2934Generic Clearance for the
Collection of Qualitative Feedback on Agency Service Delivery
Supporting Statement

A. JUSTIFICATION

1. Circumstances Making the Collection of Information Necessary

Executive Order 12862 directs Federal agencies to provide service to the public that matches or exceeds the best service available in the private sector. In order to work continuously to ensure that our programs are effective and meet our customers' needs, the Commodity Futures Trading Commission's Office of Consumer Outreach (OCO) (hereafter "OCO") seeks to obtain OMB approval of a generic clearance to collect qualitative feedback on our service delivery. By qualitative feedback we mean information that provides useful insights on perceptions and opinions, but are 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 OCO to garner customer and stakeholder feedback in an efficient, timely manner, in accordance with our commitment to improving service delivery. The information collected from our customers and stakeholders will help ensure that users have an effective, efficient, and satisfying experience with OCO programs. This feedback will provide insights into customer or stakeholder perceptions, experiences and expectations, provide an early warning of 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 OCO and its customers and stakeholders. It will also allow feedback to contribute directly to the improvement of program management.

2. Purpose and Use of the Information Collection

The OCO will undertake a variety of service delivery-focused activities over the next few years which include consumer outreach and information-sharing with stakeholders that are responsive to stakeholders' needs and sensitive to changes in the consumer market. The proposed information collection activity will use similar methods for information collection or otherwise share common elements, and provide a means to gather qualitative customer and stakeholder feedback in an efficient, timely manner. The solicitation of information on delivery of consumer services will address such areas as appropriate messages, effective message delivery methods, and current consumer beliefs, psychographics and social norms that will assist the agency in developing an outreach and communications campaign designed to change consumer behavior.

For this specific qualitative project, the research will determine which message concepts or components of message concepts best compel respondents to seek out more information on investment fraud identification, avoidance, and reporting. Message testing will also verify that the developed messages and are clear, credible, actionable, relevant, and useful to the intended audience.

3. Consideration Given to Information Technology

Where appropriate, automated information technology will be used to collect and process information for these surveys to reduce the burden on the public. However, the most appropriate and cost effective methodology will involve written or oral responses to brief questionnaires.

4. Duplication of Information

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

5. Reducing the Burden on Small Entities

Small businesses or other small entities may be involved in these efforts but the OCO will minimize the burden on them by sampling, asking for readily available information, and using short, easy-to-complete information collection instruments. Therefore, these surveys will not have a significant impact on small business or other small entities.

6. Consequences of Not Conducting Collection

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

7. Special Circumstances

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

8. Consultations with Persons Outside the Agency

In accordance with 5 CFR 1320.8(d), on January 28, 2013, a 60-day notice for public comment was published in the Federal Register at 78 FR 5780, and on April 8, 2013, a 30-day notice for public comment was published in the Federal Register at 78 FR 20897. One public comment was received on May 1, 2013, that did not address the merits of the notices.

9. Payment or Gift

The screening criteria to recruit from our target audience calls for respondents with at least $60,000 in annual income, a bachelor’s degree, and a familiarity with multiple investment products. This is a wealthier target audience than is typically recruited for focus groups, and as a result they are more difficult to recruit. We contacted 18 professional focus group facilities and the lowest incentive rate suggested to recruit this audience was $75 per recruit. In addition to their time, this incentive often covers travel costs as facilities recruit from a 45-mile radius and childcare costs since groups will not be conducted during school hours.

There are several factors that determine the amount offered to participants. As background, amounts are driven by a facility's ability to guarantee show rates. These show rates, or the rates at which respondents will "show" for research events, are tracked over time. Once show rates fall beneath the accepted industry average, facilities are forced to increase the incentive amount.

10. Confidentiality

The confidentiality of respondent identification and information will be assured to the maximum extent allowed by law. Only first names will be used during any recorded portion of the focus groups (and respondents will be given the option to pick any first name they want for the discussion), and no identifying information (including names) will be used in any reporting associated with this research.

11. Sensitive Nature

No questions will be asked that are of a personal or sensitive nature. Respondents will be asked about personal finance questions, specifically on investments. Questions will only be geared toward their experience and not specific details like amounts invested. For example, respondents may be asked if they have investments in stocks but will not be asked to give a numerical amount though they may volunteer non-numerical terms such as "a lot" or "not much" to describe the level of investment in subjective terms. These questions are needed to determine a baseline for their understanding of investment options to determine how to best educate about investment fraud. Respondents will be prompted prior to the start of each session that every question asked is voluntary.

12. Burden of Information collection

The proposed focus group project will reach potential respondents in two different phases: a **screening phase** to interview potential respondents for the purpose of identifying those who fit the screening criteria[1] and the **focus group phase** where respondents will attend a 90 minute focus group session, with a total on 9 focus group sessions conducted for this project.

According to estimates gathered after contacting 9 different focus group facilities, the table below show the number of respondents who will be impacted in the **screening phase** of this project.

a) # of screening interviews per recruit[2]	b) # of recruits needed for each session[3]	c) # of focus group sessions	# of individuals contacted during Screening Phase (a x b x c)

[1] Men Age 50-65; College-educated; Financial decision-maker in household; At least $60K in HH income; Financially literate; Not risk-averse; Married or partnered , and Women Age 50-65; College-educated; Financial decision-maker in household; At least $60K in HH income; Financially literate; Not risk-averse; Married, partnered, or single

[2] This estimate was determined by contacting 9 focus group facilities to determine the number of people needed to be screened per each respondent. Of those who responded, the majority answered in the range of 20-44 interviews

32	10	9	2,880

Per the specifications for this focus group research project, we will conduct 9 sessions among 6 respondents each, for a total of 54 respondents in the **focus group phase**.

The total annual estimated burden imposed by this specific collection of information is 427 hours annually. The burden is as follows:

	a) Number of Respondents	b) Frequency of Responses	c) Total Annual Responses per respondent (a x b)	d) Hours Per Response[4]	e) Total Burden Hours (c x d)
Screener Questionnaire	2880	1	2880	0.12	345.6
Focus Groups	54	1	54	1.5	81
Total	2934		2934		426.6

13. Costs to Respondents

No costs are anticipated.

14. Costs to the Federal Government

Our cost below are divided into 1) out of pocket costs owed to vendors who will be professionally recruiting, hosting, and moderating these focus groups, 2) labor cost for Porter Novelli Public Services (PNPS) staff to attend and report on these groups, 3) travel costs for focus groups, and 4) fees for use of a professional moderator for all sessions.

To select a focus group host and recruitment facility, we collected bids from 18 total facilities, collecting at least 3 per market to ensure the best value. Only 4 of the facilities we contacted agreed to offer an incentive of $75 per respondent.

per successful recruit, for an average of 32 interviews per recruit

[3] We will be seating 6 respondents per session, but it is common practice to over-recruit for a focus group session, especially one with a relatively low incentive, so we will plan to recruit 10 per group.

[4] For the screener questionnaire, we contacted 9 facilities and the majority of responses timed the screener at 7 minutes.

Chicago, IL		
Recruitment Costs	$ 3,000	$100/person, recruit 10 to seat 5-6
Incentives	$ 2,250	$75/person, pay all who show and assume full show
Hosting/Rental	$ 1,925	$475/group, 500 daily staffing fee
DVD recording	$ 375	$125/group
Chicago Total	$ 7,550	
Baltimore, MD		
Recruitment Costs	$ 3,000	$100/person, recruit 10 to seat 5-6
Incentives	$ 2,250	$75/person, pay all who show and assume full show
Hosting/Rental	$ 2,400	$650/group, $450 daily staffing fee
DVD recording	$ 450	$150/group
Baltimore Total	$ 8,100	
Tampa, FL		
Recruitment Costs	$ 2,550	$85/person, recruit 10 to seat 5-6
Incentives	$ 2,250	$75/person, pay all who show and assume full show
Hosting/Rental	$ 1,500	$400/group, $300 daily staffing fee
DVD recording	$ -	Complimentary
Tampa Total	$ 6,300	
3 City Total	**$ 21,950**	

PNPS has budgeted 104 labor hours for the focus group portion of this project at a cost **of $15,765.**

Our travel estimate of **$3,398.96** is determined in accordance with current Federal Travel Regulations. Travel estimates assume flights to/from and one night hotel each in Tampa, FL and Chicago, IL for three people (2 PNPS staff and the moderator), and travel from Washington, DC to Baltimore, MD.

A professional moderator is budgeted to moderate all 9 focus groups sessions at a cost of $1,000/group for a total cost of **$9,000**.

15. Reason for Change

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

16. Tabulation of Results, Schedule, Analysis Plans

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

17. Display of OMB Approval Date

We are requesting no exemption.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

These activities comply with the requirements in 5 CFR 1320.9.

B. STATISTICAL METHODS

Information collection for this effort does not employ statistical methods.