

TABLE OF CONTENTS

SUPPORTING STATEMENT

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 making the collection necessary
 - b. Statute authorizing the collection of 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.
- 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 considerations of using information technology to reduce burden.
- 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.
- A.5. If the collection of information involves small businesses or other small entities, describe the methods used to minimize burden.
- A.6. Describe the consequences to Federal Program or policy activities if the collection is not collected or collected less frequently.
- 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.
- 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.
- A.9. Explain any decisions to provide any payment or gift to respondents, other than remuneration of contractors or grantees.
- A.10. Describe any assurance of confidentiality provided to respondents.

- 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.
- A.12. Provide estimates of the hour burden of the collection of information on the respondents.
- A.13. Provide an estimate of the total annual cost to the respondents or record keepers resulting from the collection of information.
- A.14. Provide estimates of the annualized cost to the Federal Government.
- A.15. Explain the reasons for any program changes or adjustments in Items 13 or 14 of the OMB 83-I.
- A.16. For collection of information whose results will be published, outline plans for tabulation and publication.
- 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.
- 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

Supporting Statement

A. Justification

Reducing crashes involving human error is a key goal of the National Highway Traffic Safety Administration (NHTSA). One important way of reducing ambulance crashes is through operator training. Unfortunately, limited information is available concerning the common characteristics or the effectiveness of ground ambulance operator training. Following recommendations put forth by the National Emergency Medical Service Advisory Council (NEMSAC), NHTSA proposes to conduct a study entitled *Characterizing Ambulance Operator Training in EMS Systems* to assess the status of emergency vehicle operator training throughout the United States.

NHTSA desires to document the types of driver training that are offered, when this training is required, how driving incidents impact driving privileges, initial qualification standards, and other related topics. NHTSA is seeking approval from the Office of Management and Budget (OMB) to conduct an Internet-based survey of local agencies that provide ground ambulance services. Each surveyed Emergency Medical Service (EMS) agency will be asked to assign a single representative to complete the questionnaire. NHTSA is also seeking approval from the OMB to conduct a semi-structured interview with representatives from State EMS offices for the 50 States and Washington D.C. The interviews will be conducted via telephone. Approximately 153 semi-structured interviews (up to 3 per State and Washington, D.C. since multiple offices may be responsible for various aspects of ambulance driver training and regulation) will be conducted.

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 has the responsibility for making driving safer by ensuring that drivers commit the fewest errors possible and by attempting to render the residual errors that are committed benign. Not all drivers, however, face the same level of risk on the road or the same task demands. Emergency vehicle operators are arguably at elevated risk for crash and injury. Emergency vehicle operators must deal with critical time demands, large and often unstable vehicles, and numerous potential and unavoidable distractions inherent in the response to emergencies. They must additionally cope with the often competing needs for rapid transport, maintaining a level of ride quality that is compatible with a sick or injured passenger, and permitting Emergency Medical Technicians (EMTs) or other medical personnel to apply critical care treatments that cannot be postponed until arrival at a medical facility.

Operator training is one method that human factors professionals have used in virtually all domains to reduce human error and thereby increase the safety of operations. When the number of operators is relatively small or highly controlled by one or only a few government agencies (e.g., astronauts, pilots, nuclear plant operators), it is possible to prescribe specific training standards and content or even require the universal application of an “official” training course. On the other hand, when there are numerous operators with varying responsibilities facing a wide variety of State and local regulations and requirements, as is the case with ambulance services, the quality and extent of training potentially could be highly variable.

The training completed by emergency vehicle operators is diverse and not well characterized as documented by the Safety Committee of the National EMS Advisory Council (NEMSAC) in its December 13, 2011 *Final Advisory*¹ and in the omnibus national survey done by the National Association of State EMS Officials (NASEMSO).² Although emergency vehicle training for ambulance operators has been repeatedly identified as an important step in the safety system, there is no well evaluated, universally accepted standard for the content or delivery of this training.

The purpose of the information collection is to assess the status of ground ambulance operator training throughout the United States. Obtaining this information is a critical first step in meeting the goals set by NEMSAC for improving the safety and performance of emergency vehicle operations. Ultimately, NHTSA may use the information collected as part of this effort to help determine the effectiveness of ambulance operator education and training, as well as producing guidance for improving emergency vehicle operator education and training for ground ambulances. The collected data will assist NHTSA in its ongoing responsibilities for: (a) reporting the effectiveness of program activities; (b) providing information to NHTSA’s partners involved in reducing ambulance crashes; and (c) providing sound scientific reports on NHTSA’s activities to other EMS professionals.

b. Statute authorizing the collection of information

The National Traffic and Motor Vehicle Safety Act of 1966, Title 15 United States Code 1395, Section 106 (b), gives the Secretary authorization to conduct research, testing, development, and training as authorized to be carried out by subsections of this title. The Vehicle Safety Act was subsequently re-codified under Title 49 of the U.S. Code in Chapter 301, Motor Vehicle Safety. Section 30168 of Title 49, Chapter 301, gives the Secretary authorization to conduct research, testing, development, and training to carry out this chapter. Title 23 of the U.S. Code, Chapter 4, Section 403 (attached as Appendix A) gives the Secretary authorization to use funds appropriated to carry out this section to conduct research on all phases of highway safety and traffic conditions; to

¹ National EMS Advisory Council (2011, December). Safety Committee Final Report: Emergency Vehicle Operator Education, Training, and Safety. Retrieved at http://www.ems.gov/pdf/nemsac/NEMSAC_Advisory-EVOC_Dec2011.pdf

² Federal Interagency Committee on Emergency Medical Services (2012). *2011 National EMS Assessment*. U.S. Department of Transportation, National Highway Traffic Safety Administration, Washington, DC,

conduct training or education programs in cooperation with other Federal departments and agencies, States, private sector persons, highway safety personnel, and law enforcement personnel; and to conduct research on, and evaluate the effectiveness of, traffic safety countermeasures [See 23 U.S.C. 403(a)(1), 23 U.S.C. 403 (a)(4), 23 U.S.C. 403 (a)(5)].

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.

This is a new collection of information. Respondent compliance is voluntary. NHTSA intends to conduct a survey effort to gather data regarding ambulance driver training in Emergency Medical Services (EMS) systems. Data will be collected from EMS agencies across the United States, and from representatives from State EMS offices for the 50 States and Washington D.C. An Internet-based questionnaire will be used to collect local agency responses, and semi-structured interviews will be conducted to collect responses from State EMS offices.

The purpose of the information collection is to assess the status of ground ambulance operator training throughout the United States. Obtaining this information is a critical first step in meeting the goals set by NEMSAC for improving the safety and performance of emergency vehicle operations. Ultimately, NHTSA may use the information collected as part of this effort to help determine the effectiveness of ambulance operator education and training, as well as producing guidance for improving emergency vehicle operator education and training for ground ambulances. The collected data will assist NHTSA in its ongoing responsibilities for: (a) reporting the effectiveness of program activities; (b) providing information to NHTSA's partners involved in reducing ambulance crashes; and (c) providing sound scientific reports on NHTSA's activities to other EMS professionals.

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 majority of the data collection effort will involve an Internet-based questionnaire. To collect the information, NHTSA will obtain contact information for local EMS agencies and State offices and send out a solicitation via email (see Appendices F1 and F2 for the solicitations) with a request for participation. EMS agency representatives will voluntarily complete the Internet questionnaire at their convenience. Completion time for the Internet-based questionnaire has been estimated to be 15 minutes or less. The semi-structured interviews with State EMS offices will be conducted via telephone. Semi-structured interviews are expected to average 60 minutes in length.

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.

NHTSA intends to characterize ambulance operator training across the United States in as much detail as possible. For example, NHTSA is interested in learning about what types of driver training are required, when the training is required, how driving incidents impact driving privileges, initial qualification standards for operators, and other related topics. Information related to such topics either does not exist, or has never been collected and analyzed on a national scale. Therefore, until it is collected as part of this effort, no other data source can be substituted and there is no possibility of duplicating information that is currently available.

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

There is a possibility that some local EMS agencies are operated as small businesses. In order to minimize burden, participants from EMS agencies will be efficiently recruited via email to respond to the Internet-based questionnaire. The questionnaire has been designed to elicit specific information that is directly relevant to the research goals of the project, has been edited for flow, time, and face validity. The agency questionnaire will be completed a single time by one representative from the solicited agencies at their own convenience. Also, the collection does not involve any record-keeping burden.

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.

NHTSA has the responsibility for making driving safer by ensuring that drivers commit the fewest errors possible and by attempting to render the residual errors that are committed benign. The current situation with respect to ambulance operators is diverse and not well characterized. There is no well-evaluated, universally accepted standard for the content or delivery of emergency vehicle operator training. Without the conduct of the proposed data collection effort, NHTSA will not be able to meet the goals set forth by the NEMSAC, nor will NHTSA be able to effectively develop recommendations for the improved safety of emergency vehicle operations via formal driver training. Such operator education is a vital component to a systems approach at improving the overall safety and performance of emergency vehicle operations, which includes safety gains for the emergency vehicle operator, but also for injured motor vehicle passengers, and the general public. Without the current data collection effort, the state of emergency vehicle driver training in the United States will remain largely unknown.

We do not foresee any technical or legal obstacles for reducing burden.

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 that notified the public of NHTSA's intent to conduct this information collection, and provided a 60-day comment period, was published on January 21, 2015 (Vol. 80, No. 13, Page 3010-3011). See Appendix B for the 60-day notice. Two comments were entered into the NHTSA docket in response to the 60-day Federal Register Notice. One comment was received from Brian J. Maguire, Dr.PH, MSA, EMT-P, a professor at the Central Queensland University, School of Medical and Applied Sciences in Rockhampton, Qld., Australia. Dr. Maguire's comments were generally positive and in favor of the proposed project. He believed the data collection effort was necessary and would have practical utility. Dr. Maguire also included additional background information in his comments, specifically related to factors that may influence ambulance crashes. Project staff reviewed Dr. Maguire's comments in detail, and incorporated his suggestions into the items in the questionnaire, where appropriate.

A second comment was received from the National Association of State EMS Officials (NASEMSO). NASEMSO's comments were also positive and in favor of the study moving forward. NASEMSO stated that understanding existing training requirements for ambulance operators was critically important for NHTSA, and could serve further efforts to reduce both the number and severity of ambulance-involved crashes. The organization also commented that the proposed Internet-based methodology would help reduce burden on respondents, and requested an opportunity to review the questionnaire before it was finalized. NHTSA project staff accommodated NASEMSO's request to review the survey, and has incorporated the organization's comments into the design of the Internet-based questionnaire.

A copy of the 30-day Federal Register Notice (Vol. 80, No. 82, Page 23850), that notified the public of NHTSAS intent to conduct this information collection, was published on April 29, 2015 (See Appendix C).

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

No payment or gift will be provided to respondents of this study.

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

The solicitation material in Appendix F1 of this package promises anonymity for Internet-based respondents. Project staff will have a single anonymous response from an EMS agency, which means the identity of the agency representative will not be known. No personally identifiable information is being requested as part of the questionnaire.

Furthermore, the Internet-based agency questionnaire preamble (in Appendix D1) informs respondents that participation is voluntary and that responses are anonymous. The questionnaire will not collect identifying information such as names, addresses, telephone numbers, employee numbers, or social security numbers. Upon completion of the questionnaire, it would be impossible to identify any specific individual or agency based on responses to the questions.

NHTSA will identify a representative in each State EMS office to be interviewed. Although each respondent’s identity will be known to project staff, his or her personal information is of no research interest. Consequently, personally identifiable information will not be entered with, stored with, analyzed, nor reported in project findings.

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.

The study does not contain any questions of a sensitive nature or related to matters that are commonly considered private.

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

A maximum of 8,000 agencies will be solicited for the survey. The expected average completion time for the Internet-based survey of EMS agency representatives is 15 minutes (0.25 hour). Each of the 153 semi-structured interviews with State personnel is expected to average approximately 60 minutes (1 hour) in length, resulting in an estimate of 2,153 total annual burden hours (Table 1). The actual burden hours will be reduced proportionally by the response rates.

Table 1. Burden Hours: Study Potential Respondents

	NHTSA Form	Respondents	Hours per respondent	Burden
Agency Questionnaire (Appendix D1)	1318	8,000	.25	2,000
State EMS Interview (Appendix D2)	1331	153	1.00	153
TOTAL				2,153

Since local EMS agency representatives will be contacted at their place of employment, the survey could incur an actual cost to the agencies (i.e., respondents will be participating during salaried hours and not conducting their normal duties). However, it is possible that some staff may complete the survey during non-working hours. At \$30.94³ for emergency management directors, and \$54.08 for management-level State contacts, the maximum total annual estimated cost to respondents associated with the data collection is:

Agency Questionnaire (Form 1318)
 $\$30.94/\text{hour} \times 0.25 \text{ hours/response} \times 8,000 \text{ responses} = \$61,880$
 State EMS Interview (Form 1331)
 $\$54.08/\text{hour} \times 1 \text{ hour/response} \times 153 \text{ responses} = \$8,274$

The maximum total one-time cost to respondents for this data collection is \$70,154 if all possible respondents in Table 1 are surveyed. Please note that it is unlikely that all solicited agencies will respond to the survey(s). Respondents will not incur any record-keeping costs from the information collection.

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

Respondents would not incur any other reporting or record-keeping costs from the information collection.

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

The estimated one-time cost to the Federal government for collection of information is \$31,095. Table 2a provides a breakdown of costs for the local EMS agency survey, and Table 2b provides the cost associated with collecting data from State EMS offices.

Table 2a: Internet Survey of EMS Agencies

Contractor activity	Cost
Survey Hosting	\$500
Participant Recruitment	\$5,000
Survey Database Maintenance & Management	\$8,000
TOTAL ESTIMATED COST TO GOVERNMENT	0

Table 2b: Interview of State EMS Offices

Contractor activity	Cost
Interviews	\$6,000
TOTAL ESTIMATED COST TO GOVERNMENT	\$17,595

³ US Department of Labor, Bureau of Labor Statistics (2014). May 2014 National Occupational Employment and Wage Estimates – Mean Hourly Wage (All Occupations). http://www.bls.gov/oes/current/oes_nat.htm

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

This is a new information collection. As such, it requires a program change to add the 2,153 estimated hours for the new information collection to the existing burden.

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

Frequencies will be computed for each of the questions in the survey. Cross-tabular analyses of the survey data by population subgroups and key analytical variables will also be conducted. Findings 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. Those reports will be available to the general public on the NHTSA website. The data will also be placed in the public domain, available through the NHTSA website.

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.