

CONSUMER FINANCIAL PROTECTION BUREAU

REQUEST FOR APPROVAL UNDER THE “GENERIC CLEARANCE FOR QUALITATIVE CONSUMER EDUCATION, ENGAGEMENT, AND EXPERIENCE INFORMATION COLLECTIONS”

(OMB Control Number: 3170-0036)

1. TITLE OF INFORMATION COLLECTION:

Protecting Older Account Holders Focus Groups

2. **PURPOSE:** The Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (Pub. L. 111-203) (the Dodd-Frank Act) established the Consumer Financial Protection Bureau (the CFPB) to regulate the offering and provision of consumer products or services under federal consumer financial laws. Section 1013(g) of the Dodd-Frank Act established within the CFPB the Office of Financial Protection for Older Americans (OA), which includes activities designed to facilitate financial literacy of individuals who are age 62 and older (referred to as “seniors”), protect them from unfair, deceptive, and abusive practices, and assist them in making future financial choices.

In order to further this goal, the CFPB seeks to conduct research on effective strategies, tools, and educational content to assist consumers in making informed financial decisions and to improve financial education practices.

Specifically, the CFPB Older Americans team is interested in better understanding older American’s banking needs and preferences. Particularly, the CFPB wants to know what consumers think about how banks or other institutions can help older consumers avoid financial exploitation. This data will help the CFPB to encourage financial institutions to offer improved product offerings and services in order to better protect older consumers in the financial marketplace.

Understanding consumers’ views about account features will allow the Bureau to refine its recommendations to financial institutions to help prevent financial exploitation and enable the Bureau to develop educational materials for consumers. The CFPB’s OA team has contracted with Fors Marsh Group (FMG) for the focus groups.

3. DESCRIPTION OF RESPONDENTS:

This opportunity is being offered to adults, 62 years and older, living and/or working in the Arlington, Virginia and one of the following areas: Minneapolis, Minnesota, Denver, Colorado, Austin, Texas, Phoenix, Arizona, or Las Vegas, Nevada. The locations were chosen based on the potential number of retirees in the area, the ethnic/racial diversity, the fact that they are not along the east coast, and the economic diversity of the area. Participants must have a bank/credit union checking account, be conversant in English, be a diverse mix of gender, age (groups should be a mix of participants in 60s, 70s, and, if possible, 80s), and household income level. Roughly 25 percent of participants should also be providing assistance with managing finances to an older relative.

In order to secure 48 participants for these focus groups, the vendor will screen approximately 150 persons for in-person focus groups in Arlington, Virginia and one of the following locations: Minneapolis, Minnesota, Denver, Colorado, Austin, Texas, Phoenix, Arizona, or Las Vegas, Nevada. For the Arlington, Virginia sessions, FMG will contact local FMG panel members with information and the option to complete the web-based screener to determine if they qualify for the study. FMG will also post the opportunity to participate through social media channels. For the focus groups in the second location, FMG will work with a local research facility to contact their local panel members with the same information and option to complete the web-based screener that will be provided to individuals in Arlington.

The FMG team and the local team in the selected second city will contact participants who qualify based on the web-based screener and administer the phone-based screener to ensure they qualify for participation. During the phone-based screener, the recruitment teams will ask a series of questions. Depending on the answer he or she receives, the survey will either terminate or continue until 48 total respondents have been secured to be scheduled for in-person focus groups.

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 checked="" type="checkbox"/> Telephone |
| <input checked="" 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.

FMG will use a process called convenience sampling, and therefore they do not have a specific pre-determined list of individuals from which to recruit.

- For the focus groups that will be held at the FMG offices in Arlington, Virginia, FMG will contact local FMG panel members with information and the option to complete the in-person web-based screener to determine if they qualify for the study.
- The FMG Recruitment Team will then contact participants who qualify based on the web screener and administer the phone-based screener to ensure that they qualify for participation.
- The focus groups will be held in one of the following locations: Minneapolis, Minnesota, Denver, Colorado, Austin, Texas, Phoenix, Arizona, or Las Vegas, Nevada. The locations were chosen based on the potential number of retirees in the area, the ethnic/racial diversity, the fact that they are not along the east coast, and the economic diversity of the area. For the selected location, FMG and the CFPB will select a location and work with a local research facility to contact their local panel members with the same information and option to complete the web-based screener that will be provided to individuals in Arlington.
- The FMG Recruitment Team will work with the local research facility in the second location to contact participants who qualify based on the web screener and administer the phone-based screener to ensure that they qualify for participation.
- Respondents are contacted the day prior to the interview to remind them about their appointment.
- Participants' information is reconfirmed upon arrival to the session.

Those who participate will be handed the \$75 Visa gift card after their participation in the focus group.

6. INFORMATION COLLECTION PROCEDURES:

Before completing the web-based screener, participants are provided with links to review the Privacy Act Statement and Paperwork Reduction Act Statements. The Recruitment Teams will be the only personnel who have access to personally identifiable information (PII) for purposes of scheduling and providing the incentive for participation. FMG researchers and CFPB personnel will not have access to respondents' PII. Participants will be provided an Information Sheet with a copy of the Privacy Act Statement in advance of their scheduled interviews. Before beginning the interview, the moderator will hand participants a hard copy of the Privacy Act Statement, and allow them the chance to review and ask any questions before continuing. The moderator will verbally explain the key points of the information found in the Information Sheet. Two of the key points include participants' right to refuse to answer any question as well as withdraw from participation at any time. Participants are also informed in advance that audio of the session will be recorded. Participants' names will not be used in any description of findings or associated with the recordings.

After the moderator summarizes the key points of the information found in the Information Sheet, the moderator will ensure participants do not have any questions before proceeding. The moderator will then begin the focus group by asking participants about their experiences and knowledge of deposit accounts at banks or credit unions. The rest of the discussion will focus on participants' specific experiences with financial exploitation as well as the tools that their financial institutions provide or could provide to prevent consumers from falling victim to exploitation.

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 FR cite (XX FR XX):.

CFPB.022 – CFPB Market and Consumer Research Records, 77 F.R. 67802

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

Consumer Experience Research PIA

https://s3.amazonaws.com/files.consumerfinance.gov/f/201406_cfpb_consumer-experience-research_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

Participants will be compensated \$75 via a Visa gift card for their participation in the focus groups. Sessions will last approximately 60 minutes. Participants are encouraged to arrive 10 minutes early to ensure sessions begin as scheduled. Participants may have to travel 30-60 minutes to and from the facility. From past experience, a \$75 incentive for a 60-minute session allows for successful recruitment by increasing the attendance rate while controlling amount of time required for recruitment. Participants in this age range may also be responsible for childcare of their grandchildren and therefore may incur the cost of a sitter. When considering the potential estimated time and cost of participating in this test, such costs as childcare, transportation, and potential lost wages could result in a high no-show rate. For example, potential costs for participation include childcare cost of \$31, transportation costs of \$32, or potential minimum lost wages of \$25 for cost of participation. These are participants' potential base costs which does not take into account the amount to incentivize respondents to show and participate. The basis for our participant cost analysis is outlined below:

- Child Care: \$31 (\$12.5 per hour / per child with up to 1 hour commuting + 1.5 hours at office for interview = 2.5 hours of child care)
- Transportation: \$32 (2015 Federal mileage rate of 53.5 cents per mile @ an average of 60 miles).
- Minimum Lost Wages: \$25 (DC minimum wage of \$11.25 per hour x (1 hour commuting + 1.25 hours at interview site) = 2.25 hours of potential lost wages). Respondents selected for this study will be home owners and are likely to have a much higher lost wage cost.

In summary, given the potential costs of participation, \$75 is the minimum incentive necessary to recruit and retain the desired population. There is also a concern that if the incentive is not attractive enough to participants, there may be a high no-show rate and the study would need to be redone in order to obtain quality results. For example, at the \$75 incentive level, total incentives would be \$3,600 (48 scheduled participants at \$75) versus a study redo at a cost of approximately \$58,460.65. The \$75 incentive amount is also the assumed base incentive for participants in the contract with FMG.

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.

10. JUSTIFICATION OF SENSITIVE QUESTIONS (if applicable):

11. BURDEN HOURS:

Collection of Information	Number of Respondents	Frequency	Number of Responses	Response Time (hours)	Burden (hours)
Web-based Screener	150	1x	150	.08	12
Phone-based screener	60	1x	60	.08	5
Focus Groups	48	1x	48	1	48
Totals	150*	//////////	258	//////////	65

*Those who participate in the phone-based screener and focus groups are a subset of those who responded to the web-based screener.

12. FEDERAL COST: The estimated annual cost to the Federal government is \$58,460.65.

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.