

Consumer Financial Protection Bureau
Request for Approval under the “GENERIC CLEARANCE FOR QUALITATIVE
CONSUMER EDUCATION, ENGAGEMENT, AND EXPERIENCE INFORMATION
COLLECTIONS”
(OMB Control Number: 3170-0036)

1. TITLE OF INFORMATION COLLECTION:

Consumer Financial Protection Bureau (CFPB) Tax Time Savings Initiative; Collection of Post-2017 Tax Season Data

2. PURPOSE:

The purpose of the CFPB’s (“Bureau”) Tax Time Savings Initiative (“Initiative”) is to encourage earned income tax credit (EITC) recipients and other taxpayers with low incomes to engage in savings and wealth-building activities during the tax preparation process. This is the second request for information from the 58 non-profit organizations that agreed to participate in the Initiative. The first inquiry sought primarily logistical information from the organizations on best times for the Bureau to offer training, quantities of various materials the organizations could use in their tax campaign and the number of people participating in the trainings provided by the Bureau.¹ From the results of that initial inquiry, we were able to schedule and deliver three webinar-style trainings for staff and volunteers and deliver educational and consumer materials to the 58 pilot organizations in advance of tax season.

The purpose of this inquiry is to collect information from the same 58 non-profit organizations to get their feedback on the experience of using Initiative materials and training during the tax season which ends on April 15, 2017. The information provided will help the Bureau get a better understanding about how organizations, such as those included in the Initiative, integrate savings promotions strategies in their Volunteer Income Tax Assistance (VITA) campaign and the value that the Bureau can provide in support of those efforts. In addition to information about the strategies that organizations used and narrative information about their experiences and feedback, we are also requesting that participating organizations provide a small amount of data about program outputs including number of returns filed, number of EITC filers, and number of people who saved through different channels. This information will not be used to evaluate the quality or effectiveness of the individual programs or respondents.

The Bureau plans to collect post-tax season data through three activities:

- 1) Online surveys of (a) site leads at each of the participating organizations; and (b) frontline staff and volunteers at participating organizations who work directly with taxpayers;
- 2) Telephone focus groups with (a) site leads and (b) frontline staff/volunteers;
- 3) Collection of output data from sites through a separate online survey.

3. DESCRIPTION OF RESPONDENTS:

¹ CFPB Tax Time Savings Initiative; Pre-tax Season Pilot Participant Survey / Generic Information Collection Plan for Qualitative Consumer Education, Engagement and Experience Information Collections / ICR REFERENCE NUMBER: 201605-3170-009

Respondents to this inquiry will be the lead staff of 58 non-profit and community-based organizations participating in the Tax Time Savings pilot, as well as front-line staff members and volunteers who work directly with taxpayers for those organizations.

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 Bureau will be conducting both telephone focus groups and an online survey with site leads from the 58 participating organizations. The Bureau has contact information for these 58 people, and will send emails to them inviting them to participate in the survey and focus groups.

The Bureau will also be conducting telephone focus groups and an online survey of frontline staff and volunteers who work with taxpayers at these organizations. The Bureau does not have a list of these participants; instead, the agency will send emails to the program leads and ask them to distribute information about the online survey and focus groups to their staff members and volunteers.

6. INFORMATION COLLECTION PROCEDURES

Please summarize the procedures that will be used to collect data from respondents.

Potential respondents will receive requests for information via email, and will be asked to either (a) use an embedded link in the email to access online surveys; or (b) reply by email or phone to sign up for a telephone focus group.

7. 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
[Consumer Experience Research PIA](https://s3.amazonaws.com/files.consumerfinance.gov/f/201406_cfpb_consumer-experience-research_pia.pdf)
https://s3.amazonaws.com/files.consumerfinance.gov/f/201406_cfpb_consumer-experience-research_pia.pdf
- c. **If Applicable, has a System or Records Notice been published?**
☒ Yes ☐ No ☐ Not Applicable
 Consumer Education and Engagement Records CFPB.021, 79 FR

78839

8. 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.**

9. ASSURANCES OF CONFIDENTIALITY:

- a. **Will a pledge of confidentiality be made to respondents?** ☐ Yes ☒ No
- b. **If Yes, please cite the statute, regulation, or contractual terms supporting the pledge.**

10. JUSTIFICATION OF SENSITIVE QUESTIONS (if applicable): N/A

11. BURDEN HOURS:

Category of Respondent	Number of Respondents	Frequency	Number of Responses	Response Time (hours)	Burden (hours)
Site Leads (Survey)	58	1x	58	0.5	29
Site Leads (Focus Groups)	32	1x	32	1.0	32
Site Leads (Output Data)	58	1x	58	0.5	29
Frontline Staff/Volunteers (Survey)	160	1x	160	0.25	40
Frontline Staff/Volunteers (Focus Groups)	16	1x	16	1.0	16
Totals:	234*	//////////	324	//////////	146

*Note: The Site Lead respondents for the Focus Groups and the Output Data will be the same as those responding to the Site Lead Survey.

12. FEDERAL COST: The estimated annual cost to the Federal government is \$ 0.

13. CERTIFICATION:

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.
- 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; 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.