

**BUREAU OF CONSUMER FINANCIAL PROTECTION
PAPERWORK REDUCTION ACT SUBMISSION
INFORMATION COLLECTION REQUEST**

SUPPORTING STATEMENT PART A

**GENERIC INFORMATION COLLECTION PLAN FOR QUALITATIVE CONSUMER
EDUCATION, ENGAGEMENT, AND EXPERIENCE INFORMATION COLLECTIONS
(OMB CONTROL NUMBER: 3170-0036)**

OMB TERMS OF CLEARANCE:

The Office of Management and Budget (OMB) provided no Terms of Clearance when it previously approved this generic information collection plan in June 2013.

ABSTRACT:

Under the Dodd-Frank Wall Street Reform and Consumer Protection Act, Public Law No. 111-203, Section 1013(d), the Bureau's Office of Financial Education is responsible for developing and implementing initiatives intended to educate and empower consumers to make better informed financial decisions. The Bureau seeks to obtain approval of a generic information collection plan to collect qualitative data on effective strategies and consumer experiences from both financial education practitioners and consumers through a variety of methods, including in-person meetings, interviews, focus groups, qualitative surveys, online discussion forums, social media polls, and other qualitative methods as necessary. The information collected through these processes will increase the Bureau's understanding of consumers' financial experiences, financial education and empowerment programs, and practices that can improve financial decision-making skills and outcomes for consumers. This information will also enable the Bureau to better communicate to consumers about the availability of Bureau tools and resources that consumers can use to make better informed financial decisions.

JUSTIFICATION

1. Circumstances Necessitating the Data Collection

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(d) of the Dodd-Frank Act established within the CFPB the Office of Financial Education (OFE), which is responsible for developing and implementing initiatives intended to educate and empower consumers to make better informed financial decisions.

Section 1013(g) of the Dodd-Frank Act established within the CFPB the Office of Financial Protection for Older Americans, which is responsible for, among other things, activities designed to facilitate the financial literacy of individuals who have attained the age of 62 years or more on protection from deceptive and abusive practices and on current and future financial choices. In response to Section 1072 of the Act, the CFPB also has established the Office of Financial Empowerment to focus on low-income and other economically vulnerable consumers to help ensure they have access to financial products and services that meet their needs and to have the knowledge they need to use them effectively.

Additionally the CFPB created the Office of Consumer Engagement, which is responsible for engaging with the public about our work and creating tools and resources that can help consumers make informed financial decisions. Much of this work is done using digital channels and creating conversations through social media, video, and the Bureau's website.

In meeting its statutory mandates, the CFPB seeks to better understand and identify consumer experiences and financial education and empowerment strategies and practices that inform or improve consumer financial knowledge, decision-making, and financial well-being. The core objective of this data collection is to develop a deeper understanding of effective financial education and empowerment strategies in order to help inform future work at the CFPB. As part of this collection, the CFPB will also seek to better understand the experiences of consumers in making financial decisions and accessing financial information and education services and advice. Further, the CFPB seeks to use this information, in part, to increase public awareness of common consumer experiences and the CFPB tools and resources available to consumers to help them make better informed financial decisions. This information collection will also provide useful information on financial education and empowerment practices that can be shared with providers and practitioners of financial education and empowerment programs, potentially leading to better financial decision-making outcomes for consumers.

The CFPB seeks to renew OMB approval of a generic clearance to collect qualitative data on effective strategies and consumer experiences from both financial education practitioners and consumers through a variety of methods, including in-person meetings, interviews, including impromptu interviews, focus groups, qualitative surveys, online discussion forums, social media polls, and other qualitative methods as necessary. The information collected through these processes will increase the CFPB's understanding of consumers' financial experiences and financial education and empowerment programs and practices that can improve financial decision-making skills and outcomes for consumers.

2. Use of the Information

Meeting the CFPB's mandate to educate and empower consumers to make better-informed financial decisions requires ongoing information collection around consumer experiences and best practices in financial education and financial challenges facing consumers.

Types of information to be collected may include:

- Examples of promising practices and approaches in financial education and empowerment;
- Examples of promising practices and approaches in delivering financial capability programming, particularly for special populations of consumers, such as low-income consumers;
- Examples of promising practices and approaches in delivering targeted and/or innovative financial products and services to consumers, particularly for special populations of consumers, such as low-income consumers;
- Examples of challenges that financial education practitioners face in helping consumers
- Respondents' assessments of the usability and effectiveness of financial education and empowerment tools and strategies;
- Consumer stories about financial challenges they face, how they make financial decisions, and how they navigate the financial services marketplace; and experiences that affect consumer financial capability and well-being.

The categories of respondents to this information collection will include the following:

- Working-age consumers;
- Older consumers;
- College students;
- Employers who are or may be interested in providing financial education and financial wellness programs to their employees;
- Practitioners and other service providers who provide financial education and capability programs and services;
- Practitioners who provide services to older Americans;
- Other service providers, such as social workers, teachers, etc., who have interactions with consumers on topics related to financial education; and
- Other organizations, entities, and individuals that are involved in the financial education field (for example, financial institutions, philanthropic foundations, researchers, trade associations, family members who provide financial guidance to relatives, etc.).

The types of collections that this generic clearance covers may include, but are not limited to:

- In-person meetings;
- Interviews;
- Focus groups;

- Qualitative surveys;
- Online discussion forums (including via social media); and
- Other qualitative methods as necessary.

This clearance will cover information collections that may have the following uses:

- Inform the development of financial education and empowerment content produced by the CFPB;
- Better enable the CFPB to raise awareness of the financial education and empowerment content it creates for the public using digital channels;
- Provide input into the development of CFPB's financial education and empowerment programs and projects;
- Identify promising practices and approaches in financial education that the CFPB could share with the financial education field;
- Identify issues and challenges facing financial educators that the CFPB could address in future programming;
- Identify issues and challenges facing different consumer segments, including low-income consumers;
- Identify successful interventions to address elder financial exploitation that can inform the CFPB's work;
- Provide input into hypotheses about consumer financial well-being that can inform the CFPB's financial education content and research activities, including the development of assessment metrics;
- Provide qualitative feedback on the effectiveness of innovative financial education strategies that the CFPB is developing;
- Provide qualitative feedback on the effectiveness of innovative financial products, services, and delivery of financial information; or
- Inform the CFPB's understanding of consumer knowledge, decision-making, and experiences with regard to specific financial products and markets.

These collections may be conducted electronically, face-to-face, over the phone, or over the internet, depending on the specific collection. The frequency and duration of each information collection will vary depending on the specific parameters of each information collection. Details on the specific information to be collected, the method of collection, number and type of respondents, and purpose and use of each specific information collection will be submitted using the attached Information Collection template.

For several of the information collections included here, the CFPB may engage an outside vendor to undertake the information collection. Details on any data collection vendors used, if any, each specific information collection will submit using the attached Information Collection template.

30-day Federal Register and OMB Review

The CFPB will only submit a collection for approval under this generic clearance if it meets the following conditions:

Information gathered will yield qualitative information; the collections will not be designed or expected to yield statistically reliable results or used as though the results are generalizable to the population of study;

In addition, pursuant to OMB guidelines for the use of generic information collection plans, the following will be true of all collections submitted under this plan:

- The collection is voluntary;
- The collection is low-burden for respondents (based on considerations of total burden hours, total number of respondents, or burden-hours per respondent);
- The collection is non-controversial and does not raise issues of concern to other Federal agencies;
- Information gathered will not be used for the purpose of substantially informing influential policy decisions;
- The collection is not statistically significant and the results are not intended to be generalizable beyond the survey population;
- The results will not be used to measure regulatory compliance or for program evaluation; and
- Personally identifiable information will not be collected, except as needed to recruit and schedule respondents, provide remuneration for participants of interviews or focus groups, or record consumer interviews to raise awareness of CFPB tools and resources. If personally identifiable information (PII) is collected, it will be retained only to the extent necessary. In all cases, no PII will be collected, retained or shared unless the individual has provided consent. Any sharing will be done in accordance with applicable Privacy Act Notices and System of Records Notices

Additionally, the Bureau will certify that each request submitted under this generic information collection plan is consistent with 5 C.F.R. § 1320.9, and the related provisions 5 C.F.R. § 1320.8(b)(3):

- It is necessary for the proper performance of agency functions;
- It avoids unnecessary duplication;
- It uses plain, coherent, and unambiguous terminology that is understandable to respondents;
- It informs respondents of the information called for under 5 C.F.R. § 1320.8(b)(3):
 - Why the information is being collected;
 - Use of information;
 - Burden estimate;

- Nature of response (voluntary);
- Nature and extent of confidentiality (citing authority); and
- Need to display currently valid OMB control number;
- 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;
- It uses effective and efficient survey methodology; and-
- It makes appropriate use of information technology.

If these conditions are not met, the Bureau will submit an information collection request to OMB for approval through the standard PRA process.

To obtain approval for a collection that meets the conditions of this generic information collection plan, a streamlined justification document title, Request for Approval under the “Generic Information Collection Plan for Qualitative Consumer Education, Engagement, and Experience Information Collections” will be submitted to OMB along with the proposed collection instrument (e.g., a copy of focus group or interview questions). The CFPB requests OMB decisions on submissions within fifteen (15) days.

3. Use of Information Technology

If appropriate, and to the extent practicable, the CFPB will collect information electronically and/or use online tools to reduce burden.

4. Efforts to Identify Duplication

No similar data are gathered or maintained by the CFPB or are available from other sources known to the CFPB.

5. Efforts to Minimize Burdens on Small Entities

Small businesses or other small entities may be involved in these efforts but the CFPB will minimize the burden on them of information collections approved under this clearance by sampling, asking for readily available information, and using short, easy-to-complete information collection instruments. Additionally, all collections will be voluntary.

6. Consequences of Less Frequent Collection and Obstacles to Burden Reduction

Congress has mandated that the CFPB, in consultation with the Financial Literacy and Education Commission and consistent with the National Strategy for Financial Literacy, “develop and implement a strategy to improve the financial literacy of consumers that includes measurable goals and objectives.” ((12 USC 5493 Sec. 1013(d)(1)). The CFPB will be unable to carry out this mandate if it does not have information about consumer experiences navigating the financial marketplace and what strategies can in fact improve financial literacy. If the CFPB does not have

a clear understanding of what informational and other financial empowerment needs consumers have, and what financial education interventions work, its strategy, goals, and objectives will be without basis. Without periodic information collections on consumer experiences and best practices in financial education, the CFPB will not have timely information to adjust its programming to meet consumer needs. Further, an important component of the CFPB's implementation of a strategy to improve consumers' financial literacy is awareness among the public of the financial literacy tools and resources the CFPB offers to consumers.

7. Circumstances Requiring Special Information Collection

No special circumstances require the collections to be conducted in a manner inconsistent with the guidelines in 5 C.F.R. § 1320.5(d).

8. Consultation Outside the Agency

In accordance with 5 C.F.R. § 1320.8(d)(1), the Bureau has published a notice in the *Federal Register* allowing the public 60 days to comment on this proposed generic information collection plan renewal. The Bureau received four (4) comments in response to this notice which are summarized below along with the Bureau's response to these comments. Further, and in accordance with 5 C.F.R. § 1320.5(a)(1)(iv), the Bureau published a notice in the *Federal Register* allowing the public 30 days to comment on the submission of this information collection request to OMB.

One comment was generally supportive of this information collection request. Another comment expressed general support for the goal of educating and empowering consumers to make informed and responsible financial decisions and research to support that goal. However, that comment expressed a preference for such research to be conducted in a manner that would yield statistical results, as opposed to through the use of a generic clearance. The Bureau is conducting quantitative research about financial education effectiveness and consumer financial well-being and decision-making through other information collection requests. However, the Bureau believes that there is also significant utility in collecting qualitative information about consumer experiences in the financial marketplace, as well as promising financial education approaches and practices. Such information helps to inform the Bureau's development of educational tools and resources as well as the financial education field and the general public about promising financial education approaches. Another comment expressed concern that this generic clearance was used to conduct research that will substantially inform policy-making at the Bureau – specifically, the Qualitative Research of Consumer Understanding and Decision-making Related to Overdrafts. However, as the comment noted, one of the stated purposes of this generic clearance is to obtain “consumer stories about financial challenges they face, how they make financial decisions, and how they navigate the financial services marketplace.” As stated in the aforementioned information collection request, the purpose of the qualitative overdraft research was to better understand “how consumers understand the product and how consumers make decisions about using different financial products.” This research is part of an overall effort to “learn about

the prevalence of experiences with overdraft among consumer and to under the different policies and behaviors that drive differences in consumer experiences.” The last comment opposed this generic clearance request, expressing the view that there probably already a lot of existing research on consumer behavior and financial education. However, the Bureau has learned through other research and information gathering, there is a lack of adequate data about many aspects of financial education and consumer decision-making.¹

9. Payments or Gifts to Respondents

Respondents for activities conducted under this clearance may receive a small stipend. This practice has proven necessary and effective in recruiting subjects to participate in this small-scale research, and is also employed by the other Federal agencies. The incentive for participation in an interview or testing session lasting up to one hour will usually be \$40, and for participation in activities lasting longer than 1 hour or where successful recruitment may require higher incentives, such as for extensive travel or to recruit special populations, will generally range from \$50-\$75. CFPB may provide smaller incentives than these amounts at its discretion; however, any requests for larger amounts will be justified in writing to OMB. Payment or other forms of remuneration will vary depending on the specific parameters of each specific information collection. Details on proposed respondent incentives for each specific information collection will be submitted using the attached Information Collection template.

10. Assurances of Confidentiality

If a confidentiality pledge is deemed useful and feasible, the CFPB will only include a pledge of confidentiality that is supported by authority established in a statute or regulation or by the terms of a contract in place with data collection vendor precluding the sharing of PII with the CFPB, that is supported by disclosure and data security policies that are consistent with the pledge, and that does not unnecessarily impede sharing of data with other agencies for compatible confidential use. If the CFPB includes a pledge of confidentiality, it will include a citation for the statute, regulation, or contractual terms supporting the pledge.

11. Justification for Sensitive Questions

Some individual collections may include information of a sensitive nature because they may address matters commonly considered private, such as demographic information and questions related to recent household financial distress or other details of respondents’ financial lives. It may be necessary to obtain information on respondent demographics in order to ensure a diverse respondent pool, and information on financial experiences and outcomes in order to better understand the factors, experiences, and interventions related to consumer financial decision-making and well-being. If questions of a sensitive nature will be included in an individual

¹ See e.g. CFPB, Feedback from the financial education field (May 2013)

collection, notification will be provided and consent will first be obtained from those who choose to participate in the study, and justification will be provided to OMB using the attached Information Collection template.

12. Estimated Burden of Information Collection

A variety of instruments and platforms will be used to collect information from respondents. The estimated annual burden hours requested (4,000) are based on the number of collections the CFPB believes it may conduct over the requested period for this clearance. The average response time is expected to vary; however, we expect the overall average response time to be about 30 minutes with an average of 1.5 hours for focus group.

	Estimated Number of Annual Activities	Estimated Number of Annual Respondents	Average Responses per Respondent	Estimated Number of Annual Responses	Estimated Average Response Time (hours)	Estimated Annual Burden Hours
Total Annual Burden:	8	4,000	1	4,000	.5	2,000
Total Three Year Burden:	24	12,000	////////////////////	12,000	////////////////////	6,000

13. Estimated Total Annual Cost Burden to Respondents or Recordkeepers

There are no capital/start-up or ongoing operation/maintenance costs associated with this information collection.

14. Estimated Cost to the Federal Government

Any costs to the Federal Government associated with each specific information collection will be provided to OMB using the attached Information Collection template.

15. Program Changes or Adjustments

The only program change to this Information Collection request is one addition to the possible uses for the information, which is to use the information gathered about consumer experiences with financial decisions, products and services to increase awareness about the CFPB financial education tools and approaches. The CFPB believes that adding this additional use to this information collection request is appropriate because the types of information seeking to be collected and the possible categories of respondents are the same, and therefore reduces the possibility of duplication in the Bureau’s information collections. This change has not resulted in a change to the estimated burden. In addition, the increase in respondents/responses and decrease in hours comes from the fact that we have re-estimated the burden of this collection based on actual usage over the previous clearance period and that these burden estimates now

reflect the total for all three years that this clearance will be active rather than a single year.

Exhibit 2: Summary of Burden Changes

	Total Respondents	Annual Responses	Burden Hours	Cost Burden (O & M)
Total Annual Burden Requested	12,000	12,000	6,000	0
Current OMB Inventory	3,000	3,000	15,000	0
Difference (+/-)	+9,000	+9,000	-9,000	0
Program Change				
Discretionary				
New Statute				
Violation				
Adjustment	+9,000	+9,000	-9,000	

16. Plans for Tabulation, Statistical Analysis, and Publication

Information collected under this generic clearance provides useful information, but it does not yield data that can be generalized to the overall population. Information gathered is intended to primarily be used internally to inform program development and is not intended for release outside of the CFPB except, in some cases, in summary, or to raise awareness of CFPB financial education tools and resources. Information on best practices around financial education may be shared with practitioners in order to improve the quality of financial education, and summary information on consumer experiences and decision-making may be shared with researchers to inform other studies. If this information is shared, the CFPB will indicate the qualitative nature of the information. To the extent that consumer experience and decision-making is shared outside of the CFPB and it includes any PII, the CFPB will provide notification and obtain consent from the individual whose information is shared. Any sharing will be done in accordance with applicable Privacy Act Notices and System of Records Notices.

17. Display of Expiration Date

The OMB control number and expiration date associated with this PRA submission will be displayed on the Federal government's electronic PRA docket at www.reginfo.gov. In addition, all instruments used for collecting data under any collection submitted under this generic information collection plan will display the OMB control number wherever and when appropriate.

18. Exceptions to the Certification Requirement

The Bureau certifies that this collection of information is consistent with the requirements of 5 C.F.R. §1320.9, and the related provisions of 5 C.F.R. § 1320.8(b)(3) and is not seeking an exemption to these certification requirements.

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