Request for Approval under the "Generic Clearance for the Collection of Qualitative Feedback on the Service Delivery of the Consumer Financial Protection Bureau" (OMB Control Number: 3170-0024)

1. **TITLE OF INFORMATION COLLECTION:** Money Smart for Older Adults Train-the-Trainer Session Feedback Form and Money Smart for Older Adults Participant Evaluation Form.

   PURPOSE: To assess how trainers view the effectiveness of the Money Smart for Older Adults (MSOA) train-the-trainer curriculum and to survey how MSOA session participants view the effectiveness of the training curriculum. With respect to the train-the-trainer curriculum, feedback is particularly being sought on: the clarity of the information presented; the instructor's comfort level with teaching the curriculum; how the curriculum will be used; if the instructor's would recommend the curriculum to other potential instructors; and how likely they are to use the curriculum to train more clients. With respect to participants, the evaluation form provides trainers a way to assess their impact on participants' knowledge of financial exploitation, and gather feedback on the quality and effectiveness of the materials, the training and the instructor.

2. **DESCRIPTION OF RESPONDENTS**: For the MSOA Train-the-Trainer Session Feedback Form respondents will include individuals representing adult social service agencies, law enforcement, financial services, legal professionals and retired professionals from diverse backgrounds who have participated in a MSOA train-the-trainer program online or in a face-to-face session. For the Participant Evaluation Form respondents will include older adults aged 62+, family caregivers, senior advocates and financial service representatives who have received the presentation of the MSOA consumer training program.

3. **TYPE OF COLLECTION (ADMINISTRATION OF THE INSTRUMENT):**

   a. **How will you collect the information?** (Check <u>all</u> that apply)

   [ ] Web-based or other forms of Social Media   [ ] Telephone
   [X] In-person   [ ] Mail
   [ ] Small Discussion Group   [ ] Focus Group
   [X] Other, Explain: <u>Data will be provided to the CFPB in aggregate by community stakeholders who will collect the data directly from respondents.</u>

   b. **Will interviewers or facilitators be used?**

   [ ] Yes [x] No [ ] Not Applicable

4. **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?

[X] Yes [ ] 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 surveys will be given to individuals who have participated in either the MSOA train-the-trainer session or who have received an MSOA presentation.

5. **PERSONALLY IDENTIFIABLE INFORMATION:**

a. **Is personally identifiable information (PII) collected?** [X] Yes [ ] No

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

If Applicable, has a System or Records Notice (SORN) been published?
[X] Yes [ ] No [ ] Not Applicable
If Yes, provide Federal Register citation for the CFPB.021 Consumer Education and Engagement Records SORN 79 FR 78839.

c. **If applicable, what is the link to the Privacy Impact Assessment (PIA)? Consumer Experience Research PIA, http://files.consumerfinance.gov/f/201406_cfpb_consumer-experience-research_pia.pdf**

6. **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

7. **BURDEN ESTIMATES:**

Information Collection	Number of Respondents	Frequency	Number of Annual Responses	Response Time (hours)	Burden Hours
Train-the-Trainer Session Feedback Form	3000	1	3000	.05	150
Participant Evaluation Form	7000	1	7000	.08	583
Totals	**10,000**	/////////////////	**10,000**	//////////////////////	**733**

8. **FEDERAL COST:** The estimated annual cost to the Federal government is $ 0

9. CERTIFICATIONS:

CERTIFICATION PURSUANT TO 5 CFR 1320.9, AND THE RELATED PROVISIONS OF 5 CFR 1320.8(b)(3) :

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

(a) It is necessary for the proper performance of agency functions;
(b) It avoids unnecessary duplication;
(c) It uses plain, coherent, and unambiguous terminology that is understandable to respondents;
(d) Its implementation will be consistent and compatible with current reporting and recordkeeping practices;
(e) It indicates the retention period for recordkeeping requirements;
(f) It informs respondents of the information called for under 5 CFR 1320.8(b)(3):
- (i) Why the information is being collected;
- (ii) Use of information;
- (iii) Burden estimate;
- (iv) Nature of response (voluntary);
- (v) Nature and extent of confidentiality; and
- (vi) Need to display currently valid OMB control number;

(g) It was developed by an office that has planned and allocated resources for the efficient and effective management and use of the information to be collected;
(h) It uses effective and efficient statistical survey methodology; and
(i) It makes appropriate use of information technology.

CERTIFICATION FOR INFORMATION COLLECTIONS SUBMITTED UNDER A GENERIC INFORMATION COLLECTION PLAN

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

- The collection is voluntary.
- The collection is low-burden for respondents and low-cost for the Federal Government.
- 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 <u>substantially</u> informing <u>influential</u> policy decisions.
- 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.
- The data collection is not statistically significant, the sample is not intended to be representative, and the results will not be used to make inferences beyond the survey sample.
- The results will not be used to measure regulatory compliance or for program evaluation.