

# Debt Collection Model Validation Notice Qualitative Testing Moderator's Guide

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## Section 1: Introduction

Thank you for participating in this interview today. My name is \_\_\_\_\_, and I am with Fors Marsh Group, which is a private market research firm based in Arlington, Virginia. We are helping the Consumer Financial Protection Bureau gather information that will help the government understand how financial companies interact with consumers.

Today, we will be evaluating a notice that consumers receive from debt collectors. I will ask you a series of questions about the notice, so I can learn what works well on the notice and what, if anything, may need to change. Our goal is to make this notice as clear as possible for people like you who may receive it.

Today's session will last about 45 minutes.

There are a few things to cover before we get started:

- Your participation today is voluntary. If there are any questions you do not want to answer, please let me know, and we will move past them. It is also OK if you would like to stop at any point during today's session.
- Everything we talk about here will be kept confidential. That means your name will not be associated with anything you say in our reports.
- As a reminder, there are no wrong answers today. I did not create the notice, so please do not feel like you have to hold back on your thoughts to be polite to me. This is a test of how well the notice is working. It is not a test of your skills or abilities.
- There are some people who are involved in the project observing the session from the other room. We are also audio and video recording the session today. The video recording is from this camera [moderator point to camera]. After our discussion, I will write a report and will refer to the recordings to make sure that I accurately represent what was said. Even though people are observing, I want to reiterate that there are no wrong answers and that we are here to learn from you, so please feel free to speak candidly.
- To understand your thoughts and reactions as you review the forms, I would like you to think out loud as you are reviewing the notice and answering questions. I recognize that talking out loud while performing a task may be unusual, so I may give you reminders throughout the session.

Do you have any questions before we get started? Please take a moment to review and sign the informed consent form.

Please also take the time to read the Privacy Act and PRA Statements

#### Paperwork Reduction Act Statement.

According to the Paperwork Reduction Act of 1995, an agency may not conduct or sponsor and a person is not required to respond to a collection of information unless it displays a valid OMB control number. The OMB control number for this collection is **3170-0022**. It expires on **12/31/2022**. Comments regarding this collection of information, including the estimated response time, suggestions for improving the usefulness of the information, or suggestions for reducing the burden to respond to this collection should be submitted to the Consumer Financial Protection Bureau (Attention: PRA Office), 1700 G Street NW, Washington, DC 20552, or by email to [PRA\\_comments@cfpb.gov](mailto:PRA_comments@cfpb.gov).

#### **Privacy Act Statement**

##### **5 U.S.C. 552a(e)(3)**

The information you provide through your responses to the Fors Marsh Group (FMG) will assist the interview sponsor, the Consumer Financial Protection Bureau (“Bureau”), in interviewing participants to assess the effectiveness of the Bureau’s model debt collection validation notices.

The FMG will obtain and access audio and video records, and a live-stream may also be provided to a select number of Bureau employees. The Bureau will only obtain, and access, de-identified results of the audio and video recordings.

Information collected will be treated in accordance with the System of Records Notice (“SORN”), CFPB.022 - Market and Consumer Research Records, 83 FR 23435. Although the Bureau does not anticipate further disclosing the information provided, it may be disclosed as indicated in the Routine Uses described in the SORN. Direct identifying information will only be used to determine eligibility for the interview and will be kept private except as required by law.

This collection of information is authorized by Pub. L. No. 111-203, Title X, Sections 1013 and 1022, codified at 12 U.S.C. §§ 5493 and 5512.

Participation is voluntary.

Okay, I am going to start the recording.

## Section 2: Initial Version of the Validation Notice

[Moderator Instruction: Present sample notice in initial format (i.e., paper or digital).

Section 2 Purpose: Validate that the notice is performing as expected. The introduction to Section 2 informs the participant that the debt is their own to reduce participant ambiguity in how to respond. Subsection 2D informs the participant that the debt is not believed to be their own to assess the performance of the dispute language.

Available additional probes to use throughout Section 2:

- Can you describe how you arrived at that answer?
- How did you arrive at that response?
- What makes you say that?
- Tell me more about that.]

Okay, let's imagine that you are at your home or office and you are going through your [mail/email]. In this scenario, your name is [insert name on model validation notice] and you owe this debt. Please open up this [envelope/digital form] and review the notice. When you are done, tell me that you are finished.

### Section 2A: Initial Reactions and Behavioral Intentions

[Section 2A Purpose: Validate that consumers have the information needed about the options available to them for proceeding. We assess initial reactions and intended behavior before additional questions are asked about specific language that may bias participants' reported intended behavior.

Section 2A Research Questions: (1) How effectively does the validation notice perform in providing the information consumers need to make a decision about how to proceed? (2) How effectively does the validation notice perform in communicating consumers' options about how to proceed?]

First, I would like to ask you a few questions to understand your initial reactions to the notice.

2A.1. What are your initial thoughts about the notice?

a. What is the purpose of the notice?

2A.2. What would you do, if anything, in response to this notice?  
[pause and wait for them to answer]

- a. With that in mind, how easy or difficult is it to do that next step using this notice?
  - b. [Continue as necessary] What would you do after that step?
  - c. Do you feel that you must respond to this notice? [If necessary] In other words, is a response to this notice mandatory? What makes you say that?
- 2A.3. Do you have the information you need to make a decision about what to do next?
- a. What information leads you to say that?
  - b. [If necessary] What are your options for what you can do next?
- 2A.4. What do you think would happen if you ignored this notice and did not do anything? Tell me more about that.

## **Section 2B: Debt Information and Payment**

[Section 2B Purpose: Assess the performance of the information presented to consumers about debt information and payment by probing consumers' comprehension.]

Section 2B Research Question: (1) How effectively does the notice communicate key information about the debt and payment options to consumers? (2) How noticeable is information about the debt and payment options?]

Now, I would like to ask you a few questions to understand how well the notice communicates information about the debt. It is perfectly fine to say, "I don't know" if you do not think you can answer the question.

- 2B.1. If you wanted more information about the debt, who could you contact?
- a. Please show and explain how you could receive more information about the debt.
  - b. [If needed] Where did you find their contact information?
  - c. What do you think would happen next if you contacted them?
- 2B.2. What kind of debt is this? What makes you say that?

- a. Is there a brand associated with the debt?
  - b. Who is Main Street Department Store?
- 2B.3. According to the notice, how much do you owe on this debt as of this date [point to date on the notice]?
- 2B.4. Who do you owe the money to now?
- 2B.5. Does the amount you owe include any interest? If so, how much?
- 2B.6. Who charged the interest on this debt? When?
- 2B.7. Does the amount you owe include any fees? If so, how much?
- 2B.8. Who charged the fees on this debt? When?
- 2B.9. Have you made any payments on the debt? If so, how much have you paid? When?
- 2B.10. According to the notice, do you think interest and fees are currently increasing? What makes you say that?
- 2B.11. According to this notice, how much did you originally owe on this debt?
- a. [If necessary] Is there any information on the notice that speaks to that?
- 2B.12. What is your account number with the company that extended you the credit?
- 2B.13. Who should you send the payment to?
- a. Please show and explain how you could send a payment.
  - b. [If needed] From what information on the notice did you learn that you can send a payment?
- 2B.14. Based on what you see in this notice, what, if anything, could you do if you are interested in payment options? Tell me more about that.

## **Section 2C: Additional Options**

[Section 2C Purpose: Assess the performance of the information presented about what else consumers can do in response to the notice.]

Section 2C Research Question: (1) How effectively does the notice present key information about additional options available to consumers and their associated rights with these options?]

Now, I would like to ask you some questions to understand whether the information presented about additional options available to you is clear. It is perfectly fine to say, “I don’t know” if you do not think you can answer the question.

2C.1. If you wanted the debt collector to stop or limit contact with you, could you do that? Tell me how you arrived at that answer.

- a. If you wanted more information about limiting contact, could you get it? Where could you look for that information?

2C.2. What could you do if you wanted more information about debt collection in general?

- a. Please show and explain how you could receive more information about debt collection in general.
- a. What are your thoughts on the website that is listed? What do you think the site is for?

2C.3. What could you do if you wanted to request this notice in Spanish?

- a. Please show and explain how you could request a version of this notice in Spanish.

## **Section 2D: Disputing Debt**

[Section 2D Purpose: Assess the performance of the information presented about disputing the debt. In this scenario, the moderator informs the participant that they do not believe that the debt is theirs.]

Section 2D Research Question: (1) How effectively does the notice present key information about disputing the debt and their associated rights with this activity?]

In this next scenario, let’s say that you received this notice, but you think that you do not owe the debt. It is perfectly fine to say, “I don’t know” if you do not think you can answer the question.

2D.1. If you think the debt does not belong to you, what can you do?

- a. Please show and explain how you could respond if you think the debt does not belong to you. [If needed] Could you dispute the debt?
  - b. What would happen next? What do you think would happen to the debt?
  - c. What does the word “dispute” mean to you?
  - d. What happens if you write to dispute before November 12th? What about if you write after November 12th? Would you be permitted to write to the debt collector after November 12th if you do not think you owe the debt?
  - e. What happens if you call to dispute?
  - f. Is there a difference in what happens if you write or call to dispute?
  - g. [If needed] Could you use this form to write in to dispute? How could you do that?
- 2D.2. What could you do if you recognize the debt as one you owe, but some information about the debt is incorrect?
- a. Please show and explain how you could respond if you recognize the debt as one you owe, but some information about the debt is incorrect.
- 2D.3. What if you recognize the debt as one you owe, but think you should pay it to another collector?
- a. Please show and explain how you could respond if you recognize the debt as one you owe, but think you should pay it to another collector.
- 2D.4. What could you do if you are not sure whether or not you owe the debt?
- a. Please show and explain how you could respond if you are not sure whether or not you owe the debt.

### **Section 2E: Follow-up Questions**

[Section 2E Purpose: Assess the overall performance of the validation notice by probing about consumers’ experience reviewing different sections. The moderator will ask these questions while sitting next to the participant.]



Section 2E Research Questions: (1) How noticeable are the different sections of information on the notice? (2) Is there any information that is confusing or unclear to consumers?]

Next, I would like to ask you some questions to understand how noticeable the information was on the notice.

2E.1. [Moderator point to each section on the notice. Repeat 2E.1 for each section.] Did you notice this section of the notice?

a. Did you find any of this information confusing or unclear?

2E.2. What questions, if any, do you have after reading this notice?

### **Section 3: Alternate Version of the Validation Notice**

[Section 3 Purpose: Assess the alternate version of the notice to confirm that the performance of the notice is not negatively impacted.]

Section 3 Research Question: (1) Does the alternate version of the notice change how the validation notice performs?

Available additional probes to use throughout Section 3:

- Can you describe how you arrived at that answer?
- How did you arrive at that response?
- What makes you say that?
- Tell me more about that.]

Now, I will show you the [paper/digital] version of this notice. Imagine you receive this version by [email/mail] and that you owe this debt. Please review this version of the notice.

3.1 Please show and explain how you could receive more information about the debt.

3.2 Please show and explain how you could send a payment.

3.3 Please show and explain how you could receive more information about debt collection in general.

3.4 Please show and explain how you could request a version of this notice in Spanish.

3.5 Please show and explain how you could respond if you think the debt does not belong to you.

a. Would you write or call? What makes you say that?

- 3.6 Please show and explain how you could respond if you recognize the debt as one you owe, but some information about the debt is incorrect.
- 3.7 Please show and explain how you could respond if you recognize the debt as one you owe, but think you should pay it to another collector.
- 3.8 Please show and explain how you could respond if you are not sure whether or not you owe the debt.
- 3.9 Thinking about the previous version that you reviewed, how does this version compare?
- 3.10 Do you find this [paper/digital] version more or less useful than the [paper/digital] version? What makes you say that?
- 3.11 What differences, if any, are there between the two versions?

#### **Section 4: Closing**

Thank you so much for coming in today. We are all done. Those are all the questions I have for you. We really appreciate your time and participation today.