CONSUMER FINANCIAL PROTECTION BUREAU

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)

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1. TITLE OF INFORMATION COLLECTION:

Older Americans Placemat Usability Testing

2. PURPOSE:

The Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (Pub. L. 111-203) (the Dodd-Frank Act) established the Consumer Financial Protection Bureau (the CFPB) to regulate the offering and provision of consumer products or services under federal consumer financial laws. Section 1013(g) of the Dodd-Frank Act established within the CFPB the Office of Financial Protection for Older Americans (OA), which includes activities designed to facilitate financial literacy of individuals who are age 62 and older (referred to as "seniors"), protect them from unfair, deceptive, and abusive practices, and assist them in making future financial choices.

In order to further this goal, OA seeks to improve the utility and effectiveness of its financial education placemats which are designed to be distributed through meal service providers. OA partnered with Meals on Wheels America to reach isolated seniors with "consumer education meal placemats." The placemats feature simple graphics and plain language education content, and were originally intended to be distributed by Meals on Wheels volunteers nationwide. Upon release of the first several placemats, OA found that in addition to Meals on Wheels, other aging services providers, financial institutions, libraries, local government, Native American tribes, and other groups order and utilize the placemats. OA plans to release 4 placemats each fiscal year. To date, over 1,000,000 individual placemats have been distributed.

Understanding how the placemats are used in practice by consumers will allow the Bureau to refine its materials to improve effectiveness. The CFPB's OA team is working with CFPB's internal User Research team for this usability testing.

3. DESCRIPTION OF RESPONDENTS:

This opportunity is being offered to adults, 62 years and older, who visit congregate meal sites in the Washington, DC metro area.

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
      [x] In-person
      [ ] Small Discussion Group
      [ ] Other, Explain ______________________
      [ ] Telephone
      [ ] Mail
      [ ] Focus Group

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

      [x] 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 [x] 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 travel to the meal distribution locations and ask if people are willing to speak to us about their experiences. It will be totally voluntary.

6. **PERSONALLY IDENTIFIABLE INFORMATION:**

   a. **Is personally identifiable information (PII) collected?** [ ] Yes [x] 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 [x] 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 [x] Not Applicable
   If yes, cite the SORN.

7. **INCENTIVES:**

a. Is an incentive provided to participants? [ ] Yes [x] No

b. If Yes, provide the amount or value of the incentive? $___________.

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

8. BURDEN ESTIMATES:

Over a period of twelve months, 4 sessions of testing will occur on consumer education placemats. During each session, no more than 20 different people will be interviewed. Therefore, over a period of 12 months, up to 80 individuals will be interviewed about several consumer education placemats, using the same moderator's guide.

Information Collection	**Number of Respondents**	**Frequency (Responses per Respondent)**	**Number of Annual Responses**	**Response Time (hours)**	**Burden Hours**
Interviews	80	1x	80	.33	26
Totals	**80**	//////////	**80**	/////////////	26

9. **FEDERAL COST:** The estimated annual cost to the Federal government is $510

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 <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.