

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:** CFPB Libraries Survey/Non-participating Libraries

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 2,400 libraries across the country. 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 and their impact on libraries.

In 2018, a web-based survey was sent to the libraries in the CFPB’s program to assess activity and inform the strategic direction going forward. Two focus groups were also conducted to get information about the challenges and opportunities in incorporating a financial education component in rural/suburban and urban libraries.

The purpose of this project is to get feedback from libraries that are not in the CFPB Library Program about their experiences in providing financial education to their patrons and to identify ways that the CFPB Library Program can address their needs. In addition, this project will also include a follow-up survey for those participating libraries about the usability and effectiveness of the CFPB Library Program’s resources and tools, and to determine their satisfaction with OFE’s financial education tools and strategies for libraries. Focus groups may also be conducted to get more details about issues and trends identified in the surveys.

The feedback results will provide input into the continued development of OFE’s financial education

program for libraries. Our office plans to begin this data collection in October/November 2019.

3. DESCRIPTION OF RESPONDENTS: This survey will be conducted using a subset of the questions approved by OMB for the 2018 Library Survey. It will be conducted with libraries that are not in the CFPB Library database (“nonparticipants”); the invitation to participate in the survey will be sent through a third-party organization, such as the American Library Association, the Government Printing Office, and/or FINRA Foundation. The survey vendor (TBD) will receive responses, aggregate and analyze the data, and report to the CFPB on the results.

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 checked="" 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 participants for the survey and focus groups for nonparticipating libraries will utilize a mail list from a third-party organization--such as the American Library Association, the FINRA Foundation or the Government Printing Office.

6. INFORMATION COLLECTION PROCEDURES:

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

CFPB will conduct a web-based survey of libraries that are not participating in the CFPB’s Libraries Program, working through the third-party organization to send the survey invite. Survey responses will go directly to the contractor who will aggregate and report results.

This survey will consist of 12 of the previously-approved questions that were included in the 2018 Library Survey. Minor revisions will be made to the previously-approved questions, e.g., change “BCFP” to “CFPB”. A focus group—of 9 or less participants--may be conducted by the contractor with invites sent through the third-party organization, with the first 9 or less respondents contacted for participation.

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: CFPB.021, CFPB Consumer Education and Engagement Records
83 FR 23435

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

8. INCENTIVES:

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

Collection of Information	Number of Respondents	Frequency	Number of Responses	Response Time (hours)	Burden (hours)
Web-based survey for nonparticipating libraries	10,000	1x	10,000	.12	1,200
Focus groups	20	1x	20	.75	15
Totals	10,020	//////////	10,020	//////////	1,215

12. FEDERAL COST: The estimated annual cost to the Federal government is \$100,000.

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 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.