

## SUPPORTING STATEMENT

### FOR

**P.L. 89-663, Title 1, Section 106, 108, 112. - COLLECTION OF CRASH DATA**

**OMB Control Number 2127-0021**

#### A. JUSTIFICATION

1. Explain the circumstances that make the collection of information, necessary. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

Motor vehicle crash information is collected to support the establishment and enforcement of motor vehicle regulations that reduce the severity of injury and property damage caused by motor vehicle crashes. The Department's strategic goal that is supported is "safety, by working towards the elimination of highway safety related deaths, injuries and accidents".

The National Highway Traffic Safety Administration (NHTSA), under the National Traffic and Motor Vehicle Safety Act of 1966 (Public Law 89-563, Title 1, Sec. 106, 108, and 112) (Attachment 1) is charged with the collection of crash data that support the establishment and enforcement of motor vehicle regulations that reduce the severity of injury and property damage caused by motor vehicle crashes. NASS is the mechanism through which NHTSA collects nationally representative data on motor vehicle crashes.

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

NASS Crashworthiness Data System (CDS) data are used to describe and analyze circumstances, mechanisms, and consequences of high severity motor vehicle crashes in the United States. These descriptions and analyses in turn will help to describe the magnitude of vehicle damage and injury severity as related to traffic safety problems. It will give motor vehicle researchers an opportunity to specify areas in which improvements may be possible, design countermeasure programs, and evaluate the effects of existing and proposed safety measures. Users include virtually every program area in NHTSA, other federal agencies such as the Federal Highway Administration, Federal Motor Carrier Safety Administration, state and local governments, domestic and foreign motor vehicle manufacturers, insurance and consumer organizations, safety research organizations, universities, foreign government agencies, and individual citizens.

3. Describe whether, or 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.

Most of the data collection burden comes from in-person or telephone interviews with vehicle occupants that take about twenty minutes. This cannot be automated because each crash is unique; therefore the amount collected is zero percent. Also, information from this interviewee, scene inspection, vehicle inspection, and other occupants will almost always cause the interviewer to ask additional questions.

Training sessions are used to inform researchers of new and improved interview techniques and to test their interview skills.

The burden on police, medical records personnel, and tow yards is usually providing access to existing records and crash vehicles.

4. Describe efforts to identify duplication. Show why any similar information already available cannot be used or modified.

This item does not apply since no similar information is available.

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

The crash researchers minimize the burden by establishing rapport and trust with tow yard operators. Typically, the researcher knows the operators and simply asks for the location of the vehicle and permission to inspect it.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently.

NHTSA needs nationally representative, real-world crash data to support creation or modification of Federal Motor Vehicle Safety Standards (FMVSS), which cover areas such as air bags, safety belts, safety glazing, and rollover protection. NASS data helps NHTSA staff determine which systems work well and which do not. Rulemaking often follows, and the NASS data is required to defend this rulemaking in court when necessary, or to prevent the rulemaking from even being challenged in court.

If these rules were not made, there would be a significant increase in highway crash deaths and injuries.

NASS now researches the absolute minimum number of cases necessary for the activities above.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with the guidelines set forth in CFR 1320.6.

The procedures specified for this information collection are consistent with the guidelines set forth in 5 CFR 1320.6.

8. Provide a copy of the Federal Register document soliciting comments on extending the collection of information, a summary of all public comments responding to the notice, and a description of the agency's actions in response to the comments. Describe efforts to consult with persons outside the agency to obtain their views.

See Attachment 2 for the Federal Register document (March 24, 2009, Volume 74, Number 55, page 12455) soliciting comments on extending the collection of information, and summary of public comments. NHTSA received no comments.

See Attachment 4 for the Federal Register notice announcing that the Information Collection Request has been forwarded to the Office of Management and Budget. (June 2, 2009, Volume 74, Number 104, page 26457)

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

No payment or gift will be provided to any respondent.

10. Describe any assurance of confidentiality provided to respondents.

***The identification in any data files of interviewees by name or other identifying labels is not permitted and is not entered into any system of records.*** The NASS files are not a system of records that are subject to the Privacy Act. No names of individuals will be entered into automated or hard copy case files. Reports of NASS crash data collections must be made available to the public in a manner which does not identify individuals (Public Law 89-564). Thus, cases will not be retrievable by any

unique number, symbol, or other identifying variable assigned to the individual. The safeguards for privacy which are afforded by the NASS files are greater than those afforded by the Privacy Act because the personal information which the Privacy Act is designed to protect is deleted from all NASS files. Each respondent is read or provided with a copy of the NHTSA approved confidentiality pledge which states, "The National Highway Traffic Safety Administration (NHTSA) is authorized by Congress (Title 49 U.S.C., Section 30166 and 30168 and Title 23, Section 403) to collect statistical data on motor vehicle traffic crashes to aid in the development, implementation and evaluation of motor vehicle and highway safety countermeasures. NASS is the mechanism through which NHTSA collects nationally representative data on motor vehicle traffic crashes. Your cooperation in this study can aid us in improving highway safety conditions. Your response is needed to ensure the validity of this study. A representative of NHTSA who is involved in the quality review of the data may contact you only to verify that an interview did occur. Otherwise, any information that identifies you will be held CONFIDENTIAL."

Information on 4,500 motor vehicle crashes are collected and entered into the NASS file every year. For each of these crashes, every precaution is taken to safeguard against personal identifying information from appearing in the database. The potential that a person can uniquely be identified by the crash and vehicle characteristics from the more than 700 data elements collected is not likely. The reason for this is that the geographic location of the crash is not automated in the NASS file. Without the geographic location, the suspected crash could not be matched to a specific police report. Throughout many police jurisdictions in the country, a police report will only be released to the crash victims, lawyers of the victims, or insurance companies.

11. Provide additional justification for questions on matters that are commonly considered private.

Experience in motor vehicle occupant/pedestrian interviewing has demonstrated that discussion of the crash is not a private subject with the respondent if the subject of culpability is excluded. Culpability is not discussed in NASS Crashworthiness Data System interviews.

The NASS program seeks to identify injuries and correlate those injuries to interior features of the motor vehicle. This allows NHTSA engineers and the motor vehicle industry to evaluate the performance of interior components to improve its design to protect the motoring public from harm. All data collected for occupant assessment and injury is voluntary. Permission must be obtained from the victims to review that portion of their medical record which contains only crash-related injury information. Simply stated, if the respondents don't cooperate then no data is collected. Therefore, all information from respondents has been acquired with their permission. Sensitive or private personal information is not recorded in the database available for government research and public perusal.

12. Provide estimates of the hour burden of the collection of information on the respondents.

The estimated number of respondents is obtained by multiplying the approximate number of crashes investigated each year by the average number of interviews per crash. Based on existing data, each crash involves approximately 2.25 victims. The respondents are contacted only once unless reinvestigations are warranted because of data falsification.

In addition to interviews, researchers must obtain official records to complete the case report. These include police crash reports and medical records. The estimate of burden to police jurisdictions is obtained by multiplying the average number of visits per year by the average burden hours per visit by the number of police jurisdictions. Based on existing data, sampled jurisdictions are visited approximately 52 times per year (once per week) and require approximately 3 minutes of staff time. Non-sampled jurisdictions are visited twice annually and involve approximately 15 minutes of staff time. The estimate of burden to hospitals is obtained by multiplying the average number of records per year by the average number of burden hours (approximately 5 minutes per record) for record processing. The burden to tow fatalities is estimated by multiplying the estimated number of visits to these facilities for vehicle inspections per year by the burden hours per visit.

ESTIMATE OF REPORTING BURDEN				
a. Respondent Burden				
Crashes Per Year (A)	Average Number of Respondents Per Crash (B)	Estimated Number of Respondents (A)*(B)=(C)	Average Number of Hours (D)	Burden Hours (C)*(D)
6,000	2.25	13,500	.33	4,455

ESTIMATE OF REPORTING BURDEN				
b. Police Jurisdiction Burden				
Average Number of Visits Per Year	Average Number of Hours Per Visit	Number of Police Jurisdictions		Burden Hours

(A)	(B)	(C)		(A)*(B)*(C)
52	.05	181	Sampled	471
2	.25	340	Non-sampled	170

ESTIMATE OF REPORTING BURDEN			
c. Hospital Burden			
Average Number of Records Per Year (A)	Average Burden Hours Per Record (B)		Burden Hours (A)*(B)
7,020	0.08		583

ESTIMATE OF REPORTING BURDEN			
d. Tow Facilities Burden			
Average Number of Visits Per Year (A)	Average Burden Hours Per Vehicle Inspection Visit (B)		Burden Hours (A)*(B)
7,515	0.017		128

ESTIMATE OF REPORTING BURDEN	
TOTAL BURDEN HOURS (A)	5,807
AVERAGE COST PER HOUR (B)	\$25
COST ASSOCIATED WITH BURDEN HOURS (A)*(B)	\$145,175

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information.

Interviewees keep no records of the interview. Hospitals and police simply allow access to copy their existing records. Tow yards merely direct the researchers to the crash vehicles. Therefore, there are no recordkeeping costs to any of the respondents.

14. Provide estimates of annualized costs to the Federal government.

The following figures come from the FY-2008 Budget Execution Plan.

FY-2008	Estimated Cost Per Year (\$K)
a. NASS (24 PSUs and 2 Zone Centers)	10,781
b. Administrative Salaries, Overhead, Printing of Forms	509
c. Analysis	1,190
TOTAL	12,480

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.

There are neither changes nor adjustments.

16. For collections of information whose results will be published, outline plans for tabulation and publication.

There are two NASS CDS files made available to the public each year after completion of quality control. These files are for clinical review and analysis. NASS CDS data file and accompanying documentation are released annually which is available on the Internet in August for the previous calendar year. For example, data collection during calendar year 2008 will be available for public release in August 2009. Copies of the data base have been acquired by motor vehicle manufacturers, highway safety research organizations, and insurance and consumer groups, who use the data for their own analyses. NHTSA uses the data files to answer hundreds of questions received from federal, state and local governments, businesses, and private citizens.

17. OMB approval of the information collection, explain the reasons that display would be inappropriate.

Approval to not display the expiration date is not requested.

18. Explain each exception to the certification statement identified in Item 19 of OMB Form 83-I.

No exceptions requested.