SECTION A

INFORMATION COLLECTION SUPPORTING STATEMENT

Awareness and Availability of Child Passenger Safety Information Resources

Data from NHTSA's Fatality Analysis Reporting System show that an average of 3 children under the age of 15 died each day in traffic crashes in 2014 and an estimated 458 children were injured.¹ Child restraint systems (CRSs) are effective at reducing the risk of injury during motor vehicle crashes. Research has shown a 28 percent reduction in risk of death for children aged 2 to 6 years if riding in a CRS installed without serious misuse.² However, a 2002 study by NHTSA estimated a misuse rate of 73 percent. If booster seats for older children were removed from the equation, the misuse figure exceeded 80 percent.³ The LATCH (Lower Anchors and Tethers for Children) child restraint technology was new at the time of the 2002 study, and few of the observed restraints were LATCH systems. While LATCH was intended to make it easier for parents to correctly install child restraints in vehicles, a subsequent NHTSA study still found loose or twisted straps and tethers as well as incorrect attachments when using the LATCH system.⁴ Research has found that incorrect use of a CRS places the child at an increased risk of both fatal and non-fatal injuries.⁵

Selection of an inappropriate CRS for the child's height and weight, and premature promotion to a new CRS, are additional factors that may increase the risk of injury to a child in a motor vehicle crash. While infants should always ride in rear-facing car seats, NHTSA's 2015 National Survey of the Use of Booster Seats (NSUBS) observed 13 percent of children under age 1 were not in rear-facing car seats; most of these infants were prematurely graduated to forward-facing car seats. Children 1 to 3 years old should ride either in rear-facing or front-facing car seats, but NSUBS found that 14 percent of children 1 to 3 years old were prematurely graduated to booster seats and 4 percent to seat belts. Children ages 4 to 7 should either ride in forward-facing car seats or booster seats, but 26 percent were observed in seat belts.⁶

² Elliott M.R., Kallan M.J., Durbin D.R., Winston F.K. Effectiveness of child safety seats vs seat belts in reducing risk for death in children in passenger vehicle crashes. Arch Pediatr Adolesc Med 2006; 160: 617-621. Available: <u>http://jamanetwork.com/journals/jamapediatrics/fullarticle/205063</u>.

http://ntl.bts.gov/lib/26000/26000/26046/741-MisuseofChildRestraints.pdf.

¹ National Center for Statistics and Analysis. (2016, May). Children: 2014 data. (Traffic Safety Facts. Report No. DOT HS 812 271). Washington, DC: National Highway Traffic Safety Administration. Available: <u>https://crashstats.nhtsa.dot.gov/Api/Public/ViewPublication/812271</u>.

³ Decina, L.E. & Lococo, K.H. (2004) Misuse of Child Restraints. (Report No. DOT HS 809 671). Washington, DC: National Highway Traffic Safety Administration. Available:

⁴ Decina, L.E., Lococo, K.H. & Doyle, C.T. (2006) Child Restraint Use Survey: LATCH Use and Misuse. (Report No. DOT HS 810 679) Washington, DC: National Highway Traffic Safety Administration. Available: <u>http://ntl.bts.gov/lib/26000/26600/26636/LATCH_Report_12-2006.pdf.</u>

⁵ Lesire, P., Cuny, S., Alonzo, F., & Cataldi, M. (2007). Misuse of child restraint systems in crash situations-danger and possible consequences. In Annual Proceedings/Association for the Advancement of Automotive Medicine (Vol. 51, p. 207). Association for the Advancement of Automotive Medicine. Available: <u>https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3217516/</u>.

⁶ Li, H. R., Pickrell, T. M., & KC, S. (2016, September). The 2015 National Survey of the Use of Booster

Many information resources are available to aid parents and caregivers with proper child restraint system selection, installation and use, including hands-on instruction. Research has shown that hands-on instruction on CRS installation, such as that provided by NHTSA and Safe Kids Worldwide at Child Car Seat Inspection Stations nationwide, is effective in reducing misuse of seats.⁷ Unfortunately, this resource seems to be underutilized. Only about one out of ten drivers interviewed for the National Child Restraint Use Special Study (NCRUSS) reported having their CRS inspected at an inspection station.⁸ At present, it is unclear what deters and what encourages use of CRS inspection stations and Child Passenger Safety Technicians (CPSTs).

To help increase correct use of CRS and utilization of inspection stations, approval is requested to conduct a national web-based survey to estimate parent and caregiver general knowledge of child passenger safety (CPS) information resources, awareness and use of CRS inspection stations, and barriers to CRS inspection station use. The survey will also examine the relationship between parent and caregiver confidence in installing CRSs, risk perception, and intent to visit an inspection station. The proposed survey is titled, "Awareness and Availability of Child Passenger Safety Information Resources" (AACPSIR).

A. Justification

A.1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

a. Circumstances making the collection necessary

1. National Highway Traffic Safety Administration (NHTSA) mission

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 conducts research on driver behavior and traffic safety to develop efficient and effective means of bringing about safety improvements. This information collection supports NHTSA's strategic goal of safety.

Seats (Report No. DOT HS 812 309). Washington, DC: National Highway Traffic Safety Administration. Available: <u>https://crashstats.nhtsa.dot.gov/Api/Public/ViewPublication/812309</u>.

⁷ Brown, J., Finch, C.F., Hatfield, J., & Bilston, L.E. (2011). Child restraint fitting stations reduce incorrect restraint use among child occupants. Accident Analysis & Prevention, 43(3), 1128-1133. Available: http://dx.doi.org/10.1016/j.aap.2010.12.021.

Duchossois, G.P., Nance, M.L., & Wiebe, D.J. (2008). Evaluation of child safety seat checkpoint events. Accident Analysis & Prevention, 40(6), 1908-1912. Available: <u>http://dx.doi.org/10.1016/j.aap.2008.08.003</u>. Tessier, K. (2010). Effectiveness of hands-on education for correct child restraint use by parents. Accident Analysis Prevention, 42(4), 1041-1047. Available: <u>http://dx.doi.org/10.1016/j.aap.2009.12.011</u>.

⁸ Greenwell, N. K. (2015, May). Results of the national child restraint use special study. (Report No. DOT HS 812 142). Washington, DC: National Highway Traffic Safety Administration. Available: <u>https://crashstats.nhtsa.dot.gov/Api/Public/ViewPublication/812142</u>.

2. Effectiveness of occupant protection systems

There is overwhelming evidence that the regular and proper use of child restraint systems (CRSs) is effective in reducing injuries and fatalities in vehicle crashes. Research has found that CRSs reduce fatal injury by 54 percent for toddlers and by 71 percent for infants in passenger cars (in light trucks, it is 59 percent and 58 percent, respectively). For children under 5, it is estimated that 252 lives were saved in 2014 by restraint use. From 1975 to 2014, an estimated 10,673 lives were saved by child restraints for children under 5 years old in passenger vehicles.⁹

3. Severity of Child Passenger Safety Problem

While child restraint use has increased over the years, to 97 percent for infants and 94 percent for toddlers,¹⁰ many children are still fatally injured as a result of motor vehicle crashes. This suggests that other factors, such as improper use or lack of knowledge on the area, may be playing a role. Therefore, it is important to determine the level of parent and caregiver understanding of child passenger safety and related services that are available. It also is important to understand the barriers that keep parents and caregivers from making use of these resources, and, more generally, how NHTSA and other child passenger safety advocates can be most effective in educating parents and caregivers on potential child passenger safety risks. NHTSA will use the information gathered from the AACPSIR survey to refine its programs so that the agency can better meet its mandate to reduce highway traffic deaths and injuries.

While significant gains in occupant protection have already been made, NHTSA's challenge is to surmount the more challenging barriers to increased child passenger safety. NHTSA proposes to conduct a survey that will collect detailed information on barriers to use of CRS inspection stations to better understand the reasons behind their underutilization. These data will help NHTSA develop programs appropriate to furthering its safety mission.

b. Legal basis for collecting data

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; and human behavioral factors and

⁹ National Center for Statistics and Analysis. (2016, May). Children: 2014 data. (Traffic Safety Facts. Report No. DOT HS 812 271). Washington, DC: National Highway Traffic Safety Administration. Available: <u>https://crashstats.nhtsa.dot.gov/Api/Public/ViewPublication/812271</u>.

¹⁰ Li, H. R., Pickrell, T. M., & KC, S. (2016, September). The 2015 National Survey of the Use of Booster Seats (Report No. DOT HS 812 309). Washington, DC: National Highway Traffic Safety Administration. Available: <u>https://crashstats.nhtsa.dot.gov/Api/Public/ViewPublication/812309</u>.

their effect on highway and traffic safety, including occupant protection. [See 23 U.S.C. 403(b)(1)(A)(i), 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.

This is a new collection. The purpose of this survey is to provide critical information needed by NHTSA to develop, implement, and maintain effective countermeasures that meet the Agency's mandate to improve traffic safety. The data collected in the survey will be used to assist NHTSA in its ongoing responsibilities for: (a) planning program activity which addresses occupant protection issues; (b) providing support to groups involved in improving public safety; and (c) identifying countermeasure strategies that are most acceptable and effective in increasing child passenger safety. Detailed information provided by the survey will identify information deficits that exist within the populace concerning awareness of CPS resources. The survey also will identify factors that foster or inhibit use of CRS inspection stations.

There are three primary objectives for this project. The first is to estimate the degree of awareness parents and caregivers have of CRS inspection stations. NHTSA also plans to assess the relationships between parent and caregiver confidence, risk perception, and the intent to visit an inspection station. Finally, the study will identify the barriers that result in underutilization of inspection stations. Ultimately, knowledge of these barriers and an understanding of the reasons for the low attendance rates will allow NHTSA and other stakeholders to develop suitable programs that will encourage use of this important life-saving resource. Demographic data collected by the survey will help pinpoint group differences, and results of the analyses will be applied to development of strategic approaches to improving safety.

Besides using the collected information for its own program development and technical assistance activities, NHTSA will:

- Disseminate the information to State and local highway safety authorities, who will use it to develop, improve, and target their own programs and activities;
- Disseminate the information to organizations concerned with traffic safety issues, who will use it to develop, improve, and target their own programs and activities; and
- Disseminate the information to the public health community, for whom information on child safety seats and information resources used by parents will be of particular interest.

In summary, the proposed survey will provide a detailed accounting of public awareness of CPS support services and barriers toward use of CRS inspection stations. The data will be studied to determine appropriate emphases for future countermeasure activity. The results will also be disseminated to others for use in their research and program development activities. If the survey was not conducted, NHTSA child safety program efforts would lack direction due to inadequate information upon which to base program decisions, which would severely limit the agency's effectiveness in reducing deaths and injuries.

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 proposed methodology for AACPSIR will be a multi-mode approach with Web as the primary response mode. In addition, a toll-free telephone number will be available for respondents who have difficulty or are unable to complete the survey online because of technical or language issues. NHTSA is employing the services of a contractor (Westat) that will develop a website for administering the survey. The contract stipulates a number of requirements designed to facilitate the interview process for the respondent and reduce burden. They include:

- Basing the visual layout of the questions on principles of heuristics that people follow in interpreting visual cues;
- Making the survey easily navigable from page to page;
- Incorporating user assistance tools, such as capability to contact a help desk via the internet or a toll-free phone number;
- Inserting placeholders so that respondents can pause and leave the system and then re-enter (at the point of departure) without losing the responses previously entered; and
- Programming in consistency checks.

Usability testing during website development included testing using mobile devices since that is how some respondents will access the survey.

As previously mentioned, the alternative response mode for the survey will be by telephone. Data collection by telephone will be accomplished through the use of Computer-Assisted Telephone Interviewing (CATI). CATI systems collect responses 100 percent electronically. They also 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 question answers (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 can't be skipped;
- 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 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.

While there have been studies conducted on the topic of child occupant protection, research on the barriers to use of inspection stations and obstacles in access to child passenger safety information has not been conducted. This absence is precisely why this study is relevant and important. The intent of the AACPSIR study is to obtain information that is not readily available elsewhere.

A number of observational surveys of occupant protection behavior have been conducted at the national, State and local levels. However, observational surveys are not a suitable method to collect in-depth information on attitudes, perceptions, knowledge, and awareness. The National Survey of the Use of Booster Seats (NSUBS) includes only limited questions on demographics for child passengers. The National Child Restraint Use Special Study (NCRUSS) included only a short interview with drivers in which three questions were asked regarding car seat information sources, confidence the car seat is installed correctly, and whether or not the driver had the seat checked at an inspection station. The NCRUSS did not explore these issues in depth and did not attempt to identify the barriers to use of child passenger safety resources, details about the resource availability, or experiences with inspection stations beyond the initial question on visit to an inspection station, which the proposed survey aims to collect. NHTSA's Motor Vehicle Occupant Safety Survey (MVOSS) includes detailed questions about attitudes, perceptions, knowledge, awareness and behaviors related to occupant protection including a specific section on child passenger safety. However, the MVOSS does not focus on accessibility of child seat inspection services, or barriers and facilitators to use of inspection stations.

The information that the AACCPSIR survey intends to collect is unique and represents a gap in the current research with respect to child occupant protection. Overall, the following criteria were applied to ensure the proposed effort is not duplicative and the data collected will be representative, relevant, and informative:

• <u>National basis</u> - The safety efforts of NHTSA are national in scope. NHTSA therefore requires national-level data for its planning.

- <u>Interrelated knowledge, behavior, and attitude questions</u> Effective targeting of future program activity requires that NHTSA determine the relationship of individuals' attitudes, knowledge, and beliefs to their safety behavior.
- <u>Focus on NHTSA program concerns</u> The items within the proposed survey instrument concern issues crucial to developing appropriate strategies for improving child occupant safety.
- <u>Review of previous surveys</u> Previous surveys on the topic of child passenger safety have been reviewed to confirm that topics addressed in the proposed survey are not duplicative.

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

There will be no impact on small businesses or other small entities. The collection of information involves randomly selected individuals in their residences, not small businesses.

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.

The traffic safety environment has changed substantially over the years. Examples include passage of seat belt and child restraint laws with provisions for primary enforcement, introduction of LATCH technology for child car seats, implementation and dissemination of a program for training and certifying child passenger safety technicians, etc. Without up-to-date information on the effects of these changes, NHTSA will not be able to adequately address shifts in attitudes or behavior, new opportunities to promote safety, or sudden obstacles that emerge.

The information collected in this proposed survey is necessary for NHTSA to be able to make strategic planning decisions in the area of child passenger safety on an informed basis. Both the public and private sectors have increasingly focused on addressing the problem of children using restraint systems that are inappropriate for their size, incorrectly installed, and consequently dangerous. Additionally, identifying and better understanding the barriers that result in underutilization of inspection stations will allow NHTSA and other child passenger safety stakeholders to develop effective programs that promote and encourage use of this important life-saving resource. All this underscores the need for NHTSA to have up-to-date data with which to help guide programmatic decisions in these critical areas.

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.

The Federal Register Notice notifying the public of NHTSA's intent to conduct this information collection, and providing a 60-day comment period, was published on March 8, 2016 (Vol. 81, No. 45, Pages 12196 -12197). NHTSA received one comment in response to the 60-day Federal Register Notice. The comment from Consumers Union was supportive of the proposed survey and did not provide any suggestions for the survey's implementation or design. A second Federal Register Notice (Vol. 81, No. 201, Pages 71789 - 71790), which announced that this information collection request will be forwarded to OMB, was published October 18, 2016.

NHTSA and outside experts played vital roles in the design of the survey instrument. Prior to any development work, experts across NHTSA's Office of Research and Program Development were asked to submit issues, topics, and specific questions they considered important to include in the survey. The collected information was then routed to the contracting organization responsible for designing the survey instrument. During development the draft version of the survey instrument underwent both cognitive and usability testing, and items were modified as appropriate to assure they accurately solicited the targeted information.

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

The invitation letter to the online survey will include \$1. Participants will receive an additional \$5 for completing the survey. This information is presented clearly in the invitation letter (Appendix A) and reminder postcard (Appendix B). The selection of a \$1/\$5 incentive configuration is based on results of a recent pilot test of the Motor Vehicle Occupant Safety Survey (MVOSS). After receiving a poor response during initial pilot testing of the MVOSS without incentives offered, NHTSA tested multiple incentive configurations. The most cost effective was the \$1/\$5 configuration, which achieved a response rate almost as high as the \$2/\$5 configuration and about twice the response rate of a no incentive condition. The final MVOSS is currently in the field and is achieving a strong response thus far using the \$1/\$5 configuration.

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

All contacted households will receive a unique PIN to access the Web version of the survey. Respondents will only be able to access the information submitted under that PIN. The introduction to the survey will tell respondents that the information they provide when answering the questionnaire will be kept completely separate from the information that was used to contact them so as to provide anonymity. They will be told that the information they provide will be used for statistical purposes only and will not be used in a way in which they could be identified. The privacy statement detailing these measures is clearly indicated on each of the survey screens.

All data will be treated with sensitivity and security considerations commensurate with its level of private content. NHTSA will not directly intervene or interact with respondents and will not have access to identifiable (including coded) private data. Throughout the project, the privacy of all participants will be protected. Access to the online instrument will be controlled using an alphanumeric PIN, with access restricted to using encrypted connection via Transport Layer Security (TLS) certificates. The webbased survey management system (SMS) will be hosted by a Windows Server which will be placed on a data-zone without access to the Internet. The web applications will connect to a PostgreSQL database using access-restricted credentials, and the database server will also be on a segregated network zone without direct access to the Internet. Communications between web server and users and between the web server and the database server will be encrypted using TLS protocols. In addition, the Contractor's Institutional Review Board (IRB) reviewed all instruments, informed consent language and procedures to ensure that the rights of individuals participating in the survey are safeguarded. The Contractor's Institutional Review Board is a specially constituted review body established to protect the welfare of human subjects recruited to participate in biomedical and behavioral research.

Westat follows the FISMA and NIST (NIST Special Publication 800-37 Rev 1, "Guide for Applying the Risk Management Framework to Federal Information Systems" and NIST Special Publication 800-53 Revision 4, "Security and Privacy Controls for Federal Information Systems and Organizations") process for security operations, documentation, and audit/assessment. Over recent years the Westat facility and individual information systems have undergone numerous audits from multiple independent contractor security assessors and government agencies and have Authorization to Operate (ATO) letters as proof they have completed the process successfully.

The Contractor holds a Multiple Project Assurance (MPA) from the Federal Office for Human Research Protections (OHRP). For the proposed study, the criteria for IRB approval are: risks to participants are minimized; risks to participants are reasonable in relation to anticipated benefit; selection of respondents is equitable; each prospective respondent is asked to provide consent to advance in the survey after completing the screener; and there are adequate provisions to protect the privacy of participants and to maintain the confidentiality of data.

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.

Questions regarding occupant protection and child restraint systems are not commonly considered sensitive or private.

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

As detail in Table 1, the maximum total respondent burden for this data collection would be 990 hours.

Form Number	Form Name	Respondents	Average Completion Time (minutes)	Burden (hours)
1333	Screener	7,680	5	640
1334	AACPSIR Survey	1,400	15	350
Total	-		-	990

Table 1. Survey Burden by Form

NHTSA will contact a maximum of 32,000 households (28,000 base field sample with a 4,000 reserve sample) via an invitation letter (Appendix A) with the goal of obtaining 1,400 completed interviews. While the reserve sample will be released if response rates are lower than anticipated, the burden is calculated using the maximum of 32,000 households contacted. NHTSA estimates that of the 32,000 households contacted. 24 percent or 7,680 potential respondents would log onto the Web site and take a 5 minute eligibility screener (Form 1333). The estimated burden for the eligibility screener is 640 hours (7,680 * 5 minutes = 38,400 minutes/60 = 640 hours). Of the 7,680 who log in to take the screener, NHTSA estimates that 25 percent or 1,920 would be eligible to complete the full AACPSIR survey (Appendix B, Form 1334). NHTSA estimates a 25 percent eligibility rate based on data from the 2014 American Community Survey (ACS) on households with children, a review of recent household travel surveys, and data from NHTSA's Motor Vehicle Occupant Safety Survey (MVOSS). Eligible respondents will be parents, grandparents, and other child care providers who drive with a child in a personal vehicle at least twice a month. It is anticipated that approximately 73 percent of those eligible, or 1,400 households, will actually complete the full survey which would average 15 minutes in length (1,400 * 15 minutes = 21,000 minutes/60 = 350 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 be contacted at home, 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 June 2016 from the Bureau of Labor Statistics, U.S. Department of Labor, list average hourly earnings in private industry as \$25.61

(<u>http://www.bls.gov/news.release/empsit.t19.htm</u>, accessed July 27, 2016). The estimated 990 interviewing hours multiplied by average hourly earnings of \$25.61 totals \$25,354 cost if the respondents had spent that amount of time on the job.

There are no record keeping or reporting costs to respondents. Respondents will be contacted randomly and asked for their attitudes, knowledge, and behavior regarding child passenger safety resources and inspection stations. Each respondent only participates once in the data collection. Thus there is no preparation of data required or expected of respondents. Respondents do not incur: (a) capital and startup 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 estimated total cost to the Federal government is \$150,451. This amount is the funds specifically associated with the cost of data collection. Annualized cost for the 36 months (3 years) of the project is approximately \$50,150 per year.

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 estimated 990 hours for the new information collection to existing burden.

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

A final electronic file including all data collected in the study will be developed. All open-ended and narrative responses will be coded to the extent possible. The full sample and replicate weights will be developed for analysis. A data dictionary including variable names, labels, and ranges of responses will be designed to accompany the final file. The analysis plan for the AACPSIR data includes the following types of analysis using the weighted data:

- Descriptive analysis: proportions, means, confidence intervals;
- Cross-tabulation analysis to examine association of two or more categorical variables and comparisons of key variables between groups;
- Logistic regression analysis to study the relationship between parent/caregiver confidence, risk perception, and the intent to visit an inspection station; and
- Causality analysis that explores causal relationships between auxiliary variables and outcome variables using the observational study technique such as the propensity score modeling.

NHTSA will develop a final report that presents the findings from the data collection effort, which will be disseminated on the agency website. We expect the data collection to begin in July of 2017, and we expect the report to be published in 2019. Individual data will not be identified in the report; data will be reported only in aggregate

as part of the findings. The findings of the research may also be summarized in an agency research note and developed into a journal article.

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.