

**SUPPORTING STATEMENT FOR  
GENERIC INFORMATION COLLECTION PLAN FOR THE COLLECTION OF  
QUALITATIVE FEEDBACK ON BUREAU SERVICE DELIVERY  
OMB CONTROL NO.: 3170-0024**

**A. JUSTIFICATION**

**1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

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. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

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 decisions<sup>1</sup>;
- 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
- 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):

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<sup>1</sup> 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."

- 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. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also, describe any consideration of using information technology to reduce burden.**

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

**4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item A.2 above.**

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

**5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.**

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. Describe the consequence to federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

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. Explain any special circumstances that would cause an information collection to be conducted in a manner:**

- **requiring respondents to report information to the agency more often than quarterly;**
- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **requiring respondents to submit more than an original and two copies of any document;**
- **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**
- **in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- **requiring the use of statistical data classification that has not been reviewed and approved by OMB;**
- **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has**

**instituted procedures to protect the information's confidentiality to the extent permitted by law.**

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. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

**Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.**

**Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years -- even if the collection-of-information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.**

In accordance with 5 CFR §1320.8(d)(1), the Bureau has published a notice in Federal Register that provides the public 60 calendar days to comment on the extension of reporting requirements contained within OMB Control No. 3170-0024.<sup>2</sup>

Also, in accordance with 5 CFR §1320.5(a)(1)(iv), the Bureau has also published a notice in the Federal Register providing the public 30 days to comment on reporting requirements contained within this information collection request.<sup>3</sup>

**9. Explain any decision to provide any payments or gifts to respondents, other than remuneration of contractors or grantees.**

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

<sup>2</sup> 86 FR 63345 (published on 11/16/2021).

<sup>3</sup> 87 FR 13720 (published on 3/10/2022).

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. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.**

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. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

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

**12. Provide estimates of the hour burden of the collection of information. The statement should:**

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and**

**explain the reasons for the variance. General, estimates should not include burden hours for customary and usual business practices.**

- **If this request for approval covers more than one form, provide separate hour burden estimates for each form.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14.**

The Bureau estimates the burden of this information collection as follows:

<b>Information Collection Requirement</b>	<b>Number of Respondents</b>	<b>Number of Responses per Respondent</b>	<b>Total Responses</b>	<b>Average Burden Hours</b>	<b>Annual Burden Hours</b>	<b>Wage Rate</b>	<b>Total Burden Cost</b>
Various collection instruments	500,000	1	500,000	15 minutes	125,000	27.07 <sup>4</sup>	\$1,624,200

A variety of collection instruments will be used to collect information from respondents and will have specific burden estimates when submitted to OMB. These burden estimates are noted in the chart above, in which the response time will vary, ranging between 1 minute to 1.25 hours to complete.

**13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).**

No costs to respondents are anticipated.

**14. Provide estimates of the annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 into a single table.**

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

**15. Explain the reasons for any program changes or adjustments.**

<sup>4</sup> Bureau of Labor Statistics, [https://www.bls.gov/oes/current/oes\\_nat.htm#00-0000](https://www.bls.gov/oes/current/oes_nat.htm#00-0000), May 2020 National Occupational Employment and Wage Estimates (Occupation code: 00-0000).

A nonsubstantive change request was submitted and approved in May 2021 to increase the number of responses from 80,000 to 250,000 and burden hours from 9,000 to 29,000. This renewal requests an increase of the number of responses and burden hours to 500,000 responses and 125,000 hours respectively. Other than these changes to the burden estimate, there are no program changes.

**16. For collections of information whose results will be published, outline plans for tabulations, and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.**

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. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

The information collection is not collected in a manner that allows the display of the current expiration date. However, the expiration date can be found under the “Information Collections under Review” section of [www.reginfo.gov](http://www.reginfo.gov) (<https://www.reginfo.gov/public/do/PRAMain>).

**18. Explain each exception to the certification statement.**

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.