

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:

YMYG Behind on Bills Bundle – User Testing

2. PURPOSE:

We seek to understand the ease of use of the YMYG binder complement, Behind on Bills. We'll train social workers on how to use the bundle and then receive feedback on how well it helps them do their financial coaching, as well as the ways in which it needs improvement.

3. DESCRIPTION OF RESPONDENTS:

Respondents are social workers that serve clients on a regular basis. They have little to no formal financial training, except for having been trained to use the YMYG binder toolkit.

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

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

- | | |
|---|--------------------------------------|
| ☐ Web-based or other forms of Social Media | ☐ Telephone |
| ☒ In-person | ☐ Mail |
| ☐ Small Discussion Group | ☐ Focus Group |
| ☐ Other, Explain _____ | |

b. Will interviewers or facilitators be used?

☒ Yes ☐ 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 ☐ 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?

We will identify our group of respondents by those we have worked with in the past. In our previous rounds of research we spoke with social workers in three markets –Camden, Nj; Knoxville, Tn; Kansas City, Ms—and in this round of user testing, we'll return to these same

markets to speak with the same social workers.

6. PERSONALLY IDENTIFIABLE INFORMATION:

a. Is personally identifiable information (PII) collected? ☐ Yes ☒ No

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

If applicable, what is the link to the Privacy Impact Assessment (PIA)?

http://files.consumerfinance.gov/f/201406_cfpb_consumer-experience-research_pia.pdf

c. If Applicable, has a System or Records Notice (SORN) been published?

☒ Yes ☐ No ☐ Not Applicable

If yes, cite the SORN. Title CFPB.021- CFPB Consumer Education and Engagement Records. 79 FR 78839.

7. INCENTIVES:

a. Is an incentive provided to participants? ☐ Yes ☒ 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

8. BURDEN ESTIMATES:

The testing session will be a total of 5 hours across one month. This time includes part of the session that is training on how to use the product, followed by questions that day, and then subsequent questions a month later.

Information Collection	Number of Respondents	Frequency (Responses per Respondent)	Number of Annual Responses	Response Time (hours)	Burden Hours
User Testing Sessions	15	2	30	5	150
Totals	15	//////////	30	//////////	150

9. **FEDERAL COST:** The estimated annual cost to the Federal government is \$60,000

10. 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 not raise issues of concern to other federal agencies.
- The results are not intended to be disseminated to the public.
- Information gathered will not be used for the purpose of substantially informing influential 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.