

Department of Transportation National Highway Traffic Safety Administration

SUPPORTING STATEMENT

Parent & Caretaker Focus Groups to Develop New Child Passenger Safety Public Service Advertising Campaign

Generic Clearance OMB Control No: 2127-0667: Focus Groups for Traffic and Motor Vehicle Safety Programs and Activities

As part of its generic clearance entitled *Focus Groups for Traffic and Motor Vehicle Safety Programs and Activities* (General Clearance OMB Control No: 2127-0667), NHTSA would like to conduct a limited number of focus group sessions to help assess creative concepts designed for a national public service advertising campaign. The campaign is being developed to inform parents and caregivers of the necessity of securing their child in the proper motor vehicle safety restraints.

For this, NHTSA proposes to conduct 6 focus group sessions, each lasting 90 minutes. NHTSA proposes to recruit 12 people for each of the 6 groups to seat 9 participants per focus group session. Recruiting will be done via telephone screening calls estimated to take no more than 10 minutes each. The total estimated burden for this information collection is 93 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 authorized by the Highway Safety Act of 1966 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 is developing a public service campaign designed to reduce child fatalities that result from improper use of child safety restraints in vehicles. NHTSA proposes conducting information collections to assess the target audience's reaction to the creative concepts developed for the campaign and to determine the clarity, relevance, and motivating appeal of the concepts prior to final production of the advertising – for a multi-media national advertising campaign launching in late 2011.

NHTSA is requesting approval for collecting information under its existing generic clearance through the use of focus groups. This information collection will be used to determine whether the advertising will be effective and motivating to elicit the intended change in behavior. The information collected will help determine whether revisions should be incorporated into the creative concepts prior to final production.

Focus groups are an important information gathering technique because they allow for more in-depth feedback from parents and caregivers than other types of studies. A focus group serves the narrowly defined need for direct and informal opinion on a specific topic.

Specifically, the key objectives of creative message testing are to determine:

- How well the target audience understands the concepts
- The overall appeal of the concepts
- The strengths and weaknesses of the concepts
- The relevancy of the concepts to the target audience
- How motivating the concepts are to the target audience to follow through on the call-to-action, or main “ask” of the advertising

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 will be missed. Without finely tuned messages, NHTSA could jeopardize the effectiveness of communicating to parents and caregivers about child passenger safety.

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.

For this information collection, focus groups will be used to better understand parents’ and caregivers’ attitudes and emotions in response to creative concepts designed to communicate information about child passenger safety.

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 to the population at large. 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. Without the appropriate use of focus groups, the agency could potentially waste time and resources pursuing ineffective approaches to public service advertising messages.

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.

Each focus group study is formative and designed to address a narrowly defined need. Focus groups are only considered for use when no other source of relevant information is available. For this collection of information, focus groups will be used to understand responses to new, unique creative concepts. Therefore, 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 main purpose of these focus groups will be to gain participant opinions and comments about original, never-before-used ideas for communications messages; hence 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.

There will be no impact on small business or other small entities. The collection of information involves 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 child passenger safety with parents and caregivers. Without examining the reactions of parents and caregivers to various creative approaches, NHTSA cannot adequately determine which approaches are most likely to resonate with these audiences and to ultimately reduce traffic injuries and fatalities. Without the information obtained from focus groups NHTSA may make assumptions about attitudes, knowledge, and understanding of proposed messages that are not accurate or useful.

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 5 CFR 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 child passenger safety and other qualitative information collections to identify areas of interest and concern. NHTSA used experienced contractors to develop focus group plans and materials. NHTSA will hire a professional recruiting company and moderator to help facilitate the focus groups. 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 in line with the industry standard, relative to focus group participation by people in the 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, the moderator conducting the Focus Groups will verbally explain to participants that qualitative results will not be associated with identifying information or with a particular participant. Moderators and contractors will follow procedures to prevent unauthorized access to respondent data and will not disclose to the public the identities or responses of individual participants.

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.

NHTSA estimates that there will be 93 hours based on this information collection request to use focus groups.

NHTSA plans to conduct a total of six focus groups, each lasting 90 minutes. Each group will consist of 9 participants. For recruiting these participants, a total of 72 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 annual estimated burden imposed by this collection of information is approximately 93 hours. This accounts for 12 hours of screening calls (72 participants x 10 minutes) and 81 hours of focus group discussions (54 participants x 90 minutes).

Neither the respondent screening nor the focus group discussions will involve any startup or

operational costs to respondents.

ESTIMATED ANNUAL REPORTING BURDEN

No. of Respondents	No. of Responses per Respondent	Average Burden per Response (hours)	Total Burden Hours
72 Participants (Screening call)	1	1/6 hours (10 minutes)	12
54 participants (Focus group discussion)	1	1.5 hour (90 minutes)	81
TOTAL			93

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

$$\$15.57 \text{ per hour}^1 \quad \times \quad 93 \text{ interviewing hours} \quad = \quad \$1,448.01$$

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 burden hours shown in item A12. Respondents will not need capital equipment, ongoing 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 estimates the costs to be approximately \$41,000 annually.

¹ From Bureau of Labor and Statistics' median hourly wage (all occupations) in the May 2008 National Occupational Employment and Wage Estimates, Updated May 2009

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 to NHTSA's ICR.

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. NHTSA will display the expiration date for OMB approval on any collection materials (e.g., screening questionnaire, moderator guide).

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 Parent & Caretaker Focus Groups to Develop New Child Passenger Safety Public Service Advertising Campaign