

SUPPORTING STATEMENT
FOR
FATALITY ANALYSIS REPORTING SYSTEM
INFORMATION COLLECTION
(HS-214, 214A, 214B, 214C, 214D and 214E)
OMB Clearance 2127-0006

(A) Justification

(1) Explain the circumstances that make the collection of information necessary. Attach a copy of the appropriate statute or regulation mandating or authorizing the collection of information.

Under both the Highway Safety Act of 1966 and the National Traffic and Motor Vehicle Safety Act of 1966, as amended, the National Highway Traffic Safety Administration (NHTSA) has the responsibility to collect accident data that support the establishment and enforcement of motor vehicle regulations and highway safety programs. These regulations and programs are developed to reduce the severity of injury and the property damage associated with motor vehicle accidents. The Fatality Analysis Reporting System (FARS) is in its thirty-seventh year of operation as a major system that acquires national fatality information directly from existing State files and documents. This supports the Department of Transportation's strategic goal for Safety by working toward the elimination of transportation related deaths, injuries and property damage.

OMB Clearance 2127-0006 authorizes four FARS data acquisition forms, Crash 214, Vehicle 214A, Driver 214B, and Person (MV Occupant) 214C. In addition to these forms, NHTSA is requesting clearance for two other forms, PreCrash 214D, and Person (Not a MV Occupant) 214E.

(2) Indicate how, by whom, and for what purpose the information is to be used. Indicate actual use of information received from the current collection.

NHTSA established cooperative agreements with the 50 States, the District of Columbia and Puerto Rico to report a standard set of data on each fatal accident. State employees extract and transcribe information from existing State files including police accident reports as well as driver license, vehicle registration, highway department and vital statistics files. This information comprises a national database that is NHTSA's and many States' principal means of tracking trends in fatalities and quantifying problems or potential problems in highway safety.

FARS data are used extensively by all of the NHTSA program and research offices and other DOT modes such as Federal Highway Administration and Federal Motor Carrier Safety Administration. Other users include State legislators for determining highway safety problem areas requiring laws and programs (mandatory use of seat belts, 55 vs. 65 mile per hour speed limits); by the highway research community including the private sector (industry and associations) for trend analysis, problem identification, and program evaluation (e.g., air bag studies and drunk driving campaigns and Click It or Ticket programs); and by the Congress for making decisions concerning safety programs. The FARS data are available upon request to anyone interested in highway safety. FARS data are made available through the Internet and via specialized data run requests. NHTSA responds to over 20,000 information requests for FARS data each year.

(3) Describe whether the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology.

A major upgrading in FARS information processing and retrieval took place in September 2009 when all 52 FARS sites completed the modernization process which entailed switching from local data storage to a virtual computer accessed through Web-based applications. The benefits

to the FARS modernization included the following: improved security of data - data no longer located in the State, elimination of the need for daily data backups and equipment purchases, and it allows multiple parties (analysts, backup analysts and supervisors) to access data simultaneously. As a result of the modernization, each FARS State Analyst virtually enters coded data directly into NHTSA's central computer database. This has improved the State analysts' ability to input the FARS data, facilitated corrections and improved overall quality control of the data.

Improved technology is constantly being sought and evaluated to reduce the burden of the data collection and reporting effort. A greater part of the burden, however, remains with the State analyst's task of obtaining appropriate data sources and encoding the data into FARS standard forms or coding directly onto the software of the computer program. Each state has its own unique records system and data retrieval capabilities that dictate much of the burden necessary for FARS. Nevertheless, our provided technology will offer the ability to directly access various state data files, as the state deems appropriate.

(4) Describe efforts to identify duplication. Show specifically why similar information cannot be used.

Several studies have been conducted to support the need for FARS and assure no duplication. One such study was: "Feasibility Study -- Review of Accident, Traffic and Highway Data Collection" which was completed and forwarded to OMB in November 1981. It concluded that no unnecessary duplication existed in FARS. Other studies include: "Office of the Inspector General's Report On Review of the Fatal Accident Reporting System, No. AS-NH-4-00, November 1983"; "Feasibility Study - National Center for Statistics and Analysis of Highway Operations, A Report to Congress from the Secretary of Transportation", February 1975; "Highway Safety Data, A Report to the Secretary of Transportation by the National Highway Safety Advisory Committee", June 1979; "Accident Data Collection Systems of the National Highway Traffic Safety Administration, A Report to the House Appropriations Committee", December 1979.

No existing data file is similar to FARS. It is a central source of national highway fatality data containing a standard set of data on each fatal accident. The method of acquisition is totally unique in that it overcomes problems with inconsistent local reporting and multiple local records systems that are not linked. It is a census of all defined fatal crashes in the country.

While other organizations such as the National Safety Council and the Department of Health and Human Services also collect highway accident information, there are no assurances in those systems that the fatality counts and the data elements are consistent from State to State. Further, the detailed data necessary for highway safety analysis are not included on these other files. FARS is the largest and most comprehensive data base of fatal accident data in the world.

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

The actual collection of the FARS data involves the State governments from the 50 States, D.C. and Puerto Rico. These respondents are not "small government jurisdictions" (i.e. none are the government of a city, county, town, township, school district, or special district with a population of less than 50,000).

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

If this collection is not done, the major source of information in the country for highway safety problem identification multi-year trend analysis and counter measure program evaluation would be lost.

FARS is unique in that it is the only census of all reported fatal traffic accidents. Being a census allows NHTSA many advantages: (1) the individual state totals as well as the national totals produced from

FARS are extremely accurate, (2) sampling techniques and statistical estimations are not necessary, (3) year-to-year changes, even minor ones, can be detected, and (4) case detection and record keeping is easier for the analysts since they do not have to select a sample of fatal cases. If FARS were a sample of fatal accidents, none of the above advantages would exist. If FARS were conducted every second or third year, yearly increases and decreases could not be detected. Furthermore, NHTSA could not maintain the corps of adequately trained State personnel who actually perform the data acquisition.

(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.

FARS is collected consistent with the guidelines in 5 CFR 1320.6.

(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.

For the Federal Register document soliciting comments on the collection of information and summary of public comments (78 FR 38096 (June 25, 2013) (U.S. DOT Docket Number NHTSA-2012-0168). There were no comments on this information collection.

FARS was designed in 1972 and has been fully operational since 1975. Originally, the design of the record forms and the operational system was thoroughly collaborated with each prime user in the Federal Government and with a wide representation from both the States and several professional organizations that represent functional associations of the safety community. Consultation is constantly being conducted through the Governor's Highway Safety Association or designee with the States, NHTSA's Regional Offices, and other prime users so that a mutually beneficial program is maintained. Attendance at professional meetings such as the Traffic Records Forum, the Transportation Research Board and American National Standards Institute committee meetings by FARS staff personnel, as well as presentation of FARS data to these groups, constantly keep the type and quantity of FARS data collected in the public's eye.

Thorough collaboration was made internal to the Federal Government, and is maintained with the Federal Highway Administration, Federal Railroad Administration, the National Center for Health Statistics (CDC) of the Department of Health and Human Services, the National Park Service and the Consumer Product Safety Commission.

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

Respondents are employees of State agencies whose salaries and other direct costs are reimbursed through cooperative agreements duly executed through the NHTSA Office of Contracts and Procurement. In some States there are shared program costs contributed by the State.

(10) Describe any assurance of confidentiality provided to respondents.

The data acquired for FARS are taken from State public record files. Personal identifiers are not required, requested or recorded on analytical files released to the public. NHTSA makes the FARS data available to the public. The data are maintained in two separate file formats:

MASTER FILE - The data resides as submitted by the "respondent." This file is only for internal NHTSA use and is not released to non – NHTSA users as it is a working file, which is not fully documented for analysis purposes.

ANALYTICAL FILE - The data are reformatted for analysis purposes and to ensure compliance with the

Privacy Act. This results in a sanitized version of the Master File in which those remotely possible identifiers (e.g., the unique portion of the Vehicle Identification Number) have been deleted.

(11) Provide additional justification for questions on matters that are commonly considered private.

FARS acquires data related to fatal motor vehicle traffic crashes. The data are coded from the State Police Accident Reports, which contain only information related to the fatal accident.

The Death Certificate Number is collected in order to supplement the FARS crash data with detailed injury data. The National Center for Health Statistics (NCHS) maintains the Multiple Cause of Death (MCO) file. The MCO contains very detailed information in a standardized format on injuries and specific cause of death, but no details on the causative factors of traffic crashes. FARS, on the other hand, contains substantial information on the crash but less detailed injury information than the MCO file. These two sets of data are being linked through the death certificate number by NHTSA's statisticians without duplication of effort or undue burden on the respondents to collect extra injury information.

The result is of mutual benefit to NCHS and NHTSA as well as the highway safety community at large. Once the link has been established through the death certificate and the injury data obtained, these data are attached as a supplemental file to the FARS analysis file with death certificate numbers eliminated. This file is used for internal analysis only and is not released or accessible to the public. No personal identifiers exist on this file as a result of the linking. The death certificate number is transmitted to the master file but is not recorded on the coding forms.

In 1987, FARS requested a determination from NHTSA's Chief Counsel as to whether the collection of the death certificate number would pose a violation of the Privacy Act. NHTSA's Chief Counsel determined that the collection would not violate the Act

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

There are 52 State "respondents" reporting on approximately 32,885 fatal accident cases per year. The State employee (or employees depending on the number of fatal crashes per year occurring in the particular State) acquires and codes the required information as fatal crashes occur. Approximately 3.00 hours per case are necessary to complete the FARS forms. This results in an estimated annual burden of 98,655 hours. This estimate is based on 29 years of FARS operation and includes the nominal time needed to access data from existing State files including police accident reports, driver license files, vehicle registration information, highway department records, and vital statistics files. These various sources reside in several places in each State. NOTE: FARS does not involve the gathering or generation of new data. The federal contribution associated with the burden hours is \$5.1 million annually. The in-kind contribution from the grantees that employ the respondents varies from 0-100K on average (above the 5.1 million federal funding provided).

Funding provided by the States is used to cover respondents labor hours and records. Little, if any, variance by the State employee is expected in encoding the forms for a case and no variance is expected in the requirements of the existing State records. If the State analyst cannot get the information from existing records, it is reported to NHTSA as "unknown". The number of total FARS cases varies from State to State from a high of 2720 in California to a low of 28 in The District of Columbia in 2010.

(13) Provide estimates of the total annual cost to the respondents or record keepers.

Most of the costs associated with "respondents" participation in FARS are charged to the Federal Government through the FARS Cooperative Agreements.

(14) Provide estimates of annualized cost to the Federal Government.

The total cost of the FARS program for FY 2011 is approximately \$8.4 million. This figure includes the cost of the data acquisition (\$5.1 million). The remainder of the program costs are for: the data processing costs associated with data collection (file maintenance, hardware, software development and time-sharing); the data quality control costs (training, consistency, timeliness, completeness and error rate monitoring); analysis of data to respond to inquiries; and related administrative/support activities.

FARS' major costs involve reimbursement to the States for the FARS analysts' person hours (the \$5.1 million annually). The person hours spent in each State is dependent upon many factors: (a) the number of fatal crashes in that state, (b) the quality and status of the traffic records in the State, (c) the experience and training of the analyst, and (d) the skill of the analyst in coding and entering data. Measures are being taken to improve the cost efficiency of data acquisition including better training and cross-fertilization of methods and techniques used by very efficient States to States with higher costs per case.

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

This is a reinstatement resulting in a program change of increasing NHTSA's total burden hour by 98,655.

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

The data files are made available to the public each year after completion of quality control. These data files are released annually. The previous calendar years data are available on the internet. For example, data collected during calendar year 2011 will be available for public release in November 2012.

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

NHTSA plans to operate FARS indefinitely. We must do this to comply with our enabling legislation.

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

No exceptions to the certification statement are made.