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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 on community-level public perceptions of enforcement of the laws prohibiting alcohol-impaired driving in order to relate that information to different models of Highly Visible Enforcement (HVE) conducted by law enforcement agencies. NHTSA is requesting approval to conduct telephone surveys to assess community awareness of the HVE activity and community perceptions of the likelihood of law enforcement officers stopping alcohol-impaired drivers. The five selected communities are Fresno and San Luis Obispo in California; and Rockford, Decatur, and Peoria in Illinois. NHTSA has revised this ICR to reduce the number of telephone interviews to a maximum of 6,000.

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 Services⁴ 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 differing approaches to HVE carried out by law enforcement agencies to perceived risk.

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 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. 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 A number of law enforcement agencies do conduct more than two waves of HVE. 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). In contrast to the wave approach is what may be termed an integrated approach, where the HVE is a normal part of law enforcement officers' ongoing activities and is integrated into their regular tasks. Under the integrated approach, the HVE becomes a constant throughout the year and may serve as 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.

While HVE limited to just a few times a year would not be expected to have much impact on public perceptions, the relationship of more extensive implementation of HVE to public perceptions is unknown. In particular, does the perceived risk within a community of an alcohol-impaired driver being stopped and arrested by law enforcement increase as a function of the amount of HVE activity, such as by adding enforcement waves? Or is the optimum effect on awareness and perceived risk achieved through an integrated program that relies more on how HVE is conducted rather than the absolute amount? The proposed information collection will address those questions. Detailed information on enforcement activity over the course of a year will be obtained from law enforcement agencies that span different models of HVE. The agencies participating in the study have automated systems in which enforcement activity is entered as a normal part of their

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.

operations. Approval is requested by NHTSA to survey the public by telephone within those communities served by the participating law enforcement agencies in order to gauge community awareness of the enforcement activity and the perceived risk of an alcohol-impaired driver being stopped by law enforcement. The five study sites are Fresno and San Luis Obispo in California; and Rockford, Decatur, and Peoria in Illinois.

b. Statute authorizing the collection of information

Title 23, United States Code, Chapter 4, Section 403 (Attachment A) gives the Secretary authorization to conduct research and development activities, including demonstration projects and the collection and analysis of highway and motor vehicle safety data and related information needed to carry out this section, with respect to human behavioral factors and their effect on highway and traffic safety, including impaired driving. 23 U.S.C. 403(b)(1)(B)(ii).

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 law enforcement agencies' approaches to HVE directed at the alcohol-impaired driving laws and: (1) public awareness that the alcohol-impaired driving laws are being enforced; and (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 HVE relates to these perceptions. Programs that differ in how HVE is conducted will be observed, and public perceptions compared. Analyses will identify the relative success of varying 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 how best to implement 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.

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 survey data collection will be explicitly linked to HVE activity conducted by selected law enforcement agencies. A unique feature of the study is the level of detail that the study will have concerning the enforcement activity and the length of the time period it will cover (one year). The necessary connection of the survey data to the HVE activity precludes there being alternative data that could be used to answer the study questions.

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 HVE to work, but left unclear what approach works best. Without information on the relationship of different HVE models to perceived risk, law enforcement agencies won't know if their planned HVE activity will be adequate for the enforcement to have a deterrent effect, or alternatively will be excessive such that it 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.

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 (February 14, 2014, Vol. 79, No. 31, Pages 9038-9040) which announced NHTSA's intention to conduct the collection of information is provided in Attachment B. No comments were received in response to the Notice.

A copy of a second Federal Register Notice (November 5, 2014, Vol. 79 No. 214 Pages 65767-65768), which announced that this information collection request will be forwarded to OMB, is provided in Attachment 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.

No payment will be made to participants in the telephone survey.

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.

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 to public

perceptions of enforcement activity, 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 1,200 interviews per site. Interview length will average 10 minutes. Overall burden for the telephone surveys would then be:

$$1,200 \text{ sample size} \times 5 \text{ sites} \times 10 \text{ minutes} = 1,000 \text{ hours}$$

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 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. Preliminary estimates for November 2014 from the Bureau of Labor Statistics, U.S. Department of Labor, list average hourly earnings in private industry as \$24.66 (<http://www.bls.gov/news.release/empsit.t19.htm> , accessed December 5, 2014). The estimated 1,000 interviewing hours multiplied by average hourly earnings of \$24.66 totals \$24,660 if the respondents had spent that amount of time on the job.

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 \$190,000.

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 survey questions will be computed and compared across sites to assess the relationship of HVE model to awareness of enforcement activity and perceived likelihood of an alcohol-impaired driver being stopped by law enforcement.

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.