BUREAU OF CONSUMER FINANCIAL PROTECTION

REQUEST FOR APPROVAL UNDER THE
"GENERIC INFORMATION COLLECTION PLAN FOR THE COLLECTION OF QUALITATIVE FEEDBACK ON
THE SERVICE DELIVERY OF THE CONSUMER FINANCIAL PROTECTION BUREAU"

(OMB Control Number: 3170-0024)

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1. **TITLE OF INFORMATION COLLECTION**: **Feedback on the Use of the Your Money, Your Goals Toolkit**

2. **PURPOSE**: This survey will collect information about people's use of the Your Money, Your Goals toolkit. The Bureau created the toolkit—and continually updates it—for social services organizations interested in integrating financial empowerment activities into their work with clients. For the past several years, the Bureau has selected annual cohorts of organizations to receive training and technical assistance focused on how to integrate Your Money, Your Goals tools into the services they offer. These trainings follow a train the trainer model, with the Bureau holding initial trainings in each selected community. Individuals who attend these initial trainings then go on to train others, thereby multiplying the number of consumers that Your Money, Your Goals reaches. In some cases, the Bureau deviates from this model and offers trainings directly to frontline staff.

The survey described in this submission will gather information about attendees' perceptions of the trainings, quantify what share of training participants go on to use the toolkit with clients, and explore what factors aid and impede its use. Intended survey respondents include people who attend the train the trainer workshops as well as individuals who attend subsequent trainings. The survey contains different sections to assess the toolkit's use by trainers and by frontline staff who work directly with clients. The survey will be fielded to approximately 1,500 individuals who attend train the trainer workshops led directly by the Bureau or subsequent trainings. Ultimately, this survey will support the Bureau's understanding of how people integrate Your Money, Your Goals into a variety of settings, information that will be used to improve the materials, trainings, and technical assistance.

3. **DESCRIPTION OF RESPONDENTS**: Individuals trained to use or trained to train others to use Your Money, Your Goals will be surveyed. Most of these individuals are staff at social services organizations.

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

a. How will you collect the information? Check all that apply.

[X] Web-based or other forms of Social Media	[X] Telephone
[ ] In-person	[ ] Mail
[ ] Small Discussion Group	[ ] Focus Group
[ ] Other (please explain) ___________________________________	

b. Will interviewers or facilitators be used?

[ ] Yes [X] 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?

[X] Yes [ ] No [ ] Not Applicable

b. 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.

Respondents will be recruited from a list of individuals who complete sign-in sheets at Your Money, Your Goals training events. All individuals who sign in at these events will be contacted to participate in the survey.

6. **INFORMATION COLLECTION PROCEDURES**:
Please summarize the procedures that will be used to collect data from respondents.

Respondents will receive an email inviting them to participate in the survey. The email survey invitation and reminder text are included with this submission. In this email, there will be a link and a unique identifier that will allow the respondent to enter the survey website. Respondents who do not reply to the initial email invitation or up to two follow-up email invitations will receive a phone call inviting them to participate in the survey. A script for that phone call is included with this submission. In the phone call, respondents will also be provided the web address and their own unique identifier. Those who choose to enter the survey will first see an informed consent page that advises respondents of their right and the confidentiality of their responses. After consenting, respondents will enter an online survey. The informed consent text and survey text are included with this submission.

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

If Yes, describe what PII will be collected and why it is needed and how it will be used.

The researchers will use PII from Your Money Your Goals sign-in sheets collected at the trainings to send survey invitations and reminders. Information contained on those sign-in sheets include names, email addresses, and telephone numbers. This information is necessary to identify individuals who have been trained to use Your Money, Your Goals and will be used to contact potential respondents. PII will also be needed to facilitate incentive fulfillment. PII will not be used for any purposes other than sending the invitations and fulfilling the incentives.

To add anonymity to the collected data, the researchers will assign each record a unique random PIN. This PIN will be used to ensure each survey is completed only once and facilitate the tracking of completion progress. Throughout the survey-fielding period the research contractor will handle incentive processing for completed surveys utilizing the PII provided. PII will be transfered using a secure transfer method such as SFTP or HTTPS. Study contractors will store data password protected servers with hard drives that utilize FIPS 140-2 standard encryption in a locked server room. Access to files, both internally and for transfer, is granted to only those user accounts with a project requirement for access.

PII will be stripped from all files used to analyze the data, and at the conclusion of the study all PII will be sanitized off servers using Department of Defense sanitization standard DoD 5220.22-M which overwrites all addressable locations with a character, its complement, then a random character. Once this data has been sanitized there will be no way to link the collected data to the original PII.

The collection instrument collects demographic data, but it is not required to participate in the survey.

c. Has a System or Records Notice (SORN) been published?
[ ] Yes [ ] No [X] Not Applicable
If yes, list the SORN title and *Federal Register* (FR) citation
Title: ____
__ FR ________________________.

d. If applicable, please provide a link to the Privacy Impact Assessment.

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: $_ __________.

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

11. **BURDEN HOURS**:

Collection of Information	Number of Respondents	Frequency	Number of Annual Responses	Average Response Time (hours)	Burden (hours)
Survey	1,500	1x	1,500	.42	630
Totals	**1,500**	//////////////	**1,500**	//////////////	**630**

We have assumed a total response time of 25 minutes. This includes 15 minutes to respond to the survey as well as 10 minutes to read recruiting emails or for recruiting phone calls.

12. **FEDERAL COST**: The estimated annual cost to the Federal government is $__270,415__.

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.