Putting Disclosures to the Test

an FTC Workshop

September 15, 2016
Edith Ramirez
Chairwoman, Federal Trade Commission
A COGNITIVE FRAMEWORK FOR DISCLOSURE EFFECTIVENESS: COMMUNICATION-HUMAN INFORMATION PROCESSING (C-HIP) MODEL

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FTC Workshop
*Putting Disclosures to the Test*
September 15, 2016
Background

• Area: Human Factors, Cognitive Ergonomics
  • Discipline that is concerned with the design of things (products, equipment, tasks, and built environments) based on people’s abilities and limitations with an aim at increasing productivity, comfort/satisfaction and safety
  
  • Person–Thing Interface (& Interactions)
Background

• Broad research on warnings: Communications to prevent injury or loss in a very general sense
  • Risk/hazard/safety information
  • Disclosures (informed consent forms, credit card terms, online acceptance of terms)
• Telling the negatives, not just the positives, and doing it effectively
• Factors that influence effectiveness, both negative and positive
Background

• Warning research:
  • Consumer product warnings including labels, accompanying inserts/sheets, tags, product manuals
  • Posted signs for environmental hazards, directions, & information
  • DTC advertising of prescription drugs, OTC labels
  • Symbols/icons/pictograms/pictorials
  • Visual and auditory presentation, and other modalities
  • Print, video, internet
Coverage

- Communication-Human Information Processing (C-HIP) Model
  - General cognitive processing framework
- Combines basic communication theory and human information processing stage theory
- Utility: Organizes a lot of seemingly haphazard constructs & research
C-HIP Model

- Breaks it up into stages
- Linear process - “Bottlenecks” that could disrupt
- Sequential, but there are feedback loops
- Describes what is needed for a warning or disclosure to work
- Helpful in investigating why a warning or disclosure is not working & suggests ways to improve it
- Will start from top and work down
C-HIP Model: Source

- Entity that transmits disclosure/warning
  - Determines its necessity (by law, by standards, by hazard/risk analysis, etc.)
- Some research on source effects (Beliefs)
  - Surgeon General & government added to warning - greater credibility
- Social persuasion literature
  - Characteristics of source
    - Expert
    - Trustworthy
    - Likeable
    - Similarity
C-HIP Model: Channel

- via Modalities
  - Visual
  - Auditory
- via Media
  - Print & video (TV, radio, Internet), labels, signs, posters/placards, tags, brochures, manuals, inserts, billboards, voice warnings, etc.
- Different characteristics
- Generally, redundancy (more than one method) is better
C-HIP Model: Receiver

- Third stage of communications theory part, most complicated
- “Recipient” member of target audience
- Demographic, person variables
- Different message for general public vs. sophisticated (trained, expert) group
- Future: tailor disclosures to individuals
C-HIP Model: Receiver

• Delivery – Did the disclosure actually get to the “receiver”?
  • Different methods reach different groups/percentages of persons
  • Assessment method: Check whether sample received it
C-HIP Model: Attention **Switch**

- Noticing (catching attention) in a cluttered (noisy) context
  - Salient, conspicuous, prominent
- Assessment methods:
  - Looking behavior, eye movement (saccades), response time (faster), post-exposure (if remember it, must have seen it), subjective evaluation
- Features that benefit
  - Large, high contrast, color
  - Location, placed in visual field, reduction of competing stimuli
  - Symbols
C-HIP Model: Attention Maintenance

Attention Holding to Read or Examine
• Adequate time given to acquire info
• Features that benefit:
  • Legible (distinguish attributes of print)
    • Large
    • High contrast (print to background brightness difference)
  • Brief, low density
  • Structured format
  • Most relevant, priority information first
C-HIP Model: Attention Maintenance

- Assessment methods:
  - Dwell time, eye fixations
  - Legibility: distance/obscuration techniques
  - Participant evaluation
  - Prioritization evaluation
**C-HIP Model: Attention**

**Issue: Habituation**

- Seeing same or similar thing over & over
  - Novel visual things are more salient
  - Problem with standardization
    - Material all looks alike—not a good thing for Attention stage
  - Need some change
C-HIP Model: Comprehension

• Purpose is to give appreciation/understanding of risk & enable informed judgment

• Assessment methods:
  • Convenience: readability formulae
  • Better: Show participants material & then test
  • Open-ended questions & cognitive interview
C-HIP Model: Comprehension

• Features that benefit
  • Simpler terms, high freq in language
  • Has content reflecting intended concepts
  • Message components:
    (1) Nature of Risk/Hazard
    (2) Instructions
    (3) Consequences
  • Direct, active, organized/structured
  • Sufficiently explicit/specific
  • Avoid ambiguity & misinterpretation
C-HIP Model: Comprehension

- Considerations:
  - Target audience factors
    - Skills & their levels, cognitive impairment
  - Development
    - Check content for necessary content
    - Usability testing: Iterative design (changes) & test cycles
  - Symbols/pictorials/pictograms
    - ANSI Z535.3 standard comprehension test
      - Acceptable to use when 85% (of sample) correctly understand what symbol means with no more than 5% critical confusions
C-HIP Model: Attitudes & Beliefs

Beliefs: Knowledge structures based on experiences, accepted as true
• Attitudes - more emotion/affect
• Easier/quicker to process if message concurs with existing beliefs
• Problem: if beliefs are discrepant with message, e.g.,
  • Perceive lower risk than it is
  • Government would not allow substantial risk to exist
• Could lead to not looking/attending
• Need salient, persuasive message to overcome erroneous beliefs
C-HIP Model: Attitudes & Beliefs

• Perceptions of hazard-risk
  • Consumers primarily consider severity and to lesser extent probability / likelihood
  • Match message characteristics to risk level
  • e.g., Use different signal words: Danger vs. Caution vs. Note

• Familiarity
  • If believe already familiar or adequately knowledgeable then less likely to read

• Perceived relevance
  • Relevant to me or is it for someone else?

• Assessment Methods: self report, participant evaluations using rating scales
Energy/motivation to carry out task
• Cost of compliance and noncompliance
  • Effort, time, money
• Explicitness
• Severity of loss
• Other factors
  • Social influence / modeling – doing what others do
  • Time stress, mental workload, busyness
    • Interferes at all stages
Complying, adhering, doing or not doing something appropriate or safe
• Good measure of effectiveness if disclosure appropriately changed behavior
• Assessment methods:
  • Empirical behavioral compliance
    • Did they do what message directs?
  • Indirect assessment (measure related outcome)
• A lot of things have to come together to change behavior!

C-HIP Model: Behavior

Source

Channel

Attention
  Switch & Maintenance

Comprehension

Attitudes
  Beliefs

Motivation

Behavior
C-HIP Model - Summary

• Try to design disclosure/warning system so information passes through stages

• Described linear processing of stages but there are feedback loops: later stages can affect earlier stages
  • e.g., familiarity (Attitudes-Beliefs stage) affects earlier Attention stage

• Helps to organize diverse research

• Helps to track down reason for warning/disclosure not doing its job
  • Enables more directed/specific fixes
C-HIP Model

• Current Version

• Separates Attention **Switch** & **Maintenance**

• Environmental stimuli (competing for attention)

• Delivery (did it actually get to receiver)

• Memory (with comprehension)
Contact Information

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- www.safetyhumanfactors.org (pre-2013 publications)

Suggested resources:


Evaluation procedures and methods

Ilana Westerman
CEO and Co-founder of Create with Context, Inc.

Craig Andrews
Department of Marketing
Marquette University
Evaluation Methodologies for Trusted Experiences

create with context
Context: Scientists want to understand how artists express themselves.

The Goal: Designers create solutions for others.
**Trust:It** Data-Driven Funnel-Based Approach Driving to a Solution

**EXPLORATORY**

**FOUNDATION**

- Gather the context
  - People – Knowledge, expectations, mindset, tasks, workflows, values, beliefs, wants, needs, desires...
  - Environment – Societal norms, social context, time or day, location, attention factors...

**DEFINE**

- Create concepts
  - Form hypothesis
- Iterative test & design (qualitative)

**CREATE**

- Define and validate solutions
  - Iterative test & design (quantitative)
  - Validation test

**DEPLOY**

- Implement solutions
  - Measure outcomes
  - Define guidelines
  - Develop design patterns

**EXPLORATORY**

**FOUNDATION**

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Trust: It

Ask questions or gather reactions for topics that people can reliably respond to

Observe behaviors & environmental factors; gather artifacts; model underlying motivations, predict future behaviors

Systematically gather data across individuals utilizing ask & observe methodologies
# Trust:It Research Methodologies

## Multi-Disciplinary
- Anthropology
- Cognitive Psychology
- Data Science
- Economics
- Ergonomics & Human Factors
- Market Research
- Medical Sciences
- Statistics
- UX Research

## Data Collection
- In-Context vs. In-Lab
- In-Person vs. Remote
- Qual. vs. Quant.
- Recall vs. Reaction
- Target vs. Actual

## A/B Testing
- Benchmark Evaluation
- Biometrics
- Card Sorting
- Clickstream Analysis
- Concept Testing
- Data Mining
- Desirability Study
- EKG & EEG

## Ethnography
- Eye Tracking
- Facial Coding
- In-Depth Interviews
- Iterative Test & Design
- Journey Mapping
- Longitudinal Studies
- Mind Mapping
- Navigation Tree Test
- Online Intercepts

## Personas
- Recall & Recognize
- Secret Shopper
- Spark Analysis
- Surveys
- Talk-Aloud Protocol
- Task Flow Analysis
- Usability Study
- User Diaries
- Validation Testing
There is no perfect method. Each has strengths and limitations. The best approach isn’t one methodology, but a combination.
Case Study: Inform Shoppers of In-Store Data Collection Practices

Gather Context

*People*: What should be communicated?
*Environment*: How should it be communicated?
In-Depth Interviews
Research Question: What do people know? What do they expect? What do they understand?

Ask

Observe

Experiment

Recall & Recognize Test
Research Question: Can we notify people using in-store signage? What in-store messaging gets the most attention? What are their attributes? Generate hypothesis as to why.

In-Context Observation
Research Question: Can we notify people on their mobile devices? Do environmental factors impact people’s ability to receive notices on their mobile devices? What is the best context and factors for messaging?
What Do People Know, What Do They Expect?

IN-DEPTH INTERVIEWS (2013-2015 US GEN.POP)

1:1 lab-based sessions

Blind research goal with funnel-based methodology

Talk aloud protocol to gather expectations and reactions

Do:It recruiting methodology

“Do you think that retail stores such as Target, Walmart, Macy’s, Best Buy, Home Depot, etc. are able to track your cellphone while in the store?”

“Read the article, tell me your thoughts. Is it something you were aware of prior to reading the article?”

Attention, Shoppers: Store Is Tracking Your Cell

By STEPHANIE CLIFFORD and DAVID MARTIN
JULY 9, 2013

Like dozens of other brick-and-mortar retailers, Nordstrom wanted to learn more about its customers — how many came through the doors, how many were repeat visitors — the kind of information that e-commerce sites like Amazon have in spades. So last fall the company started testing new technology that allowed it to track customers’ movements by following the Wi-Fi signals from their smartphones.

*https://www.nytimes.com/2013/07/16/business/attention-shopper-stores-are-tracking-your-cell.html?_r=0
Amber didn’t expect that stores are collecting data from her phone.

When prompted to discuss her thoughts, she doesn’t understand what would be collected, how and why.
Alicia was asked to read the article "Attention Shoppers: Store is Tracking your Cell"
In-Store Mobile Usage

IN CONTEXT OBSERVATION (US 2013)

Observe when and where mobile phones are used in stores

Assess the ability to hold a mobile phone while shopping

4624 shoppers; AM & PM, weekday/weekend, in-mall, big box, urban, suburban, rural

Bloomingdale’s, Costco, Hollister, Walmart, Neiman Marcus, Pottery Barn, Macy’s, Target, TJ Maxx, Walgreens
11% of people had phones visible at a given time

<table>
<thead>
<tr>
<th>HANDS AVAILABLE</th>
<th>37%</th>
<th>33%</th>
<th>30%</th>
</tr>
</thead>
<tbody>
<tr>
<td>No ability</td>
<td>0 free hands</td>
<td>1 free hand</td>
<td>2 free hands</td>
</tr>
<tr>
<td>Limited ability</td>
<td>20%</td>
<td>53%</td>
<td>27%</td>
</tr>
<tr>
<td>Full ability</td>
<td>30%</td>
<td>53%</td>
<td>27%</td>
</tr>
</tbody>
</table>

30% of people had phones visible at a given time
What Are the ‘Best Signs’? What Is Given Attention?

**RECALL & RECOGNIZE (2013 US GEN.POP)**

Secret shopper study followed by 1:1, 60 minute lab-based test

Blind research approach

Open and prompted recall grounded in storytelling

**OPEN RECALL**

Participants were given a floor plan of each store with key landmarks such as registers

**PROMPTED RECALL**

Participants were given a set of signs and asked which ones they had seen – 50% of signs were in the store, 50% were not
People Were Wrong More Often than Right

Signs Recalled

- Only 8% of signs were recalled unprompted, and only 26% when prompted, 0% recalled consumer notice.

Signs Recalled (Prompted)

- 26% of the signs they thought they saw, were not in store.
Case Study: Create an Icon to Inform Mobile Users That Personal Data Is Being Collected

Create Concepts and Refine Solutions
Do They See It?

**EYE TRACKING**
determines if the eyes have ‘focused’ on measuring where and for how long an item is viewed.

Eye tracker

**Focus (fixation)**

**Pathway between fixations (saccade)**

** Longer duration**

** Shorter duration**

Participants don’t see fixation visualizations on the screen.

**ITERATIVE TEST AND DESIGN**
Over 200 rounds of testing with 30 different methodologies to support concepting.
Do People Understand the Meaning of the Icon? Is It Desirable?

VALIDATION TESTING (2013 US GEN.POP)
Quantitative

Unmoderated word association exercise

Positive and negative controls included

“Imagine you saw this symbol on the status bar of your phone while you were browsing the web. Which words would DESCRIBE the symbol? Select all that apply.”

Access
Alive
Appealing
Approachable
Attractive
Authentic
Beneficial
Busy
Choice
Collecting
Community
Compelling
Complex
Confidential
Connected
Convincing
Coverage
Credible
Cutting edge
Disconnected
Disruptive
Distracting
Dynamic
Easy
Empowering
Encouraging
Energetic
Engaging
Entertaining
Exciting
Friendly
Frustrating
Giving
Harmful
Helpful
Honest
Human
Impersonal
Ineffective
Informative
Innovative
Inspiring
Interesting
Intimidating
Inviting
Irrelevant
Location
My data
Not Valuable
Overwhelming
Personal
Positive
Receiving
Reliable
Reputable
Rigid
Safe
Sending
Signal
Sharing
Taking
Tracking
Transmitting
Trustworthy
Unattractive
Understandable
Undesirable
Unique
Useful
However data-driven design processes only work if the research is executed properly.

Incorrect or unreliable research findings can be more damaging than not conducting research; people are less likely to doubt a ‘fact’ than their assumptions.
The Order and Content of Survey Questions Can Bias Responses

Spring Tracking Survey 2012
Data for March 15–April 3, 2012
Princeton Survey Research Associates International for the Pew Research Center’s Internet & American Life Project

Sample: n=2,254 national adults, age 18 and older, including 903 cell phone interviews
Interviewing dates: 03.15.2012 – 04.03.2012
Margin of error is plus or minus 2 percentage points for results based on Total [n=2,254]
Margin of error is plus or minus 3 percentage points for results based on cell phone owners [n=1,954]
Margin of error is plus or minus 4 percentage points for results based on those who download apps to their cell phone [n=714]

q35 Has your cell phone ever been lost or stolen, or has this never happened to you?
Based on cell phone owners [N=1,954]

<table>
<thead>
<tr>
<th>CURRENT</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>68</td>
</tr>
<tr>
<td>No</td>
<td></td>
</tr>
<tr>
<td>Don't know</td>
<td></td>
</tr>
<tr>
<td>Refused</td>
<td></td>
</tr>
</tbody>
</table>

q36 Has another person ever accessed the contents of your phone in a way that made you feel your privacy was invaded?
Based on cell phone owners [N=1,954]

<table>
<thead>
<tr>
<th>CURRENT</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>12</td>
</tr>
<tr>
<td>No</td>
<td></td>
</tr>
<tr>
<td>Don't know</td>
<td></td>
</tr>
<tr>
<td>Refused</td>
<td></td>
</tr>
</tbody>
</table>

Taken together, 57% of all app users have either uninstalled an app over concerns about having to share their personal information, or declined to install an app in the first place for similar reasons.
Thank you!

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Tradeoffs and Traps in Testing Disclosures

Craig Andrews
Marquette University
September 15, 2016
Privacy Disclosure Example:
Understanding and/or behavior?

Take a detailed look at how we protect your privacy.

Privacy Built In
We design products with your privacy in mind from the start. Learn more ⬤

Manage Your Privacy
We empower you to make your own choices about what you share and with whom. Learn more ⬤

Government Information Requests
We believe you have a right to transparency. Learn more ⬤

Who can see my stuff?
• Friends

Where do I review who can see or find things I've posted or been tagged in?
• Use Activity Log

What do other people see on my Timeline?
• View As
Before one begins testing...

- Clearly identify purpose/objectives and expected outcomes
- Is an evaluation plan in place before the testing is launched? If not, don’t get involved.
- With teams/panels in evaluation – watch out! KISS principle and the difference between “interesting” and “important” (e.g., do you really need 30 different treatments or 100 coding categories?)
- Are the IVs and DVs clearly named and tied to key information processing objectives?
- Target market’s priors, motivation, ability (e.g., sample knowledge, literacy), opportunity to process information/disclosures?
- Try to understand objectives and focus of different disciplines.
<table>
<thead>
<tr>
<th>Information Processing (Outcome) Variables</th>
<th>Possible Testing Methods</th>
</tr>
</thead>
<tbody>
<tr>
<td>(1) Exposure</td>
<td>Impressions (page views), ratings</td>
</tr>
<tr>
<td>(2) Attention</td>
<td>Recognition, recall, eye tracking</td>
</tr>
<tr>
<td>(3) Affect</td>
<td>Emotions evoked, sentiment analysis, facial/brain imaging</td>
</tr>
<tr>
<td>(4) Comprehension</td>
<td>Message beliefs/ knowledge and accuracy tests</td>
</tr>
<tr>
<td>(5) Yielding/Persuasion</td>
<td>Attitude change</td>
</tr>
<tr>
<td>(6) Decision-Making</td>
<td>Choice scenarios</td>
</tr>
<tr>
<td>(7) Behavior</td>
<td>Click through to action/choice re: privacy settings (location, public/friends, 3rd parties)</td>
</tr>
<tr>
<td>(8) Post-Behavior</td>
<td>Longitudinal change</td>
</tr>
</tbody>
</table>

Tradeoffs with testing methods

Awareness
- Recall – cognitively based; memory issues with age progression.
- Recognition – more contextual, better with emotional/affect ads (Bruzone tests; FCB Recognition); more brand focused.
- Eye tracking – good with controversial issues/topics (warnings); doesn’t assess sentiment/persuasion/cognition/understanding. Is ad received, understood? accepted?

Comprehension
- Beliefs, accuracy, knowledge tests – can assess understanding of disclosures/stimuli objectively. Open to validity issues given selection of exact beliefs/information tested.

Decision-making and behavior
- The ultimate tests, yet many things can affect behavior beyond the disclosure/stimuli tested. Field studies (package disclosures) – pricing, promotion, place, prior attitudes….
- Experiments – Behavior (learning) without understanding? null effects? – poor stimuli, exposure issues, wrong sample … Control groups are very important to infer causality.

Type of Study Design?

- **Type of data?** Primary versus secondary? Experimental (randomized control; causality; does x -> y?); Quasi-experimental; Focus groups; Survey; Eye-Tracking; Content analyses; Meta-analyses; Reviews, ...

- Internal versus external validity (Cook and Campbell 1979)

- Cross-sectional versus longitudinal (change over time)?

- **Study designs** (after-only, pre-post/no control, after-only/control, pre-post/control, Solomon four-group)

- Different types of **control groups** (cf. Andrews and Maronick 1995 *JPPM*)
Common Designs in Testing Ads:
The Importance of Control Groups

1) One-shot case study:
   \[ x \ O \]
   any problems?

2) Pre-post with no control:
   \[ O_1 \times O_2 \]
   any problems?

3) After-only with a control group:
   \begin{align*}
   &\text{EG (R): } x \ O_1 \\
   &\text{CG (R): } O_2 \\
   \end{align*}
   any problems?

4) After-only with a control group:
   \begin{align*}
   &\text{EG (R): } O_1 \times O_2 \\
   &\text{CG (R): } O_3 \text{ O}_4 \\
   \end{align*}
   any problems?

Key: \( x = \) ad treatment, \( O = \) observation; Burns and Bush (2010), Churchill (1979), Cook and Campbell (1979)
Sampling issues

- Consumers in your target market?
  - Knowledge/literacy issues (e.g., average U.S. adult readability scores between 7th-9th grade; Neuhauser 2011)?
    - Senior citizens? English as second language?
- Collecting data online:
  - e.g., “Who are these people?” – address-based versus opt-in sampling; need for cognitive interviews; mTurk and rewards; panel data: “click-throughs” and checks; mobile device viewing
- Probability (simple random, cluster, stratified); Non-probability (convenience, quota, expert)
- Panel company “partners” and different recruitment/incidence levels
- Weighting/propensity scores; size per cell/power tables (Cohen 1969)
Disclosure Stimuli!

- Color? large enough? type size/contrast/other distractors?
- Same testing context as viewed normally
- FTC Clear and Conspicuous Std. (1970; 2013)
- If text – use readability indices
- Pretesting with control groups

Privacy Policy

Last Modified: March 29, 2016

Snapchat is a text and fun way to share experiences with your friends and the world around you. You can send a photo or video Snap to friends, chronicle your day through Story, touchbase using Chat, immerse yourself in global events through Live, and enjoy handcrafted stories from the world’s top publishers on Discover.

Of course, you’ll also provide us whatever information you send through the services, such as Snaps and Chats to your friends. Keep in mind that the users you send Snaps, Chats, and any other content to can always save that content or copy it outside the app. So, the same common sense that applies to the Internet at large applies to Snapchat as well. Don’t send messages or share content that you wouldn’t want someone to save or share.

[Rest of the text is not visible in the image]
Questions and measures

- Screeners (target market: demographics, product usage? consent; quotas)
- Specificity: TACT (target, action, context, time; Ajzen and Fishbein 1980) and product experience/ sufficient knowledge/literacy? credence claims- EOI – (e.g., prescription drugs)
- Funnel (open-ended → successively narrow/closed-ended); question order/priming?
- When/ how long to show stimuli? Prominent? Mobile access?
- Manipulation/confound checks? (Perdue & Summers 1986 JMR)
- Avoid negatives, biasing, hypotheticals, lack of options
- Multiple measures? hierarchy of effects? (Vakratsas and Ambler 1999 JM)
- Creativity (e.g., comprehension tests: if ate four servings – greater than, equal, or less than rec. daily amount? WTP, auctions, choices in mock stores)
- Behavior versus communication/comprehension (understanding)
Analysis Issues

- Match with objectives/data/measures
- Read outside of discipline (e.g., mediation)
- Comparisons with control group(s)
- Significance levels, comparison adjustments
Common Problems Experienced in the Testing Process

- Poor planning: no objectives or evaluation
- Treating exposure as awareness
- No control groups, bad stimuli, wrong sample
- “Sample of one, ” “We already know that”
- Incidence/qualification rates, panel “partners,” re-bidding
- Too many “cooks in kitchen,” 30 different test conditions, 100 coding categories,….
- Conclusion based on six decades of disclosure research: “…when accounting for audience characteristics … and proper delivery modes … disclosures can … be effective communication tools and remedies for consumer and public health policy” (Andrews, 2011, Communicating Risks & Benefits, FDA, p. 156).
Some helpful research on testing/disclosures:

- **Study Design Issues:**

- **Copy Testing Issues:**

- **Clear and Conspicuous Standard:**

- **Warnings and Disclosures:**
Morning break

The next session begins at 11 am
Putting Disclosures to the Test

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