

# AFI Financial Education Practices and Cost Study

## Part A: Justification

### A.1 Circumstances Making Information Collection Necessary

Assets for Independence (AFI) is a national demonstration through which the HHS Office of Community Services (OCS) awards grants to community-based nonprofit organizations and State, local, and tribal government agencies around the country. These grantees implement five-year individual development account (IDA) projects that empower low-income families and individuals to save earned income and purchase an economic asset as a means for becoming economically self-sufficient for the long term. IDAs are special savings accounts in which account-holder deposits can be matched when used to purchase homes, start or expand businesses, or obtain further postsecondary education.

The program is authorized in Section 403 of the Community Opportunities, Accountability, and Training and Educational Services Act of 1998 (Title IV of Public Law 105-285, referred to hereafter as “the Act”). As stated in the Act, the purposes are to determine “(1) the social, civic, psychological, and economic effects of providing to individuals and families with limited means an incentive to accumulate assets by saving a portion of their earned income; (2) the extent to which an asset-based policy that promotes saving for postsecondary education, homeownership, and microenterprise development may be used to enable individuals and families with limited means to increase their economic self-sufficiency; and (3) the extent to which an asset-based policy stabilizes and improves families and the community in which the families live.”

As the primary federally funded program that supports asset building through IDAs, the AFI program is a critical tool for promoting homeownership, micro-enterprise, and secondary education among economically disadvantaged populations. It is also a major locus of financial education for those of limited means. Financial education is seen as a primary component of effective AFI projects. However, only a small share of AFI grants may be used to cover financial education costs,<sup>1</sup> so grantees typically need to supplement the operation of their financial education programs with other resources. Further, financial education is a new endeavor for some AFI grantees, one with which they have little experience or have been able to dedicate few—if any—resources.

OCS has been working to strengthen the quality of financial training provided to AFI grantee staff by implementing the ***Assets for Independence Program Resource Center Financial Education Enhancement Initiative***. Under the Initiative, resources of several kinds—including training, technical assistance, and materials—are being provided to AFI grantees, in order to improve the quality and effectiveness of their financial education and asset-specific training efforts.

At the same time, there is little systematic information available on the nature or variety of grantee financial education practices. The data collected from AFI grantees for the Annual Data Report identify the curricula used by grantees and give the amounts and duration of basic financial literacy training and asset-specific training offered. But those data do not address the contents or gaps in curricula, the tools used, the adaptations for specific clientele, the organizational arrangements, the resources, or the funding involved.

**This request is for clearance of two survey instruments to collect in-depth information on AFI grantee practices in the area of financial education including asset-specific training.**

The first instrument, **IC1 - Survey of Financial Education Practices of AFI Grantees**, will be administered to all active AFI grantees.

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<sup>1</sup> Not more than 5.5 percent of AFI grant funds can be spent for training and participant support, including financial training, credit repair, debt counseling, asset-specific training, and other services. See the *Report to Congress: Assets for Independence Program, Status at the Conclusion of the Eighth Year* (OCS, ACF, HHS), p. 9.

Administrative or finance personnel of respondents who have completed at least three years of the active AFI project will also receive the second instrument, the **AFI Financial Education Cost Data Form**:

- 1) **IC2** - 30 direct AFI grantees, and
- 2) **IC3** - 42 sub-grantee agencies.

**IC1**, the **Survey of Financial Education Practices of AFI Grantees** is designed to provide OCS with a better understanding of the types of financial education and asset-specific training provided to AFI participants. By exploring AFI grantee practices on financial education, the survey data can also help inform existing and new grantees, funders, and other interested parties. Some AFI grantees have been implementing financial education for years and can provide the AFI community and other interested parties with a wealth of information on this topic. This survey tries to gain an understanding of who provides the financial education, the process and content of the financial education, and the resources needed to deliver it. OCS will request that all active grantees complete the online survey consisting mostly of multiple choice type questions. The information collected will be shared with all grantees to help improve future financial education and training offered to AFI participants.

The **Survey of Financial Education Practices of AFI Grantees (IC2 and IC3)** covers the following topics:

- Overview of the grantee's financial education programs and one-on-one coaching offerings;
- Timing and extent of the grantee's financial education requirements for AFI participants;
- Format, frequency, and availability of grantee's financial education programming;
- Financial education course content, variations in content, and gaps in available financial education curricula;
- Financial education curricula, training materials, and other tools used by grantee for teaching participants;
- Methods and measures used for tracking participant outcomes;
- Grantee internal staffing, functions, and level of effort for providing financial education;
- Grantee use of external resources (staff of partner organizations, volunteers, consultants) and their functions and level of effort for providing financial education;
- Funding sources and amounts devoted to financial education;
- Maintaining participant engagement and other challenges to the grantee's financial education programs; and
- Grantee training and technical assistance needs in the area of financial education.

The **AFI Financial Education Cost Data** supplements the grantee practices survey. A small sample of grantees will be selected to complete this form. It has been designed to answer several specific questions about the cost of providing basic and asset-specific financial education to AFI participants:

- What resources do grantees and their sub-grantees use to support financial education? What are the resource amounts, types, and variations in resource mix?
- What is the amount of resources for financial education per offering, and what are the key program characteristics affecting this?
- What is the amount of resources expended per client beginning and per client completing financial education?

To answer these questions, the cost data instrument uses an approach developed and applied in several other studies of non-profit service provision. This approach takes into account the fact that the grantees often operate multiple other programs and support their operations (both AFI and non-AFI) with a variety of resources.

An AFI grantee may offer financial education programs to AFI and non-AFI clients, using a variety of resources, at different times during the year, using different trainers or providers and different formats.

Understanding the full picture is necessary in order to get accurate cost information and see how AFI and other financial education programs inter-relate and leverage each other.

Collecting accurate and complete cost data takes some time and effort. The data should be collected at the level of organization delivering the financial education. This could be a grantee or sub-grantee organization. The **AFI Financial Education Cost Form** is designed for administration through an interview, after sending the form in advance to a grantee or sub-grantee that has been selected into the cost data sample. Data from the prior year's Annual Data Report can be used to pre-populate many fields. Then the respondent will only need to update those fields as necessary.

It is anticipated that most AFI grantees will offer at least one basic financial education program, perhaps an advanced financial education program, and asset-specific trainings covering from one to three types of assets. All such offerings are covered in this form. The **AFI Financial Education Cost Data Form** has three steps, described below:

1. Defining the grantees'(or sub-grantees') financial education programs—this section helps the respondent define each separate financial education program component. For this form's purposes, a financial education program is an offering of financial education (including asset-specific training)
  - a. by a specific provider,
  - b. over a specific time period,
  - c. of a specific type and format, and
  - d. to a specific group of clients.
2. Identifying the resources used for each of the financial education programs—this section collects information on how the financial education programs identified in the first section were staffed, the costs associated with that staffing, the costs of materials, and any other direct costs. It asks how many hours were delivered and how many participants began/completed the program. It covers volunteer and in-kind resources as well as those paid by the respondent organization.
3. Obtaining a resource summary and cross-walking this to the financial education programs previously defined—this section gathers administrative (indirect) cost information for the respondent organization, summarizes all the funding sources for the organization, and then identifies which sources support the financial education programs.

The data collected through the **AFI Financial Education Cost Form** will enable analysts to develop several important cost measures for financial education offered by AFI grantees:

- Total and average costs of basic financial education offerings, advanced financial education offerings, and asset-specific trainings;
- Total and average costs of financial education offerings by AFI grantees, including direct and indirect costs and the value of volunteer or donated effort;
- Costs per participant starting and completing financial education programs;
- Breakdown of these measures according to grantee structure (grant size, target population, agency type, grantee type -single vs. network, etc.).

Combined results from the survey and cost form will provide OCS with comprehensive descriptive data on the financial education practices among AFI grantees.

The time period covered by the data collection will be the most recently ended Federal Fiscal Year. Copies of the two instruments are provided in Appendices B and C, respectively. The information gathered with them will enable the OCS to make a thorough assessment of the current state of financial education across the AFI projects and to target the **AFI Financial Education Enhancement Initiative** more closely to the challenges and needs identified by grantee respondents.

## A.2 Purpose and Use of Information

### A.2.1. Project Overview

The Office of Community Services (OCS), the program agency for AFI, seeks to continue to strengthen the quality of financial training provided to AFI grantee staff by implementing the ***Assets for Independence Program Resource Center Financial Education Enhancement Initiative- Phase II***. Following on the work begun under Phase I, OCS is intensifying the effort to meet many of the financial education training needs of AFI grantees, provide a robust array of tools and resources, and ultimately affect grantee outcomes. Through the proposed data collection, OCS will develop knowledge about current grantee practices in financial education. As a result, it will be better able to make available technical assistance, tools, and strategies for AFI grantees working to improve their programs and the outcomes for their clients.

AFI grantees and their partners face a number of challenges in implementing financial education efforts. These include insufficient understanding among trainers (beyond a superficial level) of critical financial concepts and a lack of resources with which to invest in staff training and materials. Without adequate training, inexperienced trainers may tend to over-simplify the material and have difficulty leading participants through the learning cycle to the application of concepts. AFI grantees are also challenged to provide culturally relevant financial education (this involves more than translating materials to another language), often to geographically dispersed populations. Finally, the current state of the financial services industry and the economy also challenge AFI grantees in the provision of effective financial education.

For education focused on asset-building, the challenges are similar. Many AFI grantees do not have staff members that are skilled in providing homebuyer education, business plan development, and education/career counseling or planning. Grantees sometimes develop partnerships with organizations that can provide this type of training. Even so, the grantees may not have the capacity to assure the quality of the training provided.

### A.2.2. Purpose of the Information

Ultimately, AFI grantees need to offer their IDA clients training that: 1) delivers worthwhile and useful information to support IDA savings and goal achievement; 2) is delivered in a way that appeals to different learning styles; and 3) is accessible in terms of time, location, and content. OCS will be better able to assist them in improving their financial education once it has a full set of data on grantee financial education practices.

In order to develop in-depth knowledge on grantee practices, OCS will conduct a review of grantee practices and strategies concerning financial literacy training, at basic as well as more advanced levels. Specific topics to be covered include: the financial education curricula used by grantees; amounts and duration of financial literacy training and asset-specific training required by grantees; assessment tools that are used to determine participant needs and effectiveness of training efforts; costs and sources of funding for training; and strategies for tracking participant progress in developing financial skills. ***The primary means of information-gathering for this purpose is the data collection proposed in this request for OMB clearance.***

### A.2.3 Who Will Use the Information

There is growing interest in the availability and efficacy of financial education, particularly in light of current economic conditions and the role of credit card debt and subprime mortgages in bringing about the recession and putting many low-income families in deep economic distress. The proposed data collection—as part of the ***AFI Financial Education Enhancement Initiative***—will fill gaps in knowledge about the financial education being offered to AFI participants (and other clients) by AFI grantees.

OCS is already making use of the small amount of grantee-reported information on financial education practices collected to prepare the annual AFI Report to Congress, as well as the limited information provided in grantee applications and progress reports. OCS will use the new information gathered with these two instruments for several purposes:

- To report on the state of financial education among AFI grantees, addressing both basic financial education and asset-specific training;
- To identify the full range of curricula and materials currently in use for financial education, the ways content may vary with clientele, and the gaps in available curricula and materials;
- To analyze patterns of staffing, level of effort, and use of internal vs. external personnel in financial education delivery;
- To assess the degree to which evaluation activities are conducted for financial education programs; and
- To understand the costs of grantees' financial education programs and how their sources of funding to provide basic financial education and asset-specific training for AFI participants.

In addition, grantees will use this information—which will be made readily available through the Resource Center—to examine their own financial education programs in comparison with those of other grantees, to re-evaluate and potentially revise their basic financial education and asset-specific offerings, and to analyze their own staffing and costs relative to other programs.

Finally, policy makers will be able to use this information to make informed decisions about future policy and funding for AFI and other asset-building initiatives.

#### **A.2.4 Item-by-Item Justifications**

Both instruments were pretested with nine grantees attending the financial training academies presented under the ***AFI Financial Literacy Enhancement Initiative***. These pretests allowed us to test the questions on grantees from both networks and single agencies, as well as with grantees from different agency types. The testing helped us clarify some of the question wording and build upon the response categories, as well as give us some timing estimates which were used in determining respondent burden.

## A.2.4(a) AFI Survey of Financial Education Practices Item-by-Item Justification

The item-by-item justification below shows the question content and the reason for inclusion.

Survey Section	Q #	Items	Justification
<b>FE Contact Information</b>		AFI Grantee Name:	Identify grantee agency and AFI funding stream(s)
		Name(s) of Partner or Subgrantee Organization(s) Represented in the Survey	
		AFI Grant Number(s) Represented in the Survey:	
		Individual Responsible for Completing this Survey:	Identify individual respondent to contact for missing data
		Email:	
		Phone Number:	
<b>Overview of the Range of Financial Education Programs Offered</b>	1	Please tell us which of the following programs are offered to your AFI participants. Check all that apply.	Identify the types of financial education programs that are being offered to AFI participants.
	2	Which statement best describes your organization's overall approach to financial education? Please select one from the list.	Provides information on whether the grantee provides financial education to individuals outside of the AFI project.
<b>AFI FE Program Requirements</b>	3	What is the total number of hours or sessions of basic financial education (FE) that each AFI participant is required to complete?	These questions tell us more about the requirements for financial education under the AFI grant, including the total number of hours required, and when the required education needs to be completed within the context of the program.
	4	Must AFI participants complete all, some, or none of their required hours/sessions of basic financial education before opening an IDA in your AFI project? Please select one from the list.	
	5	Are AFI participants required to take other FE courses each year in order to maintain active status in the AFI program?	
	6	Which of the following statements best describes how your AFI project's financial education (FE) requirement is most often applied? (Please check one.)	
	7	Please tell me the total number of participants who participated in the Basic Financial Education training between October 1, 2010 and September 30, 2011.	
	7a	Out of this total, please tell me the total number of AFI participants who participated in the Basic Financial Education training between October 1, 2010 and September 30, 2011.	
	7b	Out of this total, please tell me the total number of AFI participants who completed the Basic Financial Education training between October 1, 2010 and September 30, 2011.	
<b>AFI Target group</b>	8	Which of the following primary target groups does your AFI program serve? (Please check any target group your program serves and enter a number indicating the proportion that each target group is served by the AFI program, e.g., 10 for 10%, 50 for 50%, up to 100 for 100%.)	This information will allow us to determine whether the financial education provided varies for different populations or subgroups.
<b>Description of Financial Education Training</b>	9	Please describe the required FE that you provide to AFI participants. Please provide as much detail as you can and use the following description as an example.	Provides a general description of the financial education provided to AFI participants in the grantee's own words.
	9a	How often did you offer basic FE trainings during the most recent AFI fiscal year e.g., from October 1, 2010-September 30, 2011)? (Check one)	
<b>FE Instruction Methods</b>	10	What type of experience does your FE Instructor have to teach Basic Financial Education? (Please select all that apply)	Provides a description of the type and quality of experience the primary FE instructor has in teaching financial education.
	10a	How many years has your primary FE instructor taught basic (FE) financial education?	Obtains information about the number of years of experience the primary FE instructor has in teaching financial education.
	11	What instruction method format(s) are used for your basic required FE course? (Please check all that apply.)	Obtains information about the formats used to provide financial education to AFI participants.
	12	What learning activities are used for your basic required FE course? (Please check all that apply.)	
	13	Do you provide individual one-on-one, personalized financial counseling or coaching to AFI participants that focuses on basic financial concepts such as money management, budgeting, credit repair, and building a banking relationship? Do not include case management for non-financial issues, or asset-specific counseling, such as homeownership counseling in this response.	These questions determine whether the grantee provides one-on-one counseling or coaching to AFI participants and identifies the content of that coaching.
		IF YES: During the past year between October 1, 2010 – September 30, 2011, what is the average number of hours you spend per participant	These questions also determine the level of frequency of the one-on-one

		each year providing one-on-one personalized financial counseling or coaching to AFI participants? Do not include case management for non-financial issues or asset-specific counseling, such as homeownership counseling in this response.	financial counseling provided by obtaining the average number of hours spent per participant on counseling in the past year, and the number of participants that were counseled.
		IF YES: How many AFI participants received one-on-one, personalized financial counseling or coaching between October 1, 2010 and September 30, 2011? Do not include case management for non-financial issues or asset-specific counseling, such as homeownership counseling in this response.	
		IF YES: What is the content of the one-on-one, personalized financial counseling or coaching? Please check all that apply.	
<b>Financial Education Course Content</b>	14	Which of the following topics are covered in the basic financial education (FE) program that AFI participants are required to attend? (Please check all that apply.)	Elicits information about the topics and variety of topics on financial education offered to AFI participants.
	15	Is your basic financial education program a cohort-based model or a non-cohort based model? It is a cohort-based model if the participants attend a sequence of classes together as a group. A non-cohort based model is when participants are given a schedule of classes and instructed to choose sessions that are convenient for them. Please select one.	Determine whether the financial education offered is based on a cohort or non-cohort model of recruitment.
<b>Gaps in Available FE Curricula</b>	16	Please tell us which topics you would like to, but are unable to cover in your required FE, either because current resources or time are limited, you don't have a qualified instructor to teach the topic, or information or knowledgeable trainer on topic is just not available. (Please specify all topics you would like to be able to cover in your FE training.)	tries to identify any perceived gaps in the financial education offered to AFI participants
<b>Variations in FE Course Content</b>	17	Does the course material for your required financial education course always stay the same, or do instructors vary and adapt the course materials to meet the needs of specific clientele?	Identifies how often and why course content varies to meet the needs of AFI participants.
	17a	If FE varies in materials, please tell us how you vary the content of your financial education training to address clients' needs:	
<b>FE Curriculum</b>	18	Which of the following curricula do you use in your AFI required financial education? (Please check all that apply.)	Obtains the names of the curricula used by grantees in providing financial education to their AFI participants.
	18a	Please tell us why you use the particular curricula and which modules are most useful in the ones you use.	
<b>Other Financial Education Training Materials</b>	19	What other training materials/tools do you use in your AFI required financial education? (Please check all that apply.)	Obtains information about other training materials used in providing financial education to their AFI participants.
	19a	Please tell us the names of any videos, games, online tools, or other items that you find useful for teaching participants about budgeting, banking, and financial management topics	Elicits information about other tools and training materials that AFI grantees use in their financial education programs.
<b>Maintaining Participant Engagement in Financial Education</b>	20	What are the most effective ways for promoting AFI participants' participation in the required financial education? (Please check up to three ways.)	Identifies techniques that grantees use to keep participants engaged in the financial education trainings and that elicit changes in participant's behavior.
	21	What are the most effective ways for maintaining AFI participants' interest in the required financial education? (Please check up to three ways.)	
<b>Participant Outcomes</b>	22	How do you determine whether your participants are achieving favorable results from the financial education course? (Please check all that apply.)	Determines the frequency AFI grantees are conducting any evaluation to determine the effectiveness of their financial education programs.
<b>Participant Measures</b>	23	Which of the following measures or questions do you use to determine participant outcomes? (Please check all that apply.)	Identifies what types of evaluation or measurement grantees are using to determine the effectiveness of their financial education.
	23a	Which of the following measures or questions do you include on your overall course evaluation? (Please check all that apply.)	
<b>FE Internal Staffing, Functions, and Level of Effort</b>	24	Please indicate who within your organization provides the basic financial education to your AFI participants.	Identifies who within the grantee organization is involved in the delivery of financial education and what the annual level of effort is for these staff members. Information also helps us understand labor costs involved in providing financial education to AFI participants.
	25	Please indicate who within your organization provides the basic financial education to your AFI participants and what functions they perform. Please tell us your best estimate of the total number of hours each staff spent per year between October 1, 2010 and September 30, 2011 to perform the various functions to prepare and deliver financial education to AFI participants. If no internal staff provides basic financial education to your AFI participants, check the box immediately below and skip to Q.26.	
<b>Financial Education External Staffing, Functions, and Level of Effort</b>	26	Please indicate who outside your organization are involved in providing basic financial education to your AFI participants.	Identifies who outside the grantee organization is involved in the delivery of financial education and what the annual level of effort is for these staff
	27	Please tell us who outside the grantee organization is involved in providing basic financial education to your AFI participants, the total	

		number of hours per year, and what functions they perform. Please tell us your best estimate of the total number of hours external staff spent per year between October 1, 2010 and September 30, 2011 to perform the various functions to prepare and deliver financial education to AFI participants. If no external staff provides basic financial education to your AFI participants, check the box immediately below and skip to Q.28.	members. Information also helps us understand labor costs involved in providing financial education to AFI participants.
<b>Funding for FE</b>	28	What funding sources do you use to finance your basic financial education for AFI participants? Please check all that apply.	Will help identify the sources of funding and costs of providing financial education from grantees not selected to complete the AFI Financial Education Cost Data Form. We will ask grantees for their best estimates on the total cost of providing financial education to AFI participants in the last year, and the average amount of funding per year. We will then compare this information with the data we collect from similar agencies/grants during the AFI Financial Education Cost Data Form data collection.
	29	What is the total amount of funding spent on your required FE for AFI participants in the past year? (Please provide your best estimate).	
	29a	Please provide best estimate of the total amount of in-kind funding provided for AFI basic FE training between October 1, 2010 and September 30, 2011? (Please provide your best estimate.)	
	29b	What is the total amount of funding from non-AFI sources for the AFI basic FE training in the past year? (Please provide your best estimate.)	
	29c	What is the total amount of funding for training materials for the AFI basic FE training in the past year? (Please provide your best estimate.)	
	30	What is the average amount of funding spent per AFI participant on your required financial education in the past year? (Please provide your best estimate).	
<b>Challenges Faced</b>	31	What are the most serious challenges faced by your AFI program in providing effective financial education to participants? (Please check up to three challenges.)	Identifies any serious difficulties or challenges faced by grantees in providing effective financial education.
<b>Training and Technical Assistance Needs</b>	32	What are the most important areas in which the AFI Resource Center could provide assistance to your organization in improving your financial education?	Identifies training and technical assistance needs for grantees regarding financial education
<b>Micro-Enterprise Training</b>	33	Which of the following topics are covered in the business education for AFI participants?	Will help us better understand what level and types of training is being provided to those planning to start or expand a business.
<b>Micro-Enterprise Counseling</b>	34	Do you provide one-on-one personalized business ownership counseling to AFI participants? IF YES, what is the average number of hours spent per participant per year, what is the nature of the counseling, and how many individuals were counseled in the past year?	Provides us with the level of effort expended on this type of training, and the topics being discussed during counseling.
<b>Home Ownership Training</b>	35	Which of the following topics are covered in the home ownership education for AFI participants?	Will help us better understand what level and types of training is being provided to those planning to purchase a home.
<b>Home Ownership Counseling</b>	36	Do you provide one-on-one personalized home ownership counseling to AFI participants? IF YES, what is the average number of hours spent per participant per year, what is the nature of the counseling, and how many individuals were counseled in the past year?	Provides us with the level of effort expended on this type of training, and the topics discussed during counseling.
<b>Secondary Education Training</b>	37	Which of the following topics are covered in the secondary education training for AFI participants?	Will help us better understand what level and types of training is being provided to those planning to participate in secondary education.
<b>Secondary Education Counseling</b>	38	Do you provide one-on-one personalized secondary education to AFI participants? IF YES, what is the average number of hours spent per participant per year, what is the nature of the counseling, and how many individuals were counseled in the past year?	Provides us with the level of effort expended on this type of training, and the topics discussed during counseling.

### A.2.4(b) AFI Financial Education Cost Data Form Item-by-Item Justification

The item-by-item justification below shows the question content and the reason for inclusion.

Survey Section	Items	Justification
<b>STEP 1: Guide for Defining AFI Grantee's Financial Education Programs</b>		
<b>Part I: Grantee or Sub-Grantee Information</b>	1. What type of organization is the grantee?	These questions provide the organizational context for the grantee's AFI programs.  Questions 1 and 3 will be pre-populated with data from the Annual Report to Congress data.
	2. What are the principal activities and programs operated by the grantee?	
	3. What was the annual budget for the grantee organization in the most recently completed fiscal year?	
	4. List all the programs currently in operation, for AFI clients and others, and specify the type.	



<b>Part II: Defining Grantee's or Sub-Grantee's Financial Education Programs</b>	5. Please identify each separate financial education program offered during this period. 6. Please identify each asset-specific training program offered during this period.	These questions are necessary to define each part of the grantee's financial education programming, in terms of timing, format, content, provider, and client group.
<b>STEP 2: Resources Used for Grantee's Financial Education Programs</b>		
<b>For each financial education program and asset-specific training program offered:</b>	If the grantee is the provider, were other organizations involved? If so, what were their roles? If the provider is a different organization, what was the arrangement with the grantee? If contractual or fee for service, what was the full cost (even if not all paid by the grantee)? How was the program staffed? List the costs of staff for this program. List materials used for this program and costs of each item. List any other direct costs of this program (such as space rental, computer leasing, telephone charges, transportation) If program has a case management component, estimate % of staff time/ costs in Q. 5 for individualized financial counseling. How many hours of education/training were delivered in the whole program? How many clients began the program? How many clients completed the program?	These questions elicit information on how the financial education and asset-specific training were provided, in order to identify the cost elements involved. For each cost element, the form collects the direct cost. Fringe and overhead amounts applicable to salaries are collected. Other (non-labor) direct costs are collected. All volunteer or donated elements are identified.  Q 9 provides data needed to measure per hour costs of financial education provision. Qs10-11 provides data needed to measure per-client costs of financial education provision.
<b>STEP 3: AFI Financial Education Resources Cross-walk</b>		
<b>Table A: Administrative Cost Background</b>	A1. What is the accounting period covered by financial reports used to complete this form? A2. Does the grantee use a standard overhead/administrative rate? If yes, what is this rate? A3. If no, is overhead/administrative rate determined for the AFI program? A4. Which staff are included in the overhead rate (e.g., fiscal staff, legal staff, agency management) A5. Is there a standard fringe benefit rate? If yes, does it vary by staff?	For grantees providing financial education using internal resources, these questions are necessary to calculate the full administrative costs associated with financial education provision.
<b>Table B: Annual Program Funding Sources for All Activities and Programs of This Organization</b>	B1. Source name B2. Total value B3. Was this source used for [each of the organization's financial education programs]? B4. Was this source used for [each of the organization's asset-specific training programs]?	Identifies the sources and corresponding amounts of funding for the organization as a whole and the amounts used for each financial education program and asset-specific training.

### A.3 Use of Improved Information Technology and Burden Reduction

The proposed data collection will make extensive use of electronic mechanisms, including electronic submission of results, and will use information technology to reduce respondent burden. Improved information technology will be used in this data collection in the following ways:

- To advise AFI grantees of the survey effort and encourage the prompt participation of sample members, through the AFI Resource Center, on-line newsletters, and community of practice conference calls;
- To facilitate grantees completion of the **Survey of Financial Education Practices of AFI Grantees** through on-line survey software;
- to establish the sampling frame and recruit grantees to complete the **AFI Financial Education Cost Data Form**;
- to pre-populate fields in the **AFI Financial Education Cost Data Form** from grantees' prior responses to the Annual Report data collection;
- to furnish the pre-populated **AFI Financial Education Cost Form** in Excel format and collect it when completed; and
- To provide access to the survey results for AFI grantees and the public in general.

OCS has broadly implemented the use of automated collection mechanisms to reduce the burden to grantees in providing AFI data for the Annual Report to Congress. Annually, OCS sends instructions to grantees explaining the options available for electronic reporting and sponsors teleconference training and Q&A

sessions for all grantees. With this background, AFI grantees are generally comfortable with automated data collection methods and will find it easy to respond to the survey and cost form.

Further, existing data will be used to the greatest extent possible, to facilitate recruitment for this data collection and to reduce the burden on respondents. As noted above, administrative data collected for the AFI Annual Data Report have been used to develop the sampling frame for the survey and cost form. In addition, for the grantee organizations in the sample, the **AFI Financial Education Cost Form** can be populated in advance with Annual Data Report data, allowing grantees to review and update (as necessary) a number of fields instead of filling them out anew.

#### A.4 Efforts to Identify Duplication and Use of Similar Information

AFI grantees report about their financial education programs in two ways: they answer a small number of questions during the Annual Data Report data collection by OCS, and they may describe these efforts in their application or the narrative annual progress reports to OCS.

The questions from the Annual Data Report that all AFI grantees answer about basic financial education and asset-specific training are shown below.

Indicate the total number of hours each participant is required to complete.
Number of times a year that the training, in its entirety, is offered.
Indicate if this varies. Explain variation.
Indicate the number of participants who have completed the training through September 30, 2009.
What curriculum is used for financial literacy training? Please choose from the dropdown menu. If other is chosen please indicate the curriculum used.
If Other curriculum used, please describe.

Source: 2009 AFI Annual Data Report Form

Although useful for general AFI program description, this limited information does not provide the depth or detail needed by OCS to meet the purposes of this data collection. For example, it does not allow identification of the full range of curricula and materials currently in use for financial education or asset-specific training, the ways content may vary with clientele, or the gaps in available curricula and materials. It also does not support assessment of the degree to which evaluation activities are conducted for financial education programs.

Regarding the **AFI Financial Education Cost Form**, a number of questions on the form—necessary to establish basic facts about the grantee organization—do duplicate the Annual Data Report data collection. However, it is planned to use those responses to fill the **AFI Financial Education Cost Form** fields in advance, before sending out the instrument to grantees in the sample. This will eliminate duplication of effort for the grantees.

#### A.5 Impact on Small Businesses or Other Small Entities

There are small community-based nonprofits among the current AFI grantees, meeting the OMB definition of “not-for-profit enterprises that are independently owned and operated and are not dominant in their field.” The agency budgets for the lowest quartile of AFI grants to single grantees fall below the \$1 million mark, while those for the lowest quartile of grants to network grantees fall below the \$1.2 million mark. On this basis, it is estimated that perhaps one fourth of the grantee agencies can be considered small entities.

Measures will be taken to reduce the burden of this data collection on small entities, including the following:

- Automating survey response via the web for ease of completion;

- Assisting potential respondents who request help with the survey; and
- Assisting all grantees in completing the **AFI Financial Education Cost Form**.

## A.6 Consequences of Collecting the Information Less Frequently

This request is for an annual data collection. The first wave of data collection will be carried out over three months beginning in late spring 2010. The consequences for Federal program or policy activities, if the survey and cost form are not approved by OMB, will be a loss of information needed to assess and possibly reshape financial education efforts associated with AFI.

## A.7 Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

The proposed data collection activities are consistent with the guidelines set forth in 5 CFR 1320.6 (Controlling Paperwork Burden on the Public, General Information Collection Guidelines). There are no circumstances that require deviation from these guidelines.

## A.8 Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency

In accordance with the Paperwork Reduction Act of 1995, the Administration for Children and Families published a notice in the *Federal Register* on February 22, 2011. The document number is FR DOC #: 2011-3803. The *Federal Register* notice appeared on pages 9787 – 9788. The authority is Section 3506 of the Paperwork Reduction Act of 1995, 44 U.S.C, Chapter 35, as amended. The notice provided a 60-day period for public comments, and comments were due by April 23, 2011.

**No comments were received.**

The AFI grantee financial education data collection—using the **Survey of Financial Education Practices of AFI Grantees** and the **AFI Financial Education Cost Data Form**—was developed and is being implemented with the assistance of Abt Associates Inc., the prime contractor for the AFI Financial Education Enhancement Initiative. Key members of the Abt team include:

Individuals Consulted on the Study Design		
Name	Telephone Number	Role in Study
K.P. Srinath	301-634-1836	Statistician
Judith Feins	617-349-2370	Project Quality Advisor
Donna DeMarco	617-349-2322	Data Collection Task Leader
Direct inquiries regarding the study's planned statistical analysis to:		
Eliza Kean	301-634-1743	Project Director

## A.9 Explanation of Any Payment or Gift to Respondents

OCS will not provide any payments to grantees specifically for completing the **Survey of Financial Education Practices of AFI Grantees** or the **AFI Financial Education Cost Data Form**.

## A.10 Assurance of Confidentiality Provided to Respondents

OCS provides no assurance of confidentiality regarding the information provided concerning financial education programming by AFI grantees. The information is not individual-specific but is, instead, summary information that is aggregated at the grantee or program level.

## A.11 Justification for Sensitive Questions

The proposed information collection does not contain any questions of a sensitive nature. It focuses on behavior at the grantee or program level, with no data collected about individuals.

## A.12 Estimate of Annualized Burden Hours and Costs

The estimated number of annualized burden hours associated with this data collection is as follows:

Exhibit A-1 Estimated Annualized Respondent Burden Hours and Costs					
Collection	Respondents	Number	Time/min	Frequency	Burden(hrs)
IC-1 Financial Education Practices	AFI grantees & sub-grantees	300	60 min	1	300 hrs
IC-2 AFI Financial Education Cost Data	AFI grantees	30	120 min	1	60 hrs
IC-3 AFI Financial Education Cost Data	AFI sub-grantees	42	120 min	1	84 hrs
TOTAL annualized burden hours					444 hrs
TOTAL annualized costs (\$22.17/hour) <sup>2</sup>					\$9,843

### Respondent Universe Estimation Procedures

#### Respondent Universe Estimation Procedures IC-1: Survey of Financial Education Practices

To gather accurate and detailed data on the financial education practices of network grantees, there will be no sampling of grantees for the **Survey of Financial Education Practices** of AFI Grantees. We propose to include the entire population of active grantees -- approximately 300 primarily community-based nonprofit organizations, with some State, local, and tribal government agencies included.

Specifically, 32 percent of AFI grantees are community action agencies , 13 percent are community development , and other nonprofit organizations make up most of the remaining grantee types. Just seven percent are State, local, and tribal government agencies. The total number of current grantees may vary slightly from the 2008 count shown, as new awards are made and older projects are completed.

Some AFI grantees—known as “network grantees”—are coordinating agencies that pass the implementation and funding along to sub-grantees (ranging in number from two to 531).

We expect the grantees to enlist the help of the most knowledgeable respondents for their own programs, usually the staff, partners or contractors that actually deliver the financial education or asset-specific training.

Since OCS is requesting that the survey be mandatory, a 100 percent response rate is expected from the grantees. The results will produce statistically valid program-wide information on numerous aspects of financial education practices across the AFI projects.

#### Respondent Estimation Procedures: AFI Financial Education Cost Data

Questions on the AFI Financial Education Cost Data form require a fairly comprehensive level of financial information about and understanding of the organization implementing the financial education or asset-specific training. Therefore, respondents are limited to the approximately 30 grantees in the fourth or fifth year of their AFI grant. The cost survey will be administered to two distinct groups: grantees (IC-2) and sub-grantees(IC-3).

OCS considers the AFI Financial Education Cost research component to be exploratory, because nothing systematic is known yet about the full mix and scale of resources (beyond the AFI grants) supporting this vital work with AFI participants.

#### Respondent Universe IC-2: Direct Grantee Financial Education Cost Data

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<sup>2</sup> The assumed hourly wage is the June 2008 mean hourly earnings for U.S. full-time civilian workers who are “miscellaneous community and social services specialists.” See U.S. Department of Labor, Bureau of Labor Statistics, *National Compensation Survey, Occupational Wages in the United States*. From Table 7 of <http://www.bls.gov/ncs/ocs/sp/nctb0721.txt>.

Based on historic distribution, we anticipate twenty single agency grantees and ten networks in the fourth or fifth year of their grant to comprise the pool of respondents. This distribution will provide sufficient information on the variation in financial education delivery and funding patterns to allow us to report on the resources that support basic and asset-specific training.

### **Respondent Universe IC-3: Sub- Grantee Financial Education Cost Data**

Most network grantees have partners—sub-grantees—that deliver financial education to program participants using AFI grant funds. The sub-grantees or partner's data reported by network grantees in 2008 will form the second group of respondents to the IC-3 Cost Data.

The total number of current grantees in the fourth or fifth year of their grant may vary slightly from the estimated counts, but on 70% of grantees each year have sub-grantees that should complete the Cost Form. The mean number of sub-grantees is 6 for most network grantees, which is the basis for estimating 42 sub-grantee respondents each year . We will exclude from the sub-grantee data collection any grantee with more than 20 sub-grantees delivering financial education to AFI participants. Since OCS is requesting that the survey be mandatory, a 100 percent response rate is expected.

### AFI Grantee Organization Characteristics

	Single Grantees		Network Grantees	
	Number	Percent	Number	Percent
Total Grantee Organizations, 2008a	204	100%	88	100%
Number of Current AFI Grants	204	100%	88	100%
One	141	69.1%	39	44.3%
Two or more	63	30.9	49	55.7
Type of Organization	Single Grantees		Network Grantees	
Community Action Agency (Non-profit)	60	29.4%	29	33.0%
Community Action Agency (Government Agency)	2	1.0	4	4.5
Community Development Corporation	22	10.8	12	13.6
Community Development Financial Institution	12	5.9	6	6.8
Credit Union	3	1.5	0	0.0
Economic Development Agency (State/Co/City Govt)	4	2.0	1	1.1
Educational Institution	2	1.0	0	0.0
Faith-based Organization	9	4.4	4	4.5
Housing Agency (State/County/City Government)	6	2.9	3	3.4
Housing Organization (Non-Profit)	16	7.8	1	1.1
Human Service Organization (Non-Profit)	30	14.7	3	3.4
Human Services Agency (State/Co/City Government)	3	1.5	1	1.1
Micro-enterprise Development Organization	6	2.9	0	0.0
Refugee Resettlement Organization	2	1.0	0	0.0
United Way Organization	7	3.4	14	15.9
Workforce Development Agency (State/Co/City Govt)	2	1.0	1	1.1
Youth Development Organization	2	1.0	2	2.3
Other	12	5.9	7	8.0
Missing	4	2.0	0	0.0
Number of Asset-Specific Programs	Single Grantees		Network Grantees	
One	38	18.6%	10	11.4%
Two	35	17.2	2	2.3
Three or more	127	62.3	75	85.2
Missing	4	2.0	1	1.1
Grantee Organization Overall Budget Size	Single Grantees		Network Grantees	
Under \$1 million	48	23.5%	20	22.7%
\$1 million – under \$10 million	97	47.5	36	40.9
\$10 million – under \$50 million	40	19.6	23	26.1
\$50 million and over	12	5.9	9	10.2
MISSING	7	3.4	0	0.0
Mean	\$48,145,519	-	\$28,501,162	-
Median	\$3,502,146	-	\$3,944,309	-
Partners/Sub-Grantees per Network	Single Grantees		Network Grantees	
One	N/A	N/A	15	17.0%
Two-five	N/A	N/A	27	30.7
Six-ten	N/A	N/A	11	12.5
Eleven-twenty	N/A	N/A	12	13.6
Over twenty	N/A	N/A	22	25.0
MISSING	N/A	N/A	1	1.1
Mean, all network grantees	N/A	N/A	14.5	-
Median, all network grantees	N/A	N/A	8	-
Mean, excluding grantees with > 20 subs	N/A	N/A	5.7	-

Preliminary data from 2008 Annual Data Report collection.

### A.13 Estimates of Other Total Annual Cost Burden to Respondents and Record Keepers

This data collection effort involves no reporting or recordkeeping costs for respondents other than those described in item A.12 above.

### A.14 Estimate of Cost to the Federal Government

The annualized cost to the Federal Government of the proposed data collection is the cost associated with related activities of the contractor for the Financial Education Enhancement Initiative. That contractor, Abt Associates, will be responsible for planning, implementing, and monitoring the first wave of data collection, including provision of assistance to grantees. Abt Associates will also complete the first annual report on financial education practices. The activities associated with this first wave of data collection are estimated to cost \$88,966.

### A.15 Explanation for Program Changes or Adjustments

This request for clearance does not involve a change in burden due to any program changes or adjustments. It concerns a new data collection not previously submitted to OMB for review.

### A.16 Plans for Tabulation and Publication and Project Time Schedule

Upon OMB approval, the information generated by the **Survey of Financial Education Practices of AFI Grantees** and the **AFI Financial Education Cost Data Form** will be used to develop a research report on **AFI Grantee Practices in Financial Education**.

#### A.16.1 Research Questions

Exhibit A-2 shows the main topics of the report and the research questions associated with each topic.

Exhibit A-2 Research Questions for the Report on *AFI Grantee Practices in Financial Education*

Research Topic	Research Questions
Context of AFI Financial Education	What is the range and mix of grantees and sub-grantees delivering financial education? Who are the clients receiving financial education?
Content of AFI Financial Education	What are the types of financial education provided to AFI participants? What curricula are used, and does this vary with the populations served? What are the contents of these curricula? Does financial education content vary with the populations served? Are curricula adapted to specific clientele (and if so, how)? Are there identified gaps in available curricula (and if so, what are they)?
Process of AFI Financial Education	Who provides financial education (out-sourcing vs. in-house resources)? How is financial education staffed? How is financial education delivered to AFI clients (course formats, when offered)? What is the range and mix of requirements for financial education? How do programs maintain clients' momentum/ensure continued progress?
Resources for AFI Financial Education	What resources are used to support financial education (resource amounts, types, variations in resource mix)? What other programs and grants leverage the AFI grant and support financial education? What is the range of resources for financial education?
Results of AFI Financial Education	What are the outputs of the financial education provided (numbers of clients beginning financial education, numbers completing financial education, hours of financial education provided)? What data are collected about participant learning or about their responses to the training? Do grantees and sub-grantees conduct assessments or evaluations of their financial education components (if so, what do they show)?
AFI Financial Education—Strengths and Challenges	What are the issues and barriers to providing effective financial education? What are recommendations for addressing issues and increasing grantee success in financial literacy and asset-based training?

## A.16.2 Tabulations

Tabulations of data from the **Survey of Financial Education Practices of AFI Grantees** and the **AFI Financial Education Cost Data Form** will be created for each section of the report. The analysis will be primarily descriptive in nature.

Information from the survey will be presented using tables similar in format to the shell shown in Exhibit A-3. As described further in Section B below, the sample will be stratified between single and network grantees, grant size, number of participants, agency type and target population; results will be shown for each stratum.

**Exhibit A-3 Descriptive Tabulation of Survey Data (Illustrative Shell)**

AFI Grantee or Financial Education Characteristics	Single Grantees		Network Grantees	
	Number	Percent	Number	Percent
<b>Total Grantees in Sample</b>	#	100%	#	100%
<b>Item #1</b>				
Category #1	#	%	#	%
Category #2	#	%	#	%
<b>Item #2</b>				
Category #1	#	%	#	%
Category #2	#	%	#	%
Etc.	#	%	#	%

Tabulation of the data from the **AFI Financial Education Cost Data Form** will take a somewhat different format. Analysis of these data will address questions about common patterns of funding for financial education offerings of AFI grantees, typical funding amounts from different sources, and the costs per IDA client beginning and completing financial education. Illustrative table shells for these topics are shown in Exhibits A-4 through A-6.

**Exhibit A-4 Descriptive Tabulation of Cost Form Data—Funding Sources (Illustrative Shell)**

AFI Grantees Reporting Specific Funding Sources				
Most Common FE Funding Sources	Single Grantees		Network Grantees	
	Number	Percent	Number	Percent
<b>Federal Sources</b>				
DHHS other than AFI	#	%	#	%
DHUD	#	%	#	%
Other federal sources	#	%	#	%
<b>State Sources</b>				
State welfare program funds	#	%	#	%
State education program funds	#	%	#	%
Other state funds	#	%	#	%
<b>Local Sources</b>				
Local community development funds	#	%	#	%
Local housing authority funds	#	%	#	%
Local education funds	#	%	#	%
Other local funds	#	%	#	%
<b>Private Sources</b>				
Federal Home Loan Bank	#	%	#	%
Other financial institutions	#	%	#	%
Businesses	#	%	#	%
Local United Way	#	%	#	%
Foundations	#	%	#	%
Other private sources	#	%	#	%

**Exhibit A-5 AFI Basic Financial Education Funding Sources and Amounts (Illustrative Shell)**

Sources, Average Funding Amounts for Basic Financial Education	Single Grantees	Networks	All AFI Grantees
----------------------------------------------------------------	-----------------	----------	------------------



<b>AFI Grants</b>			
Direct cost of financial education	Mean \$	Mean \$	Mean \$
Associated administrative costs	Mean \$	Mean \$	Mean \$
<b>Budgeted Funding (Matching Funds)</b>			
Source 1	Mean \$	Mean \$	Mean \$
Source 2	Mean \$	Mean \$	Mean \$
<b>Other Funding</b>			
Source 1	Mean \$	Mean \$	Mean \$
Source 2	Mean \$	Mean \$	Mean \$

**Exhibit A-6 Cost per AFI Financial Education Client (Illustrative Shell)**

<b>Annualized Unit FE Costs</b>	<b>Single Grantees</b>	<b>Network Grantees</b>	<b>All AFI Grantees</b>
<b>Cost per AFI client beginning basic financial education programs</b>			
Mean	\$	\$	\$
Median	\$	\$	\$
<b>Cost per AFI client completing basic financial education programs</b>			
Mean	\$	\$	\$
Median	\$	\$	\$
<b>Cost per AFI client beginning asset-specific training programs</b>			
Mean	\$	\$	\$
Median	\$	\$	\$
<b>Cost per AFI client completing asset-specific training programs</b>			
Mean	\$	\$	\$
Median	\$	\$	\$

### A.16.3 Reporting

The analyses and tabulations of data from the **Survey of Financial Education Practices of AFI Grantees** and the **AFI Financial Education Cost Data Form** will be presented in a report on **AFI Grantee Practices in Financial Education**. A summary-level outline of the report is shown in Exhibit A-7.

**Exhibit A-7 Draft Outline of Report on AFI Grantee Practices in Financial Education**

<b>Chapter Topic</b>	<b>1. Chapter Description</b>
Chapter 1: Context of AFI Financial Education	Introduces AFI financial education and provides summary description of grantees and sub-grantees, characteristics relevant to variations in financial education practices. Chapter frames remainder of report.
Chapter 2: Content of AFI Financial Education	Presents descriptive data on the content of financial education provided by AFI grantees (including basic financial literacy and money management as well as asset-specific training).
Chapter 3: Process of AFI Financial Education	Describes the organizational arrangements and methods for delivering financial education. Presents data on the range and variation in requirements and how grantees encourage client completion of financial education.
Chapter 4: Resources for AFI Financial Education	Examines the variety of resource types used to provide financial education, presents descriptive statistics (ranges and central tendencies) on per-program and per-client costs.
Chapter 5: Results of AFI Financial Education	Describes available information on what financial education provided by AFI grantees accomplishes, drawing on any assessments or evaluations conducted.
Chapter 6: Effective Financial Education—Strengths and Challenges	Sums up what is known about the issues in providing financial education and ways these issues have been overcome in specific programs. Gathers recommendations for increasing the value of financial education for clients.

#### **A.16.4 Time Schedule for Analysis and Reporting**

The data collection period will be carried out over a two month period in late spring 2011. The data processing and analysis of the data will follow and take approximately four weeks. The report will then be drafted and be submitted four weeks later.

#### **A.17 Reason(s) Display of OMB Expiration Date is Inappropriate**

The data collection instruments created for OCS to assess the status of financial education under the AFI program will display prominently the expiration date for OMB approval.

#### **A.18 Exceptions to Certification for Paperwork Reduction Act Submissions**

This submission describing data collection requests no exceptions to the Certificate for Paperwork Reduction Act (5 CFR 1320.9).