CONSUMER FINANCIAL PROTECTION BUREAU
REQUEST FOR APPROVAL UNDER THE GENERIC CLEARANCE
FOR CONSUMER COMPLAINT AND INFORMATION COLLECTION SYSTEM
(TESTING AND FEEDBACK)
(OMB Control Number: 3170-0042)

1. **TITLE OF INFORMATION COLLECTION:** Submit a Complaint - Small Business Intake User Experience Test

2. PURPOSE:

The Submit a Complaint Form is adding a section for consumers to identify themselves as submitting a complaint on behalf of a small business. Questions about the small business will be asked toward the end of the submission process. The target audience for this new section is small business owners and employees who would submit a complaint on behalf of a small business. The goal of the user experience (UX) test is to produce user-centered design findings and recommendations that lead to the improvement of the small business intake section of the form. The UX test will focus on receiving feedback on the clarity and relevance of the questions being asked as well as to look for suggestions on questions that should be included.

3. DESCRIPTION OF RESPONDENTS:

Fors March Group (FMG) will be conducting one-on-one user interviews with adults (over the age of 18) who are small business owners. We will recruit 12 participants for 9 to show. Once we have completed 9 sessions with participants we will stop data collection. FMG will use a panel provider to recruit using the following criteria:

Small business owners who have:

a. Revenue of at least 100K
b. No self-employed/no employee participants (minimum 10 employees)
c. Small business defined as less than 500 employees
d. Participants will be outside the Washington, D.C. area
e. Participants will have a banking relationship (such as having a business checking account)

4. TYPE OF COLLECTION: (Check all that apply)

[ ] Customer Satisfaction Survey   [X] Piloting Revisions to Consumer Complaint Form
[ ] Focus group   [X] Usability or laboratory test (not in live system)
[X] Web-based   [ ] Other (describe) ____________________

5. PERSONALLY IDENTIFIABLE INFORMATION:

a. **Is personally identifiable information (PII) collected?** [X] Yes [ ] No

b. **If Yes, is the information that will be collected included in records that are subject**

to the Privacy Act of 1974? [X] Yes [ ] No [ ] Not Applicable
If applicable, what is the link to the Privacy Impact Assessment (PIA)?
Consumer Response System, V2; http://www.consumerfinance.gov/f/201303_CFPB_PIA-Consumer-Response-System.pdf

c. If Applicable, has a System or Records Notice (SORN) been published?
[X] Yes [ ] No [ ] Not Applicable
If Yes, provide Federal Register citation for the SORN CFPB.005 Consumer Response System, 79 FR 2144.

PII is collected for the purposes of recruitment but not shared with Consumer Financial Protection Bureau (CFPB). The FMG recruitment team will have access to participants' names and contact information (phone numbers and email addresses) for the purposes of scheduling and compensation. Social security numbers are not collected. The FMG recruitment team does not share PII with the FMG research team or CFPB, so the data that is collected during the interview is separate from the PII. We will be recording the participant's computer screen as well as audio, so there is a small chance that a participant could disclose their identity by what they say or write on the screen but that would be on their own volition.

6. GIFTS OR PAYMENTS:

Participants will be sent $75 via PayPal after their participation in the interview. This amount is provided by our vendor and is the necessary amount to motivate people to participate in the test.

As participants often have competing demands for their time, incentives are used to encourage participation. The use of incentives treats participants justly and with respect by recognizing and acknowledging the effort they expend to participate. In this particular information collection, we will be asking small-business owners to schedule time away from the day-to-day operation of their business to provide thought-intensive and open-ended responses that require a high level of participation. When applied in a reasonable manner, incentives are not an unjust inducement and are an approach that acknowledges respondents for their participation[i].

Incentives must also be high enough to equalize the burden placed on respondents with respect to their time and cost of participation as well as provide enough motivation for them to participate in the project[ii]. If the incentive is not adequate, participants might agree to participate and then not show up or drop out early. Low participation could result in inadequate information collection or, in the worst cases, loss of government funds associated with facility rental as well as moderator and observer time[iii].

For this study we have proposed offering incentives of $75 for small-business owners which is below market rates for this population. The estimated market incentive rate for a one-on-one interview with this population is approximately $150 per participant, making the proposed incentive already lower than what participants would typically be offered.

Incentives lower than $75 will make it difficult to recruit a diverse, representative group of respondents. Our experience has been that when incentives are significantly below the market rate, we are most likely to be able to recruit participants with lower income and education levels, and this may not accurately represent the population of interest for this research. If we are not able to appropriately incentivize small-business owners to respond to the recruitment posts and commit to attend a one-on-one interview, we will not be able to collect the necessary data for this research effort.

When considering the potential estimated time and cost of participating in this test, such costs as childcare and potential lost wages could result in a high no-show rate. For example, potential lost wages of $75 per hour amounts to an estimated $150 cost of participation when considering the total length of time to complete the screener, setup technology, and participation in the interview.

In summary, given the difficulties of recruiting the desired population and the potential costs of participation, we believe that $75 is the minimum incentive necessary to recruit and retain the desired test population. There is also a concern that if the incentive is not attractive enough to participants, there may be a high no-show rate and the test would need to be redone in order to obtain quality results. For example, at the $75 incentive level, total incentives would be $675 (9 participants x $75) verses a test redo at a cost of approximately $28,000.

7. BURDEN HOURS:

Information Collection	Number of Respondents	Frequency	Number of Annual Responses	Response Time (hours)	Burden Hours
Web-based screener (1st level screening)	100	1	100	.08	8
Phone-based screener (2nd level screening)	50	1	50	.08	4
Actual Test	9	1	9	1	9
Totals	**100***	//////////////////	**159**	//////////////////////////	21

* Respondents to the Phone-based screener and Test are a subset of those who responded to the Web-based screener; therefore, the total number of respondents is 100.

8. FEDERAL COST: The estimated annual cost to the Federal government is $27,709.

9. DURATION OF TEST: Not to exceed 60 minutes per participant.

10. CERTIFICATION:

CERTIFICATION PURSUANT TO 5 CFR 1320.9, AND THE RELATED PROVISIONS OF 5 CFR 1320.8(b)(3) :

By submitting this document, the Bureau certifies the following to be true:

(a) It is necessary for the proper performance of agency functions;
(b) It avoids unnecessary duplication;
(c) It uses plain, coherent, and unambiguous terminology that is understandable to respondents;
(d) Its implementation will be consistent and compatible with current reporting and recordkeeping practices;
(e) It indicates the retention period for recordkeeping requirements;
(f) It informs respondents of the information called for under 5 CFR 1320.8(b)(3):
  (i) Why the information is being collected;

(ii) Use of information;
(iii) Burden estimate;
(iv) Nature of response (voluntary);
(v) Nature and extent of confidentiality; and
(vi) Need to display currently valid OMB control number;

(g) It was developed by an office that has planned and allocated resources for the efficient and effective management and use of the information to be collected;

(h) It uses effective and efficient statistical survey methodology; and

(i) It makes appropriate use of information technology.

CERTIFICATION FOR INFORMATION COLLECTIONS SUBMITTED UNDER A GENERIC INFORMATION COLLECTION PLAN

By submitting this document, the Bureau certifies the following to be true:

- The collection is voluntary.
- The collection is low-burden for respondents and low-cost for the Federal Government.
- The collection is non-controversial and does not raise issues of concern to other federal agencies.
- The results are not intended to be disseminated to the public.
- Information gathered will not be used for the purpose of substantially informing influential policy decisions.
- The collection is targeted to the solicitation of opinions from respondents who have experience with the program or may have experience with the program in the future.
- The data collection is not statistically significant, the sample is not intended to be representative, and the results will not be used to make inferences beyond the survey sample.
- The results will not be used to measure regulatory compliance or for program evaluation.

[i] Halpern, et al., 2004
[ii] Russell et al., 2000
[iii] Morgan & Scannell, 1998