Department of Transportation National Highway Traffic Safety Administration

SUPPORTING STATEMENT

FOCUS GROUPS TO DEVELOP DISTRACTED DRIVING MESSAGING

As part of the proposed information collection activity, NHTSA would like to conduct a limited number of focus group sessions to refine its strategic messaging for the upcoming distracted driving demonstration projects. NHTSA plans to recruit participants via telephone screening calls estimated to take no more than 10 minutes. NHTSA anticipates a maximum of 24 sessions, each lasting 80 minute with 9 participants. Thus, the total estimated burden is 324 hours.

A. JUSTIFICATION

A.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.

A.1.a) Circumstances making the collection necessary

The National Highway Traffic Safety Administration (NHTSA) was established by the Highway Safety Act of 1970 (23 U.S.C. 101) to carry out a Congressional mandate to reduce the mounting number of deaths, injuries and economic losses resulting from motor vehicle crashes on our Nation's highways. In support of this mission, NHTSA proposes to conduct information collections to assess the public's attitudes, beliefs, and behaviors related to distracted and unsafe driving practices, and develop strategic messaging.

NHTSA is requesting approval for collecting information through the use of focus groups. This information will be used to develop advertisements and public service announcements to support a distracted driving enforcement demonstration program that NHTSA awarded to New York and Connecticut in October 2009, and plans to conduct in quarterly waves beginning in 2010. NHTSA anticipates making these messages available to other States that are interested in conducting high visibility distracted driving enforcement projects or other educational activities. Focus groups do provide an important role in gathering information because they allow for a more in-depth understanding of drivers' attitudes, beliefs, motivations, and feelings than do quantitative studies. A focus group serves the narrowly defined need for direct and informal opinion on a specific topic.

A.1.b) Statute authorizing the collection of information

The National Traffic and Motor Vehicle Safety Act of 1966, Title 15 United States Code 1395, Section 106 (b), gives the Secretary authorization to conduct research, testing, development, and training as authorized to be carried out by subsections of this title. The Vehicle Safety Act was subsequently re-codified under Title 49 of the U.S. Code in Chapter 301, Motor Vehicle Safety. Section 30168 of Title 49, Chapter 301, gives the Secretary authorization to conduct research, testing, development, and training to carry out this chapter (see Appendix A for full text).

A.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.

If this information is not collected, a vital link in gathering information by NHTSA to develop appropriate messages and programmatic activity policy and programmatic proposals will be missed. Without finely tuned messages, NHTSA could jeopardize the effectiveness of publicizing their distracted driving enforcement programs.

Focus groups, used as a qualitative research tool, have three major purposes:

- To obtain information useful for developing variables and measures for quantitative studies;
- To better understand the public attitudes and emotions in response to topics and concepts; and
- To further explore findings obtained from quantitative studies.

Focus groups do not yield meaningful quantitative findings. They can provide public input, but they do not yield data about public opinion that can be generalized. As such, they cannot be used to drive the development of policies, programs, and services. Policy makers and educators can use focus groups findings to test and refine their ideas, but should then conduct further research before making important decisions such as adopting new policies and allocating or redirecting significant resources to support these policies.

A.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 information technology. Also describe any consideration of using information technology to reduce burden.

Focus group studies are directed group discussions that enable skilled observers to infer the underlying views and assumptions of the group. To facilitate interpretation, discussions are recorded and videotaped so that both a visual record and written transcript of the discussion are available for review.

A.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.

It is not expected that any of the information gathered during these focus group studies is duplicative or is already in the possession of the Federal government. The proposed focus groups will address the needs of the Agency and significantly improve our ability to test and redefine ideas.

A.5) If the collection of information involves small businesses or other small entities, describe the methods used to minimize burden.

The collection of information involves randomly selected individuals, not small businesses.

A.6) Describe the consequences to Federal Program or policy activities if the collection is not collected or collected less frequently.

Without these data collections, NHTSA will not have information on how to best target distracted driving enforcement. Without additional information of the kind that would be provided by the study, large segments of the driving public will likely be unaffected by the distracted driving messages. Only by feeding information about the public perception of distracted driving back into a media message will it be possible to create an effective message. Ultimately, the impact of the distracted driving enforcement program depends on this information.

A.7) Explain any special circumstances that require the collection to be conducted in a manner inconsistent with the guidelines set forth in 5 CFR 1320.6.

No special circumstances require the collection to be conducted in a manner inconsistent with the guidelines in 5CFR 1320.6.

A.8) Provide a copy of the Federal Register document soliciting comments on 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.

A.8.a) Federal Register Notice

NHTSA has submitted a Federal Register Notice announcing its request for emergency clearance to conduct the focus groups. A copy of the signed Notice is attached as Appendix B.

A.8.b) Expert Consultation

NHTSA has reviewed reports on distracted driving and other qualitative information collections to identify areas of interest and concern. NHTSA used in-house statistical staff and outside contractors to develop focus group plans. NHTSA will establish an independent review process to assure the development and implementation of high quality focus groups.

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

It is standard practice to reimburse focus group respondents for their time. Each respondent will be provided with \$75 following their participation in a focus group session.

A.10) Describe any assurance of confidentiality provided to respondents.

Respondents will participate in person, and therefore no assurances of complete confidentiality can be issued. However, it will be explained to participants that qualitative results will not be associated with identifying information.

A.11) Provide additional justification for any questions of a sensitive nature, such as sexual behavior or attitudes, religious beliefs, and other matters that are commonly considered private.

The focus groups do not contain any questions of a sensitive nature or related to matters that are commonly considered private.

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

The following burden estimates are based on NHTSA projected focus group usage to develop a distracted driving message for the next year.

NHTSA will conduct focus groups in New York and Connecticut to test messaging to support each State's distracted driving enforcement program. In addition, NHTSA will conduct focus groups in other regions of the country to test these messages with other subpopulations.

Participants will be recruited via randomly dialed telephone screening calls, which are estimated to take 10 minutes per response. NHTSA plans to conduct approximately 24 focus groups, each lasting approximately 80 minutes and including 9 participants. Thus, the total burden per participant is estimated to be 90 minutes.

The total number of focus group respondents will be 216. Therefore, the total annual estimated burden imposed by this collection of information is approximately 324 hours.

ESTIMATED ANNUAL REPORTING BURDEN

No. of	No. of Responses per Respondent	Average Burden per	Total burden
Respondents		Response (hours)	Hours
216	1	1.5	324

The maximum total input cost over three years, if all respondents were interviewed on the job, is estimated as follows:

\$15.57 per hour x 324 interviewing hours = \$5044.68

A.13) Provide an estimate of the total annual cost to the respondents or record keepers resulting from the collection of information.

Respondents will have no additional burden beyond the hours burden shown in item A12. Respondents will not need capital equipment, on going recordkeeping operations, or services to complete the information collection.

A.14) Provide estimates of the annualized cost to the Federal Government.

The Agency incurs costs to set up the focus groups including hiring the contractor (facilitator or moderator), renting meeting space, travel and subsistence and the payment of a de minimis cost in the form of a token stipend. For these expenses, NHTSA spends approximately \$190,500 annually.

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

The program change is due to the focus group information collection that will increase NHTSA's overall burden hour total by 324 burden hours.

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

There are no tabulated results for this information collection.

A.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.

Approval is not sought to not display the expiration date for OMB approval.

A.18) Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions" of the OMB Form 83-I.

No exceptions to the certification are made.

Appendices

Appendix A: Title 49, Chapter 301, Section 30168 of the United States Code

Appendix B: 60 Day Federal Register Notice (submitted on 11/27/09)
Appendix C: Draft Recruitment Screener and Moderator's Guide for Focus Groups