

FOCUS GROUPS FOR TRAFFIC AND MOTOR VEHICLE SAFETY PROGRAMS AND ACTIVITIES

SUPPORTING STATEMENT

- A.1) Explain the circumstances that make the collection of information necessary. Identify any Legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

A.1.a) Circumstances Making the Collection Necessary

The National Highway Traffic Safety Administration (NHTSA) was authorized by the Highway Safety Act of 1966 to carry out a Congressional mandate to reduce the mounting number of deaths, injuries and economic losses resulting from motor vehicle crashes on our Nation's highways. In support of this mission, NHTSA is requesting to renew its generic clearance (2127-0667) to conduct information collections in the form of Focus Group Studies. These studies are necessary to develop and refine NHTSA's problem identification, messaging, resource development, and strategic approaches.

Focus groups are an important information gathering technique because they allow for more in-depth understanding of the driving public's beliefs, attitudes, motivations, and self-reported behaviors than do other kinds of studies. Focus groups are essential to obtain drivers' reactions to different technologies, public information materials, and countermeasure strategies. They are used to gather suggestions on how to design countermeasure strategies or highway safety programs. Focus group sessions are narrowly defined to provide direct and informal feedback on a specific topic. The information obtained from focus groups complement other research findings (e.g. crash data, citations and arrests) by providing a window into the thinking, motivations, and understanding of drivers and others about traffic safety and various potential countermeasures to enhance safety.

A.1.b) Statute authorizing the collection of information

The Highway Safety Act of 1966, Title 23 United States Code, Section 403 (a,b,c,d) and the National Traffic and Motor Vehicle Safety Act of 1966, Title 15 United States Code 1395, Section 106 (b), give the Secretary authorization to conduct research, testing, development, and training as authorized to be carried out by subsections of these titles. The Vehicle Safety Act was subsequently re-codified under Title 49 of the U.S. Code in Chapter 301, Motor Vehicle Safety. See Title 23 Section 403 and Title 49 Chapter 301 for further information.

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.

Focus Groups, used as a qualitative research tool, have five major purposes:

- Problem Identification - To better understand the beliefs, attitudes, motivations, and practices associated with traffic safety behavior, particularly among high-risk populations and subject matter experts.
- Strategic Messaging - To ensure that creative material designed to communicate information about a specific traffic safety issue is effective and appropriate for its target audience.
- Resource Development - To assess the needs of the driving public and highway safety professionals in order to develop and provide resources to address those needs.
- Strategic Approaches and Program Initiatives - To obtain reactions to strategic approaches and program initiatives.
- Technological Approaches - To examine the effectiveness, acceptability, and limitations of technological approaches to traffic safety and vehicle safety issues.

Focus Group moderators elicit participant discussion and infer the underlying views and assumptions of the group. Focus Groups are used for formative research purposes and provide data about public opinion and general reaction to new concepts, messages, or technologies.

NHTSA has applied the information obtained from focus groups conducted under the existing clearance to the development of media campaigns in the areas of impaired driving and child passenger safety.

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.

To facilitate analysis, focus group moderators sometimes record or videotape discussions to ensure that notes and summary reports accurately reflect participants' comments, suggestions, and questions. If sessions are recorded, recordings are kept in a secured location and destroyed at the conclusion of the study.

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, to the best of our knowledge, the kind of information we are seeking is not available to the Federal government.

A.5) If the collection of information involves small businesses or other small entities, describe the methods used to minimize burden.

There will be no impact on small business or other small entities. The collection of information involves selected individuals, not small businesses.

A.6) Describe the consequences to Federal Program or policy activities if the collection is not collected or collected less frequently.

Focus Group studies can be an invaluable part of the development process for highway safety countermeasures and initiatives. Without examining the attitudes, beliefs, and motivations of the driving public, NHTSA cannot adequately define its programs, messages, and materials to reduce traffic injuries and fatalities.

When developing communication messages, it is important to obtain drivers' reactions to various concepts to determine which approaches are most likely to resonate with target groups of different demographics.

Without the information obtained from focus groups NHTSA may make assumptions about driver attitudes, knowledge, and understanding of proposed messages, labels, or countermeasures that are not accurate or useful.

A.7) Explain any special circumstances that require the collection to be conducted in a manner inconsistent with the guidelines set forth in 5 CFR 1320.6.

No special circumstances require the collection to be conducted in a manner inconsistent with the guidelines in 5CFR 1320.6.

A.8) Provide a copy of the Federal Register document soliciting comments on the collection of information, a summary of all public comments responding to the notice, and a description of the agency's actions in response to the comments. Describe efforts to consult with persons outside the agency to obtain their views.

A.8.a) Federal Register Notice

A Federal Register Notice (78 FR 47488) announcing NHTSA's intention to collect information by means of focus groups was published on August 5, 2013, providing 60 days for public comment. One comment was received in the docket. The American Motorcyclist Association (AMA) urged that at least one of the participants in each focus group be a motorcyclist. They wrote:

"... the AMA has concerns with how this survey will be conducted. Will the NHTSA attempt to include at least one motorcyclist in each of these focus groups? By including motorcyclists in this survey, the NHTSA will demonstrate its resolve to curtail distracted driving and its significant dangers to motorcyclists, thus, achieve safer highways for all users."

From their comments, it appeared the AMA may have misunderstood the nature of the generic clearance, and assumed it was a single planned effort rather than multiple information collections that would address different topics as information needs emerged. The AMA's stated interest was distraction, which NHTSA listed solely as an example of the type of topic that could be the subject of one of the focus group projects. Whether distraction will ultimately be a topic explored by some of the focus groups is unknown at this time. NHTSA's response to the AMA's comments is that the agency will review the focus group studies as they emerge, and will make an effort to include motorcyclist participation where appropriate.

A second Federal Register Notice announcing that NHTSA intended to forward an Information Collection Request to OMB was published on October 30, 2013 (78 FR 65038), providing 30 days for public comment directly to OMB.

A.8.b) Expert Consultation

NHTSA uses in-house experts (behavioral researchers, engineers, communications and marketing specialists) and experienced contractors to develop focus group plans and materials. NHTSA's use of non-Agency experts for input will depend on the nature of the particular Focus Group study being proposed.

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 and out of pocket expenses. NHTSA will provide, on average, \$75.00 payment as reimbursement for expenses and compensation for their time. Compensation will vary based on requirements of each study (e.g., duration, location). It is unrealistic to expect respondents to incur expenses (e.g. to travel to a focus group location, pay for parking, etc.) as a result of participation. In many locations, without some form of reimbursement and compensation it would be virtually impossible to recruit participants.

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, moderators conducting Focus Groups will explain to participants that qualitative results will not be associated with identifying information or with a particular participant. Moderators and contractors will follow procedures to prevent unauthorized access to respondent data and will not disclose to the public the identities or responses of individual participants.

A.11) Provide additional justification for any questions of a sensitive nature, such as sexual behavior or attitudes, religious beliefs, and other matters that are commonly considered private.

NHTSA does not anticipate asking questions that are of a sensitive nature or discussing matters commonly considered private. NHTSA will provide the specific discussion topics and questions with each individual ICR submitted under this generic clearance and will, if necessary, provide additional justification for questions of a sensitive nature at that time.

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

The following burden estimates are based on NHTSA’s projected annual focus group usage.

Studies: NHTSA plans to conduct approximately 14 Focus Group studies per year.

Focus Groups per Study: A Study will require approximately 8 to 12 groups (averaging 10 groups), depending on the requirement

Participants: Each focus group will involve an average of 10 participants. Therefore, the total number of participants is estimated to be 1,400 per year.

Burden: Individuals will be recruited via advertisement, intercept, or randomly dialed telephone calls and screened based on the study criteria. The recruiting and screening process is estimated to take no more than 10 minutes per person. Selected individuals will participate in a single session which, on average, lasts 80 minutes. Thus, the total burden per participant is estimated to be 90 minutes (1.5 hours).

ESTIMATED ANNUAL REPORTING BURDEN							
<u>Studies</u>		<u>Focus Groups</u>		<u>Participants per Group</u>	<u>Total Participants</u>	<u>Hours per Participant</u>	<u>Total Hours</u>
14	x	10	x	10	= 1,400	x 1.5	= 2,100

Therefore, the total annual estimated burden imposed by this collection of information is 2,100 hours.

While respondents will not be participating in the focus groups during working hours, the time they spend in the groups can still be looked at in terms of what it would have cost if they had spent that amount of time on a task while on the job. The total annual estimated cost associated with the burden hours is:

$$\$24.05 \text{ per hour}^1 \quad \times \quad 2,100 \text{ interviewing hours} \quad = \quad \$ 50,505 \text{ annually.}$$

¹ From Bureau of Labor and Statistics, Establishment Data, Table B-3: Average hourly and weekly earnings of all employees on private nonfarm payrolls by industry sector, seasonally adjusted. Retrieved from <http://www.bls.gov/news.release/empsit.t19.htm> on October 21, 2013.

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

Respondents will have no additional burden beyond the hours shown in item A12. 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 focus groups.

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, subsistence, and participant compensation, all of which may vary by location. For these expenses, NHTSA estimates the costs to be approximately \$30,000 per study, and \$420,000 annually.

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

This is a renewal of a generic clearance. The previously approved number of burden hours was 2,882 hours per year. NHTSA believes it can reduce the number of hours while still meeting its needs. The requested number of burden hours is 2,100 hours per year. The change due to adjustment in the estimate is -782 hours per year.

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

There are no tabulated results for this information collection.

A.17) If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

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

A.18) Explain each exception to the certification statement identified in Item 19, “Certification for Paperwork Reduction Act Submissions” of the OMB Form 83-I.

No exceptions to the certification are made.
