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Supporting Statement

A. Justification

The National Highway Traffic Safety Administration (NHTSA) of the U.S. Department of Transportation (USDOT) is seeking approval from the Office of Management and Budget (OMB) to conduct the next administration of the Motor Vehicle Occupant Safety Survey (MVOSS), which the agency uses to track changes in public attitudes, knowledge, and behavior related to occupant protection. Program areas subsumed under occupant protection include seat belts, child safety seats, and air bags. NHTSA conducted the baseline MVOSS in 1994, and has repeated the survey five times since then, with the most recent administration occurring in 2007.

The previous surveys have provided important information for strategic planning. For example, the baseline survey identified “part time” seat belt users as a critical target group, found many children graduating from car seats to seat belts before the belts fit them properly, and showed uncertainty among the public about how air bags work. The 1996 survey revealed success by NHTSA and others in publicizing the danger of air bags to children, and alerting the public that children should ride in the back seat. The 1998 survey identified concerns parents had in using booster seats for their children, and differences between groups in the perceived utility of seat belts. The 2000 survey detected increased child restraint use by children ages 3 to 5, but raised a "red flag" that there may have been some backsliding for infants. The 2003 survey saw child restraint usage by infants return close to levels recorded in 1996 and 1998, but found some people having difficulties attaching the new LATCH system for child restraints. The 2007 survey showed major gains in restraint use by children older than five, but significant room left for improvement. There also was a continuation of trends such as increasing self-reported belt use, declining percentages of people disliking or feeling annoyed about seat belts, and increasing support for primary enforcement of seat belt laws.

The proposed MVOSS will continue NHTSA’s tracking of the public’s attitudes, knowledge, and behavior related to occupant protection. Data from the survey will identify current obstacles to public safety, detect emergent targeting issues for program activity, and provide an overall status report on where the public stands on key occupant protection matters. New items will be inserted into the survey to address recent developments in occupant protection. NHTSA will use the information to refine its programs so that the agency can better meet its mandate to reduce highway traffic injuries and fatalities.

- 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.

This collection supports the Department of Transportation's strategic goal in safety by working towards elimination of transportation-related deaths and injuries. The collected information will be used to develop strategies and initiatives to meet NHTSA goals for increasing seat belt use and child restraint use.

1. Effectiveness of occupant protection systems

There is overwhelming evidence that the regular and proper use of safety devices such as seat belts and child safety seats is effective in reducing injuries and fatalities in vehicle crashes. Research has found that lap/shoulder belts, when used, reduce the risk of fatal injury to front-seat passenger car occupants by 45 percent and the risk of moderate-to-critical injury by 50 percent (for occupants of light trucks, it is 60 percent and 65 percent, respectively). Other analyses have shown that child safety seats reduce fatal injury by 54 percent for toddlers and by 71 percent for infants in passenger cars (in light trucks, it is 59 percent and 58 percent, respectively). In addition, NHTSA estimates that air bags have saved 34,757 lives from 1987 through 2011.¹

Non-use of simple occupant protection devices not only leads to enormous personal pain and tragedy, but also exacts a heavy economic toll on the country as a whole. The total economic cost of motor vehicle crashes in 2000 was \$230 billion dollars. Non-use of seat belts accounted for \$26 billion in injury-related costs that year.²

2. The need for current information

The national seat belt usage rate has risen from less than 20 percent during the early 1980s to 87 percent as of June 2013. Much of the increase has been attributed to the enactment of primary seat belt laws and the use of highly visible enforcement of those laws such as conducted under the Buckle Up America (BUA) Campaign and more recently the Click It or Ticket Campaign. However, there has been little increase in the national seat belt use rate in recent years, with an average of less than a one percentage point gain per year over the past 10 years according to the National Occupant Protection

¹ National Highway Traffic Safety Administration. (2013) Occupant Protection. (Traffic Safety Facts 2011 Data No. DOT HS 811 729). Washington, DC: Author. <http://www-nrd.nhtsa.dot.gov/Pubs/811729.pdf>

² Blincoe, L. Seay, A. Zaloshnja, E. Miller, T. Romano, E. Luchter, S. & Spicer, R. (2002) The Economic Impact of Motor Vehicle Crashes, 2000. (Report No. DOT HS 809 446). Washington, DC: National Highway Traffic Safety Administration, DOT. <http://www-nrd.nhtsa.dot.gov/Cats/listpublications.aspx?Id=225&ShowBy=Category>

Use Survey (NOPUS).³ This reflects the increasing difficulty of getting significant increases in seat belt use.

While infants should always ride in rear-facing car seats, NHTSA's 2011 National Survey of the Use of Booster Seats (NSUBS) observed 14 percent of infants either using an inappropriate restraint or being unrestrained. Children 1 to 3 years old should ride either in rear-facing or front-facing car seats, but NSUBS found almost 1-in-5 children in this age range either in booster seats, seat belts, or unrestrained. Children ages 4 to 7 should either ride in forward-facing car seats or booster seats, but 25 percent were observed in seat belts and 10 percent were unrestrained.⁴ Even when children are riding in the correct child restraint, oftentimes the restraint is not properly installed or the child is not correctly buckled into the seat. In 2002, NHTSA found a misuse rate of 72.6 percent. This meant that 72.6 percent of observed child restraints exhibited one or more forms of misuse that reasonably could be expected to increase the risk of injury to a child in the event of a motor vehicle crash. If booster seats for older children were removed from the equation, the misuse figure exceeded 80 percent.⁵ The LATCH (Lower Anchors and Tethers for Children) child restraint technology was new at the time of the 2002 study, with few of the observed restraints being LATCH systems. LATCH was intended to make it easier for parents to correctly install child restraints in vehicles. But a subsequent NHTSA study still found loose or twisted straps/tethers and incorrect attachments.⁶

The easy gains in occupant protection have already been made. NHTSA's current challenge is to surmount the more resistant barriers to safety. Accomplishing this requires an up-to-date understanding of the different facets of the safety problem in order to determine appropriate strategies. With seat belt usage now at 87 percent, data are needed to identify and target remaining groups of non-users. This includes discerning their reasons for non-use, their acceptance of myths that deter safety behavior, and the presence of other characteristics such as fatalism that inhibit use and must be considered when devising program strategies. Moreover, the plateauing over recent years in the seat belt usage rate suggests a need to devise additional strategies if gains are to continue in future years. Child restraint concerns include the type of restraint being used compared to the child's size, issues of misuse, and the persistence of some children being allowed to ride unrestrained. Across program areas, there is a continuing need to measure the level of public support for legislative and enforcement initiatives because of the strong reliance of the safety community on these types of interventions.

³ Pickrell, T.M. & Liu, C. (2014). Seat Belt Use in 2013 – Overall Results. (Traffic Safety Facts Research Note. Report No. DOT HS 811 875). Washington, DC: National Highway Traffic Safety Administration.. <http://www-nrd.nhtsa.dot.gov/Pubs/811875.pdf>

⁴ Pickrell, T.M. & Ye, T.J.. (2013). The 2011 National Survey of the Use of Booster Seats. (Report No. DOT HS 811 718). Washington, DC: National Highway Traffic Safety Administration, DOT. <http://www-nrd.nhtsa.dot.gov/Pubs/811718.pdf>

⁵ Decina, L.E. & Lococo, K.H. (2004) Misuse of Child Restraints. (Report No. DOT HS 809 671). Washington, DC: National Highway Traffic Safety Administration, DOT. <http://ntl.bts.gov/lib/26000/26000/26046/741-MisuseofChildRestraints.pdf>

⁶ Decina, L.E., Lococo, K.H. & Doyle, C.T. (2006) Child Restraint Use Survey: LATCH Use and Misuse. (Report No. DOT HS 810 679) Washington, DC: National Highway Traffic Safety Administration, DOT. http://ntl.bts.gov/lib/26000/26600/26636/LATCH_Report_12-2006.pdf

As the highway safety arm of the U.S. Department of Transportation, NHTSA is responsible for collecting these data and developing programs appropriate to meeting policy requirements.

b. Statute authorizing the collection of information

Title 23, United States Code, Chapter 4, Section 403 (Attachment 1) gives the Secretary authorization to use funds appropriated to carry out this section to conduct research on all aspects of highway and traffic safety systems and conditions relating to (i) vehicle, highway, driver, passenger, motorcyclist, bicyclist, and pedestrian characteristics; (iv) emergency medical services, including the transportation of the injured. The Secretary may conduct research with respect to an evaluation of the effectiveness of countermeasures to increase highway and traffic safety, including occupant protection and alcohol- and drug-impaired driving technologies and initiatives. (See 23 U.S.C. 403(b)(1)(A)(i), 23 U.S.C. 403(b)(1)(A)(iv), 23 U.S.C. 403(b)(1)(C).

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 survey is to provide critical information needed by NHTSA to develop, implement, and maintain effective countermeasures that meet the Agency's mandate to improve highway traffic safety. The data collected in the survey will be used to assist NHTSA in its ongoing responsibilities for: (a) planning program activity which addresses occupant protection issues; and (b) providing support to groups involved in improving public safety. Detailed information provided by the survey will identify information deficits that exist within the populace concerning key safety issues. The survey also will identify factors that foster or inhibit injury prevention behavior.

The survey will answer questions and address issues raised by NHTSA program and operations staff. Both groups were alerted to the project prior to the baseline survey in 1994, and asked for direction concerning questions and topics they thought would be important to include. Feedback was received identifying numerous areas where staff believed the survey could provide information that would assist them in achieving safety objectives. The final instrument reflected that input. Each administration of the survey since the baseline data collection has been preceded by a new review of the survey instrument. Thus the proposed survey instrument for the next administration of the MVOSS has been revised based on recent input provided by NHTSA staff having expertise in the designated areas. The major changes from the 2007 survey questionnaires are:

- Overall reduction in length of the questionnaires to reduce average duration to 15 minutes to accommodate major revisions to the methodology;
- Expansion of the age range for whom detailed information concerning child restraint use will be collected (oldest age raised from 8 to 12);

- Elimination of a driver education/young driver licensing module;
- Removal of most of the air bag module;
- Revision of the Emergency Medical Services module to include several emergent issues.

Besides using the collected information for its own program development and technical assistance activities, NHTSA will:

- Disseminate the information to State and local highway safety authorities, who will use it to develop, improve, and target their own programs and activities;
- Disseminate the information to organizations concerned with traffic safety issues, who will use it to develop, improve, and target their own programs and activities;
- Disseminate the information to the public health community. Certain segments of the survey instrument will be of particular interest to professionals in public health, such as items on child safety seats and items dealing with emergency medical services.

The survey will collect detailed information important to developing effective programs, including data addressing the following questions:

- What is the current level of seat belt use, and what are the factors (attitudes; perceptions; individual characteristics) related to reported use and non-use?
- Are there continuing discrepancies between how people categorize their seat belt usage (i.e., full time users) and the usage they report (i.e., didn't use their belts recently)?
- Are company seat belt policies expanding within the private sector?
- What is the current level of support for seat belt laws and associated enforcement and penalties?
- What factors are related to non-use of child restraints?
- When are children typically graduating from child safety seat use to booster seat use, and from booster seat use to seat belt use? Has the timing of that transition period changed since previous surveys?
- How much difficulty does the public have installing child safety seats and keeping their children in them? What factors are related to those difficulties?
- Is the public having difficulties using the LATCH system for child restraints?
- Are child safety seat inspection stations operating as intended?
- What are the public's expectations regarding Emergency Medical Services (EMS) and their level of support for funding EMS?
- What percentage of the public has used EMS, and what did they call for?
- How do people respond to witnessing medical emergencies?
- How do people believe they would communicate during disaster situations?

Demographic data collected by the survey will pinpoint group differences in responding to these and other survey questions. Results of the analyses will be applied to development of strategic approaches to improving safety.

To date, results from the earlier surveys have been used in numerous ways. For example, the collected seat belt usage data previously led to examination of part time users as a target group, and subsequent work for NHTSA by the Ad Council to reframe the seat belt issue in public service announcements designed to influence part time users. In addition, survey results on attitudes of different racial and ethnic groups toward legislation and enforcement activities have been communicated to multi-cultural communities as they debated the value of those interventions. NHTSA has included results from the survey in a number of its Fact Sheets and Reports, thereby disseminating the results to a wide national audience of individuals and organizations. NHTSA has also posted the 2007 MVOSS database on its Website to increase use of the data by organizations working on traffic safety projects, universities and students conducting traffic safety research, and State traffic safety agencies conducting traffic safety research (<http://www.nhtsa.gov/Driving+Safety/Research+&+Evaluation/National+Telephone+Surveys>).

In sum, the proposed survey will provide a status report on public attitudes, knowledge, and behavior related to occupant protection issues. The data will be studied to determine appropriate emphases for future countermeasure activity. The results will also be disseminated to others for use in their research and program development activities. If the survey was not conducted, NHTSA program efforts would lack direction due to inadequate information upon which to base program decisions; severely limiting the agency's effectiveness in reducing fatalities and injuries.

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 proposed information collection will entail a major change in methodology from how the MVOSS was administered in the past. Previously, the MVOSS was conducted exclusively as a telephone survey with all of the interviews conducted with people on landline telephones. The proposed methodology for the next MVOSS will shift to a multi-mode approach, with Web as the primary response mode. That means that initial contacts with prospective respondents will direct them to go to a designated Website to take the survey, and will offer alternative modes of responding only during later contacts with those who have not yet responded (this may be slightly modified depending on results of an experiment incorporated in the Pilot Test, as described in B.4). NHTSA is employing the services of a Contractor (ICF International) that will develop a Website for administering the survey. The Contract stipulates a number of requirements designed to facilitate the interview process for the respondent and reduce burden. They include:

- Basing the visual layout of the questions on principles of heuristics that people follow in interpreting visual cues;
- Making the survey easily navigable from page to page;

- Incorporating user assistance tools, such as help screens for certain items (e.g., the respondent could click a link to get a definition that would come up if needed);
- Inserting placeholders so that respondents can pause and leave the system and then re-enter (at the point of departure) without losing the responses previously entered; and
- Programming in consistency checks.

Usability testing during Website development (described in Section B.4) will include testing using mobile devices since that is how some respondents will access the survey. Moreover, NHTSA is stipulating that contact letters include a QR (Quick Response) code to allow respondents to get to the Website right away.

The alternative response modes for the survey will be by mail, and by telephone. Data collection by telephone will be accomplished through the use of Computer-Assisted Telephone Interviewing (CATI). CATI systems collect responses 100 percent electronically. They also 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 question answers (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 can't be skipped;
- 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 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.

The NHTSA Motor Vehicle Occupant Safety Survey, of which the proposed survey is the seventh in the series, serves as a national benchmark for self-report (telephone) survey data on occupant protection issues. It acts in this capacity because of

the extensive detail with which it explores occupant protection issues, the large sample size, and how the survey instrument was constructed. Moreover, the survey is designed to provide NHTSA with data critical to the agency's strategic planning activities.

A number of observational surveys of occupant protection behavior have been conducted at the national (NOPUS, NSUBS), State, or local levels. But strategic planning and intervention development require additional information that is not observational in order to guide decisions regarding what intervention approaches to take, what misperceptions or information deficits to address, what channels to use in reaching out to the public, what themes to emphasize in communications, etc. This entails collecting information on attitudes, perceptions, knowledge, and awareness. While observation surveys could collect some of that information by stopping drivers and asking them to answer questions, there are limits on how much can be asked under those circumstances. For example, NHTSA's National Child Restraint Use Special Study, conducted in 2011, included a battery of questions asked of drivers stopped for child restraint inspections.⁷ Even though that survey included some questions previously used on the MVOSS, it did not match the breadth and depth of coverage of the MVOSS.

Other self-report surveys have tended to be administered in geographic areas below the national level and/or linked to specific occupant protection safety campaigns. For example, there have been a number of surveys associated with local seat belt campaigns, and NHTSA has conducted national telephone surveys surrounding the Click It or Ticket mobilizations. However, the localized surveys do not address NHTSA's need for national data to support its planning and program development activities. And the national Click It or Ticket surveys focus almost entirely on reaction to a several week publicized enforcement effort; they do not collect the types of information obtained by MVOSS.

The value of the MVOSS lies in its detailed questioning about attitudes, perceptions, knowledge, awareness, and behaviors related to occupant protection; which the survey then connects to reported occupant restraint usage. MVOSS is composed of two questionnaires; one focusing on seat belts and the other focusing on child restraints. Each respondent is administered only one of the questionnaires. This limits the burden on individual respondents while providing in-depth coverage of occupant protection topics. Having been conducted over a period of many years, MVOSS also provides important trend information not available elsewhere. Besides the scope of the occupant protection modules, and the large sample size (6,000 per version of the questionnaire), the questionnaire development process itself separates this survey from other highway safety surveys. The Questionnaire Design Research Laboratory at the National Center for Health Statistics (NCHS; Department of HHS) employed cognitive testing to design the baseline survey instruments for NHTSA in 1993-1994. Additional cognitive testing of the questionnaires was conducted prior to the 1998 survey by the American Institutes For Research because of the number of changes that were introduced to the survey

⁷ National Highway Traffic Safety Administration. (2012) National Child Restraint Use Special Study. (Traffic Safety Facts Research Note No. DOT HS 811 679) Washington, DC: Author. <http://www-nrd.nhtsa.dot.gov/Pubs/811679.pdf>

instruments. The current MVOSS questionnaire focusing on seat belt issues is little-changed from the earlier versions other than the elimination of some questions. However, the MVOSS questionnaire focusing on child restraints and EMS contains significant revisions. A small number (fewer than 10) of cognitive tests have been scheduled.

Overall, the following criteria were applied to determine whether existing information may be duplicative:

- Currency of information - The data must be current in order to have utility for making sound strategic decisions concerning future programmatic activity.
- National basis - The safety efforts of NHTSA are national in scope. NHTSA therefore requires national-level data for its planning. Cross-national data are unsuitable because of significant differences relating to culture, norms, etc. Data derived from limited jurisdictions (specific States, cities, counties, etc.) also are unsuitable because the data are representative of only a small proportion of the population.
- Interrelated knowledge, behavior, and attitude questions - Effective targeting of future program activity requires that NHTSA determine the relationship of individuals' attitudes, knowledge, and beliefs to their safety behavior. While some items in this survey may be similar to questions asked in surveys conducted outside NHTSA, the absence of other items on those instruments makes it impossible to assess relationships.
- Focus on NHTSA program concerns - The items within the proposed survey instruments concern issues crucial to developing appropriate strategies for improving occupant safety.

As occurred in prior years, no survey was identified that met the above criteria. Rather, as a benchmark survey, the public looks to NHTSA to collect the information.

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 businesses or other small entities. The collection of information involves randomly selected individuals in their residences, not small businesses.

A.6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

The information is necessary for NHTSA to be able to make strategic planning decisions in occupant protection areas on an informed basis. This is particularly important given the priority assigned to occupant protection by successive administrations. In addition, both the public and private sectors have increasingly focused on addressing the problem of children using restraint systems that are

inappropriate for their size, and consequently dangerous. All this underscores the need for NHTSA to have up-to-date data with which to help guide programmatic decisions in these critical areas.

The traffic safety environment has changed substantially over the years. Examples include passage of seat belt laws with provisions for primary enforcement, installation of new types of air bags in motor vehicles, and introduction of LATCH technology for child car seats. Without up-to-date information, NHTSA will not be able to adequately address shifts in attitudes or behavior, new opportunities to promote safety, or sudden obstacles that emerge.

The burden to respondents is kept to a minimum. Each respondent participates in only one survey, and each household is limited to one respondent

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 which notified the public of NHTSA's intent to conduct this information collection, and provided a 60-day comment period, was published on June 6, 2013 (Vol. 78, No. 109, Pages 34152-34154 (Attachment 2). No comments were entered into the NHTSA docket in response to the 60-day Federal Register Notice

A copy of a second Federal Register Notice (Vol. 79, No. 112 Pages 33638-33639), which announced that this information collection request will be forwarded to OMB, was published June 11, 2014 (Attachment 3).

EXPERT CONSULTATION: Experts both within and outside NHTSA played vital roles in the design of the baseline survey instrument. Prior to any development work, Offices within NHTSA's Traffic Safety Programs (TSP) section were asked to submit issues, topics, and specific questions they considered important to include on the survey. The collected information was then routed to the organization responsible for designing the initial survey instrument for NHTSA, the Questionnaire Design Research Laboratory (QDRL) at the National Center for Health Statistics (NCHS) within the Department of Health and Human Services (DHHS). NHTSA requested that the QDRL develop the baseline survey instrument because of their expertise in cognitive testing. Application of cognitive testing techniques during questionnaire design enhances the validity of the

instrument by determining how questions are being interpreted or considered by interviewees, with items then modified as appropriate to assure they accurately solicit the targeted information. The QDRL had extensive cognitive testing and questionnaire design experience with major DHHS surveys, and had performed similar work for clients outside DHHS.

With each recurrence of the survey, the two survey questionnaires have been reviewed by experts at NHTSA in the different areas targeted for data collection. Input for the MVOSS currently being proposed was received during a series of meetings with representatives from NHTSA sections of Occupant Protection, Behavioral Safety Research, Emergency Medical Services, Communications, and Vehicle Safety.

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

Remuneration will be paid to the members of the public volunteering to participate in the usability testing. This is common practice within the industry for testing of this sort, where subjects are volunteering an hour or more of their time to participate in an intensive feedback session concerning survey content or procedures.

No payment or gift provided to respondents participating in the pilot test or final survey administration is planned at this time. If the pilot test shows a poor response to the multi-mode approach and a need to introduce some motivational element to boost the response rate, this may be reconsidered.

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

All contacted households will receive a unique PIN to access the Web version of the survey. Respondents will only be able to access the information submitted under that PIN.

The introduction to the survey will tell respondents that the information they provide when answering the questionnaire will be kept completely separate from the information that was used to contact them so as to treat it as anonymous. They will be told that the information they provide will be used for statistical purposes only, and will not be used in a way where they can be identified.

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.

Questions regarding occupant protection are not commonly considered sensitive or private. The survey does include a few general questions asking about drinking, drinking and driving, and speeding. This is to assess the inter-relationship between occupant restraint use and other behaviors affecting traffic safety. Such assessment provides guidance on whether intervention approaches for various groups can treat non-

use of occupant restraints as isolated behavior, or instead should deal with it as a deeper construct involving a constellation of behaviors in order to be effective.

The survey also asks about crash injury experience. The information collected by this module has, among other things, been used to show an approximately two-to-one disparity in hospitalizations between vehicle occupants not wearing a seat belt at time of crash compared to those that did. It also has provided prevalence information on crash injury overall (26 percent in 2007) as well as by time, age group, and level of disability (see 2007 MVOSS Volume 4 Crash Injury and Emergency Medical Services Report at <http://www.nhtsa.gov/Driving+Safety/Research+&+Evaluation/2007+Motor+Vehicle+Occupant+Safety+Survey>).

It should be noted that respondents are made aware that participation is completely voluntary, and that they may refuse to answer any questions with which they feel uncomfortable.

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

This study will entail two Phases. The initial Phase will be the development work, which will involve adapting the questionnaires to the multi-mode approach, developing the Web site and alternative data collection modes, and pilot testing the survey. The developmental work will include usability testing to assess the interface between survey and respondent. There will be 60 usability test participants, with average duration of the tests being 2 hours. Drawn sample size for the pilot test will be 1,000 per response mode (Web; telephone; paper). For purposes of burden estimation, an upper limit of 50% response rate for the Pilot Test will be assumed, which provides a cushion above the 40% expected response rate for the survey specified in Section B.1. A 50% response rate would result in 1,500 respondents. Average duration of survey participation will be 15 minutes. The maximum estimated burden for Phase 1 is:

Usability Testing:	60 x 2 hours = 120 hours
Pilot Test:	1,500 x 15 minutes = 375 hours
Total Phase 1 Burden:	495 hours

The full administration of the survey will occur in Phase 2. Sufficient sample will be drawn to complete 6,000 interviews per questionnaire. Again, average duration of survey participation will be 15 minutes. The estimated burden for Phase 2 is:

Total Phase 2 Burden:	12,000 x 15 minutes = 3,000 hours
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Combining the Phase 1 and Phase 2 burdens, the maximum total estimated burden for the MVOSS is:

495 hours (Phase 1) + 3,000 hours (Phase 2) = 3,495 hours (Total)

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

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. Preliminary estimates for January 2014 from the Bureau of Labor Statistics, U.S. Department of Labor, list average hourly earnings in private industry as \$24.21 (<http://www.bls.gov/news.release/empsit.t19.htm> , accessed March 6, 2014). The estimated 3,495 interviewing hours multiplied by average hourly earnings of \$24.21 totals \$84,614 cost if the respondents had spent that amount of time on the job.

There are no record keeping or reporting costs to respondents. Respondents will be contacted randomly, and asked for their attitudes, knowledge, and behavior regarding specific occupant protection topics. 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 startup 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 estimated annualized cost to the Federal government is approximately \$340,000. The amount is based on the Contract award amount for a three year period.

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

This is a reinstatement with change. It requires a program change due to agency discretion to add the estimated 3,495 hours to develop and implement the next MVOSS.

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

NHTSA plans to publish results of the survey as a four volume series of reports:

- Volume I: Methodology Report
- Volume II: Seat Belt Report
- Volume III: Crash Injury and Emergency Medical Services Report
- Volume IV: Child Safety Seat Report

The Methodology Report will include information on the sampling frame, the survey response rate, weighting procedures, and copies of the questionnaires in both English and Spanish. The content area Reports will consist of Figures and Tables, with limited accompanying text. The data presentations will be similar to those published previously, largely percentage distributions and cross-tabulations. No complex analytical techniques are planned at this time.

NHTSA also plans to make the database available for public access through the NHTSA Web site, as was done with the most recent (2007) MVOSS at ([http://www.nhtsa.gov/Driving+Safety/Research+&+Evaluation/2007+Motor+Vehicle+Occupant+Safety+Survey+\(MVOSS\)](http://www.nhtsa.gov/Driving+Safety/Research+&+Evaluation/2007+Motor+Vehicle+Occupant+Safety+Survey+(MVOSS))).

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.