

**BUREAU OF CONSUMER FINANCIAL PROTECTION
INFORMATION COLLECTION REQUEST**

SUPPORTING STATEMENT PART A

**GENERIC INFORMATION COLLECTION PLAN FOR THE COLLECTION OF
QUALITATIVE FEEDBACK ON BUREAU SERVICE DELIVERY**

(OMB CONTROL NUMBER: 3170-0024)

TERMS OF CLEARANCE: None. The Office of Management and Budget (OMB) provided no terms of clearance when it last approved this information collection in November 2015.

ABSTRACT: This generic information collection plan provides for the collection of qualitative feedback from consumers, financial institutions, and stakeholders on a wide range of services the Bureau provides in an efficient, timely manner, in accordance with the Bureau's commitment to improving service delivery. By qualitative feedback, the Bureau means information that provides useful insights on, for example, comprehension, usability, perceptions, and opinions, but are not statistical surveys that yield quantitative results that can be generalized to the population of study. The Bureau expects this feedback to include insights into consumer, financial institution, or stakeholder perceptions, experiences, and expectations, provide an early warning of issues with service, or focus attention on areas where communication, training or changes in operations might improve delivery of products or services. These collections will allow for ongoing, collaborative, and actionable communications between the Bureau and consumers, financial institutions, and stakeholders. It will also allow feedback to contribute directly to the improvement of program management.

This submission is requesting OMB to renew and reinstate, for additional three (3) years, its approval of this generic information collection plan.

JUSTIFICATION

1. Circumstances Necessitating the Data Collection

In order to work continuously to ensure that its programs are effective and meet the needs of financial institutions, consumers, and stakeholders (collectively, customers), the Bureau of Consumer Financial Protection (hereafter "the Bureau") seeks to obtain OMB approval of generic clearance to collect qualitative feedback on its service delivery. Qualitative feedback means information that provides useful insights on perceptions and opinions, but not statistical surveys that yield quantitative results that can be generalized to the population of study.

This collection of information is necessary to enable the Bureau to garner customer feedback in an efficient, timely manner, in accordance with its commitment to improving service delivery. The information collected from Bureau customers will help ensure that users have an effective, efficient, and satisfying experience with the Bureau's programs. This feedback will provide insights into customer perceptions, experiences and expectations, provide an early warning for issues with service, or focus attention on areas where communication, training or changes in operations might improve delivery of products or services. These collections will allow for ongoing, collaborative and actionable communications between the Bureau and its customers. They will also allow feedback to contribute directly to the improvement of program management.

2. Use of the Information

Improving Bureau programs requires ongoing assessment of service delivery, meaning a systematic review of the operation of a program compared to a set of explicit or implicit standards, as a means of contributing to the continuous improvement of the program. The Bureau collects, analyzes, and interprets information gathered through this generic clearance to identify strengths and weaknesses of current services and make improvements in service delivery based on feedback. The solicitation of feedback target areas such as: user experiences with and usability of Bureau products and services, timeliness, appropriateness, accuracy of information, courtesy, efficiency of service delivery, and resolution of issues with service delivery. Responses are assessed to plan and inform efforts to improve or maintain the quality of service offered to the public. If this information is not collected, vital feedback from customers on the Bureau's services will be unavailable.

The Bureau will only submit a collection for approval under this generic clearance if it meets the following conditions:

- Information gathered will be used only internally for general service improvement and program management purposes and is not intended for release outside of the Bureau (if released, procedures outlined in Question 16 will be followed);
- Information gathered will not be used for the purpose of substantially or solely informing influential policy decisions¹;
- Information gathered will yield qualitative information; the collections will not be designed or expected to yield statistically reliable results or used as though the results are generalizable to the population of study;
- The collection is voluntary;
- The collection is low-burden for respondents (based on considerations of total burden hours, total number of respondents, or burden-hours per respondent) and is low-cost for both the respondents and the Federal Government;
- The collection is non-controversial and does not raise issues of concern to other Federal agencies;
- The results will not be used to measure regulatory compliance or for program evaluation;

¹ As defined in OMB and agency Information Quality Guidelines, "influential" means that "an agency can reasonably determine that dissemination of the information will have or does have a clear and substantial impact on important public policies or important private sector decisions."

- Any collection is targeted to the solicitation of opinions from respondents who have experience with the program or may have experience with the program in the near future; and
- With the exception of information needed to provide incentives for respondents (when justified), personally identifiable information (PII) is collected only to the extent necessary and is not retained. In addition, every effort will be used to ensure the Bureau does not retain information that could be aggregated to become personally identifiable.

Additionally, the Bureau will certify that each request submitted under this generic information collection plan is consistent with 5 CFR § 1320.9, and the related provisions 5 CFR § 1320.8(b)(3):

- It is necessary for the proper performance of agency functions;
- It avoids unnecessary duplication;
- It uses plain, coherent, and unambiguous terminology that is understandable to respondents;
- It informs respondents of the information called for under 5 CFR § 1320.8(b)(3):
 - Why the information is being collected;
 - Use of information;
 - Burden estimate;
 - Nature of response (voluntary);
 - Nature and extent of confidentiality (citing authority); and
 - Need to display currently valid OMB control number;
- 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;
- It uses effective and efficient survey methodology; and
- It makes appropriate use of information technology.

If these conditions are not met, the Bureau will submit an information collection request to OMB for approval through the standard PRA process.

To obtain approval for a collection that meets the conditions of this generic clearance, a standardized form will be submitted to OMB along with supporting documentation (e.g., a copy of the comment card). The submission will have automatic approval, unless OMB identifies issues within 5 business days.

The types of collections that this generic clearance covers include, but are not limited to:

- Customer comment cards/complaint forms
- Small discussion groups
- Focus Groups of customers, potential customers, delivery partners, or other stakeholders
- Cognitive laboratory studies, such as those used to refine forms or questions on non-statistical surveys or assess usability of a website or other Bureau product (this generic clearance will not be used for cognitive testing associated with complex statistical studies or studies for which the result are intended to be statically significant)
- Qualitative customer satisfaction surveys (e.g., post-transaction surveys; opt-out web

- surveys)
- In-person observation testing (e.g., website or software usability tests).

3. Use of Information Technology

If appropriate, the Bureau will collect information electronically and/or use online tools to reduce burden.

4. Efforts to Identify Duplication

No similar data are gathered or maintained by the Bureau or are available from other sources known to the Bureau.

5. Efforts to Minimize Burdens on Small Entities

Small businesses or other small entities may be involved in these efforts but the Bureau will minimize the burden on them of information collections approved under this clearance by sampling, asking for readily available information, and using short, easy-to-complete information collection instruments. Additionally, all collections will be voluntary and low burden.

6. Consequences of Less Frequent Collection and Obstacles to Burden Reduction

Without these types of feedback, the Bureau will not have timely information to adjust its methods and modes of service delivery to better meet customer needs or optimize the use experience of its products to make them as usable as possible to the public.

7. Circumstances Requiring Special Information Collection

There are no special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR § 1320.5(d)(2). Further, the information collected will be voluntary and will not be used for general statistical purposes.

8. Consultation Outside the Agency

In accordance with 5 CFR § 1320.8(d)(1), the Bureau has published a notice Federal Register allowing the public 60 days to comment on the proposed extension of this currently approved collection of information. Further and in accordance with 5 CFR § 1320.5(a)(1)(iv), the Bureau published a notice in the Federal Register allowing the public 30 days to comment on the submission of this information collection request to the Office of Management and Budget.

Information collections seeking approval under this generic information collection plan are for the purpose of allowing the Bureau to consult with the public and other interested parties on the on-going development of its products and services with the specific purpose of improving the utility, usability, and quality of Bureau products and services.

9. Payments or Gifts to Respondents

The Bureau may or may not provide incentives to respondents of information collections approved under this generic clearance. In the case of in-person usability studies, the Bureau may provide a maximum incentive of up to \$40. In the case of in-person focus groups, the Bureau may provide a maximum incentive of up to \$75. The Bureau may provide smaller incentives than these amounts at its discretion; however, all requests for the use of incentives will be justified in the requests made to OMB under this generic. If respondents participate in these kinds of studies remotely, via phone, or internet, any proposed incentive will be justified to OMB and must be considerably less than that provided to respondents in in-person studies, who have to travel to the Bureau or other facility to participate. If such information collections include hard-to-reach groups and the Bureau plans to offer non-standard incentives, the Bureau will provide OMB with additional justifications in the request for clearance of these specific activities.

10. Assurances of Confidentiality

If a confidentiality pledge is deemed useful and feasible, the Bureau will only include a pledge of confidentiality that is supported by authority established in statute or regulation, that is supported by disclosure and data security policies that are consistent with the pledge, and that does not unnecessarily impede sharing of data with other agencies for compatible confidential use. If the Bureau includes a pledge of confidentiality, it will include a citation for the statute or regulation supporting the pledge. Any such pledge and its justification given in any activity cleared under this information collection plan will be included with the submission of the individual collection.

Each request under this generic will include, as applicable, the name and citation for the System of Records Notice and the name and link to the Privacy Impact assessment. Additionally, as applicable, a Privacy Act Statement or Privacy Notice, as well as an informed consent form where appropriate will be provided with each submission made under this generic clearance as well as any other related documentation such as informed consents.

11. Justification for Sensitive Questions

No questions will be asked that are of a personal or sensitive nature.

12. Estimated Burden of Information Collection

During the past 3-year approval of this generic information collection plan (GICP), the Bureau received OMB approval for 22 information collection requests resulting in a total of about 5,000 burden hours and about 34,000 responses. For purposes of estimating the burden for the proposed 3-year extension of OMB's approval of this GICP, the Bureau envisions that it will submit about 10 new requests per year to OMB under this GICP resulting in about 27,000 respondents/responses per year with an annual burden of approximately 3,000 hours. For purposes of inventorying the burden thresholds for this GICP, the estimated number of respondents and estimated annual burden hours are rounded to the nearest 1,000s, as applicable.

Exhibit 1: Estimated Annual and Three-Year Burden

| Collection of Information | Estimated Number of Annual Activities | Estimated Number of Annual Respondents | Estimated Number of Annual Responses | Estimated Annual Burden (hours) |
|----------------------------------|--|---|---|--|
| Total Annual Burden: | 10 | 27,000 | 27,000 | 3,000 |
| Total Three Year Burden: | 30 | 80,000 | 80,000 | 9,000 |

The numbers listed above show the projected inventory over the next 3 years. The Bureau will monitor the usage and adjust as needed.

13. Estimated Total Annual Cost Burden to Respondents or Recordkeepers

No costs to respondents are anticipated.

14. Estimated Cost to the Federal Government

Costs to the federal government incurred by an information collection submitted under this plan will be reported when it is submitted.

15. Program Changes or Adjustments

Exhibit 2: Summary of Burden Changes (Three-Year Totals)

| | Respondents | Responses | Burden Hours | Cost Burden (O & M) |
|-------------------------------|--------------------|------------------|---------------------|--------------------------------|
| Total 3 Year Burden Requested | 80,000 | 80,000 | 9,000 | 0 |
| Current OMB Inventory | 0 | 0 | 0 | 0 |
| Difference (+/-) | 80,000 | 80,000 | 9,000 | 0 |
| Program Change | 80,000 | 80,000 | 9,000 | 0 |
| Discretionary | 0 | 0 | 0 | 0 |
| New Statute | 0 | 0 | 0 | 0 |
| Violation | 0 | 0 | 0 | 0 |
| Adjustment | 0 | 0 | 0 | 0 |

The burden change results from the request to reinstate this GICP. The change in burden from what was previously approved by OMB is as follows:

- 160,000 respondents/responses for a difference of –80,000 respondents/responses
- 30,000 hours for a difference of -21,000 hours

The change in burden reflects the Bureau’s experience in using this generic information collection plan during the prior three year approval period and projected use of the next three years.

16. Plans for Tabulation, Statistical Analysis, and Publication

Feedback collected under this generic clearance provides useful information, but it does not yield data that can be generalized to the overall population. Information gathered is intended to be used only internally for general service improvement and program management purposes and is not intended for release outside of the Bureau (if released, the Bureau must indicate the qualitative nature of the information).

17. Display of Expiration Date

No exemption is requested. The Bureau plans to display the expiration date for OMB approval of the information collection on all instruments approved under this generic information collection plan.

18. Exceptions to the Certification Requirement

The Bureau certifies that this collection of information is consistent with the requirements of 5 CFR § 1320.9, and the related provisions of 5 CFR § 1320.8(b)(3) and is not seeking an exemption to these certification requirements.

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