

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: Focus Groups on Family Engagement in Youth Financial Education

2. PURPOSE:

The Consumer Financial Protection Bureau (CFPB) is conducting qualitative research to better understand how young people who take personal finance education talk to their parents or other family members about what they learn in these classes or programs. Research questions that will be addressed through these focus groups include:

- How do students discuss what they learn in school with their parents?
- How do families talk about money at home?
- To what extent and how can youth personal finance programming influence how families talk about money at home?
- How do parents respond when their children talk to them about personal finance topics they learned about at school or through an after-school program?

3. DESCRIPTION OF RESPONDENTS:

A total of six focus groups will be conducted: three with students ages 13-19 and three with parents of students in this age group for a total of 36 to 48 participants (i.e. six to eight participants per group).

The primary eligibility criteria for students are that all participants must be between the ages of 13 and 19 inclusive and that all must have participated in some form of formal financial education. For purposes of this research, “formal financial education” will include a stand-alone personal finance course taught at school, an out-of-school program with a specific focus on personal finance, or school-based instruction in personal finance topics that are integrated into other coursework as long as they directly address personal finance concepts.

The primary eligibility criteria for parents are that all participants must have at least one child from the ages of 13 to 19 and that their child must have participated in some form of formal financial education. In addition to these basic criteria, the recruitment screener will ensure the focus groups are demographically diverse.

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 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.

The CFPB is partnering with a research firm for this work. This research partner will work with a recruiting firm that has a database of individuals who have already expressed interest in participating in qualitative research. The research partner will also reach out and recruit individuals in this database using a screening instrument developed by the CFPB. The recruiters will obtain parental consent for any participants who are minors.

6. INFORMATION COLLECTION PROCEDURES:

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

All focus groups will be conducted remotely using Microsoft Teams. Recruitment materials will be clear about the technology requirement up front and the instructions for joining the meeting. Respondents should not have to download anything to access the interview.

With participant consent, all sessions will be audio and video recorded through Microsoft Teams 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. During the session introduction, respondents will be reminded of their rights, any ground rules and be asked to mute their lines when not speaking.

Each focus group session will last approximately 75 minutes.

7. PERSONALLY IDENTIFIABLE INFORMATION:

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

1. The recruitment firm's database will already include names and contact information for prospective participants and demographic information will be collected through the participant screener. The recruitment firm will link demographic information to name and contact information, so that they can ensure that the people that are scheduled for focus groups meet the screening criteria. However, no last name or contact information will be provided to the contractor (ICF) or the CFPB. ICF will only have access to participants' first names and the information collected through the screener.

ICF will also record audio and video of the focus group sessions.

- 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

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: \$ 75.

After the interview or focus group, participants will receive their incentive in the form of a \$75 Amazon gift card within 2 business days. Focus groups require a more significant investment from the individual research participant in terms of time and effort, relative to other forms of data collection such as surveys. As a result, there has long been a tradition to provide a suitable incentive for participation.¹

The incentive will serve 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 similar participants, as well as feedback from our professional focus group recruitment partner.

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.

¹ Krueger and Casey, Vol 4 page 77. https://www.sagepub.com/sites/default/files/upm-binaries/24056_Chapter4.pdf

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 protocol and consent forms 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):

N/A

11. BURDEN HOURS:

Collection of Information	Number of Respondents	Frequency	Number of Responses	Response Time (hours)	Burden (hours)
Screening instrument	100	1	100	0.10	10
Focus group	56	1	56	1.25	70
TOTAL	156		156		80

12. FEDERAL COST: The estimated annual cost to the Federal government is **\$36,531.00.**

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.