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**:

Tax Time Savings Initiative, Collection of Post-Tax Season Data.

2. **PURPOSE**:

The purpose of the Bureau's Tax Time Savings Initiative ("Initiative") is to encourage earned income tax credit (EITC) recipients and other taxpayers with low incomes to engage in savings and wealth-building activities during the tax preparation process. To fulfill this purpose the Bureau annually engages a number of Volunteer Income Tax Assistance (VITA) programs around the country and provides the programs with training, technical assistance, guidance on best practices, and communications materials to assist these programs in encouraging consumer saving during the tax return preparation process. For the 2019 tax season the Bureau intends to engage seventy-five (75) VITA programs.

The purpose of this inquiry is to collect information from VITA programs that participate in the Bureau's annual tax time saving cohort. The Bureau is interested in obtaining feedback from cohort programs on the saving activities of the clients they serve, and on the role their volunteers play in facilitating that saving activity. The information provided will help the Bureau get a better understanding about how consumers save, both formally and informally, and how the Bureau can better support VITA program staff and volunteers in their local tax time saving initiatives. This information will not be used to evaluate the quality or effectiveness of the individual programs or respondents.

The Bureau plans to collect tax season data through three activities:

1) An in-season survey of tax filers at participating VITA programs who are receiving a tax refund and who saved any portion of their refund. This is a four question survey asking tax filers if they saved all or a portion of their tax refund in a savings account, a 529 saving plan, a retirement account or on a pre-paid card. If the consumer answers yes to any of these options they will be asked how much they saved.
2) An online survey of seventy-five (75) VITA program site leads at each of the participating organizations. This survey will include a request to provide aggregated de-identified data on program outputs including number of returns filed, number of EITC filers, and number of people who saved through different channels such as saving into traditional savings accounts, 529 plans, retirement accounts and other saving vehicles. The survey will also ask for qualitative feedback, through open-ended questions, on the effectiveness of Bureau trainings, technical assistance and materials.
3) Focus group discussions with up to sixty (60) volunteers from selected VITA programs that are part of the tax time savings cohort.

3. **DESCRIPTION OF RESPONDENTS**:
Respondents to these inquiries will be the lead staff of 75 non-profit and community-based organizations participating in the Tax Time Savings pilot, as well as volunteers who work directly with taxpayers for those organizations.

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

a. How will you collect the information? Check <u>all</u> that apply.

[X] Web-based or other forms of Social Media	[ ] Telephone
[X] In-person	[ ] Mail
[ ] Small Discussion Group	[X] Focus Group
[ ] Other (please explain) ______________________	

b. Will interviewers or facilitators be used?

[X] 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?

[X] 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.

VITA programs will be conducting a Bureau sponsored survey of tax filers receiving a refund at participating VITA sites to gain a better understanding of consumer saving activity. The Bureau does not have any consumer contact information nor will it receive any personally identifiable information of responding consumers during or after the implementation of this survey.

The Bureau will be conducting an online survey with site leads from the 75 participating organizations. The Bureau has contact information for these 75 people, and will send emails to them inviting them to participate in the survey.

The Bureau will also be conducting in-person and telephone focus groups with volunteers who work with taxpayers at these organizations. The Bureau does not have a list of these participants; instead, the agency will send emails to the program leads and ask them to distribute information about focus groups to their tax preparation volunteers who will then be offered an opportunity to participate in the focus groups.

6. **INFORMATION COLLECTION PROCEDURES**:

Please summarize the procedures that will be used to collect data from respondents.
Potential respondents will receive requests for information via email, and will be asked to either (a) use an embedded link in the email to access online surveys; or (b) reply by email or phone to sign up for a focus group.

7. **PERSONALLY IDENTIFIABLE INFORMATION**:

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

b. If yes, is the information that will be collected included in records that are subject to the Privacy Act of 1974?

[X] Yes [ ] No [ ] Not Applicable

c. Has a System or Records Notice (SORN) been published?
[X] Yes [ ] No [ ] Not Applicable
If yes, list the SORN title and Federal Register citation
Title: Consumer Education and Engagement Records CFPB.021, 79 FR 78839

d. If applicable, what is the link to the Privacy Impact Assessment?

Industry, Expert, and Community Input and Engagement PIA
https://s3.amazonaws.com/files.consumerfinance.gov/f/documents/20161101_cfpb_Industry_Expert_Community_Input_and_Engagement_PIA.pdf

8. **INCENTIVES**:

a. Is an incentive provided to participants? [ ] Yes [X] No

b. If yes, provide a statement justifying the use and amount of the incentive ***and*** the amount or value of the incentive: $__N/A__________.

9. **ASSURANCES OF CONFIDENTIALITY**:

a. Will a pledge of confidentiality be made to respondents? [ ] Yes [X] No

b. If yes, please cite the statue, regulation, or contractual terms supporting the pledge.

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)
Consumer Saving Survey	15,000	1x	15,000	.025	375
Site Leads Survey	75	1x	75	1	75
Volunteers Focus Group	60	1x	60	1	60
Totals	**15,135**	//////////////	**15,135**	//////////////	**510**

12. **FEDERAL COST**: The estimated annual cost to the Federal government is $____0____.

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.