

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

**SUPPORTING STATEMENT**

**Focus Groups to Develop  
Impaired Driving Prevention 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 refine its communications strategy for a public service campaign designed to deter impaired driving among young adults, ages 21-34.

For this, NHTSA proposes to conduct 8 focus group sessions, each lasting 120 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 6 minutes each. The total estimated burden for this information collection is 153.6 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 has developed a public service communications campaign in partnership with the Ad Council designed to deter impaired driving. The multi-media campaign, entitled *Buzzed Driving Is Drunk Driving*, has been running for more than five years. At this time, NHTSA proposes to conduct information collections to assess the public's attitudes, beliefs, and behaviors related to impaired driving, receive direct feedback on the effectiveness of the existing campaign's creative assets, and to use these insights to optimize campaign strategy and creative development moving forward.

NHTSA is requesting approval for collecting information under its existing generic clearance through the use of focus groups. 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 other kinds of studies. A focus group serves the narrowly defined need for direct and informal opinion on a specific topic. The feedback from the focus group participants will be used to help assess the effectiveness of the current advertising, particularly whether it is motivating to elicit the intended change in behavior. Findings from the focus groups will also help determine where improvements can be made in order to ensure the messaging is as effective as possible.

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

- Whether the strategy and language of the current campaign remain relevant and motivating;
- Public perceptions of the campaign;
- The overall effectiveness of the current advertising, including comprehensibility, relevance, and motivation.

#### **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.

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#### **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 ongoing effectiveness of this impaired driving prevention initiative.

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 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.

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- 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.

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- 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. 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. In this instance, focus groups will be used to elicit feedback on the unique public service advertising campaign strategy and messaging.

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- 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.

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- 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. 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. Ultimately, the impact of the impaired driving prevention campaign depends on this information.

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**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.

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**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 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.

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**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.

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**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.

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**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.

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

NHTSA estimates that there will be 153.6 burden hours based on this information collection request to use focus groups.

NHTSA plans to conduct a total of eight focus groups to elicit the feedback from target audience members that will inform the development of the Buzzed Driving Is Drunk Driving campaign. Each group will consist of 9 participants. A total of 96 potential participants (12 per group) will be recruited. Based on experience, it is prudent to recruit up to 12 people per group in order to help ensure at least 9 will appear at the focus group facility at the appointed time. Because of the high incidence of impaired driving crashes among the 21-34 year old age group, four of the groups will consist of men ages 21-34, and four of the groups will consist of women ages 21-34.

Participants will be recruited via telephone by a market research facility. The facility will randomly dial telephone numbers from a database of potential participants who have opted-in to the database and provided a mobile or landline phone number. Each screening call will

average approximately 6 minutes. The estimated response burden for the screening process will be 6 minutes x 96 respondents, which equals 576 minutes or 9.6 hours. Respondent screening will involve no startup or operational costs to respondents.

It is estimated that the response burden for the focus group discussions will be approximately 120 minutes per individual participant. Thus, the total response burden for the discussion will be 120 minutes x 72 respondents, which equals 8,640 minutes or 144 total hours. The focus group discussions will involve no startup or operational costs to respondents.

The total annual estimated burden imposed by this collection of information is approximately 153.6 hours.

**ESTIMATED ANNUAL REPORTING BURDEN**

<b>No. of Respondents</b>	<b>No. of Responses per Respondent</b>	<b>Average Burden per Response (hours)</b>	<b>Total Burden Hours</b>
<b>96 (recruits)</b>	<b>1</b>	<b>1/10-hours (6 minutes)</b>	<b>9.6</b>
<b>72 (participants)</b>	<b>1</b>	<b>2 hours (120 minutes)</b>	<b>144</b>
			<b>153.6 hrs total</b>

The Agency estimates that it may cost respondents \$15.57 an hour in loss of potential salary by participating in the survey. The maximum total input cost, if all respondents were interviewed on the job, is estimated as follows:

$$\$15.57 \text{ per hour} \quad \times \quad 153.6 \text{ interviewing hours} \quad = \quad \$2,391.55$$

**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 \$45,000 annually.

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**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.

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**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.

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**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).

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**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.

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