

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:** Concept Evaluation Survey
2. **PURPOSE:** This survey will evaluate the effectiveness of the consumer communications developed for the Consumer Financial Protection Bureau (CFPB) and its tools and resources, including the Consumer Response consumer complaint handling system and the Owning a Home tool. This research will allow the CFPB to quantitatively select the most effective message “headlines” and visual creatives to drive positive public awareness of the agency and increased usage of the agency’s tools and resources.

There are a core set of questions used by the CFPB that appear across surveys (e.g., “Survey for Consumer Attitudes, Understanding, and Behaviors with Respect to Finance Services and Products”/OMB Control Number 3170-0034 or “Awareness Survey”). First, in order to differentiate the responses of those who are “aware” of the Bureau from those who are not, we ask whether or not the respondent has heard of the Bureau. Secondly, “Call to action” and “agency attribute” lines of questioning are expected to be influenced by the respondents’ exposure to the visual creatives and messaging stimuli. Comparing those answers to baseline responses from the Awareness Survey will provide a measure of the impact of the stimuli, which is a core objective of the survey.

Finally, demographic classification questions are used across surveys and this repetition helps facilitate benchmarking. The Awareness Survey supports the pre- and post-campaign studies needed to assess an executed campaign’s impact and determine whether a given campaign has achieved its goals. Through the ethnographic information collected through the Awareness Survey, the agency can gain understanding of its primary online target audience and make adjustments with the goal of optimization and higher return on spending. By repeating the core questions found in the Awareness Survey, the Concept Evaluation Survey team can better assess whether the tested message, content, and design are optimal for the intended targeted audience notwithstanding any minor shifts in strategy.

3. DESCRIPTION OF RESPONDENTS:

National online survey of 1500 English-speaking adults, age 30 to 65, with household income between \$35k and \$150k, and 1500 Spanish-speaking adults, age 25 to 65 with household income between \$25k and 125k. Participants must be financial decision-makers in their households.

Sample Split into 5 Cells for both English and Spanish language groups:

English

Approximately For Each Cell (N=300)

Age:

N=200 between the ages of 30 and 44

N=100 between the ages of 45 and 65

Gender:

N=150 female

N=150 male

Income:

N=150 \$75k or less

N=150 Over \$75k

Spanish	N=150 female
Approximately For Each Cell (N=300)	N=150 male
Age:	Income:
N=200 between the ages of 25 to 44	N=150 \$50k or less
N=100 between the ages of 45 to 65	N=150 Over \$50k
Gender:	

The targeted group of respondents is a sample of individual consumers nationwide recruited from a national database of U.S. Adult who have opted in to participate in surveys. All respondents must be 25 years of age and older. The screening questionnaires will be completely voluntary.

To achieve a target number of Concept Evaluation Survey participants, respondents must first complete a web-based screener, a questionnaire designed to filter the population of interest from the general population. Three thousand English- and Spanish-speaking, qualified individuals who are identified through the web-based screener will then undergo the Concept Evaluation Survey.

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?

The researchers will recruit participants using pre-recruited national online panels. Respondents will be screened to be in between the ages of 25 and 65. All respondents will be screened to either be the sole financial decision-maker or share financial decision-making in their household.

The recruiting of survey respondents is subcontracted by GMMB and Applied Research & Consulting (ARC) to independent panel companies. These companies own and manage proprietary, national databases of potential respondents who have opted in to participate in surveys. At no point in the process will ARC, GMMB or CFPB have access to the respondents' names, mailing addresses, email addresses, phone numbers or any other information that would make it possible to identify or contact the individuals. ARC, GMMB and CFPB will only have access to the demographic, attitudinal and behavioral category data that comprise the contents of the survey questionnaire.

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)?
Consumer Education PIA, September 15, 2014
http://files.consumerfinance.gov/f/201409_cfpb_consumer-education_pia.pdf.
- c. If Applicable, has a System or Records Notice (SORN) been published?
☒ Yes ☐ No ☐ Not Applicable
CFPB.021-Consumer Education and Engagement SORN , 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? “Reward Points” are provided to participants, which can be redeemed for items such as merchandise and gift cards. Given the variety of redemption options, a dollar value is not assigned to the points. The vendor will determine the amount of points participants will receive for taking the survey, based on the vendor’s determination of what is necessary to collect the targeted number of responses for the agreed upon sample set. The approximate value of the points is less than 10 (ten) dollars.
- c. If Yes, provide a statement justifying the use and amount of the incentive.

For this type of voluntary survey being given to respondents who have opted in to respond to such surveys, it is normal practice to provide a small incentive to survey participants. Such incentives help to ensure the organization receives a large enough number of responses to provide valuable data.

8. BURDEN ESTIMATES:

Information Collection	Number of Respondents	Frequency	Number of Annual Responses	Response Time (hours)	Burden Hours
Web-based screener	5,000	1	5,000	0.05 hours	250
Web-based survey	3,000	1	3,000	0.17 hours	500
Totals	5,000*	//////////	8,000	//////////	750

*Note: Respondents to the survey are a subset of those who responded to the screener.

9. **FEDERAL COST:** The estimated annual cost to the Federal government is \$120,000

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.