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**: Usability Testing Plan: Family College Planning Tools

2. **PURPOSE**: CFPB wants to conduct user testing with practitioners and family borrowers on the effectiveness of each of the three Family College Planning Tools. Usability testing is the third phase of the Office for Older Americans' (OA) and Office of Students' joint project (the Family College Planning Tool). Through Phase I (literature review and environmental scan) and Phase II (practitioner and family member interviews) OA, students and their contractor (Abt Associates) developed three finite tools to help family members understand the cost of paying for a student's education. The three tools are:

   1. A Life Cycle infographic identifying key points in the college financing decision process and providing information for family borrowers to consider at each point along the path,
   2. Considerations Widget that provides helper text based on inputs on student's age, borrower's age, and whether there are multiple students that borrower will assist, and
   3. Worksheet projecting future costs.

3. **DESCRIPTION OF RESPONDENTS**: Individuals including practitioners and family borrowers.

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

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

      [ ] Web-based or other forms of Social Media　　[ ] Telephone
      [ ] In-person　　[ ] Mail
      [ ] Small Discussion Group　　[ ] Focus Group
      [X] Other (please explain): Using WebEx for individual interviews

   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 [X] 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.

1) There is no customer list. Although, Abt interviewed some practitioners and consumers during the qualitative research phase of this project and will include some of those contacts in this user testing phase.
2) Abt will recruit practitioners through Abt staff and referrals from consultant Dr. Sonya Lutter and CFPB staff.
3) Abt will recruit family borrowers using multiple strategies to reach prospective participants, such as email and online postings.

6. **INFORMATION COLLECTION PROCEDURES**:

a) We will hold two groups of interviews with nine participants in each group. One group will test the life cycle map and considerations widget and the other group will test the worksheet projecting future costs. Participants will use the tools during the interview and will answer open-ended questions to provide feedback.

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

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: System of Records Notice ("SORN"), CFPB.021 – CFPB Consumer Education and Engagement Records, 83 FR 23435

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

8. **INCENTIVES**:

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:
   a. Individual interview participants will receive a $75 gift card for participating in the interview. Providing incentives will help in our recruitment efforts for consumers who are family borrowers.

9. **ASSURANCES OF CONFIDENTIALITY**:

   a. Will a pledge of confidentiality be made to respondents? [X] Yes [ ] No

   b. If yes, please cite the statute, regulation, or contractual terms supporting the pledge.

For Recruitment:

Privacy Act Statement
5 U.S.C. 552a(e)(3)

The information you provide to Abt Associates (Abt) will be used by the Consumer Financial Protection Bureau (Bureau) for research recruitment to evaluate and improve the Family College Planning Tool resources.

If you choose to participate, the Bureau will obtain personally identifiable information (PII) such as your name, email address, and telephone number to contact you to schedule a session and provide compensation for your participation in the research.

Information collected will be treated in accordance with the System of Records Notice (SORN), CFPB.021 – CFPB Consumer Education and Engagement Records. Although the Bureau does not anticipate further disclosing the information provided, it may be disclosed as indicated in the Routine Uses described in the SORN. Direct identifying information will be kept private except as required by law.

This collection of information is authorized by Pub. L. No. 111-203, Title X, Sections 1013 and 1022, codified at 12 U.S.C. §§ 5493 and 5512.

Participation is voluntary.

For usability testing sessions:

Privacy Notice

The information you provide to Abt Associates (Abt) will contribute to the development of a Consumer Financial Protection Bureau (Bureau) tool to help consumers make decisions about how to finance their child's or family member's education.

With your consent, Abt may capture audio recording of this interview and images of your screen which may include video images. Recordings will not be shared with the Bureau. The Bureau will only receive aggregated and de-identified information. The Bureau will publish summaries of aggregate findings in a public report. Direct identifying information will be kept private except as required by law.

Participation is voluntary.

10. **JUSTIFICATION OF SENSITIVE QUESTIONS (if applicable)**: Not applicable. The user testing will consist of general conversations on financial topics to gather information about the effectiveness of the proposed tools.

11. **BURDEN HOURS**:

Collection of Information	Number of Annual Respondents	Frequency	Number of Annual Responses	Average Response Time (hours)	Annual Burden (hours)
Observational Interviews (Life Cycle & Widget)	9	1[1]	9	1	9
Interviews (Future Cost Spreadsheet)	9	1[1]	9	1	9
Totals:	**18**		**18**		**18**

12. **FEDERAL COST**: Per the contract for this project, the estimated cost to the Federal government is $33,266.30 for the usability testing portion of the project.

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

[1] Both categories of interviews are one-time information collections (not recurring).

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.