

**CONSUMER FINANCIAL PROTECTION BUREAU  
INFORMATION COLLECTION REQUEST – SUPPORTING STATEMENT  
GENERIC CLEARANCE FOR THE COLLECTION OF QUALITATIVE FEEDBACK  
ON BUREAU SERVICE DELIVERY  
(OMB CONTROL NUMBER: 3170-XXXX)**

**TERMS OF CLEARANCE:** None.

**A. JUSTIFICATION**

**1. Circumstances Necessitating the Data Collection**

In order to work continuously to ensure that its programs are effective and meet the needs of financial institutions, consumers, and stakeholders (collectively, customers), the Consumer Financial Protection Bureau (hereafter “the Bureau”) seeks to obtain OMB approval of a generic clearance to collect qualitative feedback on its service delivery. Qualitative feedback means information that provides useful insights on perceptions and opinions, but not statistical surveys that yield quantitative results that can be generalized to the population of study.

This collection of information is necessary to enable the Bureau to garner customer feedback in an efficient, timely manner, in accordance with its commitment to improving service delivery. The information collected from Bureau customers will help ensure that users have an effective, efficient, and satisfying experience with the Bureau’s programs. This feedback will provide insights into customer perceptions, experiences and expectations, provide an early warning for issues with service, or focus attention on areas where communication, training or changes in operations might improve delivery of products or services. These collections will allow for ongoing, collaborative and actionable communications between the Bureau and its customers. They will also allow feedback to contribute directly to the improvement of program management.

**2. Use of the Information**

Improving Bureau programs requires ongoing assessment of service delivery, meaning a systematic review of the operation of a program compared to a set of explicit or implicit standards, as a means of contributing to the continuous improvement of the program. The Bureau will collect, analyze, and interpret information gathered through this generic clearance to identify strengths and weaknesses of current services and make improvements in service delivery based on feedback. The solicitation of feedback will target areas such as: timeliness, appropriateness, accuracy of information, courtesy, efficiency of service delivery, and resolution of issues with service delivery. Responses will be assessed to plan and inform efforts to improve or maintain the quality of service offered to the public. If this information is not collected, vital feedback from customers on the Bureau’s services will be unavailable.

The Bureau will only submit a collection for approval under this generic clearance if it meets the following conditions:

- Information gathered will be used only internally for general service improvement and program management purposes and is not intended for release outside of the Bureau (if released, procedures outlined in Question 16 will be followed);
- Information gathered will not be used for the purpose of substantially informing influential policy decisions<sup>1</sup>;
- Information gathered will yield qualitative information; the collections will not be designed or expected to yield statistically reliable results or used as though the results are generalizable to the population of study;
- The collection is voluntary;
- The collection is low-burden for respondents (based on considerations of total burden hours, total number of respondents, or burden-hours per respondent) and is low-cost for both the respondents and the Federal Government;
- The collection is non-controversial and does not raise issues of concern to other Federal agencies;
- Any collection is targeted to the solicitation of opinions from respondents who have experience with the program or may have experience with the program in the near future; and
- With the exception of information needed to provide remuneration for participants of focus groups and cognitive laboratory studies, personally identifiable information (PII) is collected only to the extent necessary and is not retained.

If these conditions are not met, the Bureau will submit an information collection request to OMB for approval through the normal PRA process.

To obtain approval for a collection that meets the conditions of this generic clearance, a standardized form will be submitted to OMB along with supporting documentation (e.g., a copy of the comment card). The submission will have automatic approval, unless OMB identifies issues within 5 business days.

The types of collections that this generic clearance covers include, but are not limited to:

- Customer comment cards/complaint forms
- Small discussion groups
- Focus Groups of customers, potential customers, delivery partners, or other stakeholders
- Cognitive laboratory studies, such as those used to refine questions or assess usability of a website
- Qualitative customer satisfaction surveys (e.g., post-transaction surveys; opt-out web surveys)
- In-person observation testing (e.g., website or software usability tests)

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<sup>1</sup> As defined in OMB and agency Information Quality Guidelines, “influential” means that “an agency can reasonably determine that dissemination of the information will have or does have a clear and substantial impact on important public policies or important private sector decisions.”

### **3. Use of Information Technology**

If appropriate, the Bureau will collect information electronically and/or use online tools to reduce burden.

### **4. Efforts to Identify Duplication**

No similar data are gathered or maintained by the Bureau or are available from other sources known to the Bureau.

### **5. Efforts to Minimize Burdens on Small Entities**

Small businesses or other small entities may be involved in these efforts but the Bureau will minimize the burden on them of information collections approved under this clearance by sampling, asking for readily available information, and using short, easy-to-complete information collection instruments. Additionally, all collections will be voluntary.

### **6. Consequences of Less Frequent Collection and Obstacles to Burden Reduction**

Without these types of feedback, the Bureau will not have timely information to adjust its services to meet customer needs.

### **7. Circumstances Requiring Special Information Collection**

There are no special circumstances. The information collected will be voluntary and will not be used for statistical purposes.

### **8. Consultation Outside the Agency**

In accordance with 5 CFR 1320.8(d), on August 7<sup>th</sup> 2012 (77 FR 47045), a 60-day notice for public comment was published in the *Federal Register*. No comments were received.

### **9. Payments or Gifts to Respondents**

The Bureau will not provide payment or other forms of remuneration to respondents of its various forms of collecting feedback. Focus groups and cognitive laboratory studies are the exceptions.

In the case of in-person cognitive laboratory and usability studies, the Bureau may provide stipends of up to \$40. In the case of in-person focus groups, the Bureau may provide stipends of up to \$75. If respondents participate in these kinds of studies remotely, via phone, or Internet, any proposed stipend will be justified to OMB and must be considerably less than that provided to respondents in in-person studies, who have to travel to the Bureau or other facility to participate. If such information collections include hard-to-reach groups and the Bureau plans to offer non-standard stipends, the Bureau will provide OMB with additional justifications in the request for clearance of these specific activities.

**10. Assurances of Confidentiality**

If a confidentiality pledge is deemed useful and feasible, the Bureau will only include a pledge of confidentiality that is supported by authority established in statute or regulation, that is supported by disclosure and data security policies that are consistent with the pledge, and that does not unnecessarily impede sharing of data with other agencies for compatible confidential use. If the Bureau includes a pledge of confidentiality, it will include a citation for the statute or regulation supporting the pledge.

**11. Justification for Sensitive Questions**

No questions will be asked that are of a personal or sensitive nature.

**12. Estimated Burden of Information Collection**

A variety of instruments and platforms will be used to collect information from respondents. The annual burden hours requested (250,000) are based on the number of collections the Bureau may conduct over the requested period for this clearance.

Estimated Annual Reporting Burden				
Average annual expected number of activities	No. of Respondents	Annual Frequency per Response	Hours per Response	Total Hours
25	10,000	1	1	250,000

**13. Estimated Total Annual Cost Burden to Respondents or Recordkeepers**

No costs are anticipated.

**14. Estimated Cost to the Federal Government**

There are no additional costs to the Federal Government.

**15. Program Changes or Adjustments**

Not applicable. This is a new request for a generic ICR.

**16. Plans for Tabulation, Statistical Analysis, and Publication**

Feedback collected under this generic clearance provides useful information, but it does not yield data that can be generalized to the overall population. Information gathered is intended to be

used only internally for general service improvement and program management purposes and is not intended for release outside of the Bureau (if released, the Bureau must indicate the qualitative nature of the information).

**17. Display of Expiration Date**

No exemption is requested.

**18. Exceptions to the Certification Requirement**

These activities comply with the requirements in 5 CFR 1320.9.