

**SUPPORTING JUSTIFICATION
CAUSAL ANALYSIS AND CONTERMEASURES TO RAIL-RELATED SUICIDES
Form Numbers FRA F 6180.125A; FRA F 6180.125B
OMB No. 2130-0572**

Summary

- This is a revision to a previously approved collection of information.
- The total number of burden hours requested for this submission is 643 hours.
- Total number of responses for this submission is 360.
- Total **adjustments** for this submission amount to 106 hours.
- There are no **program changes**.

** The answer to question **number 12** itemizes the hourly burden associated with each requirement of this rule (See p. 8).

1. Circumstances that make collection of the information necessary.

The present submission is a request for a three-year extension of the approval granted by OMB on November 20, 2007. The study was begun after OMB and the Western Institutional Review Board gave their approvals on November 20, 2007 and February 13, 2008, respectively. The contract from the Railroad Research Foundation (RRF) was awarded to the American Association of Suicidology (AAS) on October 10, 2006. While much was done to prepare for the study during the period prior to the receipt of the approvals, no data could be collected through interviews with human subjects. This caused a delay in the recruitment and data collection processes and, therefore, RRF and AAS are seeking an extension of the OMB clearance in the case all data have not been collected by the time of the expiration of this OMB clearance, set for November 30, 2010. At the time of funding, it was not clear how many families could be recruited to respond to the study; the original number chosen and entered in the OMB application was 35. Since then, interest in this area has promulgated additional studies that are collaborating by employing the same set of questions. AAS hopes to extend the original study questionnaire to up to 80 cases of rail suicide if the OMB clearance can be extended by four to six months.

Background

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.

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. How, by whom, and for what purpose the information is to be used.

This is a continuation of a first-time collection of information, and is completely voluntary. In 2006, 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 transit lines as well, and used the same collection instruments in that study. AAS collected data for 11 individuals for the FTA study, the results of which are being published by FTA to its web site for public review.

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 expected to conduct a number of 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.

While the project is nearing its 60-case expectation for rail cases, it is difficult to tell exactly which families will participate and which will withdraw, so AAS researchers are attempting a slight over-sample, and cannot predict if all information from human subjects will be collected by the September 30, 2010 deadline. Further, AAS has sought an exchange of data with two other projects with the potential for an additional nine cases. It is for that reason that RRF and AAS are requesting a review for approval of the project for at least four additional months.

3. Extent of automated information collection.

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.

RRF and AAS have found that many family and friends of suicide are most grateful for the opportunity to discuss a death by rail suicide in person, although if they request a telephone interview, we have acceded to their wishes. We have not believed that this material would lend itself to electronic data collection because it would be impossible to assess the interview respondent for potential distress during the interview. RRF and AAS have trained the interviewers to be sensitive to body language as well as expressed distress so that the interview can be cut short at any time in order not to cause further harm to the survivor.

Regarding reducing burden on respondents, it should be noted that the burden for this collection of information is extremely minimal.

4. Efforts to identify duplication.

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 still not duplicated anywhere.

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

5. Efforts to minimize the burden on small businesses.

This 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 study is a one-time effort. Moreover, it should be noted again that the burden for this collection is very minimal.

6. Impact of less frequent collection of information.

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. This agency sponsored 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 this important 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.

It should be noted that, during the several years in which the study has been collecting data, members of the Steering Committee, the press, and suicidologists have expressed interest in the results so that when these become available, prevention plans and programs may be tailored better to the problem of rail suicide.

This is a one-time study. Consequently, it would not be possible to collect the necessary information less frequently.

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. Special circumstances.

AAS collects 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. The reports are kept in a locked cabinet accessible only to members of the AAS staff associated with this project. None of the information obtained that might be identifying will be disseminated or disclosed in any way.

When complete, 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. Compliance with 5 CFR 1320.8.

As required by the Paperwork Reduction Act of 1995, FRA published a notice in the Federal Register on July 13, 2010, soliciting comment on this particular information collection. *75 FR 40021*. FRA received no comments in response to this notice.

9. Payments or gifts to respondents.

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

10. Assurance of confidentiality.

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 keeps all identifying information confidential and will be responsible for assuring the safety of sensitive data that is obtained. All information gathered during the research phase of the project is immediately transferred to a data matrix by case number. The reports are then filed in a locked cabinet accessible only to 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 this 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. Justification for any questions of a sensitive nature.

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 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.

12. Estimate of burden hours for information collected.

Form	Number of Respondents	Number of Responses per Respondent	Time per Response	Total Burden in Hours
Forms FRA F 6180.125A; and	40	1	5 min./	3
FRA F 6180.125B, Psychological autopsies of railroad suicides	320 (Over a two-year period, 40 cases per year of suicides with maximum of 8 interviews per case of families and friends)	1	2 hrs.	640

a. AAS interviewed 11 families of transit deaths, has a goal of 60 families of rail deaths, and may have access to answers from families using the same questionnaire from two smaller studies in which clusters of rail suicides death have been occurring. It is quite likely that the 60-case rail goal will be exceeded by at least one or two cases.

b. The survey is an open-ended design; the number of questions is large (93), however, because respondents often answer more than one question in a response, the interview notes the data and not all questions are asked of each interviewer.

c. Some of the questions are short, factual questions such as: “Did the decedent own a gun.”

d. There is no cost to respondents, as the activity is voluntary and conducted during their free time.

Data will be collected only once for the project period. The collection of information will take

place over a two-year period, and there will be no data collections in subsequent years.

13. Estimate of total annual costs to respondents.

There will be no additional cost to survey respondents.

14. Estimate of Cost to Federal Government.

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. Explanation of program changes and adjustments.

The burden for this collection of information has increased by 106 hours from the previously approved submission. The change in burden is due to **adjustments** in the number of respondents interviewed and the number of responses per respondent.

In the previous submission, FRA estimated 35 suicide cases per year and a total of 5,600 responses for form FRA F 6180.125A (35 cases x 8 interviews per case x 20 responses per respondent x 5 min. = 467 hours). For form FRA F 6180.125B, FRA estimated a total of 35 suicide cases per year and a total of 70 responses (70 responses x 2 hrs. = 140 hours). The total burden requested was 537 hours.

[Note: The burden for both forms in the earlier submission was miscalculated. The burden for Form FRA F 6180.125A should have been three (3) hours (35 cases x 1 form/response x 5 minutes). The burden for Form FRA F 6180.15B should have been 560 hours (35 cases x 8 interviews x 2 hours). The total burden correctly calculated should have been 563 hours. The number of responses per respondent in this submission should have been listed as one and not 20.]

In this submission, FRA estimates 40 suicide cases and a total of 40 responses for form FRA F 6180.125A (40 cases x 1 interview per case x 1 response/form per respondent x 5 min. = 3 hours). For form FRA F 6180.125B, FRA estimates a total of 40 suicide cases and a total of 320 responses (40 cases x 8 interviews/forms x 2 hrs. = 640 hours). The total burden requested is 643 hours.

The current OMB inventory shows a total of 537 hours for this collection of information, while the present submission exhibits a total of 643 hours. Hence, there is a increase in burden of 106 hours.

There is no change in cost to respondents.

16. Publication of results of data collection.

The data collection from states and rail companies began on November 15, 2007 upon receipt of OMB approval. Data collection from human subjects (friends and family) did not begin until February 14, 2008, as approval from an Institutional Review Board had to be obtained.

AAS expects to complete data collection for the psychological autopsy portion of the study (the part requiring OMB approval of the study questionnaire) by December 31, 2010 at the latest, but hopes for an extension until March 2011 in case of the unlikely event that the expected sample of 60 rail cases is not obtained.

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. These agency partners and the Steering Committee may recommend venues for the dissemination of results. A manuscript describing the project and its findings will be submitted for publication in the peer-reviewed journal, *Suicide and Life-Threatening Behavior*.

17. Approval for not displaying the expiration date for OMB approval.

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

18. Exception to certification statement.

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.