

**Countermeasures That Work (9th and 10th Editions) and
Countermeasures At Work (1st and 2nd Editions)
Supporting Statement for Information Collection Request**

SUPPORTING STATEMENT

Part A.

JUSTIFICATION

Table of Contents

A.	Justification – Brief Description of Study.....	1
A.1.	Explain the circumstances that make the collection of information necessary.....	2
A1.1	Circumstances making the collection necessary.....	2
A1.2	Statute authorizing the collection of information.....	3
A.2.	Indicate how, by whom, and for what purpose the information is to be used.....	3
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.....	4
A.4.	Describe efforts to identify duplication.....	4
A.5.	If the collection of information involves small businesses or other small entities, describe the methods used to minimize burden.....	5
A.6.	Describe the consequences to Federal Program or policy activities if the collection is not collected or collected less frequently, as well as any technical or legal obstacles to reducing burden.....	5
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.....	5
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.....	5
A.9.	Explain any decisions to provide any payment or gift to respondents, other than remuneration of contractors or grantees.....	6
A.10.	Describe any assurance of confidentiality provided to respondents.....	6
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.....	7

A.12. Provide estimates of the hour burden of the collection of information on the respondents.....7

A.13. Provide an estimate of the total annual cost to the respondents or record keepers resulting from the collection of information.....8

A.14. Provide estimates of the annualized cost to the Federal Government.....8

A.15. Explain the reasons for any program changes or adjustments in Items 13 or 14 of the OMB 83-I.....8

A.16. For collection of information whose results will be published, outline plans for tabulation and publication.....9

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.....9

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.....9

References.....9

Approval is requested to conduct interviews for the study entitled: Countermeasures That Work (9th and 10th Editions) and Countermeasures At Work (1st and 2nd Editions).

A. JUSTIFICATION - BRIEF DESCRIPTION OF STUDY

The National Highway Traffic Safety Administration (NHTSA) was established by the Highway Safety Act of 1970 (23 U.S.C. 101) to carry out a Congressional mandate to reduce the mounting number of deaths, injuries, and economic losses resulting from motor vehicle crashes on our Nation's highways. In support of this mission, NHTSA proposes to collect user feedback on the *Countermeasures That Work* (8th edition - Goodwin et. al., 2015) and *Countermeasures At Work* (new effort to be developed) guides. The *Countermeasures That Work* guide was developed for the State Highway Safety Offices (SHSOs) to assist them in developing programs for implementing safety countermeasures in nine program areas of alcohol-impaired and drugged driving, seat belt use and child restraints, aggressive driving and speeding, distracted and drowsy driving, motorcycle safety, young drivers, older drivers, pedestrians, and bicyclists. The *Countermeasures That Work* guide covers each of these program areas in separate chapters that include a short background section relaying current data trends, which is followed by a description of applicable countermeasures, and an explanation of their effectiveness, use, costs, and time to implement. The new effort (to be developed using this information collection) *Countermeasures At Work* will elaborate on some of the countermeasures contained in the *Countermeasures That Work* guide by providing real world examples and details on localities where specific countermeasures were put into place. The countermeasure descriptions may include details about locality size, implementation issues, cost, stakeholders to involve, challenges, evaluation, and outcomes.

To collect this information for the 10th edition of *Countermeasures That Work* and the new guide effort, *Countermeasures At Work*, NHTSA is requesting approval to conduct in-person or telephone based surveys (NHTSA Forms 1343 and 1344) of representatives from the SHSOs and/or local jurisdictions, in addition to representatives from the Governors Highway Safety Association (GHSA), State Coordinators, and other relevant stakeholders. The interview will ask the representatives the following information:

- Their background, including job roles and responsibilities, which provides context for document use.
- What are their key information needs for the *Countermeasures At Work* document, including obtaining details of specific use-case examples.
- Opinions on both the *Countermeasures That Work and Countermeasures At Work* documents' structure, format, and content, which includes using a consistent question format for different information items/sections in the document.
- Opinions about specific aspects and potential changes or improvements pertaining to examples of alternative presentation formats for both documents.
- Opinions about how the *Countermeasures At Work* guide would be used, what information should be included, and if stakeholders have information about good locality examples.
- Opinions about features or topics that should be included in both guides, such as the addition of figures and illustrations, and adjustments to the design of topic subsections.

The following sections describe the justification for these proposed data collections in more detail, along with the estimates of cost and burden.

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.

A1.1 CIRCUMSTANCES MAKING THE COLLECTION NECESSARY

The National Highway Traffic Safety Administration (NHTSA) was established by the Highway Safety Act of 1970 (23 U.S.C. 101) to carry out a Congressional mandate to reduce the mounting 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.

NHTSA's mission is to save lives, prevent injuries and reduce traffic-related health care and other economic costs. The agency develops, promotes and implements effective educational, engineering and enforcement programs with the goal of ending preventable tragedies and reducing economic costs associated with vehicle use and highway travel. This project addresses the issue of providing information to traffic safety professionals about countermeasures that have been demonstrated to be effective in addressing certain traffic safety problems.

The public health approach to traffic safety has resulted in a mix of countermeasures, and the choices among them are driven by research on their effectiveness. Generally this approach includes some combination of countermeasures aimed at improving safety in terms of improved vehicles, education, improved roads, enhanced road user perception, and behavior and better enforcement of traffic safety laws.

In 2005, the Governors Highway Safety Association (GHSA) and the National Highway Traffic Safety Administration (NHTSA) developed a guide of *Countermeasures That Work* for the State Highway Safety Offices (SHSOs). Currently, this guide addresses countermeasures in the nine program areas of alcohol-impaired and drugged driving, seat belt use and child restraints, aggressive driving and speeding, distracted and drowsy driving, motorcycle safety, young drivers, older drivers, pedestrians, and bicyclists. This guide is a basic reference to assist State Highway Safety Offices in selecting effective, science-based traffic safety countermeasures for major highway safety problem areas. The guide:

- Describes major strategies and countermeasures that are relevant to SHSOs;
- Summarizes their use, effectiveness, costs, and implementation time; and
- Provides references to the most important research summaries and individual studies.

Given that SHSO's and other state practitioners responsible for implementing these countermeasures use *Countermeasures That Work* as an aid to make decisions, it is important to solicit their opinions about the document and its content. Specifically, it is important to know

which aspects of the guide readers may find problematic when using it, and if there are features or topics that the guide does not currently have that they would like to have included.

This same framework will be used to develop the new companion piece of the *Countermeasures That Work* document, the *Countermeasures At Work*. The focus of this new document will be to build upon the effective countermeasure descriptions contained in *Countermeasures That Work* with case studies of localities that have implemented the targeted countermeasures. *Countermeasures At Work* will allow decision-makers to explore some of the pros and cons of implementing, sustaining, and evaluating countermeasures in similar communities. In addition, program contact information and relevant program links will be included if the reader desires additional information about the countermeasure's use in that locality. Given this, it is important to know what specific information guide readers would like to see about the localities who have implemented countermeasures and what would be most helpful to them when they are trying to decide whether to implement a countermeasure. The data collected in this study will help us better understand guide user needs and their information requirements which will be used to update the content of *Countermeasures That Work* and develop and populate the *Countermeasures At Work* guide.

A1.2 STATUTE AUTHORIZING THE COLLECTION OF INFORMATION

Title 23, United States Code, Chapter 4, Section 403 gives the Secretary authorization to use funds appropriated to carry out this section 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 all aspects of highway and traffic safety systems and conditions relating to - vehicle, highway, driver, passenger, motorcyclist, bicyclist, and pedestrian characteristics; accident causation and investigations; human behavioral factors and their effect on highway and traffic safety; and evaluation of the effectiveness of countermeasures to increase highway and traffic safety. [See 23 U.S.C. 403(b)(1)(A), 23 U.S.C. 403(b)(1)(B), 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 data from this study will provide NHTSA with information that will guide the update of the *Countermeasures That Work* and development of the *Countermeasures At Work* documents. Data collected from interviews will be used primarily to (1) update the content, format, and structure of information provided in the document and (2) identify the localities/implementation of countermeasures that should be presented as case studies in the *Countermeasures At Work* document. For example, if the readers interviewed indicate that the current format of the documents needs to adopt a table format to present information such that key information is easily accessible, a table with the relevant information will be added to the chapters.

Countermeasures That Work is used by SHSOs to assist them in developing programs for implementing safety countermeasures in the top nine traffic safety program areas. The new *Countermeasures At Work* will elaborate on some of the countermeasures contained in the *Countermeasures That Work* guide by providing real world examples and details on localities where specific countermeasures were put into place. The countermeasure descriptions may include details about locality size, implementation issues, cost, stakeholders to involve, challenges, evaluation, and outcomes to help officials determine which countermeasures may be effective in their jurisdictions. Per §1200.11 of the Uniform Procedures for State Highway Safety Grant Programs, each fiscal year, as part of the highway safety planning process for the State's Highway Safety Plan a list of information and data sources consulted must be included in the plan. *Countermeasures That Work* is the document referenced as an example to include as a consulted source.

The information will also be available to anyone in the public and private sectors through the NHTSA website.

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.

Interviews will be conducted with representatives from the SHSOs and/or local jurisdictions, in addition to representatives from Governors Highway Safety Association (GHSA), State Coordinators from across the United States, and other important stakeholders. Up to 170 structured interviews, will be conducted in person, or by telephone (no other modes will be used) during three project years. All reporting of findings for the *Countermeasures That Work* guide will be done in aggregate. The findings of interviews conducted for *Countermeasures At Work* will be reported separately for each individual locality so that the reader can get an idea about the size and type of the featured locality and issues specific to that locality. The *Countermeasures At Work* guide will include general contact information about the locality (i.e., DOT or SHSO office) or the contact information of key individuals (only if permission is granted by the interview participant), so that readers of the document can follow-up, if desired, with the locality to obtain more information about the countermeasure.

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 has previously conducted similar, smaller scale interviews for obtaining feedback on the *Countermeasures That Work* guide; most recently conducted in 2014/15 for the 8th edition published in 2015); however, the interviews were limited to federal employees and approximately 6 non-federal SHSO and traffic safety officials. We are seeking approval to survey more than nine non-federal employee end users including program officials and traffic engineers to better gauge current information needs based on ever changing program

development and funding initiatives. In addition, the project also aims to develop a first of its kind guidance document (*Countermeasures At Work*) which will present information about countermeasure implementations and case studies of these implementations – there is no end user data that is currently available for development of this guide.

A.5. IF THE COLLECTION OF INFORMATION INVOLVES SMALL BUSINESSES OR OTHER SMALL ENTITIES, DESCRIBE THE METHODS USED TO MINIMIZE BURDEN.

Interview information for this study will only be collected from individuals. There is no burden on small businesses for this information.

A.6. DESCRIBE THE CONSEQUENCES TO FEDERAL PROGRAM OR POLICY ACTIVITIES IF THE COLLECTION IS NOT COLLECTED OR COLLECTED LESS FREQUENTLY, AS WELL AS ANY TECHNICAL OR LEGAL OBSTACLES TO REDUCING BURDEN.

If the end user surveys were not implemented for *Countermeasures That Work* and *Countermeasures At Work*, NHTSA would lack current data on the needs of traffic safety officials to help with refinement of the guides and countermeasure selection and development. The end result would be that the agency would not have adequate information to determine how best to modify the current *Countermeasures That Work* guide and to develop the new *Countermeasures At Work* guide. Evaluation of countermeasures changes frequently and data needs to be collected every two years in order to keep pace with this trend. Again as cited in Section A.2 above, per §1200.11 of the Uniform Procedures for State Highway Safety Grant Programs, each fiscal year, as part of the highway safety planning process for the State’s Highway Safety Plan a list of information and data sources consulted must be included in the plan. *Countermeasures That Work* is the document referenced as an example to include as a consulted source. As such the document should be updated frequently to be of most use to SHSOs. There are no legal or technical obstacles to 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.

There are no special circumstances that would cause this collection to be conducted in a manner inconsistent with OMB guidelines.

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.

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 March 21, 2016 (Volume 81, Number 54, pages 15147-15148). It is attached as Appendix B-1.

NHTSA published a notice in the *Federal Register* on May 17, 2016 (Volume 81, Number 95, page 30607) with a 30-day public comment period to announce forwarding of the information collection request to OMB for approval. It is attached as Appendix B-2.

b. Responses to the Federal Register Notice

No responses to the notice were received.

c. Expert Consultation

For previous editions of *Countermeasures That Work*, experts from NHTSA as well as the Federal Highway Administration, SHSOs, the Governors Highway Safety Association, and the University of North Carolina's Highway Safety Research Center (the previous contractor) provided significant end user feedback that was used to refine the guide.

A.9. EXPLAIN ANY DECISIONS TO PROVIDE ANY PAYMENT OR GIFT TO RESPONDENTS, OTHER THAN REMUNERATION OF CONTRACTORS OR GRANTEEES.

For this study, respondents will not be compensated for their time and the effort they give to the study. Participation is voluntary.

A.10. DESCRIBE ANY ASSURANCE OF CONFIDENTIALITY PROVIDED TO RESPONDENTS.

The introduction read to interviewees of the *Countermeasures That Work* guide at the start of the interview will describe the measures that will be taken to ensure participant confidentiality. Specifically, the text states that:

“Your responses will be treated in a **secure and confidential** manner.”

All interviewee responses for the *Countermeasures That Work* interviews will only be used for internal project purposes, and will only be published in aggregated form that preserves participant anonymity via a short report of overall findings to the project manager. The

Contractor's IRB has reviewed the protocol and does not require an Informed Consent Process for these interviews.

For the *Countermeasures At Work* guide, the interviewees will be made aware that their responses, their official contact information including department/program contact, and information about the locality will be published in the reference document. Therefore, interviewees will go through an Informed Consent Process to ensure that they understand that their contact information will be included in the guide *Countermeasures At Work*. This contact information is needed to allow interested readers to follow-up with the responsible department to obtain additional information about the countermeasure and the process of countermeasure implementation. Participation in the *Countermeasures At Work* interviews is voluntary, and interviewees will be fully informed about the publication of their contact information prior to their agreeing to participate. The Informed Consent Procedure has been approved by the Contractor's IRB.

Note that, all interviewees for the *Countermeasures At Work* guide will be government employees that are in-charge of the department/program; their official contact information is already publicly available. Therefore, no assurance of confidentiality will be provided to the interviewees about their official contact information.

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.

No information of a sensitive nature will be collected in the interview. The focus of the interviews will be getting feedback on the format, structure and content of *Countermeasures That Work* and collect information on localities that have implemented the countermeasures for *Countermeasures At Work*. Only official contact information for the interviewee will be collected for publication in the *Countermeasures At Work* document.

A.12. PROVIDE ESTIMATES OF THE HOUR BURDEN OF THE COLLECTION OF INFORMATION ON THE RESPONDENTS.

The estimated completion time for each semi-structured interview is 1.5 hours per interview per participant. The total estimated burden if all solicited participants respond is approximately 75 hours for *Countermeasures That Work* and 300 hours for *Countermeasures At Work*. Note that NHTSA will administer one interview round for the *Countermeasures That Work* (2018) and two separate interview rounds for the *Countermeasures At Work* guide (2016-2017 and 2018-2019), for a total of 3 interview rounds conducted, as seen in Table 1. The average yearly estimated burden is 93.75 hours (375 total hours / 4 years). Participants will incur no costs and no record keeping burden from the information collection. Participants will also receive no compensation from the project for their involvement in the interviews.

Since respondents will be contacted at work, the interviews will not be an actual cost to the respondents (i.e., they will be participating during work hours as part of their traffic safety jobs). However, the time they spend on the interviews 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. At \$22.71¹ per hour, the total annual estimated cost associated with the burden hours is: \$22.71 x 93.75 hours for a total of \$2,129.06 yearly burden (if all possible respondents in TABLE 1 1 are surveyed yearly). Respondents would not incur any other reporting cost from the information collection.

TABLE 1. ESTIMATED BURDEN HOURS

	CMAW Round 1	CMTW	CMAW Round 2	GRAND TOTAL
Interview Period	2016-2017	2018	2018-2019	
Respondents	100	50	100	250
Minutes	90	90	90	270
Burden Hours	150	75	150	375

CMTW = *Countermeasures That Work*

CMAW = *Countermeasures At Work*

A.13. PROVIDE AN ESTIMATE OF THE TOTAL ANNUAL COST TO THE RESPONDENTS OR RECORD KEEPERS RESULTING FROM THE COLLECTION OF INFORMATION.

There are no record keeping or reporting costs to respondents. All responses are provided spontaneously.

A.14. PROVIDE ESTIMATES OF THE ANNUALIZED COST TO THE FEDERAL GOVERNMENT

This is one-time data collection and there will be no recurrence. The total cost to the Federal Government for this study is \$551,036 over 48 months, which amounts to an annual cost of approximately \$137,759 per year for 4 years. In addition to administering interviews, this cost includes updating and development of the countermeasure reports, and other project planning and administrative costs.

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 this is a set of new surveys which will increase NHTSA’s overall burden hour total by 375 hours over the course of four years, or 93.75 hours yearly.

¹ U.S. Department of Labor, Bureau of Labor Statistics (2015). May 2014 National Occupational Employment and Wage Estimates – Mean Hourly Wage (All Occupations). http://www.bls.gov/oes/current/oes_nat.htm

A.16. FOR COLLECTION OF INFORMATION WHOSE RESULTS WILL BE PUBLISHED, OUTLINE PLANS FOR TABULATION AND PUBLICATION.

This data collected for *Countermeasures That Work* will not be published. The data will only be used for internal purposes, i.e., the data will be used to inform the content, design, and structure of the *Countermeasures That Work* guide. Under the current contract, two updated editions will be produced for this guide (9th ed. and 10th ed.), and will be published in February 2017 and February 2019, respectively. The timing for publishing the 2017 edition does not allow a full scale end user interview process; thus, this ICR is only for the 10th edition of the document.

For the *Countermeasures At Work*, information collected from respondents on countermeasure specifics (implementation problems, stakeholder involvement, evaluation information, etc.) will be published by locality. Official contact information for the interviewee who is in-charge of the department/program that is being featured will be published so that interested readers may obtain more information. As these respondents are government officials, official contact information is already readily available on the internet. The two editions of this new guide (1st ed. and 2nd ed.) will be published in March 2018 and March 2019, respectively.

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 statement are made.

REFERENCES

Goodwin, A., Thomas, L., Kirley, B., Hall, W., O'Brien, N., & Hill, K. (2015, November). *Countermeasures that work: A highway safety countermeasure guide for State highway safety offices, Eighth edition*. (Report No. DOT HS 812 202). Washington, DC: National Highway Traffic Safety Administration.