

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)

1. TITLE OF INFORMATION COLLECTION:

Savings Initiative focus groups and interviews

2. PURPOSE:

The Consumer Financial Protection Bureau (CFPB or Bureau) is conducting qualitative research to better understand the knowledge, experiences, and behavior of economically vulnerable consumers related to financial products and services and financial circumstances in their lives. Specifically, the goal of this research is to obtain insights into the knowledge and experiences of consumers and their ability to build and/or retain emergency savings with five topic areas to be explored including:

1. Housing insecurity (for renters and homeowners);
2. Changes in income due to a variety of factors including job loss, displacement, enhancement, or volatility and corresponding consistency of cash flow;
3. Impacts of debt of various kinds including medical debt, credit card debt and student loan debt, including ability to repay;
4. Influence of stimulus payments and enhanced tax credits on consumer ability to save; and
5. Significant issues for consumers to accessing the EITC, other tax credits, and public benefits.

This information collection will use focus groups and one-on-one interviews to understand the experiences of economically vulnerable consumers with these circumstances. Additionally, we will seek information on how consumers coped with these circumstances and whether they were negatively or positively affected.

The information gathered will help inform the CFPB’s consumer education efforts and future research work on these financial topics.

3. DESCRIPTION OF RESPONDENTS:

The focus groups and interview participants will be a diverse group of low to moderate individual consumers (defined as incomes up to \$80,000, depending on family size) that are residents of one of the seven communities that are part of the CFPB Community Initiative. The seven communities include Seattle WA, Great Falls MT, Little Rock AR, St. Louis MO, Louisville KY, Richmond VA, and Manchester NH. The consumers will be selected to reflect a broad breakdown of race/ethnicity, geographic location, age, and education levels. They will also be selected to include people with a range of levels of experience with the five topic areas that are the focus of this inquiry.

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 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) focus groups and one-on-one interviews via virtual platform | |

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.

The research team will use one main source to recruit eligible participants: clientele of community-based organizations (CBOs) in the seven target communities who work with the populations of interest.

Working with CBOs that are the lead organizations in each of the seven communities allows for a more targeted approach. The Bureau and the contractor have close relationships with CBOs in the seven communities that include Community Action Agencies (CAAs) and direct service providers such as United Ways, city governments, and local credit unions. The contractor will work with CBOs to recruit consumers to participate in the focus groups and interviews.

In recruiting participants, we will use a screening data collection instrument (included in Research Plan).

6. INFORMATION COLLECTION PROCEDURES:

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

The research team will use the video conference platform, either Microsoft Teams or Adobe Connect, for the focus groups and interviews. Recruitment materials will be very clear about the technology requirement up front and the instructions for joining the call. Respondents should not have to download anything to access the interview.

All sessions will be audio-recorded so transcripts can be created. Participants will be provided with an informed consent document as part of the invitation materials that lays out the expectations for the interview as well as their rights as a participant.

We will encourage video to be on for the sessions. However, if the participant does not wish to use video, we will not require it. If a recruit does not show for an in-depth interview (IDI), the interviewer or recruiter will attempt to contact them via phone or email after 5 minutes. If unsuccessful, we will attempt to reschedule with them (depending on eligibility for other sessions).

During the session introduction, respondents will be reminded of their rights, any ground rules and be asked to mute their lines when not speaking.

The focus groups will last no more than 75 minutes while the semi-structured interviews will last approximately 45 minutes.

7. PERSONALLY IDENTIFIABLE INFORMATION:

- a. Is personally identifiable information (PII) collected? Yes No

Name and contact information only for scheduling plus demographic information described in screening data collection instrument. No additional PII will be collected.

- 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).**

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

e. 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: **\$100**

After the interview or focus group, participants will receive their incentive in the form of a \$100 Amazon gift card within 2 business days. Focus groups and IDIs require a more significant investment from the individual research participant relative to other forms of data collection. It

also takes time and effort to participate in a focus group or interview. As a result, there has long been a tradition to provide a suitable incentive for participation.¹

Our target respondents are hard-to-reach populations which may make the recruitment challenging. For example, our eligibility criteria for certain sessions includes having experienced a very specific set of events. The incentive serves as a motivational stimulus for participants to attend the session, to be on time, and to take the research seriously. The specific amount proposed is based both on our contractor's prior experience conducting qualitative interviews with members of the general population as well as feedback from our interaction with professional focus group hosting facilities.

We are proposing the same incentive for both focus groups and interviews because both require effort from participants. While the focus group sessions are longer, the interviews involve continuous, more "intensive" personal participation.

The research team wants to ensure that we can reach a diverse group of participants. While the sessions will be held remotely and participants will not need to travel, they will still need to schedule time on their calendar. For some individuals from low-income backgrounds who may have more unpredictable schedules, it may be an added challenge. They may have to arrange childcare coverage, put off meal planning, or even take time from their paid work to participate. Providing the incentive allows the participant to "protect" the time slot on their calendar from any other requests for their time.²

While cash is often provided to qualitative research participants, we believe an Amazon online gift card is equivalent to cash in terms of participant convenience given the breadth of the Amazon marketplace. Also, Amazon gift cards also can be shared virtually, allow for easy tracking, and never expire.

9. ASSURANCES OF CONFIDENTIALITY:

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

The instrument 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 you.

10. JUSTIFICATION OF SENSITIVE QUESTIONS (if applicable):

Some of the questions that are included in the focus groups and interviews deal with sensitive topics such as being housing insecure, incurring debt and accessing public benefits. The purpose of this data collection is specifically to understand the impact on consumers who have

¹ Krueger and Casey, Vol 4 page 77.

https://www.sagepub.com/sites/default/files/upm-binaries/24056_Chapter4.pdf

² Ibid.

experienced these events on their ability (potentially positive or negative) to build and/or retain emergency savings. Thus, it is necessary to include questions on these topics in this information collection. To reduce possible discomfort with these questions in the focus groups, we will group consumers to the extent possible with other consumers who have faced similar issues. For example, consumers who may have had difficulty with paying for the cost of housing will be assigned to a focus group that is comprised of other participants with similar issues, to reduce the potential discomfort of sharing about those issues.

11. BURDEN HOURS:

Collection of Information	Number of Respondents	Frequency	Number of Responses	Response Time (hours)	Burden (hours)
Screening instrument	400	1	400	0.2 hour	80.0 hours
Focus group	126	1	126	1.25 hour	157.5 hours
Interview	14	1	14	0.75 hour	10.5 hours
TOTAL	540		540		248 hours

12. FEDERAL COST: The estimated annual cost to the Federal government is \$114,232.90.

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.