

**Request for Approval under the “GENERIC CLEARANCE FOR QUALITATIVE
CONSUMER EDUCATION, ENGAGEMENT, AND EXPERIENCE INFORMATION
COLLECTIONS”**

(OMB Control Number: 3170-0036)

1. TITLE OF INFORMATION COLLECTION:

Elder Financial Protection Networks Study

2. PURPOSE:

The CFPB has entered into an Inter-Agency Agreement with the Library of Congress’s Federal Research Division to conduct a study of existing collaborative efforts between public, private, and/or non-profit organizations to increase prevention, awareness, and action on senior financial abuse. The proposed interviews and group discussions are part of a 9 case-study research design that will provide in-depth qualitative information about these collaborative efforts. The Library of Congress and CFPB staff will be conducting a number of interviews and group discussions with members of existing collaborative efforts to gather key information about the activities, best practices, composition, and outcomes of their collaborative efforts. In addition, the interviews and group discussions will inform the development of a replication guide that will help communities where these collaborative efforts do not exist to build their own collaborative effort or to enhance their existing one.

3. DESCRIPTION OF RESPONDENTS:

Respondents in this study are leaders or representatives of public, private, and/or non-profit organizations that are involved in these collaborative efforts. The questions posed and the respective responses received in these interviews and group discussions are specifically aimed at gathering information on the participants’ opinions and experiences in their capacity as representatives/employees of these entities and in their specific roles in the collaborative effort.

Participants will not be selected or asked to provide personal details such as their social security number, gender, age, race/ethnicity, marital status, income, health, or any other information that is personal, aside from their professional contact information, experience, and expertise.

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

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

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

b. Will interviewers or facilitators be used?

- Yes No Not Applicable

6. INFORMATION COLLECTION PROCEDURES:

Please summarize the procedures that will be used to collect data from respondents.

The study seeks to identify the benefits of collaborative efforts to address elder financial exploitation, their measures of impact, and key features and practices that can be used in a replication guide.

To select participants and collect information, we will follow these procedures:

a) Selection of Case Studies

The proposed project consists of 9 case studies of collaborative efforts to address elder financial exploitation. The 9 cases studies are divided into three broader categories that represent the three most common types of collaborative efforts in the field: 3 TRIADs (law enforcement and seniors’ coalitions), 3 FASTs (financial abuse specialist teams)/MDTs (multidisciplinary teams), and 3 Other Coalitions (e.g., roundtables, alliances, task forces). After the 9 case studies are selected and identified, we will select the specific individuals to be interviewed on a one-to one basis and the individuals who will participate in a large discussion group.

b) Selection of Participants for On-on-One Interviews

We have identified five categories of participants for the one-one one interviews (see Table 1). These categories are based on key roles/members of these collaborative efforts according to the findings of our literature review, analysis of publicly available information, and advice from subject matter experts.

Table 1. Individual Interviews

Method	Structure	Participants
One-on-one interviews	Interviews with 5 participants per case study. Each interview will last no more than two hours. Questions will be mostly similar for all participants. If interested: FRD will share the transcript with participants for review. If consent provided: FRD will follow-up to clarify comments, edits or additional information added.	<ul style="list-style-type: none"> • 1 Adult Protective Services representative • 1 law enforcement representative • 1 non-profit consumer or senior group representative • 1 financial institution representative • 1 effort lead

The names of these individuals will be known once we have selected the specific case studies, and we have reached out to the points of contact for each collaborative effort and communicated our interest in studying their efforts.

These five categories of participants will be selected consistently throughout each of the 9 case studies for a potential maximum total of 45 interviews. However, some collaborative efforts may not have one or more of these core members involved or available for an interview. Therefore, the number of interviews is likely to be lower.

Two members of the Library of Congress research staff (in the role of interviewer and note taker), and in some cases one CFPB staff, will be participating in these interviews. The interviews will be conducted face-to face or on the phone if the person is not available or is located in a different part of the state and will last no more than 2 hours each. Participants will be asked a set of open-ended questions. The questions are similar for the 5 participants, with the exception of a few questions that relate to their specific agency's function and role in the collaborative effort. The interviews will be audio-taped to facilitate the interview process and information processing and analysis. We will inform participants that their names will not be published, and that the audio tapes will not be shared with others outside the project to the extent permitted by law.

Participants will be given an opportunity to review the transcripts of the recoding if interested. We will provide 5 business days to review the transcript, delete any information that makes them uncomfortable. They may also take that opportunity to add clarifications or additional information.

If participants provide consent during the initial interview, we will conduct a brief follow-up by email and/or phone to clarify any of their comments including any comments or changes made to the transcripts. These follow-ups will be less than 30 minutes.

c) Selection of Participants of Discussion Groups

We will also be conducting a group discussion for each case study. The members of these discussion groups will be representatives of any of the groups that form the collaborative effort, with a maximum of 10 participants. These group discussions seek to gather the views of members of the networks in general around a set of topics, ideas, and best practices.

Two members of the Library of Congress research staff (in the role of facilitator and note taker), and in some cases one CFPB staff, will be participating in these group discussions, which will be conducted in-person and will last no more than 2 hours each. The group discussions will be audio-taped to facilitate the interview process and information processing and analysis. We will inform participants that the recording and their identities names will not be remain anonymous and unpublished, and that the audio tapes will not be shared with others outside the project to the extent permitted by law.

Participants will be given an opportunity to review the transcripts of the recoding if interested. We will provide 5 business days to review the transcript, and delete any information that makes them uncomfortable. They may also take that opportunity to add clarifications or additional information.

If participants provide consent during the initial interview, we will conduct a brief follow-up by email and/or phone to clarify any of their comments including any comments or changes made to the transcripts. These follow-ups will be less than 30 minutes.

Table 2. Individual Interviews and Group Discussions

Method	Structure	Participants
Group Discussions	<p>One group discussion with up to 10 participants per case study. Each group discussion will last no more than two hours. Questions will be similar to all participants.</p> <p>If interested: FRD will share the transcript with participants for review.</p> <p>If consent provided: FRD will follow-up to clarify comments, edits or additional information added.</p>	<ul style="list-style-type: none"> Up to 10 members drawn from any involved group

7. PERSONALLY IDENTIFIABLE INFORMATION:

a. **Is personally identifiable information (PII) collected?** Yes No
 PII, including directly-identifying PII is being collected. We will be collecting name, professional affiliation/association and contact information, as well as response data and audio/video recordings of participants. We will not be using participants’ names in the reports or the Replication Guide. We will, however, use quotes that generically attribute the information to a professional, e.g., “law enforcement coalition member, Jefferson County TRIAD, Colorado.” Based on this information, individuals could be potentially re-identified. Individuals are informed of this risk in the informed consent and may choose not to participate.

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

c. **If Applicable, has a System or Records Notice (SORN) been published?**
 Yes No Not Applicable / If applicable, what is the Title and Federal Register citation for the SORN? CFPB Consumer Education and Engagement Records, 77 FR 60382.

d. **If applicable, what is the link the Privacy Impact Assessment (PIA)?** The CFPB is currently in the process of drafting a PIA to cover the information outlined here and its use.

8. INCENTIVES:

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

b. If Yes, provide the amount or value of the incentive? \$__NA_____.

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

Not applicable.

9. ASSURANCES OF CONFIDENTIALITY:

a. Will a pledge of confidentiality be made to respondents? [] Yes [X] No

b. If Yes, please cite the statute, regulation, or contractual terms supporting the pledge.

Not applicable.

10. JUSTIFICATION OF SENSITIVE QUESTIONS (if applicable):

Not applicable.

11. BURDEN HOURS:

Category of Respondent	Number of Respondents	Frequency	Number of Responses	Response Time (hours)	Burden (hours)
One-on-one discussion with experts (phone or face-to-face interviews)	45	1	45	2	90
Group discussion	90	1	90	2	180
Transcript review	135	1	135	.5	68
Email/phone follow-up for clarification	135	1	135	.5	68
Totals:	135*	//////////	405	//////////	406

*Total respondents (participants) are 135 (45 interview participants and 90 focus groups participants). All respondents will participate in transcript review and potentially all, but not necessarily all, respondents will participate in email and/or phone follow-up.

12. FEDERAL COST: There are no additional costs to the Federal government.

13. CERTIFICATION:

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

- The collection is voluntary.
- The collection is low-burden for respondents.

- The collection is non-controversial and does not raise issues of concern to other federal agencies.
- Information gathered will not be used for the purpose of substantially informing influential policy decisions.
- The collection is not statistically significant; the results are not intended to be generalizable beyond the survey population.
- The results will not be used to measure regulatory compliance or for program evaluation.

