



OCC Trust in Banking Study

Data Collection Protocol and Materials Plan

Ipsos developed this comprehensive data collection protocol and materials plan to guide the successful execution of the OCC Consumer Trust in Banking focus group study. This plan will outline our data collection, analysis, and management processes and serve as a roadmap for both Ipsos and the OCC, ensuring transparency, consistency, and adherence to best practices throughout the study.

Data Collection and Analysis

This section outlines the procedures and methodologies used to gather, record, and analyze data for the study. This includes an overview of the processes involved in recruiting participants, conducting focus group sessions, and ensuring the integrity and confidentiality of the collected data. It also describes the tools and techniques that will be used to capture insights, including recording, transcribing, and coding practices.

Overview of Approach

Within 14 business days following OMB clearance, Ipsos will recruit, schedule, and begin conducting 20 virtual focus group sessions, each consisting of 4-5 participants. We anticipate conducting 20 focus groups in English, with the option to conduct an additional 2 focus groups in Spanish if deemed necessary by the OCC. Focus groups will take place over a span of up to 3 weeks. Each focus group will run approximately 60 minutes in length and include a trained moderator and notetaker. The moderator will facilitate the discussion and the notetaker will take notes and share follow-up questions as needed. All focus group sessions will be recorded and transcribed.

Before Fieldwork

Participant Recruitment and Grouping Strategy

Data collection from the recruitment screener will be conducted by our recruitment vendor, Limelight Insights. Participants will be screened based on a set of predefined eligibility criteria, including key demographics like age, income, and race/ethnicity (**see Appendix A** for full list of screener questions), aligned with OCC research objectives.

Limelight Insights will recruit participants via email. The email invitation (**see Appendix B**) will briefly introduce the study. This email will contain a link to a screener survey that interested individuals can complete and that will be used to determine their eligibility to participate in this study. Individuals who meet eligibility

criteria will receive a follow-up email from Limelight Insights (**see Appendix B**) confirming their eligibility and providing a link to schedule a focus group session, offering multiple time slots to accommodate different schedules. Ahead of their scheduled focus group session, Limelight Insights will send reminder emails (**see Appendix B**) to reiterate the session details and include any last-minute instructions, reducing the risk of no shows. The flowchart below shows the general process respondents will experience moving from initial recruitment to final focus group participation.

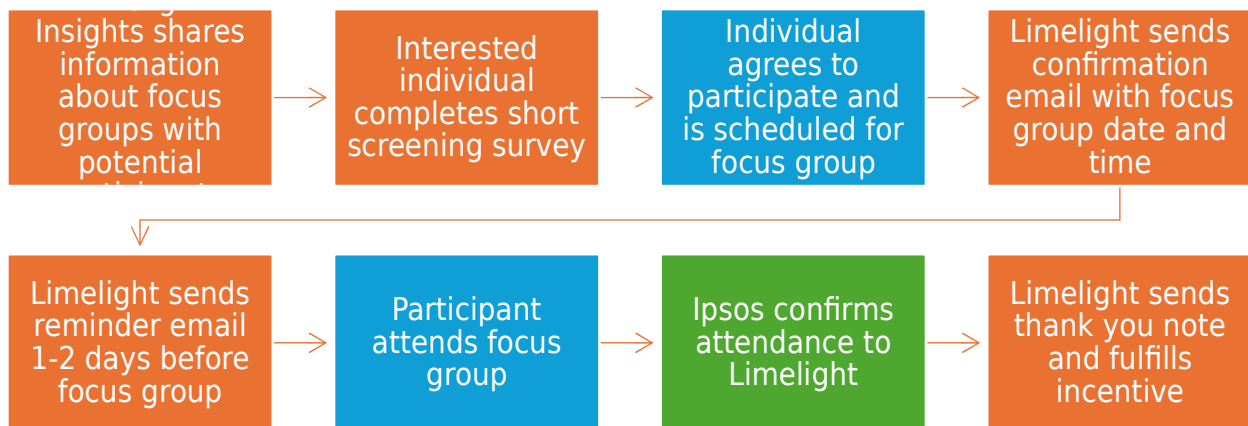


Figure 1. Flowchart of general recruitment process.

To track responses to screener questions, Ms. Kasprzycki will create a recruitment grid that will be shared with Limelight Insights. This grid will include multiple tabs for filling in participant responses to screener items, tracking quotas, and assigning participants to focus group sessions. Throughout the recruitment process, the Ipsos team will regularly monitor the shared grid to confirm participants who meet eligibility criteria.

Using the grouping criteria specified in the Research and Data Analysis Plan, Limelight Insights will segment participants into homogenous groupings through a multi-step process. First, they will screen participants based on predefined eligibility criteria, capturing key demographics, including age, income, race/ethnicity, and banking status. Next, Limelight Insights will schedule eligible participants for focus groups according to their availability and qualifying characteristics.

Once the initial groupings are created, Dr. Giffort will review the composition of each focus group to ensure balanced group compositions based on the specified criteria. Any adjustments needed to meet quotas or to enhance group dynamics will be made at this stage. The final group compositions will be confirmed with the OCC before finalizing with the recruitment vendor.

More details on the recruitment vendor, screener development, and participant recruitment are available in the Research and Data Analysis Plan.



Participant Consent

Informed consent ensures that the research team has provided participants with the information needed to make an informed decision about whether to participate in the research. Prior to focus group sessions, all participants will receive a Participant Agreement Form (**see Appendix C**), which describes the study's purpose, the voluntary nature of participation, and what to expect during the focus group. The form will also include references to video recording and information about participant confidentiality. Participants will also sign that they will not disclose any information about discussion from the sessions. Participants will sign the consent form prior to joining their scheduled session. In addition, the moderator will review these parameters at the start of the focus group session.

Limelight Insights will handle all communication with the participants, including scheduling, obtaining consent forms, and sending reminder emails and/or phone calls for their scheduled focus group session. If a participant misses their focus group session or encounters difficulties accessing the focus group link, Limelight Insights will handle all communication and provide necessary support.

Data Collection Instrument

To guide focus group sessions, Ipsos will develop a focus group moderator's guide (**see Appendix D**) containing topics of interest, mapped to the overarching research objectives and questions for this study. If needed, the moderator's guide will be translated for Spanish language focus group sessions.

The moderator's guide will contain questions and probes that focus on understanding consumer perceptions, attitudes, and experiences related to FSP, BSP, and trust in banking. This includes exploring the following broad topics:

- Understanding of different financial institutions
- Usage and significance of BPS
- Factors influencing trust in banking
- Understanding and perceptions of banking regulators

We will pre-test the moderator's guide via a pilot session prior to fieldwork with Ipsos employees. OCC team members will be able to observe the pilot session in real-time via Teams. Following the pilot session, Ipsos will debrief with the OCC team to assess the data collection instrument and make any needed adjustments to the questions and probes, the order of questions, and the length of the guide. Following the completion of the first 3-4 focus groups, Ipsos will facilitate a brainstorming workshop with stakeholders from OCC to review preliminary findings and identify possible changes to the moderator guide's questions ahead of the remaining sessions.



During Fieldwork

Recording sessions

Ipsos will offer digital recording and livestreaming for remote observation of focus group sessions.

For the virtual focus groups, Ms. Kasprzycki and Dr. Giffort will employ secure, high-quality video conferencing platforms, including Microsoft Teams and Zoom. These platforms were carefully selected to provide a seamless experience for participants, researchers, and observers alike. The technology will support live video feeds, interactive discussions, and real-time data collection, creating an engaging and productive research environment. In addition, both platforms offer user-friendly interfaces and compatibility with assistive technologies, ensuring accessibility for all participants.

Ipsos will leverage Zoom for the virtual focus groups. This platform is the most accessible for all participants and most compatible with assistive technology. Ipsos has established Zoom as the preferred platform for virtual focus groups and individual interviews when conducting research with participants who have disabilities and leverage assistive technology. Each participant will receive a Zoom link to join the virtual focus group. Before the group begins, Dr. Giffort and our IT specialist, Sam Tabascio, will ensure each participant successfully connects their audio and turns on their video.

Ms. Kasprzycki will also set up a virtual backroom for the project team and OCC to observe the sessions in real time using Microsoft Teams. Ms. Kasprzycki will send Microsoft Teams links to all observers. Mr. Tabascio will join the Teams meeting via lab computer, where the Zoom meeting is streaming, and share the lab computer's screen with the Zoom window. Observers will join the Teams meeting on mute and off camera while being able to view and hear the Zoom. Each observer can use the Teams chat to submit probes to the moderator, ask questions, and capture observations. While Dr. Giffort moderates in Zoom, she will also open the Microsoft Teams meeting in a separate window to chat with the backroom observers, fielding questions or troubleshooting as needed.

Notetaking

A notetaker will observe each focus group session to capture notes in real time. To ensure seamless and efficient data management during focus group sessions and subsequent analysis, we will leverage a cloud-based platform that combines features of a spreadsheet with those of a database, allowing for centralized data management, real-time (and remote) collaboration, and security features that ensure sensitive information is protected and only accessible to authorized users.

Transcribing Data



To facilitate accurate and efficient documentation of our focus group sessions, we will leverage Zoom's built-in transcription feature to generate real-time transcripts. This feature allows us to capture spoken content during the sessions, providing a valuable written record for subsequent analysis. However, it's important to note that while Zoom's transcription technology is advanced, it may not be flawless. Factors such as background noise, overlapping speech, and technical jargon can influence the accuracy of transcripts. Following each focus group session, the moderator and notetaker will review transcripts for accuracy. Any PII will be redacted during this process.

Debriefing

To recap the day's themes and trends and update any OCC team members who were unable to observe the focus groups, Ipsos will host a 30-minute debrief over Teams at the end of each day. Debrief sessions are designed to provide a review of the day's focus group discussions, offering a discussion of emerging themes and any unexpected insights from that day. The debrief will also include an assessment of how the day's discussions align with the overall research objectives, ensuring that the study remains on track. The debrief is also an opportunity for OCC team members to ask questions, provide input, and refine the focus as needed for subsequent sessions to make sure that the research remains responsive to evolving insights. The moderator will also highlight any logistical considerations or challenges faced during the day, allowing for prompt resolution.

After Fieldwork

Participant Reimbursement

All incentive processing and communication will be managed by Limelight Insights. If a participant asks the moderator about their incentive, the moderator will direct them back to Limelight Insights. Each participant who completes the entire 60-minute focus group will receive their \$75 incentive, which will be distributed by Limelight Insights.

Coding and Analyzing Data

Using the finalized moderator guide, Ipsos will develop a notetaking document along with an initial code frame for notetakers to leverage throughout focus groups. Qualitative coding is a process of systematically categorizing excerpts in qualitative data to identify themes and patterns, which ultimately supports efficient and thorough analysis and reporting.



Dr. Giffort will generate an initial coding frame (**See Appendix E**) drawing from final project objectives and the moderator's guide question set. Once the moderator's guide is finalized, Dr. Giffort will work collaboratively with the OCC to revise the initial code frame. We will share this code frame with OCC prior to the start of data collection to ensure we are accurately and clearly capturing insights of interest.

Once the coding frame is defined, Dr. Giffort will run a coding workshop with analysts. First, Dr. Giffort will walk them through the reasoning behind the frame, key indicators of each code, and method for capturing in the notetaking document. Then, the analysts will practice their coding during our pilot session ahead of fieldwork. Following the pilot, Dr. Giffort will work with the analysts to refine the coding frame based on results and notes from the pilot.

The coding frame is only a starting point and the notetakers will identify additional codes as needed and relevant throughout fieldwork. Typically, after the first 3-4 focus groups, we can finalize our coding frame and leverage the same frame for all remaining sessions. Once we run 3-4 focus groups for the OCC, we will provide a copy of the updated coding frame and ask that the OCC review and approve the frame before we leverage it for the rest of sessions. This iterative process of revising the coding frame ensures flexibility and adaptability, which are essential components of qualitative research.

Due to the real-time nature of qualitative focus groups, and process of manual notetaking and coding, not all coded excerpts will be captured. To ensure our coding process is comprehensive, once transcripts are available, analysts will leverage transcripts to fill in any gaps in coding.

Throughout the focus group period, Dr. Giffort will review session notes, coding, and transcripts with the research team, and representatives of OCC, if desired, to identify emerging themes and potential areas for additional probing.

To ensure that the identification of themes and patterns is systematic, we will employ the following procedures:

- **Development of Codebook:** A detailed codebook will be developed, which will document each code, its definition, and examples (see Appendix E). This codebook will be shared with the OCC for review and approval.
- **Pilot Testing:** We will conduct a pilot session with Ipsos employees to test our initial coding frame. This will allow us to refine our codes and ensure they capture relevant themes.
- **Real-Time Coding:** Ipsos notetakers will code data in real-time during sessions via the cloud-based notetaking platform and recode by rewatching sessions as needed.



- **Iterative Coding:** Our coding process will be iterative. After coding the first few transcripts, we will review the codes and themes with the OCC team to ensure that they align with study objectives.
- **Coding Oversight:** Dr. Giffort will provide oversight of the coding process, reviewing transcripts with coders as part of the daily debriefing to identify and address points of confusion or inconsistency.

These procedures ensure a comprehensive and systematic approach to coding and analyzing the data, allowing us to produce reliable data to address the OCC's research objectives.

Data Management and Storage

Effective data management and storage are critical components for ensuring the confidentiality and integrity of participant information. This section outlines protocols and measures Ipsos will implement to protect participant data throughout the research process, from the collection and handling of PII to the secure storage and retention of focus group recordings and transcripts.

Protecting Participant Information

All data collected for this study will be kept confidential and will be subject to stringent privacy protections.

Limelight Insights will collect PII, such as participant first and last names, for recruitment screening purposes. This information will be stored securely and separately from focus group data. PII will be removed from the client-facing version of the participant grid.

We will implement several measures during focus group sessions to ensure participant privacy. Before we begin recording the Zoom focus group session, Dr. Giffort will ensure that all participant names displayed on the Zoom screen are replaced with pre-assigned participant IDs, rather than showing first and last names. At the start of the session, Dr. Giffort will read a script from the moderator's guide (**Appendix D**) that reiterates the importance of confidentiality, as stated in the signed Participant Agreement Form (**Appendix C**). Participants will be reminded not to repeat any details or discussions outside of the session. Additionally, when introducing themselves, participants will be instructed to use only their first names or a preferred nickname, and to avoid using last names. If a participant reveals PII during the session, Dr. Giffort will remind all participants about the confidentiality



agreement and request that participants refrain from sharing any further PII. The notetaker will document the time and nature of any accidental PII disclosure during the session to share with our IT team. After the session concludes, the recorded video and audio will be shared via SFTP with our IT specialist, Sam Tabascio, who will scrub the recording to remove or obscure any PII that was inadvertently shared during the session.

In addition to the above measures, video and audio recordings of focus group sessions, transcripts, and written notes made by the project staff will be used for analysis and reporting only. The recordings and transcripts will be stored securely at Ipsos and made accessible only to authorized staff at Ipsos and the OCC. Recordings and transcripts will not be made public or used for any advertising or commercial purposes. Identities of focus group participants will not be included in transcripts, notes, or reports. For all session transcripts, Dr. Giffort and the notetaker will review and edit to exclude any PII. Any instances of PII in the transcript will be replaced with generic identifiers (e.g., [REDACTED]).

Ipsos will report summarized results from focus group sessions with excerpts (quotes) from individuals not identified by name, so participants' identities will not be known to report readers. We will not disclose any information that can be used to identify participants or that can be used to connect participants' identities to information presented in reports.

Storing and Retaining Data

Focus group recordings, transcripts, and coding and analysis-related documents will be securely stored in a restricted Ipsos network folder with access limited to project team members. The study records will be retained for 90 days following the end of the contract. Within 5 days of the completion of all focus groups, Ipsos will share transcripts (scrubbed of any PII) with the OCC via SFTP. Ipsos shall not reveal any incidental confidential information to the OCC. All incidental confidential information will be edited out prior to submission to the OCC. The electronic data transferred to the OCC using the secure file transfer protocol (SFTP) server will be retained for 90 days after the study's conclusion.

Our rigorous data handling protocols and commitment to privacy ensure that all participant information remains secure and confidential throughout the entire research process.

Appendices

Appendix A: Screener



Ipsos will add the finalized screener here following the OCC review and approval.

Appendix B: Vendor Recruitment Materials

Ipsos will add recruitment materials from our vendor here ahead of OMB approval, including materials used for email invitations and follow-ups.

Appendix C: Research Participation Agreement

This research study is being conducted by Ipsos-Insight, LLC (“**Ipsos**”), a market research service provider based in the United States, on behalf of the Office of the Comptroller of the Currency. As a participant, you will be asked to: share your thoughts and feelings about banks and banking products and services.

Please be aware that all the information you provide will be kept confidential and your name will not be associated with your specific comments or suggestions at any time. The findings of this research will be shared only with the **Ipsos** research team and the **Office of the Comptroller of the Currency**.

Focus Group: The session will take approximately 60 minutes of your time.

Your participation is voluntary, this means you have the right to withdraw from the focus group at any time. Please notify the study moderator at any time during the research session if you wish to withdraw. Any data that was collected during the screening process or during the session will not be used in the study if you decide to withdraw.

If you consent to participate in this study, we will ask you some questions to determine if you meet the criteria for participation. If you meet the criteria, you will be invited to participate in the study and in consideration for that participation, you will receive an incentive of \$75 for your participation, whether you complete the focus group or not. **Ipsos** will not base this incentive in any way on the opinions you express in this study.

You will be asked to review and provide your opinions of and your experiences with new concepts, products, or packaging (the “**Confidential Information**”) that are still in the early stages of development. You may not photograph or copy any of the **Confidential Information**, or discuss or share it with anyone, including but not limited to family, friends, or on social media.

The study moderator and the **Sponsor** have the right to stop your participation in this study at any time, with or without your consent. Reasons for removing you from the study may include uncooperative behavior, inability to focus on tasks or follow instructions.



Risks of Participating in the Study:

There are no physical risks associated with participating in this study.

Benefits of Participating in the Study:

There are no direct benefits for participating in this study.

PRIVACY NOTICE

The categories of personal data **Ipsos will collect** about you through your involvement in the research include:

- *Your first and last name*
- *Your age, gender, and racial identifications*
- *Your economic data (Data related to your financial and/or economic situation)*
- *Unaltered audio of your study session*
- *Unaltered video of your study session*

The categories of personal data **Ipsos expects to share** with the **Sponsor** about you through your involvement in the research include:

- *Your first name*
- *Your age, gender, and racial identifications*
- *Your economic data (Data related to your financial and/or economic situation)*

For more information about your rights and how the **Ipsos** User Experience and Human Factors research team generally manages your personal data, please see our privacy policy ("Privacy Policy" available at <https://www.ipsos-userexperience.com/docs/privacypolicy-us.pdf>).

By signing this agreement on page 4, you agree to your participation as follows:

1. Your focus group will be observed by members of Ipsos's research team. In addition, members of the **Sponsor's** organization will also observe. All **Sponsor** observers are instructed not to capture any revealed personal data that might occur in the session and to excuse themselves from observing if you are known to them.
2. To further understand the individual circumstances and characteristics that apply to me and my use of the **Confidential Information**, the **Sponsor** has requested that Ipsos record your participation in the study, which means that your focus group responses and your personal data will be collected by Ipsos. Your personal data will be anonymized prior to sharing any of your responses with the study **Sponsor**. Ipsos will share all answers which you provided in the focus group with the study **Sponsor**. You have the right to withdraw your consent at any time. Any personal data collected by **Ipsos** during the research study will be deleted by 5 years from the completion of the study.
3. I understand that **Ipsos** and **Sponsor** shall have no obligation to process my collected personal data in connection with my research participation.



PARTICIPATION, CONFIDENTIALITY, AND RELEASE NOTICE

As a research participant, you will be offered the opportunity to use or test certain concepts (“Concepts”), products and packaging that are still be in the early stages of development (each a “Product”). You may come in contact with, be allowed to see, use, or otherwise have access to certain non-public, confidential, proprietary, or trade secret information or material that are the sole and exclusive property of the **Sponsor**, including, information with respect to the **Sponsor’s** Concepts and Products (collectively, “**Confidential Information**”).

1. You acknowledge and agree, that you shall not use, copy, print, store, forward or disclose to anyone by any means any **Confidential Information** you have access to and shall not use the **Confidential Information** for any other purpose than the purpose which it was disclosed to you. You further agree and acknowledge that: (i) you will not photograph, copy, record, or reproduce any of the **Confidential Information**; (ii) the concepts, products and packaging shown, described, and/or used by you are not available for sale and no offer for sale is being made to you; (iii) any ideas, discoveries or inventions for new products or packaging, or other information relating to the Product or Concept which you develop as a result of your participation in this test during or after the test (collectively, “Inventions”) are the sole property of Ipsos and you assign to Ipsos all right, title, and interest you may have in and to such Inventions, including without limitation all intellectual property rights therein. You agree that upon completion of the research study that you shall return to **Ipsos** the Product, Concepts, **Confidential Information**, and all components, documentation, data, results, or any other information and materials which you were provided with or were created by you during the research study.
2. If you are provided with a Product for personal use, you are responsible for ensuring it is promptly returned to **Ipsos** in similar condition (absent normal wear and tear) following conclusion of the study.
3. In addition, you certify that you are of legal age to enter into this Agreement, possess full legal capacity to execute and agree to the terms of this Agreement, that you are free to enter into this Agreement, and that you have received good and valuable consideration in exchange for the undertakings set forth herein. You hereby acknowledge that you shall not be entitled to any royalties or residual payments of any kind resulting from your appearance in the Recordings, or from the Inventions, and you represent it is not necessary for **Ipsos** or **Sponsor** to pay any fees or royalties to any collective bargaining organization or any third party in connection with your appearance in the Recordings. You agree that any provision herein held by a court of competent jurisdiction or other decision-maker to be illegal or unenforceable, shall not affect the legality and enforceability of any remaining provisions, and those provisions shall remain in full force and effect. Further any provisions herein held to be overbroad or unreasonable shall be given effect to the maximum extent possible by narrowing or limiting enforcement of the provision found overbroad or unreasonable. This Agreement shall be construed in accordance with the laws of New York without regard to any conflicts of law principles that would require the application of any other law and you consent to the exclusive jurisdiction and venue in the state and federal courts in New York, New York, for the purpose of any legal proceeding relating to or arising under this Agreement.
4. You recognize and understand that participation in the research is voluntary, and you acknowledge that you are free to decide not to take part, or to withdraw from the research at any time, with no further obligations or penalties. You are also informed that either **Ipsos** or **Sponsor** may choose to end your participation at any time, without requiring your consent or providing any reason or justification for such decision.



I, the undersigned, acknowledge and agree that I have read this Research Participation Agreement and fully understand its contents and hereby consent to participate pursuant to the terms of this Research Participation Agreement.

Signature:

Date:

Name:



Appendix D: Moderator's Guide

Ipsos will add the finalized moderator's guide here for OMB submission following OCC review and final approval.

Appendix E: Initial Coding Frame

Ipsos will add the coding frame here for OMB submission following the OCC's review and final approval of moderator's guide.