

SUPPORTING JUSTIFICATION
CAUSAL ANALYSIS AND CONTERMEASURES TO RAIL-RELATED SUICIDES
Form Numbers FRA F 6180.125A; FRA F 6180.125B

INTRODUCTION

This submission is to request the Office of Management and Budget's clearance for three-years for the proposed information collection titled *Causal Analysis and Countermeasures to Rail-Related Suicides* (OMB No. 2130-NEW).

- 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.**

The Federal Railroad Administration (FRA) has statutory responsibility to ensure the safety of railroad operations. See the Federal Rail Safety Act of 1970 (45 U.S.C. §§ 421 et seq.) Under this authority, the authority of the Accident Reports Act (originally codified at 45 U.S.C. 42 and then re-codified at 49 U.S.C. 20901) and its accident/incident reporting regulations (found at 49 CFR Part 225), FRA collects data on railroad accidents/incidents. Among such accidents/incidents, pedestrian trespassing on railroad property resulting in serious injury or death is one of the two most serious safety problems – the second being grade crossing collisions – facing the railroad industry and its regulators, not only in the United States but also in other countries. It is widely believed in this country that the reported prevalence and incidence of railway suicide vastly under-represents the nature and extent of the problem. The FRA does not require railroads to report suicide deaths on their rights-of-way, and there is no central reporting system within the railroad industry or suicide prevention field that provides verifiable information about how many trespass deaths are accidental versus intentional.

According to FRA reports, there are between 300 and 400 trespass fatalities per year on the rail system. Although several reports indicate that suicide may account for a significant percentage of trespass-related serious injuries and fatalities in the United States, presently no reliable statistics are available. Determining whether a railway trespasser's death is a suicide is difficult, since such deaths are often witnessed only by railroad personnel.

In order to address this serious issue, interest groups, the railroad industry, and governments (Federal, State and local) must know more about the individuals who carry out suicides on railroads. It is necessary to know about the characteristics of these suicides in order to identify possible areas for suicide prevention and intervention. With this knowledge, effective suicide prevention programs can be developed and effectively disseminated. Since the overall goal is to reduce the number of deaths and injuries on

railroads, developing summaries and generic trespasser profiles from specific individuals and incidents will also provide essential information regarding the precise audience to be targeted with future prevention efforts.

Data currently available from the Federal Railroad Administration (FRA), gathered monthly and annually from railroads, are limited only to a tabulation of the number of deaths and injuries, and may include few, if any, demographic details. Three potential sources of more useful data exist: (1) the railroad police records of trespasser contacts and evictions, (2) the State and local Coroner/Medical Examiner (CME) death reports, and (3). Records kept by some state agencies such as State Police and Public Utilities Commissions. However, none of these data sources provide information about the circumstances that led an individual to end his/her life on the railroad.

Background:

Over the last several years, FRA and Federal Transit Administration (FTA) representatives, the Association of American Railroads (AAR) and American Association of Suicidology (AAS) staff have been in discussion with representatives from Operation Lifesaver, Inc. (OLI), the Class I railroads, shortline railroads, the Brotherhood of Locomotive Engineers and Trainmen (BLET), and others regarding the problem of suicides on railroad property. OLI identified this issue as a primary concern.

The proposed collection of information involves a one-time study, and involves conducting psychological autopsies on confirmed railroad suicides to obtain data on the circumstances that led the individual to end his/her life on railroad property. Ostensibly, State and/or County Coroners/Medical Examiners receive and/or prepare, and retain reports of deaths, particularly those considered to be from other than natural causes (e.g., accidents, such as an encounter with a train). Such reports include personal information regarding the deceased (e.g., home address, age, gender, ethnicity), as well as the date/time, type, and location of the incident. In some States, such information is centralized. In other States, the information is retained in the Counties. This information will be used to identify family and friends of the individual who has died by suicide.

Because of privacy concerns, access to such data has been limited to family members, police investigators, and those involved in relevant legal actions. In order to obtain access to such information, assurances are being provided to respondents that this data will be made public only in summary fashion, and will not be attributable to any specific incident, individual or railroad. FRA's contractor for this study, the Railroad Research Foundation (part of AAR) and its subcontractor, AAS, have committed themselves to providing these assurances, and will shield specific data from public scrutiny. AAS will use the additional data obtained through psychological autopsies to compile generalized, statistical, summary reports. Only these summary reports will be released by AAS to FRA and FTA. None of the raw data obtained by AAS will be released, and confidentiality of the information obtained will be assured by AAS. Developing summaries and generic profiles from the information provided by Coroners/Medical Examiners of specific individuals and incidents into compiled National data will not only

enable FRA, FTA, the railroads, representatives from OLI, and other interested parties to design necessary suicide prevention programs to precisely targeted audiences in all areas of the country, but will also serve to reduce the fatalities and injuries that occur each year on railroad property. Thus, this proposed collection of information supports DOT's top Strategic Goal, namely Transportation Safety.

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.

This is a new collection of information, and is completely voluntary. Last year, FRA awarded a grant for the first phase of a five-year project to reduce suicides on the rail system to the Railroad Research Foundation (part of the Association of American Railroads) and its subcontractor, the American Association of Suicidology (AAS). In the course of the five-year project, the research project's goals include: (i) A prevalence assessment to determine verifiable numbers of suicides on the rail system; (ii) Development of a standardized reporting tool for industry use; (iii) A causal analysis and root cause analysis of suicide incidents that occur during the grant cycle; and (iv) Design and implementation of suicide prevention measures for the nation's rail system to reduce suicide injuries and deaths. AAS is also receiving a grant from the Federal Transit Administration (FTA) to study suicides on commuter rail lines throughout the country. Consequently, AAS has expanded its study to include commuter lines as well, and will be using the same collection instruments once they are approved by the Office of Management and Budget.

This collection of information pertains to Phase II of the project, the causal analysis. On behalf of FRA and FTA, AAS seeks to obtain railroad suicide information from witnesses to these incidents and survivors (i.e., employers, co-workers, family and friends of the individual who died by suicide on railroads and commuter lines) that will be compiled into generalized, summary reports in order to enable it to identify the characteristics of railroad suicides as related to locality across the Nation. Specifically, AAS intends to conduct 70 psychological autopsies over the course of two years on people who die by rail-related suicide. Psychological autopsy is a recognized and accepted method for obtaining information about physical, emotional, and circumstantial contributors to a person's death.

In addition to obtaining OMB approval before beginning the research phases of this project, AAS is applying to its Institutional Research Board (IRB) for approval as well. AAS is submitting its research protocols to the Colorado Multiple Institutional Review Board (COMIRB) which serves as the IRB for AAS. All parties will be kept apprised of progress on this process as well.

COMIRB is a consortium of health care facilities in Colorado consisting of:

- University of Colorado Health Sciences Center

- Colorado Prevention Center
- Denver Health Medical Center
- Denver Veterans Affairs Medical Center
- The Children's Hospital
- University of Colorado Hospital

Dr. Peter Gutierrez, President of AAS, is a member of COMIRB and will be a co-investigator on the railroad project.

After approvals are obtained, FRA/FTA and AAS will use information gathered to develop a generic profile of those who died. These profiles will include such things as presence of mental illness, proximity of residence to railroad property, etc. FRA and its partners (representatives from AAS, RRF, OLI, the Class I railroads, shortline railroads, the Brotherhood of Locomotive Engineers and Trainmen (BLET), and other interested parties) and FTA will use the information collected to devise suicide prevention programs for those populations determined to be most at risk of suicide. Both FRA and FTA believe such programs will serve to reduce the annual incidence of railroad/commuter line attempted suicides and the grave injuries and fatalities that accompany such trespassing events, as well as to reduce the psychological trauma to rail/commuter personnel and witnesses.

- 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.**

For many years, FRA has strongly endorsed and highly encouraged the use of advanced information technology, wherever possible, to reduce burden. However, the methodology to be used for data collection (questionnaires and psychological autopsies) involves in person interviewing by trained staff. While a standard questionnaire will be used, effective data collection in this case is not possible by on-line or e-mail surveys.

It should be noted that the burden for this proposed collection of information is extremely minimal.

- 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 2 ABOVE.**

As noted in the response to Question Number One, this study proposes to obtain data from witnesses to incidents and survivors of individuals who have died by suicide on the property of railroads/commuter lines. To our knowledge, the information to be collected is not duplicated anywhere.

Similar data are not available from any other source at this time.

5. IF THE COLLECTION OF INFORMATION IMPACTS SMALL BUSINESSES OR OTHER SMALL ENTITIES (ITEM 5 OF OMB FORM 83-I), DESCRIBE ANY METHODS USED TO MINIMIZE BURDEN.

The proposed collection of information does not impact small businesses because all of the data will be collected from individuals (witnesses and survivors).

In an effort to minimize the burden, the proposed study is a one-time effort. Moreover, it should be noted again that the burden for this collection is very minimal.

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.

As remarked earlier, railroad suicides, which are believed to constitute a large proportion of trespass deaths, are one of the most significant causes of deaths in the rail industry each year in the United States. If this information were not collected, FRA's safety program relating to a safe rail operating environment and its joint efforts with railroads, Operation Lifesaver, and other interested parties to promote and maintain such an environment would be considerably adversely impacted. Specifically, without this collection of information, FRA would be unable to develop any concrete information concerning individuals who carry out suicides on railroad property every day throughout the United States. Thus, it still would not know the circumstances that lead an individual to ending his/her life on a railroad, and would not be able to target region-specific prevention efforts aimed at those individuals or groups of individuals who are most likely to attempt suicide on railroad property. The proposed study seeks to develop a better understanding of railroad suicides, and to use this understanding to make recommendations concerning the development of suicide prevention efforts, focused on those individuals most at risk, to reduce the incidence of suicide on railroad property. Without this collection of information, the tragic annual toll of suicide fatalities would continue unabated and, conceivably, could increase.

Also, without this collection of information, rail operations throughout the United States and transit operations in America's cities will continue to be impacted adversely by suicide incidents. The impacts are both immediate and longer lasting. The immediate impact is delay, i.e., every time there is a suicide resulting in a serious injury or fatality, there are significant delays on that track or that segment of track while investigations take place. The necessary smooth flow of rail/transit traffic, involving both the

movement of goods and people, is impeded and sometimes stopped altogether as train crews, police, and emergency response personnel attend to the scene and file required reports. The more long-lasting impact is on the health and well-being of locomotive/transit engineers who oftentimes suffer Post-Traumatic Stress Disorder (PTSD) after such events (fatalities). This affects their ability to work both in the short-term and in the long run and thus affects the operations of the railroads/transit lines that they work for. Locomotive/transit engineers affected by PTSD can be out-of-work for days or even months, and sometimes they do not go back to work at all. Thus, their livelihoods and that of their families can also be severely negatively impacted. By collecting the proposed information and developing a targeted prevention effort, FRA/FTA and partners can develop necessary measures to save lives and reduce the incidence of suicide-related PTSD, as well as the disruption and adverse economic impacts to rail/transit operations that occur with each railroad suicide.

In sum, this collection of information serves to further both DOT's and FRA's primary mission, which is to promote safe/efficient (rail) transportation and reduce the number of injuries and fatalities resulting from trespasser incidents that occur on rail/transit property each year.

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 A 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 CONFIDENTIALITY TO THE EXTENT PERMITTED BY LAW.**

AAS will collect the data and will be compiling summary reports; however, the data to be collected is not covered by a pledge of confidentiality supported by statute, such as the Privacy Act or CIPSEA, or by regulation. AAS solely pledges confidentiality.

In order to protect families and the railroads, AAS has developed a plan for keeping all identifying information confidential and will be responsible for assuring the safety of sensitive data that is obtained. All information gathered during the two-year research phase of the project will be immediately transferred to a data matrix that will not include identifying information. Before the records are stored, any information that could identify the individual, his or her family, the railroad involved, etc. will be manually removed from the reports. The reports will then be filed in a locked cabinet accessible to only two members of the AAS staff associated with this project. Thus, information obtained or acquired by FRA's contractor, AAS, from survivors will be used exclusively for statistical and summary purposes, or in this case to better describe the circumstances that lead to railroad suicides in various geographic regions of the United States. None of the information obtained that might be identifying will be disseminated or disclosed in any way.

AAS will release to FRA only generalized, statistical, summary reports. No micro-level data will be released to the public; only tabular data will be publicly available. Any tabular data will be aggregated in a manner that prevents identification of a specific individual. At the conclusion of the study and after summary reports are prepared and submitted, all individual records will be destroyed.

All other information collection requirements are in compliance with this section.

- 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 THOSE 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.

As required by the Paperwork Reduction Act of 1995, FRA published a notice in the Federal Register on February 6, 2007, soliciting comment on the proposed data collection. See 72 FR 5493. FRA received three comments in response to this notice. All three letters expressed support for the proposed study/collection of information.

The first letter was sent by Dr. John Draper of the National Suicide Prevention Lifeline (NSPL). In his letter, Dr. Draper remarks:

As Director of the federally-funded National Suicide Prevention Line (NSPL), I am aware of the American Association of Suicidology's (AAS) application to the federal Office of Management and Budget seeking measures to enhance accurate reporting and identify causes of railway-related suicides. I am writing today to acknowledge their important, collaborative role in promoting and supporting the Lifeline and its network of 120 crisis centers across the nation and the potential value that the Lifeline sees in the proposed collection of data.

To the extent that AAS is successful in obtaining federal authorization to collect this data, the NSPL could more effectively collaborate with AAS and railway authorities to prevent railway suicides.

Dr. Draper goes on to outline what such a collection of information as the proposed study will achieve. He states:

First, the prevalence of suicides in railway systems must be accurately documented to: a) Alert railway administrators to the full scope of this public health problem affecting their business operations and interests; and b) Provide a prevalence base-line to enable meaningful, comparative outcome measures for any suicide prevention efforts implemented to address the problem (e.g., "did it work?"). This information will assist NSPL/AAS/Railway collaborations in assessing where NSPL services and promotions efforts might be most effectively located in the vicinity of railway systems, and the degree to which such promotions/service efforts, once implemented, may have an impact on railway suicides.

Second, determining causes of railway suicides might assist the NSPL in more effectively targeting suicide prevention messages and services to address the identified risk factors. For example, if specific demographic groups in geographic areas near railways could be determined to have a significantly greater risk, or certain identifiable behavioral factors could be associated with better predicting who might be planning a railway suicide, the NSPL and AAS could work together with railway administrators to enhance awareness of the Lifeline number for such “at risk groups” showing “warning signs.”

. . . If AAS is provided with authorization to collect the valuable information noted above, the NSPL can count on AAS for further collaborations towards applying this information in efforts that could more effectively prevent suicides in railway systems.

The second letter was sent by Mr. Jerry Reed of the Suicide Prevention Action Network (SPAN USA). In his letter, Mr. Reed observes:

SPAN USA supports Phase II of the Federal Railroad Administration (FRA) project to reduce suicides on the rail system. Currently, there is no reliable source for determining how many of the approximately 500 deaths that occur on rail property each year are by suicide because they are not reported consistently or to one central source. It is believed that suicide on the railways is under-reported – as is suicide in general. Without an accurate accounting, there is no way to know the magnitude of suicide on railroad-owned property, or any way to track the effectiveness of prevention strategies. SPAN USA supports the current FRA project so that the information necessary to design and implement suicide prevention measures for the nation’s rail system in order to reduce suicide deaths will be available.

SPAN USA’s National Scientific Advisory Committee supports psychological autopsies as an accepted, empirically-based research method for obtaining information about those who die by suicide. These autopsies are particularly useful in railway deaths because many such suicides are witnessed, and often the individual completing the suicide does not leave a note. Through the psychological autopsies which the American Association of Suicidology (AAS) intends to carry out, much needed information can be gained in order to create an analysis of suicide incidents involving the 70 individuals who will be autopsied.

SPAN USA supports AAS and the Association of American Railroads (AAR) continued efforts on this project. AAS is dedicated to the understanding and prevention of suicide, and has experience conducting and analyzing psychological autopsies. In addition, AAR has been a strong partner in SPAN USA’s efforts to open minds, change policy, and save lives with respect to our suicide prevention activities.

The third letter was sent by Dr. Daniel Reidenberg of Suicide Awareness Voices of Education. In his letter, Dr. Reidenberg notes:

I am very familiar with the American Association of Suicidology and their substantial credibility and work in the field and study of suicide . . . We have a serious problem of national importance that must continue to be addressed through research, scientific study, public awareness and education. Much of what we have learned about suicide comes from psychological autopsies, from which come newly developed assessment tools and techniques, as well as prevention efforts. All of this not only will save lives, but reduce the tremendous economic impact of

suicides by rail or other forms of major public transportation.

. . . I fully support the work of the AAS and this particular project. There is no better organization more suited to conduct this type of work, and there is no more time for delay. We desperately need this work to be conducted, because any life lost to suicide is one too many.

Background

As noted earlier, FRA representatives and AAS staff have been in discussion, over the last several years, with representatives from Operation Lifesaver, Inc. (OLI), the Class I railroads, shortline railroads, the Brotherhood of Locomotive Engineers and Trainmen (BLET), and others regarding the issue of suicides on railroad property. The OLI identified this issue as a primary concern.

The proposed study is the next step in the process to better understand the characteristics of the numerous suicides that occur every year on railroad property.

9. EXPLAIN ANY DECISION TO PROVIDE ANY PAYMENT OR GIFT TO RESPONDENTS, OTHER THAN REMUNERATION OF CONTRACTORS OR GRANTEES.

There are no monetary payments provided or gifts made to respondents associated with this proposed collection of information.

10. DESCRIBE ANY ASSURANCE OF CONFIDENTIALITY PROVIDED TO RESPONDENTS AND THE BASIS FOR THE ASSURANCE IN STATUTE, REGULATION, OR AGENCY POLICY.

FRA fully complies with all laws pertaining to confidentiality, including the Privacy Act of 1974 and the Confidential Information Protection and Statistical Efficiency Act (CIPSEA) of 2002. AAS will collect the data and will be compiling summary reports; however, the data to be collected is not covered by either the Privacy Act or CIPSEA.

In order to protect families and the railroads, AAS has developed a plan for keeping all identifying information confidential and will be responsible for assuring the safety of sensitive data that is obtained. All information gathered during the two-year research phase of the project will be immediately transferred to a data matrix that will not include identifying information. Before the records are stored, any information that could identify the individual, his or her family, the railroad involved, etc. will be manually removed from the reports. The reports will then be filed in a locked cabinet accessible to only two members of the AAS staff associated with this project.

Thus, information obtained or acquired by FRA's contractor, **AAS**, from survivors will be used exclusively for statistical and summary purposes, or in this case to better describe the circumstances that lead to railroad suicides in various geographic regions of the United States. None of the information obtained that might be identifying will be

disseminated or disclosed in any way.

In conjunction with the proposed information collection, a cover letter signed by the FRA Administrator or FTA Administrator will be provided to survivors explaining the rationale for the study, its importance for public safety on and around railroad property, the potential for preventing railroad suicides, and encouraging the respondents to participate. The cover letter explains to the survivors that FRA and FTA have contracted with AAS to gather the data. The Administrator's cover letter notes that, after gathering and processing the data, AAS will release to FRA only generalized, statistical, summary reports. A second letter from AAS confirms that it will release only these summary reports to FRA or FTA, and that AAS will not release any of the raw data to either agency. No micro-level data will be released to the public; only tabular data will be publicly available. Any tabular data will be aggregated in a manner that prevents identification of a specific individual.

At the conclusion of the study and after summary reports are prepared and submitted, all individual records will be destroyed.

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.

The survey will ask for information that is intended to explain why a deceased individual ended his/her life on a certain railroad right of way. The list of survey questions includes items such as mental health status of the deceased individual, his/her past suicidal behavior, access to other lethal means for suicide, and demographic information for the purpose of developing general descriptions of railroad suicides in specific geographic locations in order to develop programs to reduce suicides on railroad property. AAS realizes that questions about marriage, job satisfaction, religious practices, psychiatric history, substance abuse, and access to guns request information that is of a personal nature. All respondents will be told upfront that they may decline to answer particular questions or the entire survey at any time. The reason for including these items is to determine reasons and motives for these individuals choosing to end their lives on railroad rights of way, rather than by other means. It is important to note that these questions are considered standard in a psychological autopsy.

These items will also enable us to find associations that will help describe the profiles of individuals who complete suicide on railroads. For example, literature shows that in England, there were some associations between marital status and railroad suicide being method of choice. It is significant to determine whether such associations are valid in the

United States. More than 90% of all suicides have some psychiatric history and/or substance abuse. There are prevention implications if we know whether these risk factors are more or less prevalent in railroad suicides. Guns are the most common method of suicide in the United States. It would be significant to determine whether availability and accessibility determine choice of method. In other words, do suicidal individuals choose other violent methods of suicide if they do not have access to a gun?

FRA, FTA and AAS realize that survivors are likely to be very emotional regarding the loss of their loved one. AAS will train field researchers to be appropriately sensitive while conducting the interviews. Field researchers hired to conduct these psychological autopsies will have background education and experience in mental health. In addition, AAS will provide training that includes role playing and practicing appropriate interviewing techniques before the researchers start data collection. AAS has a long history of conducting such trainings, most recently in state-supported research in Alaska.

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. GENERALLY, ESTIMATES SHOULD NOT INCLUDE BURDENS HOUR FOR CUSTOMARY AND USUAL BUSINESS PRACTICES**
- **IF THIS REQUEST FOR APPROVAL COVERS MORE THAN ONE FORM, PROVIDE SEPARATE HOUR BURDEN ESTIMATES FOR EACH FORM AND AGGREGATE THE HOUR BURDENS IN ITEMS 13 OF OMB FORM 83-I.**
- **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.**

Form	Number of Respondents	Number of Responses per Respondent	Time per Response	Total Burden in Hours	Cost*
Forms FRA F 6180.125A; and FRA F 6180.125B, Psychological autopsies of railroad suicides	280 (Over a two-year period, 35 cases per year of suicide with maximum of 8 interviews per case)	About 20	5 min./ 2 hrs.	537	\$18,795

*At \$35 per hour (includes 40 percent overhead costs added to annual hourly salary)

Form FRA F 6180.125B, a data-form will be filled out for each of the 35 projected cases each year, should take approximately 120 minutes or less to complete. Thus, as shown above, the total annual estimated burden for this proposed collection of information amounts to 537 hours.

Again, it should be noted that data will be collected only once for the project period. The proposed collection of information will take place over a two-year period, and there will be no data collections in subsequent years.

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 COSTS OF ANY HOUR BURDEN SHOWN IN ITEMS 12 AND 14).

- **THE COST ESTIMATES SHOULD BE SPLIT INTO TWO COMPONENTS: (A) A TOTAL CAPITAL AND START-UP COST COMPONENT (ANNUALIZED OVER ITS EXPECTED USEFUL LIFE); AND (B) A TOTAL OPERATION AND MAINTENANCE AND PURCHASE OF SERVICES COMPONENT. THE ESTIMATES SHOULD TAKE INTO ACCOUNT COSTS ASSOCIATED WITH GENERATING, MAINTAINING, AND DISCLOSING OR PROVIDING THE INFORMATION. INCLUDE DESCRIPTIONS OF METHODS USED TO ESTIMATE MAJOR COSTS FACTORS INCLUDING SYSTEM AND TECHNOLOGY ACQUISITION, EXPECTED USEFUL LIFE OF CAPITAL EQUIPMENT, THE DISCOUNT RATE(S), AND THE TIME PERIOD OVER WHICH COSTS WILL BE INCURRED. CAPITAL AND START-UP COSTS INCLUDE, AMONG OTHER ITEMS, PREPARATIONS FOR COLLECTING INFORMATION SUCH AS PURCHASING COMPUTERS AND SOFTWARE; MONITORING, SAMPLING, DRILLING AND TESTING EQUIPMENT; AND RECORD**

STORAGE FACILITIES.

- **IF COST ESTIMATES ARE EXPECTED TO VARY WIDELY, AGENCIES SHOULD PRESENT RANGES OF COST BURDENS AND EXPLAIN THE REASONS FOR THE VARIANCE. THE COST OF PURCHASING OR CONTRACTING OUT INFORMATION COLLECTION SERVICES SHOULD BE A PART OF THIS COST BURDEN ESTIMATE. IN DEVELOPING COST BURDEN ESTIMATES, AGENCIES MAY CONSULT WITH A SAMPLE OF RESPONDENTS (FEWER THAN 10), UTILIZE THE 60-DAY PRE-OMB SUBMISSION PUBLIC COMMENT PROCESS AND USE EXISTING ECONOMIC OR REGULATORY IMPACT ANALYSIS ASSOCIATED WITH THE RULEMAKING CONTAINING THE INFORMATION COLLECTION, AS APPROPRIATE.**

- **GENERALLY, ESTIMATES SHOULD NOT INCLUDE PURCHASES OF EQUIPMENT OR SERVICES, OR PORTIONS THEREOF, MADE (1) PRIOR TO OCTOBER 1, 1995, (2) TO ACHIEVE REGULATORY COMPLIANCE WITH REQUIREMENTS NOT ASSOCIATED WITH THE INFORMATION COLLECTION, (3) FOR REASONS OTHER THAN TO PROVIDE INFORMATION OR KEEP RECORDS FOR THE GOVERNMENT, OR (4) AS PART OF CUSTOMARY AND USUAL BUSINESS OR PRIVATE PRACTICES.**

There will be no additional cost to survey respondents.

- 14. PROVIDE ESTIMATES OF ANNUALIZED COST TO THE FEDERAL GOVERNMENT. ALSO, PROVIDE A DESCRIPTION OF THE METHOD USED TO ESTIMATE COSTS, WHICH SHOULD INCLUDE QUANTIFICATION OF HOURS, OPERATIONAL EXPENSES SUCH AS EQUIPMENT, OVERHEAD, PRINTING, AND SUPPORT STAFF, AND 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 IN A SINGLE TABLE.**

The total cost to the Federal Government amounts to **\$700,000** and breaks down as follows:

American Association of Suicidology **Two-Year Sub-Contract** with the Railroad Research Foundation (part of the Association of American Railroads) and **FRA** -- \$250,000 p/yr

American Association of Suicidology **One-Year Contract** with **FTA** -- \$200,000 p/yr

There are no additional costs to the Federal Government at this time.

15. EXPLAIN THE REASONS FOR ANY PROGRAM CHANGES OR ADJUSTMENTS REPORTED IN ITEMS 13 OR 14 OF THE OMB FORM 83-I.

These are new information collection requirements for a one-time survey. Therefore, there are no program changes or adjustments at this time.

16. FOR COLLECTIONS OF INFORMATION WHOSE RESULTS WILL BE PUBLISHED, OUTLINE PLANS FOR TABULATION, 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.

The contractor will be the sole user of the data gathered for the purpose of producing general, statistical, summary reports, which will be submitted to FRA/FTA. Although no raw data will be provided by the contractor to either agency, FRA does intend to place the contractor's final report on its Website so that the railroad community, and other interested parties, including researchers and the general public will have access to the findings. As previously noted, FRA/FTA and agency partners will use the reports as tools to develop prevention programs for the purpose of reducing suicides on railroad property. A manuscript describing the project and its findings will be submitted for publication in the peer-reviewed journal, *Suicide and Life-Threatening Behavior*.

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.

Once OMB approval is received, FRA will publish the approval number for these information collection requirements in the Federal Register.

18. EXPLAIN EACH EXCEPTION TO THE CERTIFICATION STATEMENT IDENTIFIED IN ITEM 19, "CERTIFICATION FOR PAPERWORK REDUCTION ACT SUBMISSIONS," OF OMB FORM 83-I.

No exceptions are taken at this time.

Department of Transportation (DOT) Strategic Goals

This information collection supports the main DOT strategic goal, namely transportation safety. As noted earlier, trespasser fatalities are one of the single most significant causes of deaths in the rail industry annually in the United States. If this information were not collected, FRA's safety program relating to a safe rail operating environment and its joint efforts with railroads, Operation Lifesaver, and other interested parties to promote and maintain such an environment would be considerably adversely impacted. Specifically, without this collection of information, FRA would be unable to develop any concrete information concerning individuals who are trespassing on railroad property every day throughout the United States. Thus, it still would not have any demographic data on trespassers, and would not be able to target region-specific education and law enforcement efforts aimed at those individuals or groups of individuals who are trespassing or who are most likely to trespass on railroad property. The proposed study seeks to develop a profile of trespassers, and use this profile to make recommendations concerning the development of public information campaigns, enforcement efforts, and other outreach programs, focused on those individuals, groups, and neighborhoods most at risk, to reduce the incidence of trespassing on railroad property. FRA and its partners, through such education and enforcement programs, seek to reduce the too high toll of the approximately 500 trespassing fatalities and numerous grave bodily injuries that occur each year on railroad property.

In summary, this collection of information supports both DOT's number one Strategic Goal and FRA's primary mission, namely safe transportation and the reduction of the number of injuries, fatalities, and property damage, which ensue from transportation/rail-related incidents each year.

In this information collection, as in all its information collection activities, FRA seeks to do its utmost to fulfill DOT Strategic Goals and to be an integral part of One DOT.

