

**CONSUMER FINANCIAL PROTECTION BUREAU
INFORMATION COLLECTION REQUEST – SUPPORTING STATEMENT**

**PROGRAM EVALUATION OF
FINANCIAL EMPOWERMENT TRAINING PROGRAMS**

(OMB CONTROL NUMBER: 3170-XXXX)

TERMS OF CLEARANCE: Not applicable. This is a new information collection request.

ABSTRACT: The Bureau’s Office of Financial Empowerment (Empowerment) is responsible for developing strategies to improve the financial capability of low income and economically vulnerable consumers. The proposed collections will focus on evaluating (1) training practices and programs that are designed to enhance the ability of caseworkers to inform and educate low income consumers about managing their finances and strategies for making choices among available financial products and services available to them; (2) the evaluation tool that the trainers will use to determine the effectiveness of the training; and (3) the scope of workshop participants’ use of the training. The Bureau expects to collect qualitative data through paper-based surveys and focus groups.

A. JUSTIFICATION

1. Circumstances Necessitating the Data Collection

The Consumer Financial Protection Bureau’s (CFPB or Bureau) Office of Financial Empowerment (Empowerment) is responsible for developing strategies to improve the financial capability of low income and economically vulnerable consumers, such as consumers who are unbanked or underbanked, those with thin or no credit file, and households with limited savings. Under the Dodd-Frank Wall Street Reform and Consumer Protection Act, Public Law No. 111-203 (Dodd-Frank Act), including Section 1013(b)(2), Empowerment has a mandate to “provide information, guidance, and technical assistance regarding the offering and provision of consumer financial products or services to traditionally underserved consumers and communities.” To fulfill this mandate, Empowerment has a need to evaluate training programs and practices involved in training front-line case managers in order to provide relevant and effective information, guidance, and technical assistance designed to improve the financial outcomes and capability of these vulnerable consumers.

Through this collection, data will be collected from two sets of respondents. The first is a pilot cohort of trainers, some of whom will participate in an initial web-based training and others of whom will participate in face-to-face training provided by the CFPB’s contractor working with Empowerment on this effort. The second respondent group is comprised of front-line case managers who will subsequently be trained by members of the cohort. The primary resource used during these trainings will be a financial empowerment training (FET) toolkit that has been developed by CFPB. (Note that, while the toolkit is referred to throughout this document as the

FET Toolkit, it has the working title “Your Money, Your Goals: A Financial Empowerment Toolkit for Social Services Programs.”)

Collecting data from these two groups through a pilot implementation of the FET toolkit is a necessary step in ensuring that the toolkit is as useful and relevant as possible to the larger financial social services.

2. Use of the Information

Staff from CFPB will use data from surveys and focus groups of participants to collect formative input concerning the training practices and resources used in this pilot implementation. The resources are designed to enhance the ability of caseworkers to inform and educate low income consumers about managing their finances and strategies for making choices among available financial products and services available to them. The results of this analysis will inform the CFPB’s subsequent revisions to the FET toolkit. Data that are collected through case manager logs will also provide information about the scope of workshop participants’ use of the training.

Information collected is not meant to be, and will not be treated as, a sample that is statistically generalizable to the overall American population, or to the general population of front-line case managers working in the United States.

In addition to surveys, case managers will also be provided with logs which they can use to track their usage of the FET toolkit. While these logs are included in the burden estimate provided in Section 12, these instruments will not be collected by CFPB or its contractor. They are simply intended to facilitate case managers’ completion of subsequent surveys which ask about their usage of the toolkit.

3. Use of Information Technology

Almost all of the data for this collection will be collected will be through paper instruments. CFPB determined that asking cohort members and case managers to submit data through paper instruments would be less burdensome than asking them to do so electronically, primarily because of the respondent burden associated with tracking electronic responses.

4. Efforts to Identify Duplication

Because this data collection is connected to a pilot implementation of the FET toolkit which CFPB have developed over the past seven months, it will not be duplicative of any previous research that has been conducted within or outside of the government. CFPB staff are cognizant of current research being done in the field of effective case manager training and financial empowerment, and this research has informed the development of the toolkit. The CFPB will continue to monitor research on these topics to ensure that the techniques used in this data collection are informed by those efforts and reflect current knowledge and best practices and are not duplicative.

5. Efforts to Minimize Burdens on Small Entities

The data collection is not anticipated to burden small entities because all information collection will occur from individuals. Further, all instruments have been reviewed to ensure that only necessary data are collected.

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

This data collection effort is part of a pilot implementation of a new model for case manager financial empowerment training. Because it is part of a pilot study, the data collection will only be conducted once; CFPB staff do not plan to collect these data on a regular basis in the future.

Case managers who are using the toolkit will be asked to complete a log both three and six months after they receive training. CFPB believes it is necessary to collect this information at two points in time to measure both persistence and sustainability of use of the toolkit over time and changes in participants' level of comfort and familiarity with the content and resources.

7. Circumstances Requiring Special Information Collection

There are no special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320(d)(2).

8. Consultation Outside the Agency

In accordance with 5 CFR 1320.8(d)(1), on January 29, 2013, the Bureau published a notice in the Federal Register allowing the public 60 days to comment on this proposed new collection of information (Vol. 78, No. 19, pages 6074-6077). The CFPB received no comments in response to this notice.

Further and in accordance with 5 CFR 1320.5(a)(1)(iv), the Bureau has published a notice in the Federal Register allowing the public 30 days to comment on the submission of this information collection request to the Office of Management and Budget.

9. Payment or Gifts to Respondents

No payments or gifts will be provided to respondents in exchange for submitting data. Members of the pilot trainer cohort will each receive \$1,000 as a stipend for their participation in the pilot study. However, this compensation is in exchange for the significant amount of time that they will spend participating in an initial training provided by CFPB and its contractor, as well as planning and conducting their own trainings with case managers. The stipend is to be provided at the end of the study and will not be provided as a payment in exchange for submitting data.

10. Assurance of Confidentiality

In the directions for each instrument, respondents will be informed that the data they provide will not be associated with their organization in any analysis or reports that derive from the data collection. Each instrument will contain the following statement: “Please note that the Bureau intends to keep your responses private to the extent permitted by law, and when survey results are reported none of your answers will be connected to you or your organization.”

11. Justification for Sensitive Questions

This information collection does not include questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, race/ethnicity, disability, social security numbers, or any other matters generally considered private.

12. Estimated Burden of Information Collection

	No. of Respondents	Annual Frequency per Response	Total Annual Responses	Burden per Response	Total Burden
Training Evaluation Forms from Pilot Trainers	55	1	55	20 min	18 hrs, 20 min
Training Evaluation Forms from Case Managers	880	1	880	15 min	220 hrs,
Telephone Focus Groups with Pilot Trainers	25	1	25	1 hr	25 hrs
Case Manager Logs	880	2	1760	10 min	293 hours, 20 min
Final Survey of Case Managers	880	1	880	10 min	146 hrs, 40 min
TOTALS					703 hrs, 20 min

Estimates of the length of time it will take respondents to complete each instrument are based on testing conducted by the CFPB's contractor, ICF.

13. Estimated Total Annual Cost Burden to Respondents or Recordkeepers

There are no capital/start-up or ongoing operation/maintenance costs associated with this information collection.

14. Estimated Cost to the Federal Government

There will be no annualized capital/start-up costs for the government to collect these data. It is anticipated that costs of \$25,000 will be incurred to carry out the data collection, including the cost of data management, analysis, and reporting.

The Blanket Purchase Agreement under which this data collection is being conducted was awarded through a competitive bidding process.

15. Program Changes or Adjustments

The Bureau is requesting a program change of approximately 703 hours resulting from this new collection of information.

16. Plans for Tabulation, Statistical Analysis, and Publication

The CFPB anticipates that data collection will begin within four weeks of OMB approval, at an initial training provided to cohort members. Cohort members will complete their first survey immediately after that training. Each cohort member will then be responsible for training 25 case managers during the subsequent month. Both cohort members and case managers will complete surveys immediately following those trainings. Participating case managers will be asked to submit logs of their usage of the toolkit both three and six months after they receive their training, and will also complete a final survey at the six month mark. After accounting for potential minor delays in data submission and processing, all data collection will be complete no more than 9 months after OMB approval is received.

CFPB's contractor will conduct the initial analysis and summary of the study findings. For qualitative, open-ended questions, ICF will conduct a thematic analysis. For closed-ended questions in which respondents are asked to select one of several different response options, the contractor will use frequencies and cross-tabulations in its analysis. For questions that ask respondents to provide a numerical answer, the contractor will calculate frequencies, means, medians, ranges, and standard deviations. CFPB staff intend to use the results of this analysis to inform internal processes and decisions regarding the FET toolkit; there are no plans to publish the results of the research.

17. Display of Expiration Date

The CFPB plans to display the expiration date for OMB approval of the information collection on all instruments.

18. Exceptions to the Certification Requirement

There are no exceptions to the Certification Requirement.