

BUREAU OF CONSUMER FINANCIAL PROTECTION

**REQUEST FOR APPROVAL UNDER THE
“GENERIC INFORMATION COLLECTION PLAN FOR QUALITATIVE CONSUMER
EDUCATION, ENGAGEMENT, AND EXPERIENCE INFORMATION
COLLECTIONS”**

(OMB Control Number: 3170-0036)

1. TITLE OF INFORMATION COLLECTION:

Financial Coaching Survey Host Sites and Partners

2. PURPOSE:

The Consumer Financial Protection Bureau (CFPB or the Bureau) launched the CFPB Financial Coaching Initiative in 2014, a pilot program that placed 60 financial coaches in American Job Centers and community-centered organizations across the country. These professionals provide free, one-on-one help to economically vulnerable consumers and transitioning veterans to craft personalized plans to address individual financial goals. On March 31, 2019, the Bureau’s Financial Coaching Initiative ceased providing services to the public, as planned.

One goal of the Financial Coaching Initiative was to test and build a deeper understanding of the impact of coaching services on host sites and referral partners. This information collection request seeks to address this goal by deploying two surveys to host sites and referral/network partners. This document outlines that plan for collecting information about the experience of stakeholders in the financial coaching program.

3. DESCRIPTION OF RESPONDENTS:

There are two groups of survey recipients receiving two distinct surveys. The first are the main points-of-contact at organizations that host Financial Coaches from the Bureau’s Financial Coaching Initiative. The second group are points-of-contact at organizations that have a referral partner relationship with financial coaches

4. TYPE OF COLLECTION (ADMINISTRATION OF THE COLLECTION 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 type="checkbox"/> Telephone
<input type="checkbox"/> In-person	<input type="checkbox"/> Mail
<input type="checkbox"/> Small Discussion Group	<input type="checkbox"/> Focus Group
<input type="checkbox"/> Other (please 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

- c. If yes, please provide a description below. If no, please provide a description of how you plan to identify your potential group of respondents and how you will select them.

The contractor has compiled and managed the two lists of contacts (one for host sites and another for referral/network partners) for several years for general project management purposes. Depending on the date of PRA approval, either Bureau staff or the contractor will utilize these existing lists for survey deployment.

6. INFORMATION COLLECTION PROCEDURES:

The contractor will use a Bureau-approved web survey platform to build the two surveys. The platform will have the necessary security-measure and will be 508 compliant.

The contractor will then use their email accounts (on Bureau-provided laptops) to send a mass email to the each of the lists with the survey link and a deadline for completion. Should delays in PRA approval require the survey be conducted after the contract ends, bureau employees will follow the same procedure. The draft email to survey respondents is attached (attachment A).

Data will be housed in the survey platform until the deadline, at which point, the contractor (or Bureau staff) will save the raw data on a bureau-approved laptop for further analysis.

The collection does not include any personally identifiable information.

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. Has a System or Records Notice (SORN) been published?

Yes No Not Applicable

If yes, list the SORN title and Federal Register citation

Title: _____
FR _____.

- d. If applicable, what is the link to the Privacy Impact Assessment?

N/A – because no PII is collected

8. INCENTIVES:

- a. Is an incentive provided to participants? [] Yes [X] No
- b. If yes, provide a statement justifying the use and amount of the incentive *and* the amount or value of the incentive: \$ n/a .

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.

The contractual terms regarding data collection and management includes language that pertains to the two surveys as well as other data collection tasks (that may collect PII). Terms include the following:

10. JUSTIFICATION OF SENSITIVE QUESTIONS (if applicable):

11. BURDEN HOURS:

Collection of Information	Number of Respondents	Frequency	Number of Responses	Response Time (hours)	Burden (hours)
Host Site Web Survey	100	1x	100	.5	50
Referral/Local Network Partner Web Survey	400	1x	400	.5	200
Totals	500	//////////	500	//////////	250

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

We estimate that the Bureau will need to cover the costs (via the contract) of maintaining a client management/outcome tracking system in order to be able to collect and report data, as well as costs associated with the collection, analysis, and reporting of interview and survey data. The contract is firm-fixed price, as such, there is no additional cost to the government for execution of this task. Should PRA approval come in after the contract performance period ends, available survey instrument licenses will be used to collect, house and analyze the data by Bureau staff. As such, there would be no additional costs to the government. Therefore estimated cost for this work 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.

