

**Information Collection Supporting Statement
Implementing a Leadership Framework for Traffic Safety and Seat Belt Enforcement**

Submitted by

National Highway Traffic Safety Administration

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Implementing a Leadership Framework for Traffic Safety and Seat Belt Enforcement

OMB Control No. 2127-XXXX

Approval is requested to conduct a set of interviews with law enforcement personnel, leaders, and key stakeholders in traffic safety to evaluate the implementation of a toolkit for enhancing seatbelt enforcement.

A. Justification

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 necessitating the data collection.

1. National Highway Traffic Safety Administration (NHTSA) mission

The NHTSA was established by the Highway Safety Act of 1970 (23 U.S.C. 101). Its Congressional mandate is to reduce the number of deaths, injuries, and economic losses resulting from motor vehicle crashes on our nation's highways. To accomplish this mission, NHTSA sets and enforces safety performance standards for motor vehicle equipment and provide funding to State and local governments for their use in supporting highway safety activities, including demonstration and evaluation programs. NHTSA also conducts research on driver behavior and traffic safety to develop efficient and effective means of bringing about safety improvements.

2. Lack of Seatbelt Use Problem

In 2012, there were 21,667 occupants of passenger vehicles who died in motor vehicle traffic crashes. Of the occupants for whom restraint status was known, these, 52% were known to be unrestrained at the time of the crash. Research shows that wearing a seatbelt or using a child safety seat can greatly reduce the chances of fatal or serious injury as a result of a motor vehicle collision. In fact, when used, seat belts reduce the risk of fatal injury to front-seat passenger occupants by 45% and to light truck occupants by 60%. Moreover, the nationwide daytime seat belt use rate was 87% in 2013, and ranged from 69% to 98% in the states and territories. Clearly there is work to be done to increase seat belt use and reduce unrestrained fatalities due to motor vehicle crashes. It is critical that NHTSA continually explore strategies to increase the use of seat belts among all occupants of motor vehicles.

High visibility enforcement (i.e., highly visible enforcement accompanied by public information supporting the enforcement) has been demonstrated to increase seat belt use. A successful high visibility enforcement program requires a written comprehensive plan with clear, well-defined goals, objectives, and performance measures; understanding of costs; funding; support from key stakeholders within the community; and aggressive law enforcement of laws. All of the above can only be accomplished with strong executive leadership.

A NHTSA-convened work group of law enforcement representatives from states with secondary seat belt laws, but exemplary work in support of occupant protection enforcement, identified strong leadership as the critical component in their successes. Potential demonstration sites provided agency, enforcement effort, and protocol information to NHTSA during the selection process. This information was then used to identify and select sites for participation which served as background information for the evaluation. Strong leadership within any law enforcement agency can result in various practices and methodologies that spotlight a program's importance and help to make occupant protection as well as other traffic safety issues an integral part of the agencies' cultures. Regardless of whether the occupant protection program is organized as a specialized unit or broadly integrated within the routine operations of the law enforcement agency, key management and enforcement roles must be clearly defined and assigned to specific individuals by the executive staff.

b. Legal basis for collecting data

NHTSA has statutory authority to conduct crash injury research and collect relevant data in the interest of public health. Specifically, NHTSA is authorized to: (1) engage in research on all phases of highway safety and traffic conditions; (2) undertake collaborative research and development projects with non-federal entities for the purposes of crash data collection and analysis; and (3) conduct research and collect information to determine the relationship between motor vehicles and crashes, and personal injury or deaths resulting from such crashes.

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.

NHTSA is undertaking a study to implement a leadership model framework within three law enforcement agencies selected by NHTSA, evaluate the process and determine if the traffic safety outcome of interest is realized, specifically the impact on increased seat belt use and reduction in unrestrained fatalities. To accomplish this, NHTSA will provide technical assistance to three law enforcement demonstration communities for the implementation of leadership frameworks in support of occupant protection enforcement and safety strategies. Evaluation measures will involve the independent identification, collection and evaluation of both qualitative and quantitative data that specifically document changes in enforcement activity and its effects on the surrounding communities' behaviors. Overall findings will be provided to other law enforcement agencies to use as a resource for improving occupant protection enforcement programs and efforts.

NHTSA proposes to conduct 108 interviews with law enforcement personnel. This will include a set of individual interviews with line officers and individual or group interviews with leadership within each of three demonstration agencies. While individual interviews will work best with line officers, either group or individual interviews can work effectively with the senior leadership. Flexibility is built into this approach in order to be mindful of senior leadership's scheduling constraints.

Eighteen individuals will be interviewed at each of three demonstration sites, for a total of 54 individuals. Each individual will be interviewed twice: once during the project implementation and once at the end of the demonstration project. Ideally, the same respondents will be interviewed at both time periods; however, in the event that an individual leaves the law enforcement agency or is otherwise unavailable for an interview, NHTSA may replace the individual with another suitable interviewee.

Interviewees will either be self-selected or selected by the demonstration agencies. The purpose of these interviews is to document how a law enforcement agency implements a new leadership approach for seat belt enforcement so that the experiences of the demonstration sites can serve as resources to other agencies undertaking new seat belt enforcement initiatives.

Questions will be asked at separate time points about their background, awareness of new/enhanced seatbelt enforcement program, department support for the new program, community support, technical assistance, and other related issues. The interviewees will be asked questions such as the following:

- What percentage of your time is spent on seatbelt enforcement?
- Can you describe the new/enhanced seat belt enforcement activities that have been implemented in the department? Has seat belt enforcement changed as a result of these new/enhanced activities? Has your day-to-day work changed at all? What specifically has changed?
- Among department leadership, what is your opinion of the level of support for the new/enhanced activities? What about among the deputies/officers/troopers responsible for enforcement? What leads you to believe that they feel that way?
- Is the local community aware of the new/enhanced activities? What, if anything, has the department done to raise their awareness? Were the efforts publicized locally? If so, how?
- Do you have any further needs for information or training? If so, what additional information or training is needed? Have you requested this from your supervisors or leadership? If so, what was their response?
- Do you have any suggestions for improving the toolkit or other technical assistance offered? If so, what needs to be improved?
- Are you familiar with how seat belt enforcement was handled in the past? Can you describe how it differs from the current approach?

NHTSA believes that the interview methodology is the best way to gain an in-depth understanding of how law enforcement personnel and key stakeholders feel about seatbelt enforcement efforts during the course of the project. There will be three types of individuals interviewed:

- Implementation Law Enforcement Personnel—Law enforcement personnel who are part of the implementation effort, including rank and file officers, sergeants, and administrative officers including top commanders. These personnel are directly involved with the implementation. (Form 1266)
- Non-implementation Law Enforcement Personnel—Law enforcement personnel who are not part of the implementation effort, but part of the demonstration agency, including officers of varying rank who are not directly involved with implementation efforts. (Form 1267)
- Key Stakeholders—may include community leaders, traffic safety commission and other relevant agency representatives, policy focused community members who help shape the laws, and department of transportation representatives. (Form 1265)

The interview format will allow respondents to comment on the areas that they think are most important. The data collected from the interviews will be used to assist NHTSA in providing guidance to other law enforcement agencies to use as a resource for developing and implementing programs to improve occupant protection enforcement efforts.

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 forms of information technology. Also describe any consideration of using information technology to reduce burden.

The interviews will be audio taped for subsequent use by the facilitator in preparing a summary report of each meeting. No one other than the interviewers, other contractor personnel and NHTSA staff involved with this project will have access to these audiotapes. Additional automatic, electronic, mechanical, or other technological collection techniques are not needed for interviews and will not be used.

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.

We are not aware of any similar efforts in the past or the present to study the implementation of a leadership toolkit for seat belt enforcement across a variety of agencies. The current project focuses on several agencies with unique characteristics which are being studied, as well as the implementation process, to identify best practices for implementing such program, strategies.

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

There will be no impact on small businesses or other small entities. Individuals will participate

in the interviews as part of their normal duties as law enforcement personnel or key stakeholders.

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.

If the proposed information collection activities are not conducted, NHTSA will not be able to properly evaluate the potential impact that leadership programs may have on establishing and enhancing seatbelt enforcement programs. Furthermore, enhanced seatbelt enforcement programs could be critical to improving the safety of drivers, especially within high risk jurisdictions with low seat belt use rates or with high, unbelted fatality rates. The interviews are designed to understand the impact and benefit the leadership approach may have on the enforcement efforts of a law enforcement agency and the community's behavior. Proper understanding of this process can make subsequent implementations more efficient and maximize the impact of such program strategies.

A.7. Explain any special circumstances that would cause the information 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 and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8 (d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Describe efforts to consult with persons outside the agency to obtain their views.

As required by the Paperwork Reduction Act of 1995, NHTSA published two notices in the *Federal Register*, as noted below.

a. Federal Register Notice

NHTSA published a notice in the *Federal Register* with a 60-day public comment period to announce this proposed information collection on June 30, 2014, Volume 79, Number 125, pages 36865-36867.

b. Responses to the Federal Register Notice

NHTSA did not receive any comments in response to the *Federal Register* notice published on June 30, 2014.

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

Interviewees will not be compensated as part of this study.

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

Minimal personally identifiable information (PII) will be obtained during the scheduling of the interviews. Any names and contact information collected for this purpose will be stored on secure network computers and only staff at Westat working on the project will have access to it. Westat's computers comply with the Federal Information Security Management Act (FISMA) guidelines. Participant information will not be connected to the data. Contact information will only be for the purpose of re-inviting, but that contact information will not be connected to the actual data from the interviews.

All interview data (including audio recordings that will be created to serve as a backup to written notes) will be maintained by Westat on project folders located on Westat's secured server. Study data will only be accessible to Westat staff assigned to this project. Any printed data or notes will be kept in a locked, secure cabinet located in Westat's Rockville offices for the duration of the study. All Westat employees have taken and signed a Confidentiality pledge. All electronic study data will be destroyed at the end of the study.

At the start of each interview, the interviewer will tell participants that their names will not be used in any report. The interviewer will also explain that the report to NHTSA will contain only a summary of the comments that reflects both consensus and minority opinions, so that anything they share specifically will not be shared with others directly and not attributed to them. Interviewees will also be informed that their participation in the interview is voluntary and that their responses will be treated in a secure manner.

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

There are no questions of a personal or other sensitive nature that are commonly considered private.

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

NHTSA estimates that there will be 54 interview participants, each of whom will be interviewed twice: once during project implementation, and once at the end of project implementation. This means that there will be 108 total interviews, with each interview estimated to last 60-75 minutes. Assuming a maximum length of 75 minutes, the total hour burden is 135 hours for the 54 participants across the 108 interviews.

Although the respondents will not be remunerated, the time they spend in the interview 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. The total number of estimated reporting burden hours on the general public would be 135 for the proposed interviews. The total annual estimated cost for law enforcement respondents is \$2,577.60 (estimated at \$28.64* per hour x 90 burden hours). The total annual cost for non-law enforcement respondents (i.e. Key Stakeholders) is \$1004.85 (estimated at \$22.33** per hour x 45 burden hours). The total annual estimated cost associated with all of the burden hours is \$3,582.45. Respondents would not incur any other reporting costs from the information collection.

TABLE A.
BURDEN ON RESPONDENTS
Law Enforcement Personnel (Mid & Post)

Population	N	Cost per Hour	InterviewLength (hr)	Total Cost	Burden Hours
Interview participants	36X2	\$28.64	1.25	\$2,577.60	90
TOTAL	72	\$28.64	1.25	\$2,577.60	90

*From <http://www.bls.gov/oes/current/oes333051.htm>, Police and Sheriff's Patrol Officers, Occupational Employment and Wages, May 2014.

TABLE B
BURDEN ON RESPONDENTS
Key Stakeholders (Mid & Post)

Population	N	Cost per Hour	InterviewLength (hr)	Total Cost	Burden Hours
Interview participants	18X2	\$22.33	1.25	\$1,004.85	45
TOTAL	36	\$22.33	1.25	\$1,004.85	45

**From http://www.bls.gov/oes/current/oes_nat.htm#b00-0000, All occupations, Mean Hourly Wage Estimate May 2013 (most recent); viewed July 2, 2014.

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

The interview participants will not incur any record keeping or reporting costs from this information collection.

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

The total cost to the Federal government is \$502,575. This cost is comprehensive of all evaluation research and reporting expenses for the duration of the project. The annualized cost

for the 24 months of the project is \$251,288 per year and is inclusive of the cost for preparing for and conducting these interviews.

A.15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-1.

This is a new collection of information for a one-time study, which adds an additional 135 hours to NHTSA's overall total.

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

A final summary report will be prepared for that presents the findings from all interviews. This report will include a description of the data collection methods (including how respondents were selected); an overview of the final sample of interviewees (including locations, number of participants, types of participants, etc.); a summary of interview findings; a discussion of lessons learned from the study; and recommendations for NHTSA. The report will document best practices that were identified among the demonstration communities as part of the evaluation.. Individual interviewees will not be identified in the report; comments will be reported only in aggregate form as part of the findings.

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.

The expiration date will be displayed.

A.18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-1.

No exceptions to the certification statement are made.