

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: CFPB Libraries Surveys

2. PURPOSE:

The Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 established the CFPB's Office of Financial Education (OFE) to develop and launch initiatives that will educate American consumers and help them make better-informed financial decisions.

Since July 2014, the OFE has been promoting financial education in libraries – primarily public libraries, but also law libraries, school libraries, and academic libraries – as a way to provide greater access to financial information to the American public. This initiative was founded on five key strategies derived from intensive coordination with nine public libraries across the country and a survey of more than 700 patrons and library staff. These strategies are:

- To provide participating libraries with financial education program ideas, resources and tools.
- To help libraries connect with local partners.
- To share financial education best practices among participating libraries.
- To provide materials that promote using the library to research financial questions, resolve problems, and learn more about money.
- To train library staff on fundamental personal finance topics and information to help raise knowledge levels and increase confidence when teaching or providing assistance on money matters.

From the nine partner libraries in July 2014, the program has grown to include more than 1,400 libraries across the country.

To date, our insight into the effectiveness of the libraries initiative has been limited to the number of participating libraries, locations of those libraries and the number of publications ordered.

Anecdotal evidence also has provided some insights into the outcomes of the initiative. For example, some participating libraries have reported adding staff to address financial education in their libraries. Others are launching financial education programs for the first time. New initiatives range from very small efforts -- such as setting out materials for the first time or building a larger referral network of community partners -- to much larger investments and efforts, depending on library size and funding capability. With a sizeable number of libraries in our database, OFE now seeks to survey these participating libraries to assess activity and inform the strategic direction going forward.

The purpose of this project is to inform CFPB's work with participating libraries to determine their satisfaction with, and usability and effectiveness of, OFE's financial education tools and strategies for libraries. To date, CFPB has provided libraries with online resources, free print materials, librarian training, outreach materials, and a guidebook for partnering with local organizations. It is important to determine how these resources are being used.

The results of the survey, interviews and focus groups will provide input into the continued development of OFE's financial education program for libraries.

3. DESCRIPTION OF RESPONDENTS:

CFPB will send survey invitations to all librarians in its database. Survey invitations will use CFPB's database of librarian contact information. Thus, respondents for both the web-based survey and the in-depth interviews will be the staff at libraries that have participated in CFPB's library program activities and outreach events. The current estimated number of participants in the CFPB database is about 1,400 library employees.

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 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?

CFPB maintains a list of librarians who have participated or expressed interest in the CFPB libraries program (as found in the CFPB libraries program database). That list will be the universe of potential respondents for this survey—approximately 1,400 library staff. For the web-survey, CFPB will send the survey to the full universe of libraries in the program database (so no sampling is required). The results of this survey are not intended to be generalized beyond the survey population.

For the in-depth interviews, it is important to include a diverse set of views and experiences of the libraries in the program to inform a rounded picture of the perspectives and needs of program participants. Unlike sampling for a survey, where much larger sample sizes and, typically a probabilistic sample

selection process would be required in order to generalize the findings to the larger population with statistical certainty, sampling for in-depth qualitative interviews is not determined by a specific number of cases and is not bound by a need for random sampling. Instead, a smaller, convenience sample can be drawn as long as some selection criteria are used to ensure that input will be gathered from different types of libraries participating in the program. Sample selection criteria will cover, at minimum, the following characteristics of participating libraries:

- Library type (stratified by academic, public, school - including law libraries)
- Library size
- Geographic location/region (Northeast, Midwest, Southern US, Pacific Northwest and Southwest)
- Urbanicity (urban, suburban and rural)
- Program participation length (less than 1 year, 1-2 years and more than 2 years)

For the in-depth interviews, CFPB will attempt to identify a sufficient number of libraries so that each category listed above is represented.

6. INFORMATION COLLECTION PROCEDURES

To this end, CFPB will first conduct a web-based survey of all participants in the libraries program. After the survey, participants of the web-based survey will receive a two-page summary, “Dashboard Report”, that shows how similar libraries utilize CFPB’s financial education resources. To provide context to the data from the web-based survey, in-depth interviews will be conducted with about 25 respondents to the web-based survey via phone and focus groups. These interviews will focus on specific issues identified through the web-based survey and will allow more detailed information to be gathered. Phone interviews will be conducted with about twelve (12) librarians and two focus groups of about thirteen (13) librarians or less will be conducted at a national or regional library conference.

Web-based Surveys

Web-based surveys will be sent to the approximately 1,400 library staff in the CFPB database. The Survey Data Collection Protocol includes email communications (invite, reminder, end of study) followed by two phone calls to survey non-respondents. Often times identifying the correct respondent at a library or gaining cooperation from respondents is a challenge. To address this challenge, on day 31 of data collection, the project team will be prepared to use a variety of outreach techniques to schedule a contact via telephone or e-mail at a convenient time to encourage participation. In addition, the project team will have staff ready to offer to administer the survey via telephone to individuals who may not have time to complete the questions on-line. While we would not anticipate a large number of respondents to complete the survey by phone, simply offering this option will often elicit a response via the web survey. Participation is voluntary.

Web-based Survey Data Collection Protocol

Survey Protocol Step	Description	Approximate Day (within 60 day data collection period)	Percent of Sample
Lead E-mail	Send an introductory e-mail to libraries to announce the forthcoming survey invitation and, secondarily, to allow for contact corrections.	Day 7	100%
E-mail Invitation	Sent with CFPB support an e-mail invitation with customized URL and PIN number to the questionnaire for each library.	Day 1	100%

Reminder E-mail/Hard Copy Message	An early reminder to any to-date non-respondents (similar to original e-mail). Hard copy letters sent to any library where initial e-mails were undeliverable and no new e-mail address is available.	Day 10	90%
Non-respondent E-mail/letter	An e-mail/letter addressing potential reasons for nonresponse for any to-date non-respondents.	Day 22	80%
Non-respondent Calls	These calls will be made by project staff. They will offer to conduct the survey over the phone.	Day 31	75%
Non-respondent Calls	These calls will be made by project staff. They will offer to conduct the survey over the phone.	Day 40	65%
End-of-study E-mail/letter	A final e-mail/letter announcing the forthcoming closure of the survey (at Day 60) with a final appeal to participate.	Day 53	55%
End of data collection	End of data collection period. No surveys collected after this date.	Day 60	-

In-Depth Interviews and Focus Groups

In-depth interviews will be conducted via telephone. Focus groups will be conducted in-person. Collecting deeper data through in-depth interviews and focus group discussions with library staff will enable CFPB to more completely understand the results of the web-based survey and to identify additional topics of interest to participating libraries. The interviews and focus groups will mostly occur after the web-based survey data collection so that it can be informed by those survey findings. The focus groups may occur prior to the end of the web-based survey so that the focus groups can be conducted during one of the national or regional library conferences. CFPB will identify about 25 library staff who participated in the web-based survey for these in-depth phone interviews and focus groups. A small convenience sample will be gathered from the web-based survey respondents from different types of libraries participating in the program. Sample selection criteria will cover, at minimum, the following characteristics of participating libraries: Library type, Library size, Geographic location/region, Urbanicity, and Program participation length. Selected participants will be initially contacted via email to inform them that they will receive a call in the next few days from the CFPB research team with more specific information and to schedule their participation in the in-depth interviews via phone or 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
- c. **If Applicable, has a System or Records Notice (SORN) been published?**
 Yes No Not Applicable
If yes, cite the SORN. Title: _____
_____ FR _____.
- d. **If applicable, what is the link to the Privacy Impact Assessment (PIA)?**

8. 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.

9. ASSURANCES OF CONFIDENTIALITY:

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

10. JUSTIFICATION OF SENSITIVE QUESTIONS (if applicable): Not applicable

11. BURDEN HOURS:

Collection of Information	Number of Respondents	Frequency	Number of Responses	Response Time (hours)	Burden (hours)
Web-based survey	1,000 *	1X	1,000	.17	170
Qualitative in-depth interview via telephone	12	1X	12	.75	9
Qualitative focus groups	13	1X	13	.75	10
Totals	1,025	////////////////	1,025	////////////////	189

*Actual number of invitees expected to respond to survey.

12. FEDERAL COST: The estimated annual cost to the Federal government is \$160,339.

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.