

**Department of Transportation
National Highway Traffic Safety Administration**

SUPPORTING STATEMENT

**FOCUS GROUPS TO ASSESS NEW TAGLINES AND ADVERTISING CONCEPTS
SUPPORTING HIGH VISIBILITY ENFORCEMENT
TO RESTRAIN IMPAIRED DRIVING**

As part of its generic clearance entitled *Focus Groups for Traffic and Motor Vehicle Safety Programs and Activities* (OMB Control No: 2127-0667) NHTSA would like to conduct a limited number of focus group sessions to refine its strategic messaging for the upcoming National impaired driving prevention law enforcement crackdowns conducted annually each late summer/Labor day holiday period, and the December holiday season. **For this, NHTSA proposes to conduct 8 focus group sessions, each lasting 95 minutes with 9 participants in each. For the recruiting of these participants, NHTSA proposes to recruit up to 12 people for each of the 8 groups, although only 9 recruits per group will actually be seated as participants for the focus group session. Recruiting will be done via telephone screening calls estimated to take no more than 10 minutes each. Thus, the total estimated burden is 129.75 hours.**

Uninitiated

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 drunk and drugged driving, and develop strategic messaging – in particular, impactful enforcement-related national advertising beginning in 2011.

NHTSA is requesting approval for collecting information under its existing generic clearance through the use of focus groups. This information will be used to assess taglines and creative concepts for television, radio, internet and print

advertisements to support a law enforcement message alerting the public that impaired drivers will be arrested during the peak time-frames that law enforcement activities nationwide are enhanced to crack down on impaired drivers. 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.

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 impaired 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. Furthermore, because one of the main purposes of these focus groups will be to gain participants' opinions and comments about original, never-before-used ideas for taglines, advertising and communications messages, no such research or information has ever been gathered previously.

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 communicate intended messages about impaired 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 impaired driving messages. Only by feeding information about the public perception of impaired driving back into a media message will it be possible to create an effective message. Ultimately, the impact of the impaired 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 submitted the required 60-day (75 FR 8426) and 30-day (75 FR 25034) Federal Register Notices with its request for generic clearance (OMB Control No: 2127-0667).

A.8.b) Expert Consultation

NHTSA has reviewed reports on impaired 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. This amount is the current norm in the marketing research industry, relative to focus group participation by people in the impaired driving target market.

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 assess impaired driving enforcement taglines and advertising concepts for the next year.

NHTSA will conduct focus groups in locations to be determined to test messaging and advertising to support enhanced national law enforcement activities during the two weeks preceding Labor Day and the last two weeks of December 2011, when thousands of law enforcement agencies throughout the nation are cracking down on impaired drivers. It is necessary for the Agency to obtain information as to the best possible tag line and advertising concept that will convince the target audience that if they drive impaired, they will be caught and prosecuted.

For this particular phase of campaign development, NHTSA plans to conduct a total of 8 focus groups, each lasting approximately 95 minutes. In each group, 9 participants will be seated. Therefore, a total of 72 people will participate in the group sessions. For recruiting of these participants, however, a total of 96 potential participants (12 per group) will be recruited via dialed telephone screening calls, which are estimated to take 10 minutes per response. (Based on experience, it is prudent to recruit up to 12 people per group in order to help ensure at least 9 will actually appear at the focus group facility at the appointed time). Thus, the total burden per person actually participating in the group discussions is estimated to be 105 minutes (10 minutes for the screening/recruiting telephone call plus 95 minutes in the focus group discussion session). Additionally, the total burden per person recruited (but not participating in the discussions) is 10 minutes.

Therefore, the total annual estimated burden imposed by this collection of information is approximately 129.75 hours. A summary table of the Estimated Annual Reporting Burden appears on the next page.

ESTIMATED ANNUAL REPORTING BURDEN

No. of Respondents	No. of Responses per Respondent	Average Burden per Response (hours)	Total Burden Hours
96 (telephone screening for recruits)	1	1/6-hours (10 minutes)	16
72 (participants in the focus groups)	1	1.58 hours (95 minutes)	113.75
			129.75 total

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

$$\text{\$15.57 per hour} \quad \times \quad 129.75 \text{ interviewing hours} \quad = \quad \text{\$2,020.21}$$

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. Additionally, because they will be important components of the assessment project, costs include production of “animatic” forms of the television commercials to be evaluated. For all these expenses, NHTSA estimates approximately \$86,000 annually.

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

This item is not applicable.

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.

Attachments

Draft Recruitment Screener and Moderator’s Guide for Impaired Driving Advertising Concepts Focus Groups