

Request for Approval under the “Generic Clearance for the Collection of Qualitative Feedback on the Service Delivery of the Consumer Financial Protection Bureau” (OMB Control Number: 3170-0024)

1. TITLE OF INFORMATION COLLECTION:

Owning A Home Study – Pilot Phase

2. PURPOSE:

The CFPB is planning a study to evaluate its Owning a Home project. The Owning a Home project is a set of online tools and resources designed to help consumers make better, more informed decisions about mortgages. The study aims to both evaluate the impact of the Owning a Home tools and better understand what pieces of the experience are and are not working to guide future improvements. However, this Pilot Phase collection will only test the instruments and methodology to be used during the main study, not program evaluation or product improvement research. The purpose of the Pilot Phase collection is only to fine-tune the instruments and methodology used to ensure success of the main study.

The instruments and methodology will be refined based on learnings from the pilot. Prior to implementation, the full study will be submitted to OMB under standard clearance procedures.

3. DESCRIPTION OF RESPONDENTS:

The target audience for the Owning a Home project is prospective homebuyers. The Pilot Phase collection will recruit prospective homebuyers planning to buy in the next 3 months.

4. TYPE OF COLLECTION (ADMINISTRATION OF THE INSTRUMENT):

a. How will you collect the information? (Check all that apply)

- | | |
|--|--------------------------------------|
| <input checked="" type="checkbox"/> Web-based or other forms of Social Media | <input type="checkbox"/> Telephone |
| <input type="checkbox"/> In-person | <input type="checkbox"/> Mail |
| <input type="checkbox"/> Small Discussion Group | <input type="checkbox"/> Focus Group |
| <input type="checkbox"/> Other, Explain _____ | |

b. Will interviewers or facilitators be used?

Yes No Not Applicable

5. FOCUS GROUP OR SURVEY:

If you plan to conduct a focus group or survey, please provide answers to the following questions:

a. Do you have a customer list or something similar that defines the universe of potential respondents and do you have a sampling plan for selecting from this universe?

Yes No Not Applicable

b. If the answer is yes, please provide a description below. If the answer is no, please

provide a description of how you plan to identify your potential group of respondents and how you will select them?

Our contractor plans to work with a large, national home-buying website to recruit respondents. This partner will recruit respondents on our behalf using their existing customer email list. We chose this methodology as the most effective means of identifying prospective homebuyers when compared to other methodologies, including online panels and mail sampling.

6. PERSONALLY IDENTIFIABLE INFORMATION:

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

The CFPB expects its partner to recruit respondents and the contractor to collect contact information on behalf of the CFPB to facilitate the study. The contractor will gather information from respondents that include direct identifying PII to administer the study, however, the contractor will strip all direct identifying PII prior to submitting the study results to the Bureau. The CFPB will not have access to any direct identifying PII regarding the respondents and will not seek it out. The CFPB similarly expects that distribution of incentive payments will be conducted by the contractor.

All respondents will be provided notice regarding the study through an Informed Consent Form and Privacy Act Statement at the time of election to participate. The notice will explain, at minimum, the authority under which the information is collected; whether disclosure of such information is mandatory or voluntary; the principal purpose or purposes for which the information is intended to be used; any routine uses which may be made of the information; and any effect of not providing all or any part of the requested information.

b. If Yes, is the information that will be collected included in records that are subject to the Privacy Act of 1974? [X] Yes [] No [] Not Applicable

c. If applicable, what is the link to the Privacy Impact Assessment (PIA)?

The information contemplated here is covered under two separate Privacy Impact Assessments (PIA). The Consumer Experience Research PIA is available at http://files.consumerfinance.gov/f/201406_cfpb_consumer-experience-research_pia.pdf, while the forthcoming Consumer Education PIA will be published on consumerfinance.gov/privacy prior to the start of the pilot.

d. If Applicable, has a System or Records Notice (SORN) been published?

[X] Yes [] No [] Not Applicable

If Yes, provide Federal Register citation for the SORN: 77 FR 60382.
CFPB.021 - Consumer Education and Engagement Records

7. INCENTIVES:

a. Is an incentive provided to participants? [X] Yes [] No

b. If Yes, provide the amount or value of the incentive? \$20-40

c. If Yes, provide a statement justifying the use and amount of the incentive.

Prospective homebuyers are a hard-to-find population – only a small percentage of the population is actively interested in purchasing a new home at any given time. They also have a lot of things going on in their lives at the time we are interested in surveying them, which is when they are actively searching for a home. We believe incentives are necessary to ensure an adequate response rate.

In addition, incentives have proven necessary and effective in recruiting subjects to participate in this scale of research, and it is also employed by the other Federal agencies, such as the Internal Revenue Service.

As this Pilot Phase collection is intended to test the instruments and methodology to be used during the main study, we plan to vary the structure and amount of incentive provided to respondents. In order to ensure that the full study attracts a sufficient number of responses while minimizing cost to the government, the pilot will test incentive levels and report the results of this test when the information collection request for the full study is submitted to OMB under standard PRA clearance procedures. For the pilot study, we plan to test an incentive of \$20-40.

The incentive will be paid out in three increments – a smaller amount at the conclusion of the baseline survey, a larger amount at the conclusion of the study, and a small additional incentive at document collection. Due to the structure of the study, the document collection payment is not advertised in advance. Participants will be divided into two groups and will receive incentives as follows:

Figure 1: Test Incentive Structure

Component	Group A	Group B	Group C
Baseline Survey (Module B-F; H&I)	\$15	\$5	\$5
Periodic Survey #2 (Module B, D, E, F)	\$15	\$25	\$15
GFE document collection (Module G)	\$10	\$10	\$10
Total	\$40	\$40	\$30

8. BURDEN ESTIMATES:

Estimating burden hours is complex, because we expect attrition throughout the duration of this pilot study. Using our best estimates, the total burden hours is estimated at 224 hours. Figure 2 below provides a detailed breakdown of our burden estimates.

Figure 2: Burden Estimates

Component	Retention from previous stage	# participants	Time per participant (mins)	Burden hours
Arrive at Study Home Page		1,500		
Take Screener (Module A)	0.95	1425	3	71.25
Pass Screener	0.6	855		
Opt-in to study	0.5	428		
Baseline Survey (Module B-F; H-J)	0.9	385		
complete	0.75	289	22	105.81
Periodic Survey #1 (Module B, C, D, J)	0.8	231		
complete	0.95	219	6	21.93
Periodic Survey #2 (Module B, C, D, J)	0.9	197		
complete	0.95	188	6	18.75
GFE document collection (Module G)	0.5	94	4	6.25
Total Burden Hours				223.99

9. **FEDERAL COST:** The estimated annual cost to the Federal government is

\$ 12,220

10. **CERTIFICATION:**

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

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

