure Harm, Topic Sensitivity, and Survey Participation." *Journal of Official Statistics*, 26(2): 287–300

[2] Hensher, David A. 2009. "Hypothetical Bias, Choice Experiments and Willingness to Pay." *Transportation Research Part B*, 44: 735-752.

[3] Teti, Andrea, Gross, Christiane, Knoll, Nina, and Bluher, Stefan. 2016. "Feasibility of the Factorial Survey Method in Aging Research: Consistency Effects Among Older Respondents." *Research on Aging*, 38(7): 715–741.

[4] Eifler, Stefanie. 2010. "Validity of a Factorial Survey Approach to the Analysis of Criminal Behavior." *Methodology*, 6(3):139–146

consumer behavior but of which the consumer is not consciously aware.[5] However, these biases are not limited to hypothetical questions, but rather are common in surveys in general.

The Bureau initially tested personalizing the vignette, asking respondents to imagine that this debt is their own) but found that a depersonalized scenario was more effective due to the sensitivity of debt collection. By depersonalizing the scenario (that is, by introducing Person A), the Bureau may still encounter some bias due to the hypothetical nature of the questions. Nevertheless, this technique also lowers the cognitive burden of response, allowing the respondent to move toward an empathetic stance and provide feedback on what the respondent thinks is the appropriate course of action for responding to the debt.

There are strategies to mitigate the impact of hypothetical bias that the CFPB employs in this research study. One way is through increased study salience, or policy consequentiality, such that “the participant cares about the results of the research, and believes that his or her answers will influence decisions to be made as a result of the research”.[6] With increased salience comes increased empathy and increased likelihood of reducing hypothetical bias. Indeed, the issue of topic salience and response quality is one that is well documented in the survey methodological literature.[7] Using best practices for increasing respondent salience for the study will combat some hypothetical bias and respondent apathy.[8] Another way to minimize hypothetical bias is to probe respondents for the certainty of their answers[9] by asking them how likely they think their

[5] Verneau, Fabio, La Barbera, Francesco, and Del Guidice, Teresa. 2017. “The Role of Implicit Associations in the Hypothetical Bias.” *The Journal of Consumer Affairs,* 51(2): 312-328.

[6] Fifer, Simon, Rose, John, and Greaves, Stephen. 2014. “Hypothetical Bias in Stated Choice Experiments: Is it a Problem? And if so, How do We Deal With it?” *Transportation Research Part A,* 61: 164-177.

[7] Calahan, C. A., & Schumm, W. R. 1995. “An Exploratory Analysis of Family Social Science Mail Survey Response Rates.” *Pshycological Reports*, *76*(3), 1379–1388.

[8] Nicolaas, Smith, P., Pickering, K., & Branson, C. 2015. “Increasing Response Rates in Postal Surveys While Controlling Costs: An Experimental Investigation.” *Social Research Practice*, (1), 3–16.

[9] Blumenschein, Karen, Blomquist, Glenn C., Johannesson, Magnus, Horn, Nancy, and Freeman, Patricia. 2007. “Eliciting Willingness to Pay Without Bias: Evidence from a Field Experiment.” *The Economic Journal*, 118(525): 114-137.

response is what they would actually do.[10] The Bureau has embedded questions in the survey that ask about the "likelihood" of various decisions as a proxy for confidence of response. The Bureau can measure a respondent's self-reported likelihood of taking certain actions in the "real world".

Other Survey Question Comments

Several commenters suggest that the Bureau track whether survey participants refer back to the notices during the online survey. Other commenters suggested that the Bureau look at differences in disclosure comprehension between subgroups. In addition, commenters urged the Bureau to ensure that the survey has enough statistical power to see differences between groups, and to perform robustness checks related to the study's overweighting of people with debt collection experience. The CFPB plans to do each of these things by collecting survey paradata (which tracks respondents' process flow throughout the survey) and individual difference measures, which we plan to use in the analysis of this study. We will also receive demographic information on respondents from Gfk as well.

In addition, several commenters expressed concern about changes to the survey that the Bureau may make after the "soft launch" and before the "full launch." The Bureau expects that any changes identified during the soft launch will not have PRA implications. The Bureau has already conducted cognitive interviews, to make sure the questions make sense to respondents. During the pilot, the Bureau will review the results to make sure responses seem reasonable. Because of the Bureau's pretesting work, however, the Bureau believes that there is a small probability of identifying concerns that would significantly change the questions of interest during the pilot.

The Bureau considered other commenter suggestions about whether to add or omit certain questions, but decided either that the Bureau found value in the current questions, or that the new questions were outside the scope of this study. One commenter disagreed with the Bureau's plan to ask respondents about their subjective beliefs in the survey instrument. The Bureau believes

[10] Hensher, David A. 2009. "Hypothetical Bias, Choice Experiments and Willingness to Pay." *Transportation Research Part B*, 44: 735-752.

that these questions are important controls to better understand how respondents are interpreting the disclosure forms. Another commenter suggested using financial literacy questions as controls; however, given that other research has indicated that many people have trouble answering traditional financial literacy questions, the Bureau decided to exclude such questions. Nevertheless, the Bureau does plan to include in the survey a measure of financial well-being, developed by the Bureau, to understand if responses vary as a function of this factor. While one commenter did not think the Bureau asked enough questions to ascertain whether respondents comprehend the disclosure, and another thought that the comprehension questions should be open-ended, the Bureau believes that the current number and scope of comprehension questions is sufficient to understand differences between forms. The Bureau also believes that its analysis plan will provide the Bureau with the answers it seeks with regard to consumer comprehension.

9. <u>Payments or Gifts to Respondents</u>

Survey recipients will receive a cash payment, currently expected to be five dollars, 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.

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 that non-monetary incentives.[11,12] 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.[13] Incentives have consistently been found to improve response rates

[11] 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.
[12] Phil Edwards, Ian Roberts, Mike Clarke, Carolyn DiGuiseppi, Sarah Pratap, Reinhard Wentz, and Irene Kwan, "Increasing Response Rates to Postal Questionnaires: Systematic Review," *British Medical Journal*324 (2002):1183-1189.
[13] Fan Zhang, "Incentive Experiments: NSF Experiences," NSF Working Paper, 2010.

across a variety of survey topics and modes.[14,15] 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.[16,17,18]

The Public will also have an opportunity to comment on the proposed disclosures when the Bureau publishes its notice of Proposed Rulemaking for the rule that this research will support

10. Assurances of Confidentiality

The CFPB will not provide an explicit pledge of confidentially. The CFPB shall treat the information in accordance with applicable federal law, and the Bureau's own privacy rules, and all applicable laws and regulations that apply to federal agencies for the protection of privacy, security and integrity of information.

The CFPB provides notice to individuals to explain how their information will be used through Privacy Act Statements. Privacy Act Statements are made available prior to the collection of information and explain whether the information is mandatory or voluntary; the authority for the information collection; whether there are any opportunities to consent to sharing and submission of information; how the information will be secured, and what System of Records applies.

In the survey's introduction, respondents will be informed about the study's purpose, the authority under which the data are being collected, that cooperation is voluntary, and that direct identifying information will not be provided to the CFPB or to any other party.

---

[14] 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.
[15] 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.
[16] Martha Berlin et al. (1992), "An Experiment in Monetary Incentives." *Proceedings of the Survey Research Methods Section, American Statistical Association*, pp. 393-398.
[17] Eleanor Singer, John Van Hoewyk, and M. Patricia Maher (2000), "Experiments with Incentives in Telephone Surveys." *Public Opinion Quarterly*, 64 (2): 171-188.
[18] 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.

Regarding respondents' personally identifiable information ("PII"), the subcontracted survey research firm uses user- and role-based access by separating identifying and non-identifying data into different database systems, each of which has its own defined security roles. Access to survey data is limited to the relevant research staff but explicitly denied to anybody who may deal with panelists' PII. Only the subcontractor's IT, Panel Management staff, and selected vendors with a need to know have access to panelists' PII. The CFPB will not have access to panelists' PII.

The contractor will deliver to the CFPB the data as received from the subcontracted survey research firm, so that CFPB can analyze the data. The CFPB will only receive and keep response data stripped of direct identifying PII. Moreover, in order to limit the amount of potentially identifying information that the CFPB receives through demographic variables, the CFPB will seek to receive demographic variables included in the data that shall be provided by the contractor/subcontractor in ranges (e.g., age 18-34) rather than specific values (e.g., age 21) where appropriate.

Conducting this survey 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 privacy, 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; any contractor staff assigned to the project also sign confidentiality agreements. Any responses transmitted to the Bureau from this survey will be de-identified and / or aggregated before the Bureau receives them. When appropriate, survey results will be presented in aggregated form to protect the privacy 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 C.F.R. 1070.40 et seq.). The Bureau treats the information collected from participating persons in a manner consistent with the Bureau's privacy regulations, and all data and analyses are subject to legal and privacy review prior to their release. For the assurances of confidentiality provided to respondents by KnowledgePanel, please see: http://www.knpanel.com/participate/privacy2.html.

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. Surveys will be 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; and the technical, administrative, and physical controls used to minimize privacy risks. This collection is covered by the CFPB.022 Market and Consumer Research Records, 77 FR 67802 System of Records Notice, and the Consumer Experience Research PIA.

11. Justification for Sensitive Questions

Questions about an individual's finances, for example, whether a person has experience with debt collection, are commonly considered sensitive. Nonetheless, the CFPB must ask these kinds of questions in order to understand consumer behavior and recognize financial trends and emergent risks relevant to consumers. Because these types of questions are central to the CFPB mission, we believe that we are justified in asking these types of sensitive questions.

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 risks to vulnerable populations, including service members, students, older Americans, and lower-income consumers. In addition, these types of questions are routinely asked by the online panel we are using for this study. For these reasons, we feel justified in asking these types of sensitive questions. For information collections involving questions of race/ethnicity, we 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 is voluntary; 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.

12. Estimated Burden of Information Collection

Information Collection Requirement	No. of Respondents	Frequency	Annual Responses	Average Response Time	Annual Burden Hours
Screening / Recruitment	17,750	1	17,750	0.05	888
Web Survey	8,000	1	8,000	0.33	2,667
Totals:	17,750*		25,750		3,555

*Respondents to the Web Survey are a subset of those who responded to the screener.

The screening and recruitment responses are estimated to require an average response time of .05 hours, as the number of screening questions will be limited. The estimate for average burden per response to the web survey is based on the contractors' study proposal and test plan.

13. Estimated Total Annual Cost Burden to Respondents or Recordkeepers

There are no capital/start-up or ongoing operation/maintenance costs associated with this information collection.

14. Estimated Cost to the Federal Government

There will be no annualized capital/start-up costs for the government to receive the survey information. The testing is funded with non-appropriated funds. The contract to carry out the study will cost $371,505.67.

15. Program Changes or Adjustments

This is a new, one-time information collection request. Therefore, all the burden is considered to be new burden and will be accounted for as a "program change" for the purposes of OMB's PRA inventory. The burden will be removed from OMB PRA inventory after the survey is completed.

16. Plans for Tabulation, Statistical Analysis, and Publication

The contractor's report will provide tabulations at the aggregate level. Once the data is tabulated, it will be presented to the CFPB along with an executive summary and detailed findings about consumer comprehension and decision-making related to our debt collection form alternatives for participants in the study.

The CFPB will also receive the underlying data from the contractor, to conduct our own additional analysis, if appropriate. As discussed above, the CFPB may share aggregate findings from the survey with the public as appropriate, for example, in connection with the release of a further study of debt collection, or in connection with any potential rulemaking related to debt collection. CFPB will only release unweighted analyses as part of any publications related to this study.

17. Display of Expiration Date

The CFPB plans to display the OMB number and expiration date for OMB approval in the survey instruments. Additionally, the OMB control number and expiration date will be displayed on the Federal government's electronic PRA docket at www.reginfo.gov.

18. Exceptions to the Certification Requirement

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

###