

**CONSUMER FINANCIAL PROTECTION BUREAU
GENERIC INFORMATION COLLECTION REQUEST
SUPPORTING STATEMENT PART B**

**GENERIC INFORMATION COLLECTION PLAN FOR THE DEVELOPMENT
AND/OR TESTING OF MODEL FORMS, DISCLOSURES, TOOLS AND OTHER
SIMILAR RELATED MATERIALS
(OMB CONTROL NUMBER: 3170-0022)**

Data collection methods and procedures under this generic clearance will vary depending on the individual collection. However, the primary purpose of collections under this generic clearance will be to design, develop, and evaluate disclosures and related materials relating to consumer financial products and services. It is anticipated that each information collection may include a report that will be published discussing the methodology and results of the data collection to inform future formative, cognitive research, not to produce estimates about a population.

1. UNIVERSE AND RESPONDENT SELECTION

The activities under this clearance may involve samples of respondents selected either to cover a broad range of consumers or to include specific characteristics related to consumer financial products or services. Further, to the extent the qualitative testing under this generic clearance relate to compliance, samples of respondents may be selected to reflect characteristics of covered entities that may utilize such materials to facilitate compliance with CFPB regulations.

The specific sample planned for each individual collection and the method for soliciting participation will be described fully in each collection request. Generally, the CFPB anticipates that qualitative testing will involve convenience samples recruited locally for each round of qualitative testing, with participants selected to include specific characteristics related to certain products. For example, when the CFPB recruited samples to test mortgage servicing disclosures, potential samples were screened by criteria including their home purchase and mortgage loan experiences. For most of the research activities, respondents will be recruited by telephone. Initial screening of volunteers will be done to identify eligible respondents.

In conducting its testing, the CFPB or an external party, such as, for example, an outside testing contractor (Contractor), if applicable, contracts with research facilities in each specified location and ensures each facility locates and recruits the appropriate populations. In addition, as applicable, the CFPB and the Contractor, if applicable, will make final decisions on the most important population demographics to capture based on the research questions. Demographics to be considered include geographic location, metro/micropolitan city size, age, ethnic and racial diversity, education, income, gender, and marital status.

The CFPB and the Contractor, if applicable, typically looks for a mix of participants and characteristics and does not expect to meet all of the criteria in any one site or single round of data collection. Patterns will be tracked across sites and collections with later sites recruiting for

characteristics that have not previously been filled. To the extent practicable, sites will be selected that provide diversity among small, medium, and large sized cities, as well as geographic diversity.

Qualitative information collections can be a valuable tool to develop model forms, disclosures, tools, and other similar related materials and to determine whether such items are understandable and usable by target audiences. The accuracy, reliability, and applicability of the results of these collections are adequate for this purpose. The samples associated with such information collections are not subjected to the same scrutiny as scientifically drawn samples where estimates are published or otherwise released to the public.

Accordingly, it is anticipated that each information collection may include a report that will be published discussing the methodology and results of the data collection to inform future formative, cognitive research, not to produce estimates about a population.

Results will not be used to make statements representative of the general population, to produce statistical descriptions (careful, repeatable measurements), or to generalize the data beyond the scope of the sample.

2. METHODS AND PROCEDURES FOR COLLECTING INFORMATION

Data collection methods and procedures will vary and the specifics of these will be provided with each collection request. The CFPB expects to use a variety of methodologies for these collections. For example, the CFPB or its contractors may use one-on-one cognitive usability interviews or focus group interviews with professional guidance and moderation. In addition, the CFPB may utilize internet feedback to collect information. The following describes the one-on-one cognitive interview method and internet collection method that the CFPB has used to test the integrated mortgage loan disclosures and anticipates using for qualitative testing under this generic clearance.

One-on-One Interview Method

Recruitment:

The external contractor will generally recruit respondents through telephone calls. In most cases, the CFPB will provide criteria to select appropriate respondents. Participation is voluntary. If the respondent possesses the desired characteristics, a time for the testing is scheduled.

Interview:

Once an interview is scheduled, it is the responsibility of the respondent to travel to the interview site. When the respondent arrives, he or she will complete a questionnaire to confirm the information received on the phone. The respondent will be informed of the availability of an assurance of privacy to read, which states that, to the extent permitted by law, the privacy of the respondent's identity will be maintained. This assurance is confirmed orally by the interviewer to the respondent and the need for audio or video taping is explained.

Interviews typically last 60 minutes. At the beginning of the interview, respondents are informed that the interview will take no more than 60 minutes, that they will be provided with a 5 minute break in the middle of the interview, and that they can step out or end the interview at any time. Respondents will be monitored for fatigue by the contractor's testing personnel and the Bureau. The contractor's testing personnel and the Bureau will keep track of the length of interviews.

The specific activities are determined by the hypotheses to be tested. The most commonly used methods include concurrent think-aloud interviews and focus group interviews. In one-on-one think aloud interviews, respondents are asked questions pertinent to the disclosure form in question and are asked to think aloud about how they would use the disclosure and what questions they would have. The interviewer usually probes extensively to ascertain the degree of comprehension.

Debriefing:

All respondents are debriefed. This procedure reiterates the purpose of the project and answers respondents' questions about the study.

Focus Groups

Recruitment:

The Contractor will generally recruit respondents through telephone calls. In most cases, the CFPB will provide criteria to select appropriate respondents. Participation is voluntary. If the respondent possesses the desired characteristics, a time for the testing is scheduled.

Focus group interviews usually consist of 6-10 people per group. In these small group sessions, respondents are again asked questions pertinent to the disclosure form or other aspects of the mortgage loan origination experience and are asked to respond openly to each based on their individual experience and perspective. The moderator tries to involve everyone in each question to better understand attitudes, opinions, and concerns.

Internet Collection Method

Internet feedback:

The CFPB may engage the public to obtain feedback regarding a disclosure or related material. The collection of additional data from the public, such as through a website on the internet, allows the Bureau to obtain a wide variety of perspectives, in addition to the formal qualitative testing. This will enable consumers, industry, and other stakeholders to track the CFPB's progress and better understand the process.

Data collection using the internet at different times during the development and evaluation of disclosures and related material may include answering comprehension questions, identifying sections of the form on which visitors want to comment, prioritizing information on the form, or identifying missing information.

3. METHODS TO MAXIMIZE RESPONSE

Information collected under this generic clearance will not yield generalizable quantitative findings. Each collection request will provide information regarding the methods used to maximize response in light of the testing procedures applicable to that collection request.

4. TESTING OF PROCEDURES

Pretesting of data collection materials will be conducted by the CFPB or its contractors, where applicable, using internal staff or a contractor's employees as part of their routine job responsibilities.

5. CONTACTS FOR STATISTICAL ASPECTS AND DATA COLLECTION

Because this data collection involves qualitative testing of a small sample, the CFPB does not expect to use statistical analysis to analyze the data.

Administrative questions regarding the CFPB use of this clearance should be directed to:

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