

CONSUMER FINANCIAL PROTECTION BUREAU

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:** Limited English Proficient (LEP) Consumers Practitioner/Intermediary In-Depth Interviews (IDIs)

2. **PURPOSE:** CFPB’s Office of Financial Education (FinEd) seeks to understand Limited English Proficient consumers to create a foundation for future outreach, education, communication, and to strengthen outreach to LEP consumers. Ignited (CFPB Contractor) will utilize the findings in the development of its strategy recommendations for LEP Consumers outreach, education and communications. D&D and DFO will utilize feedback on CFPB.gov to inform design and development of in-language web pages. Select portions of the findings may be published by FinEd to the public.

Consumer Focus Groups

Ignited will be conducting in-language consumer focus groups gathering information including sources of information utilized by LEP Consumers, experiences with obtaining financial information or filing a complaint on a financial institution, awareness of CFPB and its resources, and website usage. Number of people: 24-36 total (6 groups of up to 6 participants each).

Financial Practitioner/Intermediary IDIs

Ignited will be conducting in-depth-interviews with financial practitioners/intermediaries gathering information including how people they serve find them, awareness of CFPB and its resources, experience engaging with CFPB (i.e. consumer response team) and website interface. Number of people: Up to 12.

This research is in direct support of the Director’s priority on language access and consumer experience.

3. **DESCRIPTION OF RESPONDENTS:**

Consumer Focus Groups

The six groups will be representative of the following LEP priority languages:

- Vietnamese
- Mandarin
- Korean
- Tagalog
- Haitian-Creole
- Arabic

Criteria:

- Men and Women, non-binary

Revised October 2019

- Age 18+
- Born outside the U.S. (qualified country of origin to vary by group, in line with language of group)
- Speak a language other than English most of the time when communicating with other adults in the household
- Language proficiency: self-reported based on a 4-point scale (Spoken language: very well, well, not well, and not at all); asked for native tongue and English.
- Limited English proficient: does *not* speak English very well. Desired mix per group would be representative of the target community (a mix of those who speak English well, not well, and not at all)
- Native-tongue proficiency: fluent (Very well)
- Literate (read/write) in language of the group where person is participating
- Currently reside in the U.S.
- Household decision maker for financial matters (primary or shared)
- Have dealt with at least one of these in the past 2 years: renting an apartment/home, purchasing a home, using a prepaid card, taking out a loan, and/or opening a bank account, dealing with financial fraud/scam, sent a remittance, etc.
- Mix of renters and homeowners
- Mix of banked, underbanked, unbanked
- For each group, recruit a mix of:
 1. Age (intentional mix of folks under 62 and over 62)
 2. Gender (balanced mix)
 3. Census regions
 4. Household income/Socio-economic level
- Feels comfortable sharing their opinion and experience in a small group setting
- Has internet access from home, work or school and able to use that access to connect to the focus group
- Has a desktop, laptop, or tablet connected to the internet, and which is able to connect to the focus group platform
- Agree to participate in an online focus group
- Articulate (determined by recruiter via 1-2 open-end questions)

Financial Practitioner/Intermediary IDIs

Financial practitioners, educators or other professionals who help consumers plan and manage their money.

- Men, Women, and non-binary
- Works with consumers in target languages represented in the consumer focus groups (1-2 per language):
 - Vietnamese
 - Mandarin
 - Korean
 - Tagalog
 - Haitian-Creole
 - Arabic

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

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

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

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.

Consumer Focus Groups: Ignited will utilize third-party recruiters who have specialized knowledge of and experience working with minority communities to identify qualified consumers to participate in the focus groups.

Financial Practitioner/Intermediaries IDIs: CFPB (FinEd) will provide Ignited with Financial Practitioner/Intermediary contacts to schedule interview with. These are existing CFPB contacts, to include Community Advisory Board (CAB) members and partners/stakeholders.

6. INFORMATION COLLECTION PROCEDURES:

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

Consumer Focus Groups:

Screeners: consumers will be contacted via phone or e-mail/online to complete the screener questionnaire.

Focus Groups: Using a CFPB-approved discussion guide, an in-language moderator will lead the conversation with focus group participants. The moderator will ask questions and provide prompts for participants to respond to. Audio/video recordings of the focus groups via a CFPB-accepted platform will be utilized as reference by CFPB and Ignited following the focus groups and will not be for external consumption. Focus groups are expected to last up to 90 minutes.

Ignited will deliver to CFPB a summary of findings from the focus groups that will help inform subsequent marketing and communications recommendations.

Financial Practitioner/Intermediary IDIs:

In-Depth Interviews: using a CFPB-approved discussion guide, the moderator will engage in a dialogue with each of the Financial Practitioners/Intermediaries asking a series of questions or prompts for participants to respond to. Audio/video recordings of the interviews via Microsoft Teams will be utilized as reference by CFPB and Ignited following the interviews and will not be for external consumption. Interviews are expected to last up to 60 minutes.

Ignited will deliver to CFPB a summary of findings from the IDIs that will help inform subsequent marketing and communications recommendations.

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? N/A
- e. https://files.consumerfinance.gov/f/201409_cfpb_consumer-education_pia.pdf

8. INCENTIVES:

- a. Is an incentive provided to participants?
Consumer Focus Groups: Yes No
Financial Practitioners/Intermediaries: Yes No

- b. If yes, provide a statement justifying the use and amount of the incentive **and** the amount or value of the incentive: Consumer Focus Groups: \$125-150/ea.

The participants of the consumer focus groups will be challenging to recruit given CFPB desires to speak to LEP consumers of six languages (Vietnamese, Mandarin, Korean, Tagalog, Haitian-Creole, Arabic).

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.

In accordance with the Privacy Act of 1974, a Privacy Act Statement is provided to participants that states how their information will be used and shared, and that direct identifying information will be kept private except as required by law. Additionally, a Privacy Notice is provided for the sessions indicating that recordings will only be shared within the contractor and CFPB project team and that feedback will be kept private and not linked to individual participants.

10. JUSTIFICATION OF SENSITIVE QUESTIONS (if applicable): N/A

11. BURDEN HOURS:

| Collection of Information | Number of Respondents | Frequency | Number of Responses | Response Time (hours) | Burden (hours) |
|--|-----------------------|-----------|---------------------|-----------------------|----------------|
| Members of the general public | 36 | 1 | 36 | 1.5 | 54 |
| Financial Practitioners/Intermediaries | 12 | 1 | 12 | 1 | 12 |
| TOTAL | 48 | | 48 | | 66 |

12. FEDERAL COST: The estimated annual cost to the Federal government is \$171,110.56.

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.