

Request for Approval under the “Generic Information Collection Plan 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:

Focus Groups for Parents: Money As You Grow

2. PURPOSE:

To help meet the needs of parents and caregivers, we would like to hear from them in their own words. By gauging their response to the newly updated Money As You Grow section of the CFPB Web site, we can recommend site changes and enhancements that will continue to increase engagement with this resource and ultimately impact the future financial well-being of the next generation.

3. DESCRIPTION OF RESPONDENTS:

We will recruit parents with children age 3 through 21, across a broad range of demographic characteristics. In all, we expect to talk with about 70 parents and caregivers in 4 cities.

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

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

- | | |
|--|---|
| <input checked="" type="checkbox"/> Web-based or other forms of Social Media | <input checked="" type="checkbox"/> Telephone |
| <input checked="" type="checkbox"/> In-person | <input type="checkbox"/> Mail |
| <input type="checkbox"/> Small Discussion Group | <input checked="" type="checkbox"/> Focus Group |
| <input type="checkbox"/> 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 recruit and ask people to self-qualify to participate in the focus groups, via postings online and in

community locations like libraries. Our vendor will receive the self-qualified prospects and contact them to schedule their participation.

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)?

- c. **If Applicable, has a System or Records Notice (SORN) been published?**
 Yes No Not Applicable
If yes, cite the SORN. Title: _____
_____ FR _____.

7. INCENTIVES:

- a. **Is an incentive provided to participants?** Yes No

- b. **If Yes, provide the amount or value of the incentive?** \$____75_____.

- c. **If Yes, provide a statement justifying the use and amount of the incentive.**

To participate in the focus groups, participants must first take about 10 minutes to read the criteria, self-qualify, and request participation. Then they must spend about 20 minutes at home, completing the requested Web exercise. It's important to ensure the participants who have done this work follow through and attend the focus group discussion, so that we get the most meaningful results from the research. Participants must stay through the full 90-minute focus group discussion and sign out to receive their incentive.

The total commitment we are asking of participants is about 2 hours. Further, many participants have to travel 30-60 minutes to and from the facility. In our experience, a \$75 incentive for a 60-90 minute session allows for successful recruitment by reducing the amount of time required to recruit (i.e., it is more difficult and takes longer to recruit participants when we offer a lower incentive) and simultaneously increasing the attendance rate.

When considering the potential estimated time and cost of participating in this test, such costs as childcare, transportation, and potential lost wages could result in a high no-show rate. For example, a conservatively estimated childcare cost of \$25, transportation cost \$35, and potential lost wages of \$18 amounts to an estimated \$78 cost of participation. The basis for our participant cost analysis is outlined below:

Summary of Estimated Participant Costs

- Child Care: \$25 (\$10 per hour, per child with up to 1 hour commuting + 1.5 hours at test site = 2.5 hours of child care)
 - Nationally the babysitting rate is typically around \$8 - \$12 per hour with an average of \$10 per hour.
- Transportation: \$35 (2015 federal mileage rate of 57.5 cents per mile @ an average of 60 miles).
 - IRS mileage rate of 57.5 cents per mile with a potential of 60 miles of travel.
- Lost Wages: \$18 (federal minimum wage of \$7.25 per hour x (1 hour commuting + 1.5 hours at test site) = 2.5 hours of potential lost wages)

Total Estimated Participant Cost: \$78

In summary, given the difficulties of recruiting the desired population and the potential costs of participation, we believe that \$75 is the minimum incentive necessary to recruit and retain the desired test population. There is also a concern that if the incentive is not attractive enough to participants, there may be a high no-show rate and the

test would need to be extended in order to obtain quality results. Extending the test would be much costlier than an effective incentive. For example, at the \$75 incentive level, total incentives would be \$5,250 (70 participants x \$75). Extending the tests would require an additional commitment of time by Bureau staff and contractors, as well as imposing an additional burden on external stakeholder organizations that have agreed to support the project on a voluntary basis. Also required would be additional travel by the contractors, additional hours and costs to recruit, and additional location costs, at a cost of approximately \$25,000.

8. BURDEN ESTIMATES:

Information Collection	Number of Respondents	Frequency (Responses per Respondent)	Number of Annual Responses	Response Time (hours)	Burden Hours
Self-qualify	100	1	100	.17	17
Focus group participation	70	1	70	1.83	129
Totals	100	////////////////////	170	////////////////////	146

9. **FEDERAL COST:** The estimated annual cost to the Federal government is \$5,250

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.

Instructions

(will be deleted prior to submission to OMB)

1. **TITLE OF INFORMATION COLLECTION:** Provide the name of the collection that is the subject of the request. (e.g. Comment card for soliciting feedback on xxxx)
2. **PURPOSE:** Provide a brief description of the purpose of this collection and how it will be used. If this is part of a larger study or effort, please include this in your explanation.
3. **DESCRIPTION OF RESPONDENTS:** Provide a brief description of the targeted group or groups for this collection of information. These groups must have experience with the program.
4. **TYPE OF COLLECTION:** Check all that apply. If you are requesting approval of other instruments under the generic that are all related, you only need to complete one form. If you are requesting approval for multiple unrelated collections then you must complete a form for each instrument.
5. **FOCUS GROUPS OR SURVEY: If you are conducting a focus group or survey please provide answers to the following questions:**
 - a. **Identify if you have or will have a list of potential respondents (e.g., conference participants).**
 - b. **The selection of your targeted respondents.** Please provide a description of how you plan to identify your potential group of respondents and how you will select them.
6. **PERSONALLY IDENTIFIABLE INFORMATION (PII):** Provide answers to the questions. Also, if PII will be collected, please consult with the Bureau's Privacy office before submitting this request to the PRA Team. If applicable, provide a link to the Privacy Impact Assessment (PIA) and the System of Records Notice (SORN) citation should provide the title and Federal Register citation.
7. **INCENTIVES:** An incentive is defined as a positive motivational influence; something that induces action or motivates effort. Incentives are most appropriately used in Federal statistical surveys with hard-to-find populations or respondents whose failure to participate would jeopardize the quality of the survey data. More information on the use of incentives, please see OMB's "Guidance on Agency Survey and Statistical Information Collections" (pages 68-70). This guidance is available on OMB's website at http://www.whitehouse.gov/sites/default/files/omb/assets/omb/inforeg/pmc_survey_guidance_2006.pdf. If you answer yes to the question regarding incentives, please describe the incentive and provide a justification for the use of an incentive as well as the amount.

Original regulations implementing the 1980 PRA allowed incentives only under extraordinary circumstances. Current regulations require agencies to provide "an explanation for a decision for any payment or gift to respondents, other than remuneration of contractors or grantees" (See 5 CFR 1320.5(a)(1)(iii)(D)).

How to Justify Incentives:

- Demonstrate need for incentives to improve response rates, validity, and reliability.
- Demonstrate higher "out-of-pocket" costs to respondent or unusual, intrusive demands.
- Provide data showing impact of incentives on response rates, costs, and survey quality.
- Conduct experiments to demonstrate whether incentives work as hypothesized.
- Demonstrate the cost effectiveness of the incentive (e.g., compared to failed study or cost to redo the study).
- Demonstrate need due to special populations, such as control groups for longitudinal studies. (Note: OMB does not accept the use of incentives for recruiting poor and/or minority groups nor do they accept incentives paid to companies.)
- Consider OMB's "rule-of-thumb" for incentive amounts (no more than \$5 to \$10 for upfront cash incentives for non-in person surveys and \$40 to \$75 for focus groups).

8. BURDEN ESTIMATES:

Information Collection: List the individual collections that you are requesting to be approved under this request. For example, phone survey, web survey, training materials evaluation, conference feedback.

Number. of Respondents: Provide an estimate of the Number of respondents.

Frequency (Responses per Respondent): Enter how often respondents will respond to this collection (e.g., 1x, monthly, annually, semiannually, etc.)

Average Response Time: Provide an estimate of the amount of time required for a respondent to participate (e.g. fill out a survey or participate in a focus group). Express in hours.

Burden Hours: Provide the Annual burden hours: Multiply the Number of responses and the participation time. This estimate should be expressed as hours. Please round to the nearest whole hour.

9. FEDERAL COST: Provide an estimate of the annual cost to the Federal government for conducting the information collection. Do NOT include costs that the Bureau would incur even without the collection.

10. CERTIFICATION: Please read the certification carefully. If you incorrectly certify, the collection will be returned as improperly submitted or it will be disapproved.

PLEASE MAKE SURE THAT ALL INSTRUMENTS, INSTRUCTIONS, AND SCRIPTS ARE SUBMITTED WITH THE REQUEST

Template Paperwork Act Statement (to be placed on collection instrument(s) either at the bottom of the first or last page)

Paperwork Reduction Act

According to the Paperwork Reduction Act of 1995, an agency may not conduct or sponsor, and a person is not required to respond to a collection of information unless it displays a valid OMB control number. The OMB control number for this collection is 3170-0024. It expires on 12/31/2015. The time required to complete this information collection is estimated to average approximately [## minutes / hours] per response. Responding to this collection of information is voluntary. Comments regarding this collection of information, including the estimated response time, suggestions for improving the usefulness of the information, or suggestions for reducing the burden to respond to this collection should be submitted to Bureau at the Consumer Financial Protection Bureau (Attention: PRA Office), 1700 G Street NW, Washington, DC 20552, or by email to PRA@cfpb.gov.

Paper Forms: The information is included either on the form, questionnaire, as part of the instructions, or in a cover letter or memorandum that accompanies the collection of information. The following should appear at the top right corner of all paper forms and surveys.

OMB No. 3170-0024

Expiration Date: 12/31/2015

Electronic Forms: The information is included either in the instructions, near the title of electronic collection instrument, or for on-line applications, on the first screen viewed by the respondent. This information can also be provided in a separate window with a link titled, "Paperwork Reduction Act Statement".

Sample Privacy/Confidentiality Statements – USE ONLY IF APPLICABLE

[Standard CFPB Statement]

The Bureau will not disclose any personally identifiable information collected except to the extent that it is required to do so by law and as provided in the Privacy Act Statement listed below. Additionally, the Bureau will treat the information collected consistent with its confidentiality regulations at 12 C.F.R. Part 1070, *et seq.*

[Sample statement for when there is no legal authority for a pledge of confidentiality]

Privacy: Responses to this data collection will be used only for statistical purposes. The reports prepared for this study will summarize findings across the sample and will not associate responses with a specific organization or individual. We will not provide information that identifies you or your affiliation to anyone outside the study team, except as required by law.

Note: The above language is provided by the Office of Management and Budget's Statistical and Science Policy office for studies where there was no real statutory basis for the agency to protect the confidentiality of respondents—This doesn't mean that the agency would not resist providing identifiable information and would seek to provide aggregate nonidentifiable information that would help serve whatever purpose the information was requested for; however, the agency could be legally compelled to provide identifiable information. This statement is not intended to replace any required Privacy Act statements.