

BUREAU OF CONSUMER FINANCIAL PROTECTION

PAPERWORK REDUCTION ACT SUBMISSION

INFORMATION COLLECTION REQUEST

SUPPORTING STATEMENT PART B

DEBT COLLECTION QUANTITATIVE DISCLOSURE TESTING

(OMB CONTROL NUMBER: 3170-XXXX)

1. Respondent Universe and Selection Methods

Population and Sampling Frame

This research study is not intended to be representative of the U.S. population, but rather be an experimental design that tests differences in form comprehension between groups. The study sample will be chosen by selecting a sample from GfK's KnowledgePanel®, an online panel whose participants were recruited through probability sampling. KnowledgePanel currently includes about 55,000 adult members.

Since its inception in 1999, KnowledgePanel participants have been recruited based on industry standards for selecting general population surveys, first by random-digit dialing and currently by address-based sampling (ABS). The ABS methodology is a random sample of addresses from the U.S. Postal Service's Delivery Sequence File. Individuals residing at randomly sampled addresses are invited to join KnowledgePanel through a series of mailings (in English and Spanish); non-responders are phoned when a telephone number can be matched to the sampled address. Household members who were randomly selected can indicate their willingness to join the panel by returning a completed acceptance form in a postage-paid envelope, calling a toll-free hotline and speaking to a bilingual recruitment agent, or accessing a dedicated recruitment website. Non-internet households are provided a web-enabled computer and free internet access.

The expected completion rate for those selected is 60–70%, based on historical completion rates for KnowledgePanel participants. The survey will be conducted in English.

Sample Size

The target sample size is 8,000 completed surveys, approximately 5,330 (2/3) of which will be completed by panelists who have “experienced” debt collection in the past 24 months. We will select the sample in two phases. First, we will select a random sample of adults and screen the panelists to determine whether they have experienced debt collections in the past 24 months—

estimated to be 30–35% of adults with a credit file based on research by the Urban Institute¹ and the CFPB². In the second phase, we will select a sample of panelists for the full survey. All of those who have experienced debt collection in the past 24 months will be invited to participate, along with a random subsample of those who indicate they have not experienced debt collection in the previous 24 months. The total sample distribution is expected to be 2/3 “experienced” and 1/3 without debt collection experience in the past 24 months. We designed the sample in this way because we found during qualitative testing that people with experience and without experience with debt collection responded to the form differently. In this study, we wanted to ensure that the form works for both groups (because both groups could have a debt collection experience in the future). The study over-represents people who had experience with debt collection, to make sure that the form worked well for this population of consumers.

2. Describe the procedures for the collection of information.

KnowledgePanel participants will be recruited by email to take the survey. The email invitation will describe the purpose and importance of the research, identify CFPB as the sponsor, and include an email address and toll-free telephone number for helpdesk support. The recruitment email will include a personalized URL (e.g., www.researchsurvey/123456) for the web survey that features a unique, non-sequential identifier for secure login. When panelists click on the URL, they will be directed to the screening survey hosted by our contractor. The screening survey will determine whether the respondent has experienced debt collection in the previous 24 months. If selected to continue by an automated program to ensure balanced demographic characteristics and debt collection experience, the respondent will be directed to the full survey.

Panelists who do not respond to the email invitation will receive e-mail reminders starting on Day 3 and will continue to receive follow-up correspondence once per week, thereafter.

The fielding of the survey will begin with a soft launch, targeting approximately 1,000 completed surveys to ensure that the instrument is functioning as intended. Upon completing the soft launch, we will pause the survey, review results, and identify any changes that need to be made before fully launching the survey. After incorporating any instrument changes, we will then re-open the survey and invite the full set of participants (additional 7,000). We expect the full survey will be in the field for three weeks.

¹ Ratcliffe, C., et al. (2014) Delinquent Debt in America. Urban Institute Report, July 30, 2014. Available at: <http://www.urban.org/research/publication/delinquent-debt-america>.

² CFPB (2014) Consumer credit reports: A study of medical and non-medical collections. Consumer Financial Protection Report, December 2014. Available at: http://files.consumerfinance.gov/f/201412_cfpb_reports_consumer-credit-medical-and-non-medical-collections.pdf

3. Describe methods to maximize response rates and to deal with issues of non-response. The accuracy and reliability of information collected must be shown to be adequate for intended uses. For collections based on sampling a special justification must be provided for any collection that will not yield “reliable” data that can be generalized to the universe studied.

Increasing Response Rate

To facilitate survey response, we will provide e-mail and telephone help desk support to respondents. All help desk staff will receive training that includes a handbook containing copies of relevant materials, such as the survey, an outline of the purpose and rationale of the survey, the process for addressing participant issues, and a summary of common questions.

GfK offers incentives to encourage panel participation. In addition, we will offer an extra \$5 incentive to encourage non-respondents to complete the survey. This incentive will be offered toward the end of the fielding period and is expected to boost the completion rate by 10%. Overall we expect the completion rate to be 60-70% %, based on GfK’s historical completion rates for surveys of similar length.

Weighting

We will not publicly release non-response analysis for the survey respondents, or treat the data as nationally representative in publicly released reports. For this study, we plan to conduct an experimental research design and compare differences between groups to learn which debt collection disclosure forms work best to improve comprehension and how decisions around debt collection may vary based on the particular form respondents encounter.

4. Describe any tests of procedures or methods to be undertaken.

The survey instrument will be subject to cognitive testing before the 30 day PRA notice. Cognitive testing will aim to make sure consumers understand and appropriately interpret the questions in the survey. We do not plan to introduce new topics to the survey in the 30 day PRA notice, unless in response to comment to this 60 day PRA notice.

No additional methodological tests are planned for the pilot; however, as mentioned previously, we include a soft launch to test the administration and data quality.

5. Provide the name and telephone number of individuals consulted on statistical aspects of the design and the name of the agency unit, contractor(s), grantee(s), or other person(s) who will actually collect and/or analyze the information for the agency.

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