

**BUREAU OF CONSUMER FINANCIAL PROTECTION**

**REQUEST FOR APPROVAL UNDER THE  
“GENERIC INFORMATION COLLECTION PLAN FOR QUALITATIVE CONSUMER  
EDUCATION, ENGAGEMENT, AND EXPERIENCE INFORMATION  
COLLECTIONS”**

**(OMB Control Number: 3170-0036)**

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**1. TITLE OF INFORMATION COLLECTION:**

Black Students in Higher Education: Facilitators and Barriers to Completion

**2. PURPOSE:**

The purpose of the Consumer Financial Protection Bureau’s (CFPB’s) Black Students in Higher Education: Facilitators and Barriers to Completion study is to research and document barriers and facilitators to college completion and learn more about issues of racial disparities in college completion rates, the economic consequences of lower college completion rates, and ways the CFPB can help improve these outcomes. These focus groups and interviews will explore supports Black students receive in college; personal, institutional, and societal factors that make college difficult; and the challenges of not completing a degree. Interviews will also address university-led initiatives or strategies that support Black student persistence and completion. The information that is collected will be used for two purposes: (1) to inform and support policymakers, institutions of higher education (IHEs), and K–12 professionals by developing and sharing information, research, promising practices, and effective strategies to help identify and remove barriers to college completion; and (2) to identify new opportunities for CFPB to support efforts to increase the national focus on encouraging students who enroll in higher education to complete their college degree.

**3. DESCRIPTION OF RESPONDENTS:**

This data collection effort will consist of up to 310 participants for in-person and virtual interviews or focus groups. The CFPB, through a contractor, will conduct in-person or virtual focus groups/interviews with Black former college students who completed a degree (focus groups with 120 participants), Black former college students who did not complete a degree but attended college (focus groups with 120 participants) Black former students who enrolled in college but never attended (focus groups with 16 participants), postsecondary institution professionals knowledgeable about facilitators and barriers to completion for Black students (focus groups with 30 participants), and postsecondary institution leaders who are knowledgeable about strategies/initiatives that support Black student persistence and completion (interviews/focus groups with up to 24 participants). Focus groups with Black former student completers and noncompleters will be grouped by institution type (2–year, 4–year predominantly white institutions, and 4-year Historically Black Colleges and Universities).

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

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

- |   |   |
|---|---|
| <input type="checkbox"/> Web-based or other forms of Social Media                       | <input checked="" type="checkbox"/> Telephone   |
| <input type="checkbox"/> In-person  | <input type="checkbox"/> Mail                   |
| <input type="checkbox"/> Small Discussion Group   | <input checked="" type="checkbox"/> Focus Group |
| <input checked="" type="checkbox"/> Other (please explain) __One-on-one interviews_____ |   |

b. Will interviewers or facilitators be used?

- 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  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.

CFPB's contractor will use a two-prong approach to identify and select the potential groups of respondents. For former postsecondary students, the contractor will use existing relationships with national and local recruitment firms who have large databases of respondents who have already agreed to be research subjects, as well as trained teams skilled at recruiting diverse and representative sets of participants for research projects.

For the postsecondary institution professionals as well as the institution leaders who can speak to their institution's initiatives/strategies to support Black student completion, the contractor will oversee recruitment. Specifically, the contractor will reach out by email and telephone to identified postsecondary institutions to ask preliminary questions and invite them to participate in a group interview/focus group discussion.

## 6. INFORMATION COLLECTION PROCEDURES:

Please summarize the procedures that will be used to collect data from respondents.

For recruitment screening, the contractor will work with established research facilities to contact respondents or reach out independently via email or telephone. In either approach, potential respondents will be asked a set of screening questions to ensure they meet the criteria for participating in the interviews/focus groups. In the case of the interviews with postsecondary staff and institution leaders, the contractor will collect contact information (name, telephone, e-mail, and mailing address) so that the respondent can receive scheduling information and reminders.

In the interviews/focus groups themselves, the contractor will ask questions included in the interview guides. All interviews/focus groups will be conducted virtually using an online

meeting platform. The contractor will take notes and will also record audio and video for purposes of checking and validating the notes. Interviews/focus groups with participants will be 60–90 minutes in duration.

**7. PERSONALLY IDENTIFIABLE INFORMATION:**

- a. Is personally identifiable information (PII) collected?  Yes  No
- b. If yes, is the information that will be collected included in records that are subject to the Privacy Act of 1974?

Yes  No  Not Applicable

- c. Has a System or Records Notice (SORN) been published?

Yes  No  Not Applicable

If yes, list the SORN title and Federal Register citation

Title: CFPB.021 – CFPB Consumer Education and Engagement Records  
85 FR 3662

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If applicable, what is the link to the Privacy Impact Assessment?

[https://files.consumerfinance.gov/f/201409\\_cfpb\\_consumer-education\\_pia.pdf](https://files.consumerfinance.gov/f/201409_cfpb_consumer-education_pia.pdf)

**8. INCENTIVES:**

- a. Is an incentive provided to participants?  Yes  No
- b. If yes, provide a statement justifying the use and amount of the incentive **and** the amount or value of the incentive: \$\_125\_\_\_\_\_.

Participants will each receive a stipend of \$125 for sharing their thoughts and experiences. This amount is reasonable given 1) the time commitment of 60 minutes for each participant (as well as additional time familiarizing themselves with the platform through which the interviews will be conducted for virtual sessions); and 2) the complex nature of the topics to be discussed. Specifically, the protocols ask about the facilitators and barriers to college completion for Black students. Participants are asked describe their experiences in detail, including the issues of noncompletion faced by Black students. These topics may be emotionally challenging for participants, and we want to recognize the value their contributions to this research by providing ample incentive. This is added to the already challenging criteria of finding individuals who are willing to participate during the pandemic.

The recruitment criteria are also quite challenging. One of the goals of this data collection is to ensure the inclusion of perspectives from a diverse set of geographic areas, including (1) urban, rural, and suburban locales, (2) states that offer free community college grants or tuition waivers as well as those who do not, and (3) states within the six accreditation regions. Given the specificity of the criteria and the logistical constraints of scheduling, we and our contractor believe

that offering an incentive will be necessary in order to ensure successful recruitment. Our contractor has conducted some initial market research for this effort and has concluded that an incentive of \$125 is the minimum incentive that would be necessary to ensure successful recruitment.

**9. ASSURANCES OF CONFIDENTIALITY:**

- a. Will a pledge of confidentiality be made to respondents? [ ] Yes [X] No
- b. If yes, please cite the statute, regulation, or contractual terms supporting the pledge.

**10. JUSTIFICATION OF SENSITIVE QUESTIONS (if applicable):**

The goal of this study is to learn research and document facilitators and barriers to college completion and learn more about issues of racial disparities in college completion rates, the economic consequences of lower college completion rates, and ways CFPB can help improve these outcomes. Given these objectives, it will be necessary to ask some questions about participants’ experience with personal and societal factors that make college difficult which could touch on sensitive issues. The contractor that will be conducting the interviews has extensive experience conducting research on sensitive topics. Participants will be informed before the interviews that all questions are voluntary, and they can end the interview at any time, and interviews will be terminated if participants express any kind of distress.

**11. BURDEN HOURS:**

Collection of Information	Number of Respondents	Frequency	Number of Responses	Response Time (hours)	Burden (hours)
Recruitment screening	1,000	1	1,000	0.1	100
Black former college student participant questionnaire	256	1	256	0.08	20.48
Focus groups with Black former college students who completed	120	1	120	1	120
Focus groups with Black former college students who attended but did not complete	120	1	120	1	120
Focus groups with Black former students who enrolled but never attended	16	1	16	1	16
Focus groups with postsecondary institution professionals	30	1	30	1	30
Focus groups with postsecondary institution leaders/administrators	24	1	24	1.25	30
<b>Totals:</b>	<b>1,566</b>				<b>436.48</b>

**12. FEDERAL COST:** The estimated annual cost to the Federal government is \$600,000

### 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 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.