Request for Approval under the "GENERIC CLEARANCE FOR PROGRAM EVALUATION OF FINANCIAL EMPOWERMENT TRAINING PROGRAMS" (OMB Control Number: 3170-0038)

- **1. TITLE OF INFORMATION COLLECTION:** Your Money, Your Goals Toolkit Customer Surveys and Select Field Tests
- **2. PURPOSE:** The CFPB is currently collecting data under OMB Control Number 3170-0038 that will inform the revision and enhancement of the *Your Money, Your Goals (YMYG)* toolkit. As noted in the supporting statement for this data collection, the primary purposes of the data collection are to evaluate the effectiveness of this toolkit at enhancing the ability of caseworkers to inform and educate low income consumers about managing their finances, and to assess the scope of case manager participants' use of the resources with clients. The information collection is low-burden, voluntary, qualitative, and is not being used to inform Bureau policy. Data collection under Control Number 3170-0038 has is underway for the initial version of the toolkit.

To accomplish the aforementioned primary purpose to evaluate the effectiveness of the YMYG toolkit, the Bureau plans to conduct four (4) types of information collections:

- 1. National rollout user experience surveys.
- 2. Legal Aid Organizations Field Test.
- 3. Community Volunteers Field Test.
- 4. Workers Field Test.

The national rollout phase of this project will focus on training case managers that are connected to national partner organizations, scaling up usage of *Your Money, Your Goals* within social service programs. Data collection under Control Number 3170-0038 has begun for the initial version of the toolkit that is completing field testing with case managers of social service programs.

Additionally, CFPB now seeks to field test specialized versions of the *Your Money, Your Goals* toolkit that have been adapted for use with legal aid organizations, with community-based organizations that engage volunteers, and by organizations that serve individuals in the workplace and plans to collect similar information about the toolkit's effectiveness and usage. The results will inform the enhancement and revision of the respective versions of the toolkit.

3. DESCRIPTION OF RESPONDENTS:

<u>National rollout user experience survey</u>: 50 financial empowerment trainers and up to 6,000 case managers and other frontline social service program staff members that have been trained in using the *Your Money, Your Goals* toolkit.

<u>Legal Aid:</u> 7 financial empowerment trainers (in many cases a legal aid staffer) and up to 70 frontline staff from legal aid organizations that have been trained in using the *Your Money, Your Goals* toolkit with clients.

<u>Community Volunteers</u>: 5 financial empowerment trainers and up to 150 community-based volunteers that have been trained in using the *Your Money, Your Goals* toolkit with clients.

<u>Workers</u>: 7 financial empowerment trainers and up to 50 people that serve workers in a professional capacity that have been trained in using the *Your Money, Your Goals* toolkit with workers.

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

a. How will you collect the information? (Check <u>all</u> that apply)
 [X] Web-based or other forms of Social Media [] Telephone [X] In-person (paper surveys) [] Mail [] Small Discussion Group [] Focus Group [X] Other, Explain Surveys in the form of fillable PDF files, submitted by email
b. Will interviewers or facilitators be used?
[] Yes [X] 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 [X] 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?
The universe of respondents surveyed will be determined by the following methods:

- By the ten national social services program partners that volunteer to participate in the national rollout.
- By the seven legal aid organizations that choose to participate in the field test.
- By the five community organizations that choose to participate in the field test.
- By the 7worker organizations that volunteer to participate in the field test.

In all instances, CFPB and its contractor will not directly select those participants / potential respondents.

6. INFORMATION COLLECTION PROCEDURES
Please summarize the procedures that will be used to collect data from respondents.

For the national rollout user experience surveys, financial empowerment trainers working for the ten national partner organizations will complete web-based and paper surveys immediately following of train-the-trainer events. The ten national partner organizations that volunteer to train their staff on *Your Money, Your Goals* will gather paper surveys on the day of case manager training events.

For the Legal Aid, Community Volunteers, and Worker Field Tests, paper surveys will be conducted on the day of the training and three months following their training date, those seven organizations will gather follow-up surveys in the form of fillable PDFs.

7. PERSONALLY IDENTIFIABLE INFORMATION:

a.	Is personally identifiable information (PII) collected? [X Yes [] No PII collected will be limited to that information necessary for distributing and collecting surveys from partner organizations and survey respondents. No PII containing direct
	identifiers will be requested as part of the survey. No PII containing direct identifiers will be linked to respondent answers. CFPB will only be provided aggregate data. Any incidental PII, including PII containing direct identifiers, collected through the surveys will be appropriately protected and stored in a secure location.
b.	If Yes, is the information that will be collected included in records that are subject to the Privacy Act of 1974? [] Yes [] No [X] Not Applicable If applicable, what is the link to the Privacy Impact Assessment (PIA)?
	The CFPB is currently drafting a Privacy Impact Assessment that will cover the

b.	If Yes, is the information that will be collected included in records that are subject to the Privacy Act of 1974? [] Yes [] No [X] Not Applicable If applicable, what is the link to the Privacy Impact Assessment (PIA)? The CFPB is currently drafting a Privacy Impact Assessment that will cover the information collection outlined here.
c.	If Applicable, has a System or Records Notice been published? [] Yes [] No [X] Not Applicable If Yes, provide Federal Register citation for the SORN FR
8.	INCENTIVES:
a.	Is an incentive provided to participants? [] Yes [X] No
b.	If Yes, provide the amount or value of the incentive? $\$ N/A
c.	If Yes, provide a statement justifying the use and amount of the incentive. $N\!/\!A$
9.	ASSURANCES OF CONFIDENTIALITY:
a.	Will a pledge of confidentiality be made to respondents? [] Yes [X] No
	If Yes, please cite the statue, regulation, or contractual terms supporting the pledge $\ensuremath{\mathrm{N/A}}$

11. BURDEN HOURS:

N/A

10. JUSTIFICATION OF SENSITIVE QUESTIONS (if applicable):

Information Collection	Number of Respondents/ Responses	Response Time (hours)	Burden Hours
National rollout user experience surveys		(======)	
Instrument 1: Train-the-Trainer Feedback Survey	50	.17	9
Instrument 2: Trainer Feedback Following Usage with Case Managers and Other Frontline Staff	200	.08	16
Instrument 3A: Case Manager Training, Pre-survey (evaluation forms from frontline labor staff)	6,000	.17	1,020
Instrument 3B: Case Manager Training, Post-survey (evaluation forms from frontline labor staff)	6,000	.17	1,020
Instrument 4: Follow-Up Survey for Case Managers and Other Front Line Staff	6,000	.33	1,980
Legal aid organizations field test			
Instrument 1: Post-Train-the-Trainer Feedback Survey	7	.17	1
Instrument 2: Survey for Trainer Feedback on Curriculum Following Usage	21	.33	7
Instrument 3A: Training Pre-survey	70	.08	6
Instrument 3B: Training Post-survey	70	.33	23
Community volunteers field test			
Instrument 1: Post-Train-the-Trainer Feedback Survey	5	.17	1
Instrument 2: Survey for Trainer Feedback on Curriculum Following Usage	15	.33	5
Instrument 3A: Training Pre-survey	150	.08	12
Instrument 3B: Training Post-survey	150	.33	50
Workers/labor field test		1	
Instrument 1: Post-Train-the-Trainer Feedback Survey	7	.17	1
Instrument2: Survey for Trainer Feedback on Curriculum Following Usage	21	.33	7
Instruments 3A: Training Pre-survey	50	.08	4
Instruments 3B: Training Post-survey	50	.17	9
Instrument 4: Three-Month Survey	50	.33	17
Totals:	18,916	///////////////////////////////////////	4,188
Annualized over three year period:	6,305	///////////////////////////////////////	1,396

Note: With the exception of each Instrument 2, are all one-time data collections. The use of each 3A and B survey instrument occurs only once by each workshop participant. The trainers submit an Instrument 2 form each time they deliver training. Burden hours rounded to the nearest whole hour.

12. FEDERAL COST: The estimated annual cost to the Federal government is \$ 40,000.

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 <u>not</u> raise issues of concern to other federal agencies.
- The results are <u>not</u> intended to be disseminated to the public.
- Information gathered will not be used for the purpose of substantially informing influential policy decisions.
- Information collected is not meant to be, and will not be treated as, a sample that is statistically generalizable.
- The results will not be used to measure regulatory compliance or program evaluation (except as provided below).
- 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.