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

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

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

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

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.

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

Supporting Statement

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 approval to collect information for assessment of different models of sustained Highly Visible Enforcement (HVE) of the alcohol-impaired driving laws. The information collection would involve surveys utilizing different modes of data collection. NHTSA is requesting approval for three waves of telephone surveys to be conducted in selected communities to assess community awareness of the HVE activity, and community perceptions of the likelihood of law enforcement officers stopping alcohol-impaired drivers. NHTSA also is requesting approval of in-person surveys of bar patrons in the selected communities to assess these perceptions among a high risk population.

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

Highly visible enforcement (HVE) has historically had the strongest support in the research literature for effectiveness in reducing alcohol-impaired driving. A combined enforcement and public information campaign in Clearwater and Largo, Florida implemented from October 1983 through December 1984 corresponded with a more than 20 percentage point decrease in alcohol-related crashes. A key element of the program was extensive use of well-publicized checkpoints, with 12 checkpoints conducted during the project period.[1] Research on the checkpoint model conducted 10 years later in Tennessee found that the program resulted in a 20 percent reduction in alcohol-related crashes extending at least 21 months after conclusion of the formal program. The program included 882 checkpoints conducted Statewide between April 1994 and March 1995 augmented by television, radio, and print media coverage throughout the program duration.[2] A subsequent review of 23 sobriety checkpoint studies by scientists from the CDC's Division of Unintentional Injury Prevention found median decreases in alcohol-involved crashes and alcohol-involved fatal crashes to be of similar magnitude to the

[1] Lacey, J.H.; Marchetti, L.M.; Stewart, J.R.; Murphy, P.V.; and Jones, R.J. *Combining Enforcement and Public Information to Deter DWI: The Experience of Three Communities*. DOT HS 807 601. Washington, DC: National Highway Traffic Safety Administration, US DOT. 58 pp. , April 1990.
[2] Lacey, J.H.; Jones, R.K.: and Smith, R.G. *Checkpoint Tennessee: Tennessee's Statewide Sobriety Checkpoint Program*. DOT HS 808 841. Washington, DC: National Highway Traffic Safety Administration, U.S. DOT. 91 pp., January 1999.

Tennessee results.[3] The Task Force on Community Preventive Services[4] recommended sobriety checkpoints based on this evidence.

The studies cited above have demonstrated that prolonged commitment to highly visible and well-publicized enforcement of the alcohol-impaired driving laws, with enforcement and communication activities conducted on a regular basis, can result in substantial reduction in alcohol-related and alcohol-impaired driving crashes. The mechanism by which enforcement and communication activity is believed to affect crashes under this model is through perceived risk within a community of an alcohol-impaired driver being stopped and arrested, with drivers altering their drinking and driving behavior in response to that perceived risk. What to date has not been shown is the relationship of different amounts of HVE carried out by law enforcement agencies to perceived risk.

The level of HVE can be viewed as points on a scale. In practice, many law enforcement agencies have consolidated their HVE efforts regarding enforcement of the alcohol-impaired driving laws into a small number of waves that occur each year. In particular, they may confine their HVE to the National Alcohol Crackdowns, which stress mobilized highly visible enforcement conducted for 2 weeks during the summer and 2 weeks in December buttressed by national media campaigns. Limited HVE such as this may be considered to lie at the lower reaches of the scale. Data derived from evaluation of the Crackdowns has not shown this level to make much of an impression on the public's awareness of enforcement activity, nor perceived risk of an alcohol-impaired driver being stopped by law enforcement officers.[5] Increasing the number of HVE waves to half a dozen per year may be considered to lie at an intermediate point on the scale. This increases the level of HVE above what is standard practice for many agencies (highly visible enforcement of the alcohol-impaired driving laws is concentrated only in the two National Alcohol Crackdowns). But it still means that the HVE is an activity confined to certain times of the year (e.g., on holidays, or once every two months) rather than something that occurs as a natural ongoing activity (e.g., on a daily or a weekly basis).

At the upper reaches of the scale is what may be considered an integrated program. This is where the HVE is a normal part of law enforcement officers' ongoing activities; it's integrated into their regular tasks. Thus the HVE becomes a constant throughout the year and produces a continual reminder to the public that law enforcement is always enforcing the alcohol-impaired driving laws; i.e., the enforcement is not something they only have to pay attention to during certain times of the year.

The unknown at this time is the relationship of the amount of HVE to perceived risk within a community of an alcohol-impaired driver being stopped and arrested by law enforcement. In particular, does the perceived risk increase as the amount of HVE increases? Is the optimum effect on awareness and perceived risk achieved through an integrated program? The proposed information collection will address those questions by selecting community sites whose HVE activity is at different points on the HVE scale,

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[3] Guide to Community Preventive services. *Reducing alcohol-impaired driving: sobriety checkpoints*. www.thecommunityguide.org/mvoi/AID/sobrietyckpts.html. Last updated: April 13, 2009.

[4] The Task Force is an independent, non-governmental, volunteer body of public health and prevention experts, whose members are appointed by the Director of CDC.

[5] *The 2008 National Alcohol Crackdown Campaign – Survey Results*. Presentation to National Highway Traffic Safety Administration by M. Davis and Company, Inc., March 5, 2009.

and monitoring the perceived risk within those communities. A total of five sites will be selected, encompassing integrated, intermediate, and Crackdown-alone HVE programs.

It bears noting that strategies to enforce the drinking and driving laws have largely been based on a general deterrence model. Yet the alcohol crash fatality problem has been driven by Blood Alcohol Concentrations (BACs) at or above .08 (which is illegal per se in every State). A further interest in this information collection, therefore, is to determine the relationship of the amount of HVE to perceived risk by drivers most likely to drive at BACs above the legal limit. Is the relationship the same as with drivers who are not high risk, or does the amount of HVE differentially influence perceptions of these two groups?

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 assess the relationship between the amount of HVE directed at the alcohol-impaired driving laws and: (1) public awareness that the alcohol-impaired driving laws are being enforced, (2) the public's perceived risk of an alcohol-impaired driver being stopped by law enforcement. In pursuing this objective, the information collection will be designed to discern whether the foremost targets of the programs (i.e., drivers most likely to drive at BACs above the legal limit) differ from the broader (non high risk) community of drivers in how the level of HVE relates to these perceptions. Programs differing in their amount of HVE will be monitored, and public perceptions compared. Analyses will identify the relative success of specific HVE practices in penetrating public awareness and perceptions.

NHTSA will use the information to refine current HVE models in its promotion of effective practices. The information will be disseminated to State Highway Safety Offices and other NHTSA partners involved in public safety to use in assessing and improving their own programs. In particular, law enforcement agencies will be provided the information to help them make decisions regarding appropriate amounts of HVE to meet their community traffic safety goals.

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 telephone survey 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:

- 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.

In addition to the telephone surveys, in-person interviews will be conducted of patrons at bars. The Contractor will use a smart device, the iPod touch®, when collecting this survey information. The iPod touch® is similar to the iPhone® but does not have cellular communication capabilities. It is free to use, is Wi-Fi/ 3G capable, has the same user-friendly interface that the iPad® does, and is small enough to handle in the field. This technology allows the Contractor to collect data offline and upload it directly into a structured query language (SQL) database via Wi-Fi, 3G, or 4G connection, saving the data in two separate places (the SQL database and Microsoft Access), maximizing security as well as making the data readily available for review.

The Contractor will use a software program, Pendragon® VI®, that is compatible with the iPod touch®. Pendragon® VI® offers features necessary to effectively and securely record and upload data. Data collectors in the field will enter Bar Patron Survey responses into the smart device and after completion of each night's data collection, the Site Supervisor will upload data collected from the smart devices to a secure remote server via Microsoft ® Access. The Contractor will then be able to use Access and the associated Queries and Macros to identify any data entry issues from the weekend. The data will later be exported into Excel and SPSS/SAS for further management and analyses by research associates and statisticians.

During the interviews with bar patrons, the interviewers will collect breath samples from the respondents. These will be obtained using an alcohol breath test device that is DOT/NHTSA-approved. The breath test devices they use will be set not to display the

BAC reading results, so that data collectors in the field do not know the actual value of the reading at the survey site. Rather, these values are stored within the device and downloaded to a computer and merged with other data about the subject at a later date. Thus, the samples are anonymous; no personal identifying information is contained in the data.

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.

The information collection will be explicitly linked to several community HVE programs. The necessary connection of the data collection to the HVE programs precludes there being alternative data that could be used to answer the study questions. Because no data on the targeted HVE programs 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.

Past research has shown the HVE model to work, but left unclear how much HVE is needed to achieve that success. Without information on the relationship of the amount of HVE and perceived risk, law enforcement agencies won't know if the amount of HVE they intend to expend will be adequate for the enforcement model to have a deterrent effect, or alternatively will be an excessive amount that produces minimal benefit past a certain point while draining resources. Moreover, without information specific to high risk drivers, they won't know if their efforts will make an impression on the people they most need to influence. Without the proposed information collection, NHTSA will be unable to determine the most efficacious use of resources for HVE. This would severely hamper NHTSA in its responsibility to provide guidance on approaches to reducing motor vehicle crashes, crash injuries, and crash fatalities.

For each HVE program, data on public perceptions will be collected at three different points over the course of a one-year period. This will allow the study to identify fluctuation likely to occur in the relationship of HVE level to public perceptions due to such things as seasonal factors and program-specific spikes in HVE activity. The data collection waves across sites will be coordinated to occur at the same time.

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 (January 13, 2011, Vol. 76, No. 9, Pages 2442-2444) which announced NHTSA's intention to conduct the collection of information is provided in Appendix B. No comments were received in response to the Notice.

A copy of a second Federal Register Notice (May 11, 2012, Vol. 77 No. 92 Pages 27854-27855), which announced that this information collection request will be forwarded to OMB, is provided in Appendix C.

EXPERT CONSULTATION: The information collection instruments are being designed through a collaborative effort between NHTSA and a contracting firm with long-time experience in drinking and driving research, the Pacific Institute for Research and Evaluation or PIRE. PIRE has identified questions that have been validated in the literature as sensitive to problem drinking that will be used on the survey. Many of the questions about program awareness and perceived enforcement will be structured from questions used by NHTSA on past intervention surveys that were approved by OMB.

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

A $10 incentive (a gift card, provided to participants at bar exit) will be offered to bar patrons who agree to respond to a short survey, as well as provide a breath sample, upon both entry to and exit from a selected bar. This is known as a portal survey, and will be conducted from 9:00 pm to 2:00 am. PIRE has used this incentive approach in previous bar patron surveys that successfully obtained breath samples.

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

In the telephone survey's introduction, respondents are informed that participation is voluntary and they may break off participation at any time. Further, they will be told that the information they provide will be used for research purposes only, and no personal information will be collected that would allow anyone to identify them. The Contractor will not collect any identifying information such as names, addresses, or social security numbers. Upon completion of the telephone survey, it would be impossible for anyone to be identified based on his or her responses to the survey questions. Moreover, the NHTSA contractor will separate the responses to these surveys from the telephone numbers called.

The bar patron survey's introduction will similarly assure respondents of the voluntary nature of the interview and that no information will be collected that could be used to identify them. Identification would be impossible based on the questions being asked.

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 behavior, and drinking and driving behavior, requires questions of a sensitive nature. However, this information is important to collect in order for NHTSA to assess the relationship of HVE level to public perceptions, and to identify adults most likely to drive at BACs above the legal limit in order to assess whether their perceptions differ from drivers who are lesser risk. We have limited the questions in these areas to a bare minimum in order to meet the objectives of this study while not probing unnecessarily into areas that could make respondents uncomfortable.

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

NHTSA proposes conducting three waves of telephone surveys for each of five sites. Interview length will average 10 minutes. Sample size in each survey wave will be 1,200 per community. A total of 18,000 telephone interviews will be conducted (1,200 x 5 communities x 3 waves). Overall burden for the telephone surveys would be:

Wave 1: 1,200 sample size X 5 sites X 10 minutes = 1,000 hours

Wave 2: 1,200 sample size X 5 sites X 10 minutes = 1,000 hours

Wave 3: 1,200 sample size X 5 sites X 10 minutes = 1,000 hours

Total Telephone Survey Burden = 3,000 burden hours

The in-person bar surveys will be conducted using a full portal approach in which individuals are interviewed both during their entry and exit from a bar. Obtaining consent, conducting interviews during the two contact points, and obtaining breath samples during entry and exit, will average a combined 10 minutes. Sample size will be 400 per site per survey wave. A total of 6,000 bar interviews will be conducted (400 x 5 sites x 3 waves). Overall burden for the bar surveys would be:

Wave 1: 400 sample size X 5 sites X 10 minutes = 333.3 hours

Wave 2: 400 sample size X 5 sites X 10 minutes = 333.3 hours

Wave 3: 400 sample size X 5 sites X 10 minutes = 333.3 hours

Total Bar Survey Burden = 1,000 burden hours

Total burden on the public for the telephone surveys and bar surveys combined will be 4,000 hours.

Since respondents will not be contacted while they are at work, 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 2010 which was $26,487 (Source: Table P-1. Total CPS Population and Per Capita Income, at

http://www.census.gov/hhes/www/income/data/historical/people/index.html), the total respondent cost would be:

$12.73 per hour X 4,000 hours = $50,920

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. All responses to the surveys are provided spontaneously. 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.

The total cost of the telephone survey portion of the project to the government is $570,000. The total cost of the bar patron survey portion of the project to the government, including incentives, is $340,000. The resulting total is $910,000.

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

The reason for the program change is because this is a new information collection. All new collections are recorded as program changes.

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

Response frequencies to the telephone and bar survey questions will be computed and compared across sites to assess the relationship of amount of HVE to program awareness and perceived risk. Within site comparisons of survey results across waves will also be conducted to assess the stability of public perceptions given the nature of the different HVE programs. In addition, BACs determined from breath samples taken at the bars will be correlated with perceived risk to see if perceived risk varied with level of alcohol impairment.

Findings from the study 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. The technical reports will also be posted by NHTSA on its web site.

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.

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