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Supporting Statement

A. Justification

NHTSA was established by the Highway Safety Act of 1970 to carry out safety programs previously administered by the National Highway Safety Bureau. Specifically, the agency directs the highway safety and consumer programs established by the National Traffic and Motor Vehicle Safety Act of 1966, the Highway Safety Act of 1966, the 1972 Motor Vehicle Information and Cost Savings Act, and succeeding amendments to these laws. Dedicated to achieving the highest standards of excellence in motor vehicle and highway safety, NHTSA works daily to help prevent crashes and their attendant costs, both human and financial.

In support of its mission, NHTSA is seeking a revision of a currently approved collection (OMB 2127-0646), which is due to expire on August 31, 2011, to assess the effectiveness of interventions designed to increase seat belt use and reduce alcohol-impaired driving. Specifically, NHTSA proposes to revise downward the OMB approved inventory while extending the expiration date to mid-year 2014. During the 2011 to 2014 period, NHTSA would continue to conduct a series of telephone surveys that will examine the effectiveness of multiple National *Click It or Ticket* Mobilizations and Alcohol-Impaired Driving Crackdowns, as well as examine the effectiveness of localized demonstration projects designed to curb impaired driving and/or raise belt use.

Since Congress has authorized NHTSA to spend millions of dollars annually to conduct National Mobilizations/Crackdowns and smaller demonstration projects, which could be at the regional, State, county or local levels, NHTSA must account for whether these initiatives were effective. An essential part of this evaluation effort is to compare baseline and post-intervention measures of attitudes, intervention awareness, and (relevant) self-reported behavior to determine if the interventions were associated with changes on those indices.

The following sections describe the justification for these proposed studies in more detail, along with the estimates of burden.

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. Circumstances making the collection necessary

NHTSA was established to reduce the number of deaths, injuries, and economic losses resulting from motor vehicle crashes on the Nation's highways. As part of this statutory mandate, NHTSA is authorized to conduct research as a foundation for the development of motor vehicle standards and traffic safety programs.

The heavy toll that alcohol-impaired driving exacts on the nation in fatalities, injuries, and economic costs is well documented. In addition, non-use of seat belts continues to contribute significantly to the number of traffic fatalities. The persistence of these traffic safety problems points to an ongoing need for effective interventions to address alcohol-impaired driving and non-use of seat belts. This in turn calls for strong evaluation efforts to identify what interventions are effective.

The Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy For Users (SAFETEA-LU) is a funding and authorization bill that governs United States federal Surface Transportation spending. Signed into law in 2005, sections within the law have stimulated heightened program activity to reduce alcohol-impaired driving and increase seat belt use. Under section 410 of SAFETEA-LU, spending authority for State grants to implement alcohol-impaired driving countermeasures rose from slightly under \$40 million in 2005 to \$139 million in 2009. To be eligible for the grants, States had to carry out a specified number of programs from the following list:

- Statewide checkpoints and/or saturation patrols;
- prosecution and adjudication outreach programs;
- increased rate of BAC testing of drivers in fatal crashes;
- stronger sanctions for high-risk drivers with BACs of 0.15 percent or more;
- effective alcohol rehabilitation for repeat offenders or a program to refer them to DWI courts;
- underage drinking prevention programs;
- administrative license suspension or revocation for DUI; and
- self sustaining impaired driving prevention programs.

Section 406 of SAFETEA-LU set the funding authority for State seat belt performance grants at \$124.5 million per year between 2006 and 2009. States were eligible for the grants based on specified seat belt performance criteria. Under Section 405 of SAFETEA-LU, funding authority for State occupant protection incentive grants increased from \$19.84 million in 2005 to \$25 million in 2009. Grant eligibility was based on specified criteria regarding the presence of occupant protection programs, laws, and associated penalties for violation. Use of grant funds was restricted to implementing and enforcing occupant protection programs. Section 2009 of SAFETEA-LU established a new program to administer at least 2 high visibility enforcement programs to increase seat belt use and/or reduce alcohol-impaired or drug-impaired driving. Grant funds could be used for the development, production, and use of broadcast and print media in carrying out traffic safety law enforcement campaigns.

Funding of these programs has continued with extension of SAFETEA-LU into fiscal years 2010 and 2011. NHTSA needs to be prepared for inclusion of the programs in the upcoming Surface Transportation Reauthorization. This means maintaining a strong evaluation program that monitors the effectiveness of intervention models being implemented under this funded intervention activity, and identifies where changes are needed. Telephone surveys have been an important component in NHTSA's evaluation activity. They have been used to measure public awareness of intervention campaigns,

penetration of campaign messages, and perceived risk of negative consequences from engaging in proscribed behavior. The surveys have typically followed a pre-post design, where differences between an initial baseline survey wave and a later survey wave were associated with an intervening intervention. NHTSA has found such surveys to be valuable in assessing the multi-million dollar national media campaigns conducted for the National Alcohol-Impaired Driving Crackdowns and the National Click It or Ticket Mobilizations. They also have been useful in evaluating localized programs that tested variants of intervention models by providing information to assess campaign communications or to interpret collected behavioral measures. With seat belt and impaired driving intervention activity anticipated to remain substantial for the foreseeable future, there is a need for NHTSA to continue to apply these data collection techniques to see if the campaigns are achieving their objectives.

b. Statute authorizing the collection of information

Title 23, United States Code, Chapter 4, Section 403 (attached as Appendix A) gives the Secretary authorization to use funds appropriated to carry out this section to conduct research on all phases of highway safety and traffic conditions; conduct ongoing research into driver behavior and its effect on traffic safety; and conduct research on, and evaluate the effectiveness of, traffic safety countermeasures, including seat belts and impaired driving initiatives (See 23 U.S.C. 403(a)(1), 23 U.S.C. 403 (a)(2) and 23 U.S.C. 403 (a) (5)).

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.

The purpose of this information collection is to provide critical information needed by NHTSA to demonstrate effective countermeasures that meet the Agency's mandate to improve highway traffic safety. The collected data will be used to assist NHTSA in its ongoing responsibilities for: (a) strategic planning of its highway traffic safety initiatives; (b) informing Congress of the effectiveness of NHTSA program activities; (c) providing information to NHTSA's partners involved in improving public safety; and (d) providing sound scientific reports on NHTSA's activities to other public safety researchers.

The telephone surveys provide NHTSA with data necessary to track the success of seat belt and alcohol-impaired driving enforcement Mobilizations/Crackdowns, as well as provide effectiveness information on other demonstration projects that use innovative methods to reduce alcohol-impaired driving and/ or increase seat belt use. For each intervention, data collected prior to intervention implementation (baseline survey) is compared to data collected at the conclusion of the intervention in order to detect any changes in attitudes, awareness, or reported behavior associated with the intervention. The demonstration projects sometimes include interim survey waves so that data for different phases of intervention implementation can be compared.

Congress requested evaluation of the Click It or Ticket Mobilizations and Alcohol-Impaired Driving Crackdowns, and has been sent the results. NHTSA has used the collected survey information to evaluate the use of the paid media, and to assist in planning future NHTSA program activity. In addition, the results have been published for dissemination to State and local highway safety authorities, traffic safety program managers, researchers, citizen action groups and others concerned with traffic safety issues, who will use the findings to develop, improve and target their own programs and activities.¹ NHTSA proposes to continue the Mobilization/Crackdown surveys to monitor the effectiveness of the national media campaigns. This includes tracking the penetration of campaign messages through a communications mode recently added to the national campaigns, the internet.

Thus far, telephone survey data have been collected for three demonstration projects under the existing clearance. *Click It or Ticket, The Next Generation*, has been testing different models of seat belt enforcement at the State level (i.e., models differing in timing, media intensity, and enforcement intensity). *Improving the General Deterrence Effects of Sobriety Checkpoints* has been testing the effects on community awareness of a model designed to increase checkpoint visibility (i.e., sobriety checkpoints conducted earlier in the evening than is typical combined with signage conditions). Both of these demonstration projects are currently in progress. *Nighttime Enforcement of Seat Belt Laws* tested different models of nighttime seat belt enforcement (i.e., checkpoints; saturation patrols). Published results from that study showed increases in observed belt use, and how the level of media activity and public perceptions corresponded with those increases.² NHTSA proposes to continue testing intervention approaches on an as-needed basis.

NHTSA reports are available to the general public on our web site. Many of NHTSA's reports are accompanied by a press release. In these cases, the press reports our results to the general public.

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.

The data will be collected electronically through the use of Computer Assisted Telephone Interviewing (CATI). The CATI system allows a computer to perform a number of functions prone to error when done manually by interviewers, including:

¹ **Evaluation of the May 2007 Click It or Ticket Mobilization**, Solomon, M.G., Preusser, D.F., Tyson, J. and Chaudhary, N.K. DOT HS 811 239, December 2009

Evaluation of the May 2006 Click It or Ticket Mobilization to Increase Seat Belt Use, Tison, J., Solomon, M., Nichols, J., Gilbert, H., and Siegler, J. DOT HS 810 979, June 2008

The 2006 National Labor Day Impaired Driving Crackdown: *Drunk Driving. Over the Limit. Under Arrest*, Solomon, M.G., Hedlund, J.L., Haire, E.R., and Chaffe, R.H. DOT HS 811 039, September 2008

² **Nighttime Enforcement of Seat Belt Laws: An Evaluation of Three Community Programs**, Solomon, M.G., Chaffe, R.H., and Preusser, D.F. DOT HS 811 189, August 2009

- Providing correct question sequence;
- Automatically executing skip patterns based on prior answers to questions (which decreases overall interview time and consequently the burden on respondents);
- Recalling answers to prior questions and displaying the information in the text of later questions;
- Providing random rotation of specified questions or response categories (to avoid bias);
- Ensuring that questions cannot be skipped; and
- Rejecting invalid responses or data entries.

The CATI system lists questions and corresponding response categories automatically on the screen, eliminating the need for interviewers to track skip patterns and flip pages. Moreover, the interviewers enter responses directly from their keyboards, and the information is automatically recorded in the computer's memory.

CATI systems typically include safeguards to reduce interviewer error in direct key entry of survey responses. CATI also allows the computer to perform a number of critical assurance routines that are monitored by survey supervisors, including tracking average interview length, refusal rate, and termination rate by interviewer; and performing consistency checks for inappropriate combination of answers.

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.

For each intervention, data collected prior to intervention implementation (baseline survey) will be compared to data collected at the conclusion of the intervention in order to detect any changes in attitudes, awareness, or reported behavior associated with the selected seat belt and impaired driving interventions as they occur. The necessary connection of the timing of the data collection to the timing of the intervention implementation precludes there being available alternative data that could be used instead. Because no data on the targeted intervention exists until it is collected, no other data source can be substituted.

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.

The information is essential to the effective and efficient use of budgeted funds for programmatic activities. Congress has asked NHTSA to report on the National

Mobilizations/Crackdowns to show that the appropriated funds are being used efficiently. Without information on attitudes, knowledge and behavior of the general public before and after the intervention efforts, it will be impossible to adequately interpret the value of the Mobilizations/Crackdowns as well as the demonstration projects to increase seat belt use and reduce impaired driving. As a consequence, NHTSA would be seriously hampered in its ability to determine if modification or redirection of the seat belt and alcohol-impaired driving programs is warranted. Public safety could suffer and enormous amounts of federal funds wasted as a result.

The timing of the interventions determines the timing of the telephone surveys. The evaluation approach will follow a basic pre/post design where data are collected immediately preceding and at the conclusion of the interventions. In certain cases, there may also be interim survey waves. For example, interim waves may be used if intervention components are being implemented in stages, in order to gauge the effects of the different components (e.g. media alone, followed by enforcement). Alternatively, a demonstration project may involve a series of independent activities over time. Interim survey waves might be used to evaluate one or more discrete activities within the project. In sum, the information collections are tied closely to the timing of the activities being evaluated. The frequency of information collections therefore is dependent on the number of interventions that NHTSA believes should be evaluated as potentially significant contributors to reducing alcohol-impaired driving or increasing seat belt use. NHTSA is selective in making the decisions as to what to evaluate, as shown by the agency having used only about one-third of the approved inventory to date (see section A.12), and proposing a slight downward revision while extending the expiration date to 2014 so that its continuing evaluation needs are met.

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 extending 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.

FEDERAL REGISTER NOTICE: A copy of the Federal Register Notice (Vol. 75, No. 236, Pages 76781-76783) which announced NHTSA's intention to revise the previously approved collection of information (OMB2127-0646) is provided in Appendix B. No comments were received in response to the Notice.

A copy of a second Federal Register Notice (Vol. 76 No. 45 Page 12791), which announced that this information collection request will be forwarded to OMB, is provided in Appendix C.

EXPERT CONSULTATION: NHTSA staff designed the Mobilization/Crackdown survey instruments based on the key characteristics of the National “Click It or Ticket” Mobilizations and Alcohol-Impaired Driving Crackdowns. This included consultation with the States concerning characteristics of their Mobilization/Crackdown activities and how they would be assessed.

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

No payment or gifts will be offered to respondents for their participation in the surveys.

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

In the surveys’ introduction, respondents are informed that participation is voluntary, and their answers are anonymous and will be used only for statistical purposes. These surveys do not collect identifying information such as names, addresses, telephone numbers, or social security numbers. Upon completion of these surveys, it would be impossible for anyone to be identified based on his or her responses to the survey questions. Furthermore, the NHTSA contractors separate the responses to these surveys from the telephone numbers called.

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.

We acknowledge that collecting information on drinking and driving is a sensitive issue for the public. However, this information is important to collect in order for NHTSA to determine the success of our programs. In addition, driving on roads and drinking in bars and restaurants are often seen as public activities. The questions are not probing. Instead, they request basic information on behavior and are geared more towards awareness of our Crackdowns. Given the perceived sensitive nature of this information, our questions are phrased in a neutral/ nonjudgmental fashion.

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

NHTSA currently has an OMB-approved inventory of 164,800 10-minute interviews under 2127-0646, which is set to expire August 31, 2011. Since initial approval of 2127-0646 on June 1, 2006, a total of 53,411 interviews averaging an estimated 10 minutes have been conducted under the clearance, as follows:

Table 1 – Completed Interviews June 2006 -December 2010

Survey Name	Number of Completed Interviews	Estimated Average Length	Hour Burden For Respondents
Click It or Ticket National Mobilization	10,667	10 minutes	1,777.83
Click It or Ticket, The Next Generation	7,000	10 minutes	1,166.67
Nighttime Enforcement of Seat Belt Laws	9,567	10 minutes	1,594.50
National Alcohol-Impaired Driving Crackdown	23,165	10 minutes	3,860.83
Improving Deterrence Effects of Sobriety Checkpoints	3,012	10 minutes	502.00
Total	53,411	10 minutes	8,901.83

The following projected number of interviews are planned to be completed during 2011 prior to the current clearance expiration date:

Table 2 – Estimated 2011 Interviews Prior To Current Expiration Date

Survey Name	Number of Interviews	Estimated Average Length	Hour Burden For Respondents
Click It or Ticket National Mobilization	3,000	10 minutes	500.00
Improving Deterrence Effects of Sobriety Checkpoints	3,000	10 minutes	500.00
Total	6,000	10 minutes	1,000.00

Table 2 does not include a pre-intervention wave for the 2011 Summer National Alcohol-Impaired Driving Crackdown. While the pre-intervention wave would be conducted prior to the clearance expiration date of August 31, 2011, it would serve no purpose without also conducting a post intervention wave that would have to commence past the current expiration date. Therefore the pre-intervention wave is included in NHTSA's request to revise downward the approved inventory while extending the expiration date to August 2014. During that 3-year period, NHTSA proposes to continue conducting national surveys surrounding the National Alcohol-Impaired Driving Crackdowns and Click It or Ticket Mobilizations. In conducting one or more of the national surveys, NHTSA may have a need to collect information to assess localized activity associated with the National Crackdown/Mobilization. This would involve augmentation of the pre- and post-national sample with one or more Regional, State, or Community samples. In addition to the surveys associated with the National Crackdowns and Mobilizations, NHTSA plans to conduct telephone surveys to assess selected demonstrations of interventions designed to reduce alcohol-impaired driving and/or increase seat belt use,

which also will follow a pre-post design. Table 3 presents the maximum estimated number of respondents and burden.

**Table 3 – Estimated Number of Interviews/Burden Hours
August 2011 to August 2014**

Survey Name	Pre N	Post N	Survey Waves (Pre and Post = 2 Waves)	Sites	Total Respondents	Burden Hours
Click It or Ticket National Mobilization Survey						
Year 1	1,500	1,500	4	1	6,000	1,000.00
Year 2	1,500	1,500	4	1	6,000	1,000.00
Year 3	1,500	1,500	4	1	6,000	1,000.00
Click It or Ticket Localized Mobilization Surveys						
Year 1	500	500	8	4	4,000	666.67
Year 2	500	500	8	4	4,000	666.67
Year 3	500	500	8	4	4,000	666.67
Seat Belt Intervention Demonstrations						
Year 1	500	500	4	2	2,000	333.33
	1,200	1,200	4	2	4,800	800.00
Year 2	500	500	4	2	2,000	333.33
	1,200	1,200	4	2	4,800	800.00
Year 3	500	500	4	2	2,000	333.33
	1,200	1,200	4	2	4,800	800.00
National Alcohol-Impaired Driving Crackdown Survey						
Year 1	1,500	1,500	4	1	6,000	1,000.00
Year 2	1,500	1,500	4	1	6,000	1,000.00
Year 3	1,500	1,500	4	1	6,000	1,000.00
Localized Alcohol-Impaired Driving Crackdown Surveys						
Year 1	500	500	8	4	4,000	666.67
Year 2	500	500	8	4	4,000	666.67
Year 3	500	500	8	4	4,000	666.67
Impaired Driving Intervention Demonstrations						
Year 1	500	500	4	2	2,000	333.33
	1,200	1,200	4	2	4,800	800.00
Year 2	500	500	4	2	2,000	333.33
	1,200	1,200	4	2	4,800	800.00
Year 3	500	500	4	2	2,000	333.33
	1,200	1,200	4	2	4,800	800.00
Total 3-Year Burden					100,800	16,800
Annual Burden					33,600	5,600

Respondent burden for the proposed 3-year extension of clearance 2127-0646 is a maximum of 16,800 hours to conduct a maximum of 100,800 interviews. The total number of 10-minute interviews in Tables 1, 2, and 3 is a maximum of 160,211 (26,702 burden hours). Since the approved inventory is 164,800 interviews (27,468 burden hours), NHTSA is requesting a revision in the approved inventory to reduce it to 160,211 interviews and 26,702 burden hours.

Since respondents will be contacted at home, the survey will not be an actual cost to the respondents (i.e., they will be participating during non-salaried hours). However, the time they spend on the survey can still be looked at in terms of what it would have cost if the respondents had spent that amount of time on a task while on the job. Based on per capita income for the overall population in 2009 (Source: *Income, Poverty, and Health Insurance Coverage in the United States: 2009*, U.S. Census Bureau, U.S. Department of Commerce, Current population reports P60-238, September 2010, page 13), the total respondent cost for an inventory of 160,211 interviews is:

$$\text{\$12.75 per hour} \times 26,702 \text{ interviewing hours} = \text{\$340,450}$$

For the proposed August 2011 to August 2014 time period (Table 3), the annual respondent cost would be:

$$\text{\$12.75 per hour} \times 5,600 \text{ interviewing hours} = \text{\$71,400}$$

and the total respondent cost for the full three-year survey period would be:

$$\text{\$12.75 per hour} \times 16,800 \text{ interviewing hours} = \text{\$214,200}$$

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

There are no record keeping or reporting costs to respondents. Respondents will be contacted randomly, and asked for their attitudes, knowledge, and behavior related to a specific seat belt or alcohol-impaired driving intervention. All responses are provided spontaneously. Each respondent only participates once in the data collection. Thus there is no preparation of data required or expected of respondents. Respondents do not incur: (a) capital and start up costs, or (b) operation, maintenance, and purchase costs as a result of participating in the survey.

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

Data collection costs to the government will vary according to criteria for respondent eligibility for the survey, the presence of any over-sampling procedures, and other aspects of the data collection. The more expensive of the proposed surveys are the National Alcohol-Impaired Driving Crackdown surveys because of restrictive eligibility requirements (drivers who have consumed alcohol in the past year), over-sampling of respondents 18 through 34 (the primary target group), and inclusion of interviews with

respondents on cell phones. Projected annual costs to the government for the Crackdown surveys based on recently provided cost figures are:

National Alcohol-Impaired Driving Crackdown:

Year 1 (two national crackdowns) - \$675,000

Year 2 (two national crackdowns) - \$685,000

Year 3 (two national crackdowns) - \$710,000

Any localized Alcohol-Impaired Driving Crackdown Surveys, conducted in tandem with the National Alcohol-Impaired Driving Crackdown, would cost the government:

Year 1 - \$86,000 per locality

Year 2 - \$89,000 per locality

Year 3 - \$92,000 per locality

The above surveys screen out as ineligible anyone who is a non-driver or did not drink any alcohol in the past 12 months. According to data from the 2008 National Survey of Drinking and Driving Attitudes and Behavior, these criteria should screen out as ineligible approximately 40% of people who are administered the screener. No such screening is conducted for the Click It or Ticket surveys, resulting in greater productivity and lower costs. Both the Alcohol-Impaired Driving Crackdown and Click It or Ticket surveys will encounter non-contacts and refusals prior to the screener stage, so improved productivity of the latter surveys will be somewhere under 40%. But if improved productivity reduced costs by 25%, then projected annual costs to the government based on the above figures for the Alcohol-Impaired Driving Crackdowns would be approximately:

National Click it or Ticket Mobilizations:

Year 1 (two national mobilizations) - \$506,000

Year 2 (two national mobilizations) - \$514,000

Year 3 (two national mobilizations) - \$532,000

Localized Click It or Ticket Surveys; conducted in tandem with the National Mobilizations:

Year 1 - \$64,000 per locality

Year 2 - \$67,000 per locality

Year 3 - \$69,000 per locality

Costs of the alcohol and seat belt demonstration project surveys will at most approximate the annual locality costs specified above. Since a demonstration project may not require over-sampling younger age groups, the cost may be significantly less. It depends on the nature of the demonstration.

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

NHTSA has determined that the currently approved inventory exceeds the number of interviews that the agency expects to request over the next three years for information collections that would fall under clearance 2127-0646. The agency is therefore requesting a revision that would decrease the approved inventory by 4,589 interviews, resulting in a decrease of the burden hours from 27,468 to 16,800 for the 3 years. The reduced inventory will still be of sufficient size to give NHTSA the flexibility to meet its information collection needs.

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

Weighted frequencies will be computed for each of the questions in the surveys. Statistical tests, such as chi square or difference of proportions tests, will be computed to compare pre-intervention and post-intervention measures to ascertain any statistically significant differences. Findings will be disseminated through internal briefings to NHTSA managers who must make strategic planning decisions regarding program activities and resources, as well as through printed technical reports distributed to traffic safety officials and other interested persons at the national, State and local levels.

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.

NHTSA will 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.

B. Collections of Information Employing Statistical Methods

The proposed information collection will employ statistical methods to analyze the data collected from respondents. The following sections describe the procedures for respondent sampling and data tabulation.

B.1. Describe the potential respondent universe and any sampling or other respondent selection to be used.

The potential universe for these surveys is all non-institutionalized individuals age 18 or older in telephone households within the United States. The target population is 18 years and older because the modest size of the proposed samples would result in too few drivers age 16 and 17 to justify additional procedures for including child respondents.

This information collection will encompass multiple national and more localized (Regional, State, or community) samples.

National Surveys

National telephone survey samples will be required for both seat belt and alcohol-impaired driving Mobilization/Crackdown interventions. Up to two National Seat Belt Mobilizations and two National Alcohol-Impaired Driving Crackdowns will be evaluated each year, with each survey drawing respondents from all 50 States and the District of Columbia. For each Mobilization/Crackdown, a pre-test (baseline) national sample and a post-test national sample of approximately 1500 respondents will be surveyed. This will consist of a representative sample of 1200 respondents age 18 and older with an additional over-sampling of approximately 250 respondents ages 18 to 34. The younger age group will be over-sampled because they are a particular focus of the media campaigns for the Mobilizations and Crackdowns. The field period for each survey wave will necessarily be limited to less than one month in order to maintain proximity to the interventions. Due to concurrent interviewing and planned callbacks at the time the 1450th interview is completed, a handful of additional interviews will be completed by the time of field closure, resulting in somewhere between 1450 and 1500 completed interviews. Over the projected upcoming 3-year period, this would be:

(1500 respondents pre-mobilization + 1500 respondents post-mobilization) X
4 mobilizations (2 Alcohol-Impaired Driving Crackdowns + 2 Seat Belt
mobilizations) X 3 Years = 36,000 respondents

The surveys will utilize a dual-frame design, with landline and cell phone samples. The NHTSA contractors will apply to landline and cell phone banks systematic selection procedures that include Random Digit Dial (RDD) sampling techniques in order to select a probability sample of respondents, that is, a sample of respondents where every person with a telephone (either landline or cell phone) has a known probability of being selected for the study. The samples will be stratified according to four Census Regions: Northeast, Midwest, South, and West. The respondents will be asked an initial set of screening questions to identify those who meet the eligibility criteria for participating in

the survey. For the cell phone sample, the respondents will first be asked one or more questions under procedures approved by an Institutional Review Board (IRB) to assure that it is safe for them to respond. Both the Alcohol-Impaired Driving Crackdowns and Click It or Ticket Mobilizations will screen for age criteria (18 or older). The Alcohol-Impaired Driving Crackdown surveys will also screen respondents on driver status and alcohol use in the past 12 months. In the landline samples, if there are multiple persons residing in a household eligible to participate, NHTSA may disproportionately select the younger/male eligible household member as the sole survey respondent. Weighting procedures will adjust for any disproportionate sampling. For the cell phone sample, the survey will treat the cell phone as a single user device.

The percentage of the national samples composed of cell phone interviews will be determined by coverage and cost. Early estimates for the first half of 2010 from the National Health Interview Survey indicated that 26.6% of households had only wireless telephones.³ While a proportional allocation of cell phone only respondents within the sample based on this number would be statistically powerful, it also would be expensive since it costs more to interview cell only respondents compared to conducting landline interviews. But allocating too little sample to cell only will result in extreme weight differential that usually has a negative impact on the variance of survey estimates. A middle ground maximizes the effective sample size for a fixed cost. For the National Alcohol-Impaired Driving Surveys, optimal allocation will be 15 percent (180) cell only. This assumes a 2:1 cost ratio of a cell phone survey to a landline survey. To improve efficiency and include cell-mostly respondents who may be under-represented in the landline sample, dual users (respondents having both a landline and cell phone) will be interviewed from the cell phone sample. A total of 450 cell phone interviews (including the 180 or 40% cell only) will be conducted for the 1200 cross-sectional sample, and the remaining 750 interviews will be conducted with individuals on landlines. Thus for the cell sample, 2.5 people would need to be screened to get one cell only respondent. Assuming that 65% of the cost per completed interview goes to contacting and screening a cell phone respondent, the relative cost per interview for cell only will be $2.5 * 65\% + 1 * 35\% = 1.975$. Combining the general cell phone ratio cost ratio (2) with the screening cost ratio (1.975) gives the final cost ratio for cell only versus landline: $2 * 1.975 = 3.95$

Localized Mobilization/Crackdown Surveys

NHTSA may on occasion have a need to assess a special Regional, State, or Community seat belt/anti-DWI intervention activity occurring as part of the National Mobilization or Crackdown. If this were to occur, NHTSA would apply the same pre- post design, and same sampling and interviewing procedures, as conducted for the national surveys. Differences from the national surveys would be that the eligible phone banks against which the systematic sampling procedures would be applied would be limited to a particular geographic area (with no geographic stratification), and the sample size per survey wave would typically be 500. There may be disproportionate selection to bring a greater number of younger persons and males into the sample if those groups are higher

³ Blumberg, S.J. and Luke, J.V. *Wireless Substitution: Early Release of Estimates From the National Health Interview Survey, January – June 2010*. Released 12/21/2010. Available from <http://www.cdc.gov/nchs/data/nhis/earlyrelease/wireless201012.htm>

priority targets of the special intervention activity. Weighting procedures will adjust for any disproportionate sampling.

Demonstration Project Surveys

For each Demonstration project, a pre-test (baseline) sample and a post-test sample per designated site will be surveyed. As with the localized Mobilization/Crackdown surveys, systematic procedures would be applied to selection of sample from telephone exchanges in landline and cell phone banks. Sampling sizes will vary according to the analytic needs of the demonstration project (e.g., the level of subgroup analyses needed). Where the project is concerned with detecting changes in attitude, awareness, etc. within the general community, then the sample size will typically be 500. If the demonstration project demands subgroup analyses, then sample sizes will be larger, most likely approximately 1200. There may be disproportionate selection to bring a greater number of younger persons and males into the sample if those groups are higher priority targets within the demonstration project. Weighting procedures will adjust for any disproportionate sampling.

The Demonstration Project surveys will address high priority intervention approaches for NHTSA. High priority areas include techniques to improve enforcement of traffic safety laws, and approaches to improving traffic safety among high risk populations.

Sampling Error

The techniques described above will result in a complex sampling design. The complex sampling design would need to be taken into account while computing sampling error (or precision) of estimates. However, computation in previous NHTSA surveys of the precision of estimates in a complex design show confidence intervals that do not differ much from those produced through simple random sampling⁴. Formulas for simple random sampling therefore are a convenient means of computing sampling error for the sample sizes being proposed under this clearance since those estimates will be reasonably close to estimates from complex designs despite the above-described variations in methods across surveys.

The confidence interval for sample estimates of population proportions, using simple random sampling without replacement, is calculated by the following formula:

Where:

$$z * \left[se(x) = \sqrt{\frac{(p * q)}{(n - 1)}} \right]$$

se (x) = the standard error of the sample estimate for a proportion

p = some proportion of the sample displaying a certain characteristic or attribute

q = (1 - p)

n = the size of the sample

⁴ Such as the 2008 National Survey of Drinking and Driving Attitudes and Behavior, which also utilized a dual frame design of landline and cell phones. DOT HS 811 344. August 2010. Pages 14-17.

z = the standardized normal variable, given a specified confidence level (1.96 for 95% confidence interval)

To test whether or not a difference between two sample proportions is statistically significant, a rather simple calculation can be made. The maximum expected sampling error of the first sample is designated **s1** and the maximum expected sampling error of the second sample is **s2**. The sampling error of the difference between these estimates is **sd** and is calculated as:

$$sd = \sqrt{(s1^2 + s2^2)}$$

- For comparison of two samples of 500 each, a difference would have to exceed 6.2 percentage points to be statistically significant (with the conservative estimate of p=q).
- For comparison of two samples of 1200 each, a difference would have to exceed 4.0 percentage points to be statistically significant (with the conservative estimate of p=q).
- For comparison of two samples of 1500 each, a difference would have to exceed 3.6 percentage points (with the conservative estimate of p=q).

We believe that this is sufficient for our purpose to assess the impact of the Mobilizations/Crackdowns.

B.2. Describe the procedures for the collection of information.

The proposed surveys will be administered using a pre-/post-test design to examine the changes that occur as a result of specific seat belt and impaired driving interventions. The National and localized Mobilization and Crackdown surveys will be conducted on a schedule corresponding with the fixed annual dates for those national campaigns. The demonstration project surveys will be conducted on a more variable schedule that will depend on the timing and sequencing of the components of each demonstration project.

National Mobilization/Crackdown Surveys

At the national level, data collected from random samples of approximately 1500 people before and after the Mobilizations/Crackdowns will be compared to examine changes in awareness, attitudes and self-reported behavior. Each survey wave will be composed of a cross-sectional sample of 1200 randomly selected people 18 and older, and an independent randomly selected sample of 250 people 18 through 34.

The proposed national survey samples are based on a modified stratified random digit dialing method, using a geographically stratified RDD sample rather than a single-stage/RDD sample. There are several important advantages to using a geographically stratified base for the RDD sample: (1) it draws the sample proportionate to the geographic distribution of the target population rather than the geographic distribution of telephone households, which is vital to constructing unbiased population estimates from telephone surveys; (2) it allows greater geographic stratification of the sample to control for known geographic differences in non-response rates; and (3) it facilitates the use of

Census estimates of population characteristics to weight the computed sample to correct for other forms of non-sampling bias

The initial stage of the sample construction process requires the development of a national area probability sample based upon the distribution of the target population for this study, i.e. the non-institutionalized population age 18 and older in the United States. Once the sample has been geographically stratified with sample allocation proportionate to population distribution, a sample of assigned telephone banks will be randomly selected from an enumeration of the Working Residential Hundreds Blocks of the active telephone exchanges within the region. The Working Hundreds Blocks are defined as each block of 100 potential telephone numbers within an exchange that includes 3 or more residential listings. (Exchanges with one or two listings are excluded because in most cases such listings represent errors in the published listings.). The random samples of cell phone numbers will be selected from the dedicated exchanges (exchanges containing only cell phone numbers) of that region.

In the third stage sample, a two-digit number is randomly generated by computer for each Working Residential Hundreds Block selected in the second stage sample. This third stage sampling technique is known as random digit dialing (RDD). Every telephone number within the Hundreds Block has an equal probability of selection, regardless of whether it is listed or unlisted. The use of RDD sampling eliminates the otherwise serious problem of unlisted telephone numbers.

For the landline sample, the fourth stage of sampling will involve a procedure once contact is made with the household to select one designated respondent for each household sampled. An algorithm or system of prioritization may be inserted into the initial screening to disproportionately select younger and male respondents if the household has more than one person eligible to participate in the survey. Otherwise, the “most recent/next birthday method” will be used for within household selection among multiple eligible respondents. Salmon and Nichols (1983⁵) proposed the birthday selection method as a less obtrusive method of selection than the traditional grid selections of Kish, et al. In theory, birthday selection methods represent true random selection (Lavrakas, 1987⁶). Empirical studies indicate that the birthday method produces shorter interviews with higher response rates than grid selection (Tarnai, Rosa and Scott, 1987⁷).

For the cell phone sample, no selection procedure for multiple eligible respondents will be needed as the surveys will treat the cell phone as a single user device. However, immediately upon contact, cell phone respondents will be asked one or more questions according to IRB-approved procedures to assure that it is safe for them to respond.

⁵ Salmon, C. and Nichols, J. *The Next-Birthday Method of Respondent Selection*. Public Opinion Quarterly, 1983, Vol. 47, pp. 270-276.

⁶ Lavrakas, P. *Telephone Survey Methods: Sampling, Selection and Supervision*. Beverly Hills: Sage Publications, 1987.

⁷ Tarnai, J., Rosa, E. and Scott, L. *An Empirical Comparison of the Kish and the Most Recent Birthday Method for Selecting a Random Household Respondent in Telephone Surveys*. Presented at the Annual Meeting of the American Association for Public Opinion Research. Hershey, PA, 1987.

As regards the over-samples, the selection procedures will be the same as those used for the cross-sectional samples. But rather than screen for anyone 18 and older, they will screen only for respondents 18 through 34. The interviews will be conducted on cell phones due to the large percentage of individuals in that age range who live in wireless only households: 39.9% age 18-24, 51.3% age 25-29, and 40.4% age 30-34 according to NHIS data for January – June 2010.

Upon contacting the landline household, interviewers will briefly state the purpose of their call (including noting the anonymity of the interview), and then request to speak to the person in the household meeting the requisite screening criteria. If the person who answered the phone is the selected respondent, then the interviewer will proceed with the interview. If the selected respondent is someone else who then comes to the phone, then the interviewer will again introduce the survey (with anonymity statement) and proceed with the interview. If the selected respondent is not available, then the interviewer will arrange a callback. Cell phone respondents will be read the same project introduction, asked if they are in a situation where it is safe for them to respond at that time, and if so, proceed with the interview. If the interviewer finds that the prospective respondent is driving or in some other situation that could compromise safety, then the interviewer will immediately hang up while saying s/he will call back at a more convenient time.

Localized/Demonstration Surveys

The major differences between the national and localized/demonstration sample selection procedures will be sample size, the absence in most cases of Stage 1 distribution of sample by geographic stratification, and lesser use of over-sampling or disproportionate selection of respondent groups. Otherwise, sampling procedures will mirror the same procedures described above for selecting the national samples (i.e., Stages 2-4). Like the national surveys, they will include interviews with respondents on cell phones. Because the cell phone exchange dialed for a respondent may not match where the respondent actually resides, screening will need to include a question asking if the respondent currently lives in the geographic location targeted by the intervention.

Demonstration projects will typically be directed towards a community, a county or a media market composed of multiple counties. The telephone exchanges covering the geographic area undergoing the intervention will be determined, and a systematic procedure for randomly selecting telephone numbers to call will be implemented. Demonstration project surveys may require more screening criteria than those mentioned previously as interventions may be directed at very specific subgroups within the community. When contacting households having multiple members eligible to participate in the survey, in-house selection methods will be conducted that obtain scientifically valid random samples.

Data Collection Procedures across Samples

Data collection will be conducted by trained interviewers working in telephone research centers that utilize a computer-assisted telephone interviewing (CATI) network. The CATI network will have capability for silently monitoring the performance of

interviewers. Monitoring will be conducted by supervisory staff during all interview shifts to determine the quality of interviewer's performance in terms of:

1. Initial contact and recruitment procedures;
2. Reading the questions, fully and completely as written;
3. Reading response categories, fully and completely, (or not reading them) according to the study specifications;
4. Whether or not open-ended questions are properly probed;
5. Whether or not the interviewer enters the correct code, number, or verbatim response to the question;
6. Whether or not ambiguous or confused responses are clarified
7. How well questions from the respondent are handled without alienating the respondent or biasing his/her response;
8. Avoiding bias by either comments or vocal inflection;
9. Ability to persuade wavering, disinterested or hostile respondents to continue the interview; and
10. General professional conduct throughout the interview.

Initial telephone contact will be attempted during the hours of the day and days of the week that have the greatest probability of respondent contact. This means that the primary interviewing period will typically be conducted between 5:30 p.m. and 10:00 p.m. on weekdays; between 9:00 a.m. and 10:00 p.m. on Saturdays; and between 10:00 a.m. and 10:00 p.m. on Sundays. If the interview cannot be conducted at the time of initial contact, the interviewer will reschedule the interview at a time convenient to the respondent. Although interviews will be conducted on evenings and weekends whenever possible, daytime interviews will be scheduled whenever necessary.

Statistical Analysis

As specified above, NHTSA will employ dual-frame designs in conducting its telephone surveys. For community level samples of 500, the basic approach to weighting will be to adjust the achieved samples so that they approximate key demographics of the selected sites according to Census figures (sex, age). Since demographic data would not be available for potential eligibility criteria such as driver status, the general population figures that are available would be used. If there are indications of substantial differences between the breakouts of the samples by phone status versus what would be expected within the current environment, then further adjustment may be applied. However, there are no data to provide a precise barometer of what the phone status distribution should be

at the community level, and available State figures would likely be too old to use for weighting purposes and may not be representative of the selected communities anyway. Therefore, it would take an obvious discrepancy with State and national figures to consider weighting on this factor.

For larger samples drawn from national sampling frames, more detailed procedures will be employed to adjust the samples to represent their respective populations. For example, for the National Alcohol-Impaired Driving Crackdown surveys, the NHTSA contractor will use benchmark data from the National Health Interview Survey to adjust the landline sample to reflect the population distribution of landline-only, landline-mostly, true-dual, and cell-mostly. Then the contractor will adjust the cell sample to reflect the population distribution of landline-mostly, true-dual, cell-mostly, and cell-only. Then the contractor will adjust the over-lapping groups to adjust for the fact that they are represented in both samples and will be over-represented relative to the landline-only and the cell-only groups.

Chi square or difference of proportions tests will be applied to final data to compare results from survey waves. Specifically, statistical tests will be used to determine if there are statistically significant differences between pre and post waves. Additional statistics may be calculated if NHTSA sees a need for more refined analyses. Appropriate software will be used to account for the complex sampling designs when analyzing data (e.g., SUDAAN).

B.3. Describe methods to maximize response rates.

The National Mobilizations/Crackdowns and demonstration projects will include a minimum five call attempts and seven callbacks during the field periods. However, the limited field periods will require that the surveys place particular emphasis on contact scripts and the training/monitoring of interviewers. The initial contact script has been carefully developed and refined to be persuasive and appealing to the respondents. The interviewing will be conducted only by thoroughly trained and experienced interviewers who are highly motivated and carefully monitored. All interviewers will have had training on how to overcome initial reluctance, disinterest or hostility during the contact phase of the interview. There will be maintenance and regular review of field outcome data in the sample reporting file, derived from both the sample control and CATI files, so that patterns and problems in both response rate and production rates can be detected and analyzed. Periodic meetings will be held with the interviewing and field supervisory staff and the study management staff to discuss problems with contact and interviewing procedures and to share methods of successful persuasion and conversion.

B.4. Describe any tests of procedures or methods to be undertaken.

The proposed Mobilization and Crackdown surveys are a continuation of seat belt and impaired driving mobilization surveys conducted in previous years. As such, they will utilize questionnaires nearly identical to those utilized previously, and follow methods that have been previously implemented and found successful.

B.5. Provide the name and telephone number of individuals consulted on statistical aspects of the design

The following individuals consulted on statistical aspects of the study design:

Richard Compton, PhD
Director, Office of Behavioral Safety Research
DOT/National Highway Safety Administration
1200 New Jersey Ave, SE
Washington, DC 20590
(202) 366-2699

Maria Vegega, PhD
Chief, Behavioral Research Division
Office of Behavioral Safety Research
DOT/National Highway Safety Administration
1200 New Jersey Ave, SE
Washington, DC 20590
(202) 366-2668

Linda Cosgrove, PhD
Chief, Injury Prevention Research Division
Office of Behavioral Safety Research
DOT/National Highway Safety Administration
1200 New Jersey Ave, SE
Washington, DC 20590
(202) 366-5592

Alan Block, MA
Office of Behavioral Safety Research
DOT/National Highway Safety Administration
1200 New Jersey Ave, SE
Washington, DC 20590
(202) 366-6401