

**SUPPORTING STATEMENT FOR
CFPB NATIONAL AGE-FRIENDLY BANKING SURVEY
OMB CONTROL NO.: 3170-00XX**

A. JUSTIFICATION

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

Older adults are increasingly an important customer base for banks and credit unions. In 2019, the Federal Deposit Insurance Corporation (FDIC) estimated that 96.7 percent of households led by older Americans had transaction and/or deposit accounts at either a bank or credit union. This survey has shown that older households have the highest banking rates of all age groups. This survey has also shown that older adults' share of all depositors increased between 2015 and 2019 from 25 percent to 27 percent. Other studies have also shown that older adults account for a significant share of all deposits in banks and credit unions and on average, hold higher balances in their accounts than their younger counterparts.

Despite the implications of these demographic patterns and trends for the products and services offered by financial institutions, there are basic knowledge gaps regarding the experiences of older adults with banking and the quality of their relationships with banks and credit unions. These include gaps in our knowledge of the importance, availability, and use of "age-friendly" features that:

- offer older adults protections against the increasing threat of fraud, scams, and elder financial exploitation;
- empower financial caregivers to help older adults manage their finances; and
- improve accessibility of banking services such as making deposits and withdrawals.

Similarly, there are gaps in knowledge regarding the experiences of older adults with access to quality customer service, affordable account features and banking fees, in-person and alternative banking options, ATMs and other services, and lending that fits the needs of older adults and their income sources, particularly as bank mergers, branch closures, and transition to digital/online services continue to increase. Lastly, there are gaps in knowledge regarding older adults' awareness, understanding and preferences for banking features and services that are broadly promoted and targeted to older adults.

This collection is conducted pursuant to 12 U.S.C. § 5493(g)(3). The data obtained through this survey will support the Consumer Financial Protection Bureau (CFPB) Office of Financial Protection for Older Americans' work to:

- develop goals for programs that provide seniors financial literacy;

- identify best practices and effective methods, tools, technology and strategies to educate and counsel seniors about personal finance management;
- coordinate consumer protection efforts of seniors with other Federal agencies and state regulators; and (d) work with community organizations, non-profit organizations, and other entities that are involved with educating or assisting seniors.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

By collecting this survey data, the CFPB seeks to:

- Enhance the understanding of older adults' experiences with banking, including challenges and opportunities for adoption of age-friendly account features, and examine the quality of the relationship between older adults and their banks and credit unions.
- Examine how banking experiences may vary as people age and for specific subpopulations of older adults that face unique challenges related to accessibility and quality of banking services, such as older adults living in rural communities, older adults of color, and the oldest segment of the population (75 and older).
- Inform its age-friendly banking and financial inclusion initiatives and resources that are used by banks, lenders, other financial institutions, and other key stakeholders.
- Establish and provide foundational data that can support consumer protection, financial inclusion, and age-friendly community efforts by CFPB and other federal agencies, state regulators and localities, and other entities that work with older adults.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also, describe any consideration of using information technology to reduce burden.

The survey will be hosted on NORC at the University of Chicago (NORC)'s AmeriSpeak panel, a probability-based panel which allows for both web and phone data collection methods. Sampled participants will receive an email and/or short message service (SMS)/text notifying them that they have a survey waiting for them to complete on the AmeriSpeak member web portal. Participants who indicated a preference to participate by telephone or who do not have internet access will be invited to complete the study by phone. Both web and phone respondents who do not respond to the survey will receive multiple reminders to complete the survey. Reminders will only be sent to nonrespondents to reduce participant burden.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item A.2 above.

Existing information is not adequate and does not analyze the full spectrum of age-friendly banking issues for critical subpopulations of older adults. For example, the FDIC's unbanked/underbanked survey covers many banking topics, but it assesses general banking habits of the broader population and does not have information specific to age-friendly banking and does not allow for analysis of specific subpopulations of older adults.

Non-governmental surveys on this topic, such as those conducted by AARP and several trade associations like the American Bankers Association Foundation and Community Bankers' Association, rely on limited samples that either do not allow for complex comparison across all age groups or in-depth analysis within the older population. Additionally, many of these existing surveys are designed from an industry perspective, and do not encompass all dimensions of age-friendly banking issues from a dual consumer protection and aging perspective. The information collected in these surveys is also made available publicly in a limited format, thus limiting the ability of the general public and key stakeholders to use the data to inform their age-friendly banking work.

This survey addresses these existing limitations and will provide foundational research and generate quantitative data on age-friendly banking that fills a current gap in knowledge on this topic. This is a representative survey that oversamples subgroups of older adults, including people of color and people who speak Spanish as their primary language, lower-income individuals, rural individuals, and the oldest segment of the population. The survey will also include respondents ages 18 to 59 that will serve as comparison groups to enable examination of how banking experiences and needs vary by age. This survey will be administered both by phone and online, which will capture the segment of older adults who are not digitally connected and are typically excluded from similar surveys. The survey will cover a wide range of topics and enable CFPB to build an index of consumer protection and practices related to age-friendly banking.

To ensure that the survey is not duplicative of current efforts and provides new and valuable information for key stakeholders, the CFPB established a panel of experts to review the instruments and provide feedback on the design. The experts include representatives from FDIC, Financial Institution Regulatory Authority (FINRA), Wisconsin Dept of Financial Institutions, Stanford Longevity Center, AARP, University of Minnesota, and the National Asian Pacific Center on Aging (NAPCA), as well as expert methodologists.

Lastly, the CFPB will field the survey using an existing survey panel. In doing so, the CFPB will minimize the burden on consumers, as numerous basic demographic and financial questions are collected for all panel participants and can be appended to the dataset.

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5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

Not applicable.

6. Describe the consequence to federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

Access to and use of banking services and transactional accounts is the most basic component of financial inclusion, and the most common form of engagement between consumers and financial products and services. This is also a long-standing focus area of work for the CFPB's Office for Older Americans.

Because this survey provides foundational data on many topics related to banking needs of people as they age, if the collection is not conducted, CFPB will be without critical data to support and guide its educational, regulatory, and policy work.

Similarly, other entities who play a role in this space and don't have the capacity or expertise to collect similar data, including state regulators and localities that implement financial inclusion initiatives and age-friendly plans for cities and localities, will also lack foundational data to support and guide their educational, regulatory, and policy work. Again, existing studies related to age-friendly banking have limited samples and are typically limited, and typically do not make their datasets available for public use. The CFPB's new dataset will empower many other governmental, nonprofit, and other entities to conduct analysis on topics of interest relevant to their work and apply their findings to enhance consumer protections and expand age-friendly banking products and services nationwide.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- **requiring respondents to report information to the agency more often than quarterly;**
- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **requiring respondents to submit more than an original and two copies of any document;**
- **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**
- **in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- **requiring the use of statistical data classification that has not been reviewed and approved by OMB;**
- **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which**

- **unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentially to the extent permitted by law.**

Not applicable. There are no special circumstances.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years -- even if the collection-of-information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

In accordance with 5 CFR §1320.8(d)(1), CFPB has published a notice in Federal Register that provides the public 60 calendar days to comment on the reporting requirements of this new collection.¹ No comments were received.

Also, in accordance with 5 CFR §1320.5(a)(1)(iv), CFPB has also published a notice in the Federal Register providing the public 30 days to comment on reporting requirements contained within this information collection request.²

9. Explain any decision to provide any payments or gifts to respondents, other than remuneration of contractors or grantees.

This collection will employ the use of incentives to encourage responses. AmeriSpeak panel members who complete the survey will receive an incentive in the form of AmeriSpeak points that can be redeemed for prizes and have a cash value. A panel member will be credited with earned points once they complete the survey.

¹ 88 FR 32757 (published on 5/22/2023).

² 88 FR 58252 (published on 8/25/2023; comment period ends on 9/25/2023).

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

The survey informed consent will contain a Privacy Act Statement.

Privacy Act Statement:
5 U.S.C. 552a(e)(3)

National Opinion Research Center (NORC) is assisting the survey sponsor, the Consumer Financial Protection Bureau (CFPB), in collecting survey data to understand consumers' experiences and preferences with banking to improve resources to help and protect consumers.

NORC will link your survey responses with demographic information that you have submitted for NORC panel participation. However, your demographic information will not be used to re-identify you. The CFPB will obtain, and access, de-identified results and aggregated analyses of the survey results. You may provide your name and contact information at the end of this survey if you are interested in participating in a follow-up interview but submitting your personally identifiable information (PII) is optional.

Information collected will be treated in accordance with the System of Records Notice (SORN), CFPB.021 – CFPB Consumer Education and Engagement Records. Although the CFPB does not anticipate further disclosing the information provided, it may be disclosed as indicated in the Routine Uses described in the SORN. Direct identifying information will only be used to facilitate follow-up interviews and will be kept private except as required by law.

This collection of information is authorized by Pub. L. No. 111-203, Title X, Sections 1013 and 1022, codified at 12 U.S.C. §§ 5493 and 5512.

Participation is voluntary, and you may withdraw participation at any time.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

Not applicable. This information collection does not include questions of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. General, estimates should not include burden hours for customary and usual business practices.**
- **If this request for approval covers more than one form, provide separate hour burden estimates for each form.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14.**

CFPB estimates the burden of this information collection as follows:

Information Collection Requirement	Number of Respondent	Number of Responses per Respondent	Total Responses	Average Burden Hours	Annual Burden Hours	Wage Rate	Total Burden Cost
Screening survey (pilot)	210	1	210	0.05	10.9	\$29.76	\$312.48
Pilot survey	200	1	200	0.25	50	\$29.76	\$1,488
Screening survey	2,618	1	2,618	0.05	130.9	\$29.76	\$3,898.56
Main survey	2,500	1	2,500	0.25 ³	625	\$29.76	\$18,600
TOTAL	5,528		5,528		817		\$24,299

Please note that the estimate wage rate is taken from the U.S. Bureau of Labor Statistics, May 2022 National Occupational Employment and Wage Estimates, found at: https://www.bls.gov/oes/current/oes_nat.htm#00-0000

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

³ Participants who meet the criteria for survey participation in the Screening Survey are presented with the Pilot or Main survey.

For the screening portion of the survey, which asks if the respondent has one or more checking, savings, or money market accounts at a bank or credit union in the U.S., we estimate that 4.5% of the population is unbanked based on statistics from the 2019 FDIC Unbanked and Underbanked Households survey and therefore will screen out. (<https://www.fdic.gov/analysis/household-survey/index.html>).

Participation in this study is voluntary, and there are no costs to respondents beyond the time spent completing the questionnaire.

14. Provide estimates of the annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 into a single table.

This is a one-time data collection. The total cost to the Federal Government for this study is \$386,024.05. Since data collection will take less than a year, the annualized cost is the same.

The estimated cost in terms of government time is approximately 20 hours for the Contracting Officer's Representative (COR), 80 hours for the project managers, 40 hours for different labor categories accounting for the support and review of the collection package provided by supervisors, privacy officers, cybersecurity, and others. The total estimated cost of the collection is \$10,560 in wages. Salaries are estimated at the mid-point of each range.

The total Federal Government cost for this collection is \$396,584.05 (\$386,024.05 + \$10,560).

15. Explain the reasons for any program changes or adjustments.

This is a new information collection.

16. For collections of information whose results will be published, outline plans for tabulations, and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

An array of analyses will be conducted on survey data, depending on the final survey content and question structure. At a minimum, we will examine:

- Operational data, including sample sizes, number of respondents overall and by subpopulations, sampling error, and response rate calculations.
- Descriptive statistics (e.g., means, frequencies) for each survey item, focusing on topics of interest, including customer service experiences, satisfaction with banking services, and access to banking services. The analysis will focus on overall descriptive statistics, as well as comparisons between subpopulations defined by age group, gender, race/ethnicity, income, urbanicity, and bank type.

Since the AmeriSpeak panel is based on a probability sample, we will incorporate the design features (e.g, sampling weights and strata) throughout the analysis using Stata's Svy commands for complex surveys. Design information must be considered to obtain accurate inference (such as standard errors, confidence intervals, or p-values).

Reporting will include a public report of survey results and an in-depth methodological report. Reporting may also include additional brief analyses on specific topics, depending on findings from the survey.

Aligned with federal initiatives supporting transparency and open data, and to encourage use of the collection by researchers and other stakeholders, the resulting dataset will be reviewed and modified into a public use file (PUF) to prevent reidentification of respondents. The limited version of the data will be made public along with a codebook and other technical documentation. This will enable additional use and analysis of the data by other government agencies, nonprofit organizations, and other stakeholders to further the goals of consumer protection and expansion and improvement of age-friendly banking products and services.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

The information collection is not collected in a manner that allows the display of the current expiration date. However, the expiration date can be found under the “Information Collections under Review” section of www.reginfo.gov (<https://www.reginfo.gov/public/do/PRAMain>).

18. Explain each exception to the certification statement.

CFPB certifies that this collection of information is consistent with the requirements of 5 CFR 1320.9 and the related provisions of 5 CFR 1320.8(b)(3). CFPB is not seeking an exemption to these certification requirements.