

Justification for Converting the *Your Money, Your Goals* PRA Clearance to a Generic Clearance

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* 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 begun. CFPB now plans to develop specialized versions of the *Your Money, Your Goals* toolkit for use by particular types of organizations (e.g., legal services, community, labor, and vocational rehabilitation organizations), and plans to collect similar information about their effectiveness and usage. In order to facilitate this process, we believe that it would be appropriate to convert the current PRA clearance to a generic clearance that would encompass these additional data collections. We believe a generic clearance would be appropriate because all of these data collections would be used for the same purpose as the original OMB-approved effort, and because the instruments and protocols through which data would be collected would be almost identical, with only changes in wording based on which specialized version of the toolkit was being evaluated. As with the current data collection, these additional collections will be voluntary, qualitative, and will not be used to inform Bureau policy.

The table below shows the estimated burden that would be associated with a new generic clearance. The instruments are the same as the original approved data collection; the numbers of respondents and burden hours have been revised.

| Instrument | Respondents (#) | Annual Frequency per Response (#) | Total Annual Responses (#) | Burden per Response (minutes) | Total Burden (hours) |
|--|-----------------|-----------------------------------|----------------------------|-------------------------------|----------------------|
| Training Evaluation Forms from Pilot Trainers | 165 | 1 | 165 | 20 | 55 |

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|---|--------------|-------------------|--------------|-------------------|--------------|
| Training Evaluation Forms from Case Managers | 2000 | 1 | 2000 | 15 | 500 |
| Telephone Focus Groups with Pilot Trainers | 165 | 1 | 165 | 60 | 165 |
| Case Manager Logs | 2000 | 2 | 4000 | 10 | 667 |
| Final Survey of Case Managers | 2000 | 1 | 2000 | 10 | 333 |
| Total | 6,330 | ////////// | 8,330 | ////////// | 1,720 |