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**:
Money Smart for Older Adults Train-the-Trainer Session Feedback Form and Money Smart for Older Adults Participant Evaluation Form (English and Spanish)

2. **PURPOSE**: To assess how trainers view the effectiveness of the Money Smart for Older Adults (MSOA) train-the-trainer curriculum and to survey how MSOA session participants view the effectiveness of the training curriculum. With respect to the train-the-trainer curriculum, feedback is particularly being sought on: the clarity of the information presented; the instructor's comfort level with teaching the curriculum; how the curriculum will be used; if the instructor's would recommend the curriculum to other potential instructors; and how likely they are to use the curriculum to train more clients. With respect to participants, the evaluation form provides trainers a way to assess their impact on participants' knowledge of financial exploitation and gather feedback on the quality and effectiveness of the materials, the training and the instructor.

3. **DESCRIPTION OF RESPONDENTS:**

MSOA Train-the-Trainer Session Feedback Form: respondents will include individuals representing adult social service agencies, law enforcement, financial services, legal professionals and retired professionals from diverse backgrounds who have participated in a MSOA train-the-trainer program online or in a face-to-face session.

Participant Evaluation Form: respondents will include older adults ages 62 and older, family caregivers, senior advocates and financial service representatives who have received the presentation of the MSOA consumer-training program. The same form is available.

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
[X] In-person
[ ] Small Discussion Group
[ ] Other (please explain)
[ ] Telephone
[ ] Mail
[ ] Focus Group

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.

The forms will be given to individuals who have participated in either the MSOA train-the-trainer session or who have received an MSOA presentation.

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

The data gathered through the Money Smart for Older Adults Train-the-Trainer Session Feedback Form and Money Smart for Older Adults Participant Evaluation Form will be collected using two approaches:

- For in-person MSOA train-the-trainer session or MSOA consumer-focused presentations: the forms will be handed out physically to the individuals who participate in these presentations. The information will be gathered using a paper-pencil method, or interactively using a tablet, smartphone or computer provided by the trainer or training organization.
- For a recorded or live webinar of the MSOA train-the-trainer session or MSOA consumer-focused presentation: the forms will be provided online through a web-based survey platform or similar. The information will be gathered through the participant's own a tablet, smart phone, or computer or a device provided by the trainer or training organization.

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 [X] 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 *Federal Register* (FR) citation:
Title: CFPB.021 Consumer Education and Engagement Records SORN 83 FR 23435.

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

http://files.consumerfinance.gov/f/201406_cfpb_consumer-experience-research_pia.pdf.

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 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 (minutes)	Burden (hours)
Train-the-Trainer Session Feedback Form	3,000	1	3,000	0.05	150
Usability Testing	7,000	1	7,000	0.08	560
TOTAL	**10,000**		**10,000**		**710**

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.