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: Workplace and the Financial Well-being Scale

2. PURPOSE: By listening to employer and employee reactions to the Financial Well-Being Scale, we can recommend interventions, communications, and tools to increase engagement with this resource and ultimately impact the future financial well-being of workers nationwide.

3. **DESCRIPTION OF RESPONDENTS**: Benefits and Human Resources (HR) leaders at companies with under 500 employees; employees of these companies.

4. TYPE OF COLLECTION (ADMINISTRATION OF THE INSTRUMENT):

a. How will you collect the information? (Check <u>all</u> that apply)

[] Web-based or other forms of Social Media	[] Telephone
[x] In-person	[] Mail
[] Small Discussion Group	[x] Focus Group
[] Other, Explain	

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 recruit participating companies by placing banners on business publications in our 4 selected cities (Chicago, Raleigh-Durham, San Diego, and Seattle) and by sending direct mail to businesses from lists purchased to meet our recruiting criteria.

6. INFORMATION COLLECTION PROCEDURES

The vendor will recruit and schedule one-on-one discussions with benefits/HR leaders at small companies. The vendor will recruit and schedule focus groups with employees of that company. The vendor will take notes and record audio of the conversations. The vendor will prepare a report scrubbed of PII.

7. PERSONALLY IDENTIFIABLE INFORMATION:

- a. Is personally identifiable information (PII) collected? [x] Yes [] No
- **b.** If Yes, is the information that will be collected included in records that are subject to the Privacy Act of 1974? [x] Yes [] No [] Not Applicable

c. If Applicable, has a System or Records Notice (SORN) been published? [x] Yes [] No [] Not Applicable If yes, cite the SORN. Title:_CFPB.021--Consumer Education and Engagement Records_79__ FR _78839______.

d. **If applicable, what is the link the Privacy Impact Assessment (PIA)?** Consumer Experience Research PIA at http://files.consumerfinance.gov/f/201406_cfpb_consumer-experience-research_pia.pdf

8. INCENTIVES:

- a. Is an incentive provided to participants? [x] Yes [] No
- **b.** If Yes, provide the amount or value of the incentive? \$____50____.

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

Participants must stay through the full 60 to 90-minute focus group discussion and sign out to receive their incentive.

We are asking companies to allow us to invite their employees to participate in the focus group, ideally during the work day or just after hours. The focus group will be 60 - 90 minutes long. The employees may lose wages or use up paid time off, and may incur extra child care and transportation costs.

In our experience, a \$50 incentive for a 60-90 minute session allows for successful recruitment by reducing the amount of time required to recruit (i.e., it is more difficult and takes longer to recruit participants when we offer a lower incentive) and simultaneously increasing the attendance rate.

Given the difficulties of recruiting the desired population and the potential costs of participation, we believe that \$50 is the minimum incentive necessary to recruit and retain the desired test population. If the incentive is not attractive enough to participants, there may be a high no-show rate and the test would need to be extended in order to obtain quality results.

Extending the test would be much costlier than an effective incentive. We would need to extend recruiting to more pairs of employers and employees in the cities specified. This would require an additional commitment of time by Bureau staff and contractors. Also required would be additional travel by the contractors, additional hours and costs to recruit, and additional location costs, at a cost of approximately \$25,000. The sum of incentives to be paid is just \$14,000.

9. ASSURANCES OF CONFIDENTIALITY:

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

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

Category of Respondent	Number of Respondents	Frequency	Number of Responses	Response Time (hours)	Burden (hours)
Employer HR/Benefits staff	28	1	28	1	28
Employees	280	1	280	1.5	420
Totals	308		308		448

11. BURDEN HOURS:

For this project, we expect to recruit 28 individuals who are HR or Benefits staff at small employers. We will spend about an hour talking with each individual.

Then, at each of the 28 employers, we expect to talk to about 10 employees in a focus group setting. The maximum length of the focus group is 90 minutes.

12. FEDERAL COST: The estimated annual cost to the Federal government is \$_14,000_.

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 <u>not</u> 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.