

**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:** Consumer Focus Groups on Financial Topics

**2. PURPOSE:**

The Consumer Financial Protection Bureau (CFPB) is conducting qualitative research to better understand the knowledge, experiences, and behavior of economically vulnerable consumers related to financial products and services. Specifically, the goal of this research is to obtain insights into the knowledge and experiences of consumers with three topic areas: overdraft programs and checking account access, credit reports and scores, and background screening in housing and employment. This data collection will use focus groups and one-on-one interviews to understand the experiences of economically vulnerable consumers with these financial product and services. Additionally, we will seek information on consumer beliefs about the effects of product features and how those beliefs influence consumer financial decision-making.

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 individual consumers who are low to moderate income (defined as incomes up to \$80,000, depending on family size). 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 specific financial products and services that are the subject of this data collection.

**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 two main sources to recruit eligible participants: social media sites and community-based organizations (CBOs) across the country who work with the populations of interest.

- Social media platforms such as Facebook and Instagram have expansive reach and can target ads based on location, demographic and information in users' profiles. We anticipate casting a wide net with targeted ads and funneling interested individuals to our screener survey.
- Working with CBOs allows for a more targeted approach. The contractor has close relationships with CBOs including Community Action Agencies (CAAs) and direct service providers such as United Way and Salvation Army who work with economically vulnerable consumers. 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 as an attachment).

## 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 Microsoft Teams 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, but if the participant does not wish to use video, we will not require it. If a recruit does not show for an 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 60-90 minutes while the semi-structured interviews will last approximately 45 minutes.

## 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 \_\_\_\_\_.

- d. 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: \$\_\_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 in-depth interviews require a more significant investment from the individual research participant, relative to other forms of data collection. Quite simply, it 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.<sup>1</sup>

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, be on time, and generally 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 are able to 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

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<sup>1</sup> Krueger and Casey, Vol 4 page 77.

[https://www.sagepub.com/sites/default/files/upm-binaries/24056\\_Chapter4.pdf](https://www.sagepub.com/sites/default/files/upm-binaries/24056_Chapter4.pdf)

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.<sup>2</sup>

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. Importantly, 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 [X] No
- b. If yes, please cite the statute, regulation, or contractual terms supporting the pledge.

**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 denied credit or housing or having a criminal history. The purpose of this data collection is specifically to understand the impact on consumers who have difficulty in obtaining credit, housing or employment because of information such as criminal records in their consumer reports. Thus, it is necessary to include questions on these topics in this information collection. To reduce possible discomfort with these questions the focus groups, we will group consumers to the extent possible with other consumers who have faced similar issues. For example, consumers with criminal records will be assigned to a focus group that is comprised of other participants with criminal records, 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	1240	1	1240	0.2 hour	248 hours
Focus group	200	1	200	1.5 hours	300 hours
Interview	110	1	110	1 hour	110 hours
<b>TOTAL</b>	<b>1550</b>		<b>1550</b>		<b>658 hours</b>

**12. FEDERAL COST:** The estimated annual cost to the Federal government is \$222,628.00

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<sup>2</sup> Ibid.

### 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.