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)

- 1. **TITLE OF INFORMATION COLLECTION**: Emergency Rental Assistance Interactive Tool Creation and User Research.
- 2. **PURPOSE**: Conducting moderated unstructured discussions with renters and usability testing of an interactive web tool.

3. DESCRIPTION OF RESPONDENTS:

Respondents will consist of renters who lost income due to the pandemic and who meet at least one of the following criteria:

- Fell behind on one or more rent payments in the last year
- Made two or more late rent payments in the last 18 months
- Needed to sell belongings, borrow from family/friends, or use a credit card in order to pay rent during the last 18 months
- Currently in a rent repayment plan with their landlord
- Skipped needed items (e.g. groceries, paying utilities, doctor visits) in order to pay their rent during the last 18 months

In addition to the specific criteria related to their housing situation, we will also aim to recruit participants from a broad range of demographic, geographic, cultural, and technological backgrounds.

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

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

	[X] Web-based or other forms of Social Media[] In-person[] Small Discussion Group[X] Other (please explain)	[] Telephone [] Mail [] Focus Group
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 [] No [X] 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.
INFORMATION COLLECTION PROCEDURES : Please summarize the procedures that will be used to collect data from respondents.
Consumers will arrive on the email sign-up page via consumerfinance.gov or another source where they will be prompted to enter their email address and then be promoted to self-identify who they are and what content they are interested in receiving more information on.
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.
c. Has a System or Records Notice (SORN) been published? [X] Yes [] No [] Not Applicable If yes, list the SORN title and the <i>Federal Register</i> (FR) citation: Title: CFPB.021 – Consumer Education and Engagement Records 85 FR 3662.
a. If applicable, please provide a link to the Privacy Impact Assessment: https://files.consumerfinance.gov/f/201409 cfpb consumer-education pia.pdf

8. INCENTIVES:

6.

7.

- **a.** Is an incentive provided to participants? [X] Yes [] No
- **b.** If yes, provide a statement justifying the use and amount of the incentive *and* the amount or value of the incentive: Incentives of \$150 will be dispensed via vendor contract (Fors Marsh Group) in the form of a virtual gift card.

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.

The collection methods will feature confidentiality language based on CFPB's standard language in cases where there is no statutory basis for a pledge of confidentiality: "Please note that the Bureau intends to keep your responses private to the extent permitted by law, and when results are reported none of your answers will be connected to your organization."

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 (minutes)	Burden (hours)
Screening Questions	40	1	40	10	6.66
Interview (with usability	40	1	40	90	60
test)					
TOTAL	40		40		66.66

12. **FEDERAL COST**: The estimated annual cost to the Federal government 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 <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.