Sources and Uses of Data at the Consumer Financial Protection Bureau – Supplement



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1. Introduction

On September 26, 2018, the Consumer Financial Protection Bureau (Bureau) issued a report entitled *Sources and Uses of Data at the Bureau of Consumer Financial Protection*¹ (Data Report) describing the Bureau's data governance program and providing information on how the Bureau obtains and uses data, including data that are obtained for one purpose and put to an additional use (reuse), and how data are accessed. The Data Report also describes the Bureau's data governance structures and processes, including those governing intake, use, access, and disclosure of data. In addition, the Data Report includes the full text of current internal data governance policies and charters, and provides a list of the Bureau's data collections and interagency Memoranda of Understanding (MOUs).

At the time of the public release of the Data Report, the Bureau committed to supplementing it in the future with additional information. This Supplement includes an update to Appendix B of the Data Report to include the voluntarily-provided consumer data assets and information on the third-party costs associated with the purchase and/or collection of information. The Data Report indicated that the supplemental information would include the text of its MOUs, subject to obtaining the necessary approval from the relevant state and federal agencies. This Supplement does not address the MOUs.

Concurrent with the September 2018 Data Report, the Bureau issued a *Request for Information Regarding Bureau Data Collections*² (RFI) as part of a 'Call for Evidence' initiative to ensure that the Bureau is fulfilling its proper and appropriate functions to best protect consumers. The RFI provided the public an opportunity to: (1) comment on the overall efficiency and effectiveness of the Bureau's data collections and data governance program; and (2) suggest ways to improve outcomes for both consumers and covered entities.

The 90-day comment period for the RFI closed on December 27, 2018. The Bureau received 13 comments from 33 signatories, as listed below:

- American Bankers Association (ABA)
- <u>American Financial Services Association</u> (AFSA)
- Association of Credit and Collection Professionals (ACA International)

¹ See Bureau of Consumer Fin. Prot., Sources and Uses of Data at the Bureau of Consumer Financial Protection, (Sept. 26, 2018), available at https://www.consumerfinance.gov/data-research/research-reports/sources-and-uses-data-bureau-consumer-financial-protection/.

² See Request for Information Regarding Bureau Data Collections, 83 FR 49072 (Sept. 28, 2018).

- <u>Credit Union National Association</u> (CUNA)
- Independent Community Bankers of America (ICBA)
- Joint letter from legal scholars and former regulators, submitted by:
 - Patricia McCoy
 - □ Christopher L. Peterson
 - John J. Flynn
 - David C. Vladeck
- Joint letter submitted by Americans for Financial Reform Education Fund (AFR) along with the following signatories:
 - California Reinvestment Coalition
 - Center for Digital Democracy
 - Center for Global Policy Solutions
 - Center for Responsible Lending
 - Connecticut Fair Housing Center
 - Consumer Action
 - D Consumer Federation of America
 - Legal Services NYC
 - □ Long Island Housing Services, Inc.
 - National Association of Consumer Advocates
 - National Consumer Law Center (on behalf of its low income clients)
 - National Consumers League
 - New Jersey Citizen Action
 - Reinvestment Partners
 - D Tzedek DC
 - □ U.S. PIRG

- Woodstock Institute
- Mortgage Bankers Association (MBA)
- National Association of Federally-Insured Credit Unions (NAFCU)
- National Community Reinvestment Coalition (NCRC)
- Ohio Credit Union League (OCUL)
- <u>Robert Rutkowski</u>
- <u>Teradata Government Systems LLC</u> (Teradata)

2. Sources of data

The Bureau's Data Report noted that the list of data collections provided in Appendix B did not include information collected by the Bureau from consumers on a voluntary basis through focus groups, one-on-one interviews, user testing, or small-scale informal surveys, except where such data collection took place in the context of developing disclosures in a rulemaking or potential rulemaking context.

When the Bureau collects information directly from 10 or more individuals or institutions, the Bureau seeks approval from the Office of Management and Budget (OMB) to collect this information and account for the paperwork burden. The Bureau also seeks public comment on these collections, as appropriate.

The Bureau maintains several generic information collection plans, which have been reviewed and approved by OMB after public notice and comment. These generic information collection plans allow the Bureau to seek OMB approval to conduct individual surveys, focus groups, and other kinds of information gathering on pre-defined topics of interest to the Bureau. These information collections generally collect qualitative data drawn from deliberate sampling of non-statistically significant populations. Focus group and study consumer participants are often recruited and may be paid a small incentive of up to \$40 for an hour or less and up to \$75 for more than an hour in order to ensure data quality by encouraging response rates, particularly from hard to reach populations. Per OMB requirements for all generic information collection plans, these information collections are always voluntary, low burden, noncontroversial, and are formative in nature. Furthermore, they do not solely inform rulemaking or policymaking, nor are they used for program evaluation. For example, one of the Bureau's generic information collection plans listed in Appendix D is the "Generic Information Collection Plan for Qualitative Consumer Education, Engagement and Experience Information Collections." This generic information collection plan establishes a process where the Bureau may seek OMB approval for routine collections of information from both financial education practitioners and consumers to help the Bureau better understand the financial education needs of consumers and the effectiveness and methods of existing financial education programs in order to inform strategies and improve products. This information may be collected through a variety of methods, including in-person meetings, interviews, focus groups, qualitative surveys, online discussion forums, social media polls, and other qualitative methods as necessary. OMB has approved the Bureau to collect this type of information under OMB Control No. 3170-0036.

Appendix D provides links to the <u>OMB website</u>³ and to descriptions of the Bureau's generic information collections. From here, the public can view:

- General information about the generic information collection plan;
- Authorizing statute(s) and associated rulemaking information, if any;
- Federal Register Notices and comments;
- The number of information collections approved by OMB under the generic information collection plan;
- Supporting Statement and collection instruments for each information collection approved by OMB under the generic information collection plan;
- A summary of burden, including both time and cost burden; and other documents.

3. Uses of data

Appendix D details the general use and scope of each generic information collection plan. These generic information collection plans, as discussed above, are submitted to OMB for approval for the Bureau to conduct individual surveys, focus groups, and other kinds of information gathering on pre-defined topics of interest to the Bureau. The generic information collection plans allow the Bureau to: (1) spot areas of interest for further research by its researchers; (2) conduct trials to understand consumer thinking on economic issues; (3) improve the Bureau's

³ Information about Bureau information collections is available at <u>https://www.reginfo.gov/public/</u>.

financial education efforts; (4) conduct user testing on language used in Bureau surveys and disclosures to ensure that they are well understood by the public; and (5) to generally seek feedback on the Bureau's efforts to serve the public.

Appendix D also identifies whether an information collection contains direct personal identifiers (DPI). As discussed in more detail in the Data Report, DPI are standalone data elements (*e.g.*, name, address) that can be used to identify an individual. Some examples of the DPI collected include audio of participants of focus groups, video of participants of focus groups, email addresses of participants of focus groups so that they can provide feedback, and contact information used to conduct surveys. Privacy Act Statements, per the Privacy Act of 1974, were provided to all participants prior to participation and consent was given prior to the collection of information. The Bureau's Privacy Policy provides that access to the data assets that contain these identifiers is limited to staff for whom access is relevant to their assigned duties.

4. Obligations

As previously detailed in the Data Report, the Bureau purchases data from vendors. Some of these purchases are "off the shelf" products that are generally available for purchase by the public and private sectors. These data assets may represent a single data asset or multiple data assets captured in a specific data system. Appendix E provides more information about the Bureau's obligations (or estimated cost set aside from the budget) for purchasing commercially-vended data assets, as described in Appendix B of the Data Report.

5. Conclusion

This Supplement to the September 2018 Data Report provides additional information that the Bureau committed to publishing to provide further transparency with respect to the Bureau's data governance program and its data collections.

List of Appendices

Appendix D: List of Data Collections

Appendix E: List of Obligations

Appendix D:

List of data collections

Consumer Financial Protection Bureau – Data Inventory

Introduction

This is a supplemental inventory of Bureau data assets as of March 1, 2019, and includes information collected from consumers on a voluntary basis. This inventory supplements Appendix B of the September 2018 Data Report. Most often, the Bureau collected this voluntarily-provided information through focus groups, one-on-one interviews, user testing, or small-scale informal surveys. In a few instances, the information collections included larger scale surveys. Privacy Act Statements were provided to all participants prior to participation and consent was given prior to the collection of information, per the Privacy Act of 1974.

The data assets in this supplemental inventory are organized by the enumerated Information Collection Request (ICR), as submitted to OMB. These ICRs may include one or more information collections, and require OMB approval before the collection of information can begin. This supplemental inventory includes a complete list of the information collections included under each of the ICRs, some of which may have also been included in Appendix B of the Data Report. The text that follows provides a general description of the ICR. The "Source" column lists where the information is generally coming from, as discussed in the Data Report. The "Contains direct identifiers maintained by the Bureau" column describes whether the Bureau is maintaining a data asset that contains information (*e.g.*, names, addresses) that can be used to identify individuals. The "Weblink to OMB with detailed information on the ICR" column provides weblinks to the OMB-managed website where information about each ICR is maintained. The "OMB Control No." column lists the OMB control number for the ICR.

Each individual information collection under the ICR is listed. This enumerated list provides the title of the information collection with an embedded weblink to the OMB-managed website where additional information about each information collection is maintained.

1. Testing of Disclosures and Related Materials

Information collections under this ICR include data collected from the qualitative testing of disclosures and related materials relating to the features of consumer financial products and services.

Source	Contains direct identifiers maintained by the Bureau	Weblink to OMB with detailed information on the ICR	OMB Control No.
Consumers ⁴	X ⁵	https://www.reginfo.gov/public/do/PR AViewICR?ref_nbr=201512-3170-001	3170-0022

The information collections under OMB Control No. 3170-0022 are listed in the table below.

#	IC Title
1	Prepaid Interview Testing Phase 2
2	Pilot Study of Mortgage eClosings and CFPB Educational Materials
3	Debt Collection Disclosure Focus Groups
4	Credit Cards Rewards and Deferred Interest Products Focus Groups
5	Debt Collection Disclosure Forms Focus Groups and User Experience Study (Round 2)
6	Testing of Model Bankruptcy Periodic Forms for Mortgage Servicing
7	Overdraft Opt-In Model Form Testing
8	Debt Collection Disclosure Testing: Consumer Bill of Rights
9	Pre-Paid Disclosure Forms User Testing (Interviews)

⁴ For the purposes of this report, the term consumer also encompasses organizations acting on behalf of consumers, individuals or firms acting as whistleblowers, and financial educators.

⁵ Direct identifiers consist of basic contact information and video and/or audio recording.

#	IC Title
10	Mortgage Servicing
11	Consumer Focus Groups Relating to Prepaid Products Rulemaking and Model Form Development
12	Unmoderated Usability Testing of the Mortgage Closing Product
13	Small Dollar Lending Rule Disclosure Testing (Payday)
14	Student Loan Repayment Loan Form Testing

2. Feedback on Bureau Services

Information collections under this ICR include data in the form of the qualitative feedback from consumers, financial institutions, and stakeholders on a wide range of services the Bureau provides in an efficient timely manner in accordance with the Bureau's commitment to improving service delivery.

Source	Contains direct identifiers maintained by the Bureau	Weblink to OMB with detailed information on the ICR	OMB Control No.
Consumers, Financial Institutions	X6	https://www.reginfo.gov/public/do/PR AViewICR?ref_nbr=201509-3170- 002	3170-0024

The information collections under OMB Control No. 3170-0024 are listed in the table below.

#	IC Title
1	Recruitment Screener for Owning a Home Project User Experience Testing
2	CFPB FinEx Conference
3	Prototyping and Research to Support Contact Center Script and IVR Development

⁶ Direct identifiers consist of basic contact information and video and/or audio recording.

#	IC Title
4	Financing an Auto - External testing
5	Focus Groups for Parents: Money As You Grow
6	LAR Formatting Tool Testing Feedback
7	Your Money, Your Goals Training Planner Survey
8	Owning a Home Project User Experience Testing – Round 1
9	Round 2 of User testing to solicit feedback on the Bureau's Planning for retirement- Before you claim English website
10	Consumer Complaint Database 4.1 User Research & Usability Testing
11	Paying for College - Dynamic Disclosures Usability Test (Round 1)
12	Feedback Survey for Online Training Modules for Librarians
13	Concept Evaluation Survey
14	Older Americans Placemat Usability Testing
15	Consumerfinance.gov Top Task Usability Testing
16	Owning a Home User Questions
17	Money Smart for Older Adults Train-the-Trainer Session Feedback Form and Money Smart for Older Adults Participant Evaluation Form
18	YMYG Behind on Bills Bundle – User Testing
19	Call Center Satisfaction Survey
20	CFPB Office of Civil Rights Customer Feedback Surveys – ADR and EEO Processes
21	Spanish Ask CFPB - User Testing
22	Financial Foundations Testing

3. Compliance Costs and Other Effects of Regulations

Information collections under this ICR are used to implement new consumer protections in certain sectors of financial markets, including the mortgage and remittance industries. This information is required in order to effectively incorporate information from providers concerning compliance costs and other effects of regulations into potential rulemakings.

Source	Contains direct identifiers maintained by the Bureau	Weblink to OMB with detailed information on the ICR	OMB Control No.
Financial Institution	X7	https://reginfo.gov/public/do/PRAVie wICR?ref_nbr=201601-3170-001	3170-0032

The information collections under OMB Control No. 3170-0032 are listed in the table below.

#	IC Title
1	Remittance Assessment Industry Data Collection
2	Housing Counselor/Legal Aid Attorney Survey
3	Mortgage Servicer Interviews
4	Voluntary Mortgage Lender Survey
5	Compliance Officer Questionnaire
6	Debt Collection Activities Study
7	Remittance Transfer Rule Temporary Exception Experience Interviews
8	CFPB Dodd-Frank Mortgage Rule Implementation Tracking Project
9	Remittance Transfer Rule Implementation Case Studies
10	Prevalence of Pre-Dispute Arbitration Agreements in Consumer Contract in Certain Market for Consumer Financial Products and Services

⁷ Direct identifiers consist of basic contact information.

#	IC Title
11	Home Mortgage Disclosure Act (HMDA), Regulation C As-Is Study
12	Web Post
13	Compliance Cost Survey Site Visit Guide

4. Qualitative Consumer Education, Engagement and Experience Information

Information collections under this ICR include qualitative information on effective financial education strategies and consumer experiences in the financial marketplace from both financial education practitioners and consumers. This information is collected through a variety of methods, including in-person meetings, interviews, focus groups, qualitative surveys, online discussion forums, social media polls, and other qualitative methods as necessary.

Source	Contains direct identifiers maintained by the Bureau	Weblink to OMB with detailed information on the ICR	OMB Control No.
Consumers, Other	X ⁸	https://www.reginfo.gov/public/do/PR AViewICR?ref_nbr=201605-3170- 009	3170-0036

The information collections under OMB Control No. 3170-0036 are listed in the table below.

#	IC Title
1	Reverse Mortgage Discussion Guide Usability Testing
2	2017 Tax Time Initiative
3	Consumer Financial Protection Bureau (CFPB) Tax Time Savings Initiative; Collection of Post- 2017 Tax Season Data

⁸ Direct identifiers consist of basic contact information and video and/or audio recording.

#	IC Title
4	Young Adult Consumers Individual Financial Products and Services Interviews
5	Your Money, Your Goals Booklet Research
6	Misadventures in Money Management Survey
7	FinEx Materials User Testing
8	Workplace and the Financial Well-being Scale
9	Protecting Older Account Holders Focus Groups
10	CFPB Library Surveys
11	Personal Finance Pedagogy User Testing

5. Consumer Response and Information Collection System Testing and Feedback

Information collections under this ICR include data collected from the testing and feedback on consumer complaint, feedback, and inquiries processes.

Source	Contains direct identifiers maintained by the Bureau	Weblink to OMB with detailed information on the ICR	OMB Control No.
Consumers	X9	https://www.reginfo.gov/public/do/PR AViewICR?ref_nbr=201504-3170-002	3170-0042

The information collections under OMB Control No. 3170-0042 are listed in the table below.

#	IC Title
1	CFPB's Consumer Response Intake Form Improvement Study

⁹ Direct identifiers consist of basic contact information and video and/or audio recording.

IC Title

2 Submit a Complaint - Small Business Intake User Experience Test

6. Field and Economic Laboratory

Information collections under this ICR include data collected from controlled trials in field and economic laboratory settings for economic research.

Source	Contains direct identifiers maintained by the Bureau	Weblink to OMB with detailed information on the ICR	OMB Control No.
Consumers	X10	https://www.reginfo.gov/public/do/PR AViewICR?ref_nbr=201708-3170- 002	3170-0048

The information collections under OMB Control No. 3170-0048 are listed in the table below.

#	IC Title
1	Laboratory Research on Disclosures
2	Economic Research on Choice Overload
3	Laboratory Research on Price Complexity

7. ROADS to Financial Independence

The information collection under this ICR is a one-time collection of data from participants to monitor the effectiveness of the ROADS to Financial Independence, an initiative aimed at improving the financial well-being and economic security of individuals with disabilities who are currently working or transitioning into the workforce. While this information collection was

¹⁰ Direct identifiers consist of basic contact information.

reviewed and approved by OMB, the data was never collected by the Bureau and was discontinued August 16, 2017.

Source	Contains direct identifiers maintained by the Bureau	Weblink to OMB with detailed information on the ICR	OMB Control No.
Consumers		https://www.reginfo.gov/public/do/PR AViewICR?ref_nbr=201412-3170-005	3170-0053

The information collection under OMB Control No. 3170-0053 is listed in the table below.

#	IC Title
1	Financial Assessment, Counseling, and Follow-up

8. Cognitive Research and Pilot Testing

Information collections under this ICR include one-time collections of data from interviews with consumers to inform questionnaire development relating to consumer's strategies to manage their finances.

Source	Contains direct identifiers maintained by the Bureau	Weblink to OMB with detailed information on the ICR	OMB Control No.
Consumers	X11	https://www.reginfo.gov/public/do/PR AViewICR?ref_nbr=201506-3170-004	3170-0055

The information collections under OMB Control No. 3170-0055 are listed in the table below.

#	IC Title
1	Debt Collection Disclosure Testing Quantitative Study, Pretesting of Survey Questions

¹¹ Direct identifiers consist of basic contact information and live stream of focus group to limited number of Bureau researchers.

2 Making Ends Meet Survey Pilot

9. Surveys Using the Consumer Credit Panel

Information collections under this ICR include data collected from surveys to support the Bureau's household balance sheets agenda: research to monitor developments in consumers' financial situations, related changes in their use of financial products, and the impacts that these decisions have on their balance sheets.

Source	Contains direct identifiers maintained by the Bureau	Weblink to OMB with detailed information on the ICR	OMB Control No.
Consumers	X ¹²	https://www.reginfo.gov/public/do/PR AViewICR?ref_nbr=201506-3170-003	3170-0066

The information collection under OMB Control No. 3170-0066 is listed in the table below.

#	IC Title
1	Making Ends Meet Survey

10. Evaluation of Financial Empowerment Training Programs

Information collections under this ICR are used to evaluate the Bureau's *Your Money, Your Goals* (YMYG) training practices and programs. YMYG is a financial empowerment toolkit that social services staff and other frontline staff can use to educate and empower low income consumers about managing their finances to reach their own goals, and the Bureau uses a train-the-trainer model to help organizations integrate the toolkit into their existing programs. This ICR gathers information from trainers and staff about the effectiveness of the training, and the training participants' use of the training.

¹² Direct identifiers consist of basic contact information.

Source	Contains direct identifiers maintained by the Bureau	Weblink to OMB with detailed information on the ICR	OMB Control No.	
Consumers, Other	X ¹³	https://www.reginfo.gov/public/do/PR AViewICR?ref_nbr=201607-3170-003	3170-0067	

The information collection under OMB Control No. 3170-0067 is listed in the table below.

#	IC Title
1	Evaluation Instruments

11. Application Forms for Financial Empowerment Partnerships (Trainings)

Information collections under this ICR include data on training practices and programs that are designed to enhance the ability of caseworkers to inform and educate low-income consumers about managing their finances.

Source	Contains direct identifiers maintained by the Bureau	Weblink to OMB with detailed information on the ICR	OMB Control No.
Other	X ¹⁴	https://www.reginfo.gov/public/do/PR AViewICR?ref_nbr=201608-3170-002	3170-0068

The information collection under OMB Control No. 3170-0068 is listed in the table below.

#	IC Title
1	Application Forms

¹³ Direct identifiers consist of basic contact information.

¹⁴ Direct identifiers consist of basic contact information.

12. Consumer Response Customer Response Survey

Information collections under this ICR include data from a survey included in the complaint closing process for consumers to have the option to provide feedback on the company's response to and handling of their complaint.

Source	Contains direct identifiers maintained by the Bureau	Weblink to OMB with detailed information on the ICR	OMB Control No.
Consumers	X ¹⁵	https://www.reginfo.gov/public/do/PR AViewICR?ref_nbr=201607-3170-004	3170-0069

The information collection under OMB Control No. 3170-0069 is listed in the table below.

#	IC Title
1	Consumer Response Customer Survey

¹⁵ Direct identifiers consist of basic contact information.

List of obligations

Appendix B of the September 2018 Data Report provided an inventory of the Bureau's 188 data assets, which included information collected from financial institutions, consumers, other government agencies and regulators, and commercial vendors. If the data needed are not available within the Bureau and cannot be readily obtained from another government agency or regulator, they can often be purchased or obtained through a commercial vendor. While there is rarely an obligation associated with information collected from financial institutions, consumers, or other government agencies and regulators, there is often an obligation associated with information collected from financial institutions, and regulators, there is often an obligation associated with information collected from commercial vendors. Appendix E provides an inventory of the 34 data assets obtained from commercial vendors (as listed in Appendix B of the Data Report) and the related cost.

The "#" (Number) column provides a way to uniquely identify each data asset. The "Subject Title" column provides the title of the information collection as discussed in Appendix B of the Data Report. The "2010" – "2018" columns represent each fiscal year¹⁶ and show the obligation in U.S. Dollars "USD" associated with the purchase and/or collection of information by, or on behalf of, the Bureau during the specified fiscal year. Cells where there is a "-" for fiscal year indicate that there was no cost related to the information collection because we did not obtain data during the specified fiscal year. Cells where there is a "N/A" (Not Applicable) for fiscal year indicate that there was no potential for cost related to the information collection during the specified fiscal year.

#	Subject Title	2010	2011	2012	2013	2014	2015	2016	2017	2018
1	Panel Study of Income Dynamics (see footnote) ¹⁷	-	N/A	-	-	-	-	-	-	-

¹⁶ The Bureau's fiscal year runs from the previous October 1 through September 30 of the calendar year.

¹⁷ There is no associated cost because this is public data.

#	Subject Title	2010	2011	2012	2013	2014	2015	2016	2017	2018
2	National Mortgage Database	-	-	1,067,962	918,912	1,030,120	1,035,815	1,292,751	1,339,180	1,314,280
3	Black Knight Home Price Index	-	-	-	-	-	90,000	90,000	90,000	90,000
4	Mortgage Bankers Association - National Delinquency Survey	-	-	1,770	1,250	1,250	-	1,250	1,250	1,250
5	Educational Credit Scores (see footnote) ¹⁸	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
6	LaFleurs Historical Lottery Data	-	-	-	-	2,250	-	-	-	-
7	J.D. Power	-	-	-	-	-	-	84,000	55,000	58,000
8	Mintel Comperemedia Mailout Survey Data	-	-	200,000	200,000	243,500	587,644	331,627	331,627	314,300
9	Strategic Business Insights VALs Data	-	-	-	-	-	-	10,000	-	-
10	CoreLogic Loan Level	-	-	150,000	14,500	159,135	163,909	168,826	-	-

¹⁸ There is no associated cost because this data was voluntarily provided to the Bureau.

#	Subject Title	2010	2011	2012	2013	2014	2015	2016	2017	2018
	Mortgage Market Analytics									
11	Blackbox Logic Private Label Mortgages	-	154,000	144,000	144,000	144,000	144,000	-	-	-
12	Clarity Online Payday Loans	-	-	312,660	130,600	-	-	-	-	-
13	Geolytics	-	-	-	1,115	-	-	-	-	-
14	Informa Mortgage Rates and Fees	-	-	-	-	-	-	-	5,500	_
15	S&P Global	-	60,000	95,000	110,609	128,593	207,590	226,799	260,988	300,050
16	MBA Reports	-	-	-	-	-	-	-	-	10,500
17	AutoCount	-	-	-	306,400	241,200	241,200	249,000	249,000	249,000
18	HSH Mortgage Rate Data	-	-	-	-	-	-	4,680	-	-
19	Strategic Business Insights MacroMonitor data	-	-	-	-	186,673	120,824	-	-	-
20	Powerlytics Income Data	-	-	-	-	-	-	-	-	130,000
21	Informa Rate Sheet Data	-	-	-	-	515,000	561,354	763,128	641,262	379,600

#	Subject Title	2010	2011	2012	2013	2014	2015	2016	2017	2018
22	Credit Appends for Overdraft Data	-	-	-	-	96,544	-	-	-	-
23	Black Knight Mortgage Origination/Per formance Data	-	-	-	-	-	-	-	145,000	145,000
24	Market Intelligence Reports	-	-	36,000	36,000	34,000	34,000	34,000	34,000	34,000
25	Geographic Information Systems Shape Files	-	-	9,450	18,750	18,690	18,690	18,690	22,043	22,056
26	CreditForecast. com	-	247,600	259,980	272,979	286,628	300,959	316,007	331,808	348,398
27	Informa Checking Account Fees	-	-	-	-	77,220	80,309	83,521	86,862	90,336
28	Consumer Credit Panel	-	-	1,776,800	517,162	516,908	516,900	517,186	582,110	591,752
29	Infogroup Business Data	-	-	-	-	-	10,897	-	-	-
30	WebRecon Debt Collection Lawsuits (see footnote) ¹⁹	-	-	-	-	-	N/A	N/A	N/A	N/A
31	MeasureOne	-	-	-	-	-	-	-	50,000	50,000

¹⁹ A "no cost" MOU was signed with WebRecon, but no data was collected.

#	Subject Title	2010	2011	2012	2013	2014	2015	2016	2017	2018
32	iSpot TV	-	-	-	-	-	-	-	24,000	-
33	Informa Credit Card Rates and Fees	-	-	100,000	78,000	77,220	80,309	83,521	88,862	-
34	1073 Matched Remittance - Credit Bureau Data (see footnote) ²⁰	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

²⁰ There is no associated cost because this data was voluntarily provided to the Bureau.