

Education on Proper Use of Safety Belts on School Buses Supporting Statement for Information Collection Request

SUPPORTING STATEMENT

Part A.

JUSTIFICATION

Approval is requested to conduct interviews and qualitative surveys for the study entitled: Education on Proper Use of Safety Belts on School Buses.

A. JUSTIFICATION - BRIEF DESCRIPTION OF STUDY

The National Highway Traffic Safety Administration is undertaking a project to understand the decisions that states and local agencies face when deciding to implement safety belts on school buses and the funding mechanisms that are used to pay for safety belt installation. The project will result in the development of a non-binding Model Policy and Best Practices Guide intended to assist jurisdictions that are considering the use of safety belts on school buses. To accomplish this, NHTSA is requesting approval to conduct discussions and informal interviews with State directors of pupil transportation and local school district professionals that have established seat belt policies for school buses in order to identify policy components that influence lap-shoulder seat belt acquisition and use. NHTSA also recognizes the importance of reaching out to school districts who do not currently have safety belts in order to gain a broader picture of the priorities and challenges that jurisdictions face. Therefore, NHTSA would also conduct the proposed discussions and interviews with school districts who do not have safety belt requirements, who are not considering implementation, or who considered but decided not to implement, as these perspectives will be helpful in developing model policies and understanding what would be useful to them.

In general, the interviews will be used to gather information on:

- Practices at the State and district levels related to funding structures and established policies in place;
- the pros and cons of financial and regulatory environments;
- experiences of the districts and Local Education Agencies;
- self-reported reactions and interactions with bus drivers; and
- recommendations on best practices to promote the acquisition and use of safety belts on school buses.

Appendix A-1 provides the Interview Guide, which includes a list of critical topics/areas to be covered, along with some example questions. Although there will be a list of interview topics

and questions to cover, these discussions are intended to occur as fluid, conversational dialogues rather than structured interviews. These discussions will be held via telephone, email, and/or in-person throughout the course of the project.

The project also aims to obtain information about bus driver distraction as related to student behavior and safety belt use with the ultimate goal of determining whether safety belts, when used properly, influence student misbehavior and/or bus driver distraction. Therefore, NHTSA is also requesting approval to conduct a web-based survey to gather subjective feedback to investigate the impact of safety belts on student behavior. The survey will include questions that will be useful in providing a full picture of how safety belts have influenced behavior on buses. This will include questions regarding the driver (e.g. the degree to which their perceived levels of stress and distraction have changed, if at all), the students (e.g. if/how their behavior has changed, details on type of behavior, etc.), as well as any important details such as the type of behavior change or any unexpected effects. Appendix A-2 provides the questions that will be included in the bus driver survey.

The findings of the project will be used to develop a Model Policy and a Best Practices Guide to assist jurisdictions that are considering the use of safety belts on school buses. The project will culminate with a final report to explain the results and outcomes from the project's activities. NHTSA has no intentions of using this data to develop any regulatory action as it pertains to seat belts on large school buses.

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

On average, from 2004 – 2013, each year eight (8) school-age pedestrians killed were struck by school transportation vehicles (school buses and non-school-bus vehicles used as school buses), and 4 by other vehicles involved in school-bus-related crashes. During this same time period, on average each year six school age children are killed in collisions while riding in a school bus. By focusing on safety both in and around the school bus, we could envision a future where there really are zero school transportation fatalities.

In 2015, NHTSA hosted a school bus safety summit in Washington, DC. The school bus safety meeting (which included participants such as the National Association of Pupil Transportation, National Association School Directors Pupil Transportation Services, and National School Transportation Association) resulted in a number of ideas for needed technical resources and further research. The resources and research discussed could help NHTSA, the States, and school transportation agencies reduce the number of injuries and fatalities related to school

transportation. On November 8, 2015, NHTSA Administrator Dr. Mark Rosekind stated, “NHTSA has not always spoken with a clear voice on the issue of seat belts on school buses. So let me clear up any ambiguity now: The position of the National Highway Traffic Safety Administration is that seat belts save lives. That is true whether in a passenger car or in a big yellow bus. And saving lives is what we are about. So NHTSA’s policy is that every child on every school bus should have a three-point seat belt. NHTSA will seek to use all the tools at our disposal to help achieve that goal, and today I want to launch a nationwide effort to get us there.”

NHTSA recognizes that school districts may face a number of challenges related to the acquisition and implementation of safety belts on school buses including, but not limited to, acquiring funding, effective communication and achieving buy-in from key individuals and organizations, developing effective strategies for implementation, creating policy features to encourage compliance, and developing appropriate information for drivers, teachers, students and parents. Understanding the challenges that districts have considered as well as the solutions that districts have been implemented will help NHTSA communicate current practices for districts considering safety belt use. Therefore, NHTSA is conducting this project to better understand the decisions that states and local agencies use when deciding to implement safety belts on school buses and the funding mechanisms that are used to pay for safety belt installation. From there, a Model Policies and a Best Practices Guide will be developed to assist jurisdictions that are considering the use of safety belts on school buses. To accomplish this, NHTSA proposes to conduct discussions and informal interviews with school districts who have implemented safety belts on school buses and to gather information on both implementation and funding mechanisms; such insight will be helpful in identifying the types of challenges that may be faced, as well as methods for overcoming challenges. NHTSA also recognizes the importance of reaching out to school districts who do not currently have safety belts to gain a broader picture of the priorities and challenges that jurisdictions face. Therefore, NHTSA will also be gathering feedback from school districts who are not considering implementation, or who considered but decided not to implement, as their perspective will be helpful in developing model policies and understanding what would be useful to them.

Finally, NHTSA also proposes to obtain information on bus driver distraction as related to student behavior and safety belt use. School system transportation directors, assistant principals, and bus drivers are all in positions to provide subjective information on whether safety belts deter student misbehavior and whether bus drivers are less distracted as a result. Therefore, NHTSA plans to administer a survey to get a sense of whether 1) seatbelts deter student misbehavior when used properly, and 2) whether school bus drivers less distracted by student misbehavior when safety belts are used. The initial survey results will aid in determining whether further quantitative analysis is required. This information, however, will be useful in assisting in the development of the Best Practices Guide and identifying effective strategies use to encourage compliance by students.

The project will culminate with a final report to explain the results and outcomes from all the project’s activities. NHTSA’s objective with the final report is to share the information with states and jurisdictions that are considering procuring seat belts for large school buses.

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 objective of this project is to gather information to understand the states' and local agencies' decisions to implement safety belts on school buses and the funding mechanisms that are used to pay for seat belt installation. NHTSA will use the information gathered from this project to guide the development of a Model Policy and a Best Practices Guide to assist jurisdictions that are considering the use of safety belts on school buses. Driven by the experiences of current policymakers, the Model Policy and Guide is intended to include factors necessary for success, which are likely to include, but not limited to, the following:

- Introducing the concept,
- Achieving buy-in from key individuals and groups inside the institutions
- (superintendent/chancellor, school board members, directors of transportation, bus drivers,
- safety patrol sponsors, teachers, etc.)
- Achieving buy-in from key individuals and groups outside the institutions (media, city
- councils, PTA/PTSA, local safety & advocacy groups, parents, etc.)
- Achieving buy-in from students (may include relationship with safety patrol organizations)
- Communicating effectively
- Policy features to encourage compliance (carrot and stick)
- Strategies for implementation with special populations
- Information for bus drivers and teachers
- Information for parents

The Draft Model Policy and Best Practices Guide will be available to anyone in the public and private sectors through NHTSA's website so that State and local school district regulatory bodies have information and examples, based on past experience of others, that they may consider, use and/or implement as appropriate and contextually relevant. These documents are not intended to tell agencies what they should be doing, but rather will serve as a tool to assist any states or

agencies who are considering implementation and might benefit from examples and lessons learned.

It is not realistic to develop and encourage a single Model Policy, as it is not likely that a single Model Policy will fit the needs of all agencies. Because the policies related to the acquisition and use of safety belts are not “one-size-fits-all”, NHTSA intends that the Model Policy will be adaptable to different approaches and funding mechanisms. In other words, components will be developed that can be implemented by jurisdictions as appropriate for their needs. For example, implementation of policies will be different depending on whether school buses are purchased by the State and maintained by the jurisdiction, purchased and maintained by the jurisdiction, or whether school bus services are contracted out. NHTSA plans to find examples of different scenarios that exist, and use these, as appropriate, to develop discussion and rationale of which portion of the Model Policy is applicable based on the type of practices currently used. NHTSA will strive to ensure that sufficient discussion is provided on each policy element so that jurisdictions understand the reasoning behind the elements as well as to help determine which elements are appropriate given the jurisdiction’s requirements.

The data gathered from the bus driver survey will be disseminated to the public as qualitative data and will also be used in the development of the Best Practices Guide and in identifying promising strategies used to encourage compliance by students. This preliminary information will also be used by NHTSA to determine if future research into may be warranted to determine whether safety belts deter student misbehavior and whether bus drivers are less distracted as a result.

A Final Project Report will also be developed to explain the results and outcomes from the project’s activities. This report will also be available to anyone in the public or 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.

As described in previous sections, NHTSA proposes to conduct discussions and informal qualitative interviews with representatives both from school districts who have implemented safety belts on school buses, and from school districts who are not considering implementation, or who considered but decided not to implement. These discussions will be held via telephone, email, and/or in person throughout the course of the project.

In order to identify school districts that have implemented, or have considered implementing, safety belts on school buses, NHTSA will reach out to current partners, connections, and any existing contacts in transportation departments to identify school districts who fit the criteria identified in the previous paragraph. NHTSA will hold brief, general discussions with these partners and contacts via telephone, email, and/or in person. Most likely, these conversations will

be handled via email to national and state associations, such as the National Association of State Directors of Pupil Transportation (NASDPTS), and the National School Transportation Association (NSTA), etc. As the sole purpose of these initial conversations is to identify school districts, and their appropriate and relevant personnel who are interested in participating in the project, it is expected that these conversations will take no longer than 5 minutes. To the extent possible, NHTSA will also identify, in coordination with their partners (NASDPTS, NSTA, etc), an appropriate contact(s) in each school district.

After identifying initial potential contacts, NHTSA will solicit via email for survey participations to the identified school districts. For those who agree to participate, informational interviews will be conducted to identify policy components that influence seat belt acquisition and use, and to collect qualitative feedback on seat belts and student behavior. [Per NHTSA protocol, prior to reaching out to any of the school districts, NHTSA will contact the Regional Administrators, via email, to inform them of the school districts that NHTSA intends to contact within their region.]

Upon agreeing to participate, respondents will receive a formal introductory email, prior to, and well in advance of the telephone interview. The email will provide a brief overview of the project and discussion/interview goals, and will contain two attachments: (1) an introduction letter from NHTSA describing the goals of the project and interview process, and explaining how the information that they provide will be incorporated into the project and report, and (2) a list of discussion topics and questions. Although specific interview questions will be developed to keep the discussion on track as needed, it is expected that the actual interviews will occur as more of a informal, conversational dialogue rather than a structured interview. NHTSA will follow up with each contact via telephone within 1-2 weeks of sending the email. During this call, NHTSA will either work with the contact to schedule a time to conduct the interview, or will conduct the interview on the spot if preferred by the contact. In some cases, the necessary information may be retrieved through a one-time telephone or in-person discussion, though in very rare instances, some follow-up questions may be necessary. NHTSA is seeking to gather as much information as the school districts are willing to provide, and frequency of response and discussion will be driven by how involved the school district would like to be in the conversation. It is anticipated that the more detailed discussions will be held with approximately 25 individuals for a collective total of no more than 100 hours, or an average of no more than 4 hours per individual over an extended period, though actual times could be significantly less.

Finally, NHTSA will conduct a survey to gather information about self-reported reductions in bus driver distraction as related to student behavior and seat belt use to identify preliminary indicators of whether the use of safety belts has influenced disruptive behavior. The potential respondents would include bus drivers from school districts who have implemented safety belts. The survey will be web-based and should take no longer than 10-15 minutes to complete. NHTSA expects to distribute the survey to at least one bus driver in each of the school districts that participate in the aforementioned interviews, but hopes to collect surveys from more than one driver in each of those school districts. NHTSA will share the link, via email, to the survey with their existing contact(s) within that school district and will request that they distribute the survey to the appropriate bus drivers within their school district. Follow-up discussions may also be conducted via telephone or email depending on the interest of respondents in providing additional information that may not have been captured by the survey.

Throughout the project, the privacy of all participants will be protected. The Model Policy and Best Practices Guide, or any other reports developed as a result of this data collection effort, will not identify any individuals by name. School districts may be identified, but only if permission is given to NHTSA by the school district. Additionally, any school district identified in the Model Policy and Best Practices will be given the opportunity to review and edit any text referring directly to their school district. Any reviewing and editing of text will be done through email.

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 not been able to identify any previous effort to obtain widespread feedback on states' and local agencies' decisions to implement safety belts on school buses and the funding mechanisms that are used to pay for safety belt installation, or on the reasons why states and agencies have considered, but decided against, implementing safety belts on school buses. NHTSA is also not aware of any previous efforts to understand the role of safety belts on bus driver distraction and student misbehavior on school buses. In fact, one of the primary purposes of conducting the bus driver survey is to determine if future research is warranted.

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

Interview and survey information for this study will only be collected from individuals. The burden on small business will be limited to the bus driver surveys, though exact burden is unknown at this time, due to the unknown nature of who will agree to participate. At most, 30 minutes of time per business, in the form of two 15 minute web surveys. Participation is voluntary.

After NHTSA has identified school districts who wish to provide information for the project, NHTSA will identify the appropriate contact within the school district and will only conduct discussions and interviews with one individual within that organization in order to minimize the burden. If the school district requests that NHTSA speak with someone else within their school district, NHTSA will do so, but will not request to interview multiple people within a school district. In some cases, the necessary information may be retrieved through a one-time telephone or in-person discussion, while in other cases discussions may continue via telephone and/or email as an on-going discussion throughout the course of the project as school districts think of more information to provide. NHTSA is seeking to gather as much information as the school districts are willing to provide, and frequency of response and discussion will be driven by how involved the school district would like to be in the conversation. It is thought that this approach will allow the school district representatives to provide information in a manner that is most convenient to them in order to minimize burden.

NHTSA will share the link for the bus driver survey with their existing contact within the school district for the school district to distribute as they wish and as they deem appropriate. Although

NHTSA will ask for the survey to be distributed to at least one bus driver in each participating school district, the school district contact may distribute the survey to as many or as few bus drivers as they would like; the choice of how many bus drivers with whom to share the survey will be left to the discretion of the school district contact.

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.

As stated previously, NHTSA intends to hold more detailed discussions/informal interviews with approximately 25 individuals for a collective total of 100 hours, or an average of 4 hours per individual over an extended period. If these discussions are not held, or do not gather appropriate information, then NHTSA will not have sufficient information to develop a Model Policy and Best Practices Guide that would be useful to other states and school districts. In addition to gathering information both from school districts who have already implemented safety belts, as well as districts who have considered but not yet implemented safety belts, NHTSA also plans to ensure that different categories of jurisdictions are identified. For example, NHTSA recognizes that not all districts that have implemented safety belts have done so in the same manner. There may be different categories of those using safety belts, such as:

- Districts that are required by State law to install safety belts,
- Districts that have requirements for safety belts on certain types of buses (i.e. special needs buses),
- Districts that develop their own safety belt policies based on county or city codes or ordinances, and
- Districts that are undergoing pilot programs to consider safety belt use.

Additionally, implementation policies may be different depending on whether school buses are purchased by the State and maintained by the jurisdiction, purchased and maintained by the jurisdiction, or whether school bus services are contracted out. Therefore, NHTSA plans to find examples of the different type of scenarios that exist in order to conduct interviews with representatives from school districts that have different perspectives, challenges, etc. If fewer interviews are conducted, then there may not be adequate information to develop a Model Policy and Best Practices Guide that is useful to a variety of school districts and adaptable to different approaches and funding mechanisms. For these same reasons, NHTSA believes that having at least one bus driver survey from each participating school district will be helpful in identifying differences in bus driver perspectives depending on the types of policy features and experiences of their school district.

Therefore, NHTSA believes that the proposed collection is necessary in order to develop a Model Policy and Best Practices Guide that will be most useful to a variety of school districts. 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 December 7, 2016 (Volume 81, Number 235, pages 88320-88322).

NHTSA published a notice in the *Federal Register* on August 9, 2017 (Volume 82, Number 152, pages 37288-37289) with a 30-day public comment period to announce forwarding of the information collection request to OMB for approval.

b. Responses to the Federal Register Notice

Six comments were entered into the NHTSA docket in response to the 60-day Federal Register Notice. Comments were received from the National School Transportation Association (NSTA), SafeGuard/IMMI, the American School Bus Council (ASBC), the National Association for Pupil Transportation (NAPT), the National Association of State Directors of Pupil Transportation (NASDPTS), and one comment came from a private citizen (no organization identified).

NHTSA has carefully reviewed and considered each of the comments received. Although many commenters had some specific suggestions, all indicated that they support and/or commend NHTSA on this project and the collection of such information. In general, the comments suggested that gathering this information would be important and would have practical value to schools, districts, transportation providers and policy makers. Specific suggestions regarding NHTSA's proposed approach generally fell into one of five different subject areas. Each of these subject areas are listed below along with a summary of relevant comments and responses.

CONTACTS FOR INITIAL CONVERSATIONS/IDENTIFYING SCHOOL DISTRICTS

Summary of Comments:

ASBC indicated that they are a coalition of the school transportation community and that they do not interact directly with school districts. Therefore, they (ASBC) asked that NHTSA work directly with their members (who include NAPT, NASDPTS, NSTA, Blue Bird Corp. of Fort Valley, Ga., IC Bus Corporation of Lisle, Ill., and Thomas Built Buses of High Point, N.C.) in the collection of information for this study. NSTA also indicated that they do not track which school districts have implemented or are looking to implement seat belts on school buses, and stated that they would intend to ask their members to identify such school districts and convey those districts to NHTSA when called upon.

Response to Comments:

In response to ASBC's request, NHTSA will interact directly with ASBC's members, as necessary, rather than requesting information from ASBC. Their members are school bus contractors that provide services to districts. So it would be helpful to go through them.

CONTACTING SCHOOL DISTRICTS WHO DO NOT HAVE POLICIES IN PLACE

Summary of Comments:

The 60-day Federal Register notice stated that "*NHTSA proposes to conduct discussions and informal interviews to identify school districts who have implemented seat belts on school buses, and to gather information to understand the states' and local agencies' decisions to implement seat belts on school buses and the funding mechanisms that are used to pay for seat belt installation*". Two commenters (NSTA and NAPT) provided suggestions regarding the inclusion of surveying districts that do not have seat belt requirements, or that previously debated putting seat belts in school buses and decided against them. In general, the commenters felt that this was necessary in understanding the local priorities and challenges which must be weighed when making such decisions, and that a better understanding of these decision-making processes would be beneficial to the overall review of this issue. One of these commenters (NAPT) further suggested that this broader focus [discussions with jurisdictions that do NOT have seat belt requirements] should be the NHTSA concentration for this project. A third commenter (NASDPTS) noted that NHTSA did not propose collecting data from jurisdictions who have not used or are not considering; though they supported NHTSA's approach, they stated that "*we know the agency should and will, nevertheless, seriously consider all public comments that it receives.*"

Response to Comments:

At the kick-off meeting for this project, NHTSA did discuss the importance of speaking with some jurisdictions who are considering or struggling to implement safety belts. The following text was added to the 30-day notice to better reflect these intentions: "*NHTSA also recognizes the importance of reaching out to school districts who do not currently have seat belts in order to gain a broader picture of the priorities and challenges that jurisdictions face. Therefore, NHTSA will also be gathering feedback from school districts who are not considering implementation, or who are consider but struggling to implement, as their perspective will be helpful in developing model policies and understanding what would be useful to them.*" Therefore, NHTSA plans to interview both school districts who have implemented safety belts, as well as school districts who do not

have safety belt requirements, or who have considered implementing but are struggling or decided not to; NHTSA recognizes the importance of gathering feedback from such school districts.

CONSIDERING SAFETY BELT USAGE AND USAGE POLICIES

Summary of Comments:

Two comments were made regarding seat belt usage policies. One commenter (NSTA) recommended that the study “...*examine usage rates in school districts that have mandated seat belts and how districts address the usage issue. If a school district implements seat belts on school buses, but does not also embrace a usage policy, it becomes very difficult ensure the seat belts are worn, let alone worn properly. Most school buses do not have attendants on board and school bus drivers must focus on safe loading and unloading of children and driving safely.*” Another commenter (SafeGuard/IMMI) expressed concern that “*there is no differentiation being sought between districts/and or states with mandatory usage policies and those without any enforceable usage requirements of those belts.*” and noted that the bus driver survey responses could be influenced by whether the school districts have mandatory usage requirements (they have found that school districts having instituted mandatory usage requirements respond favorably towards lap shoulder belts at all levels); they proposed that “*If NHTSA truly wants to understand the impact of lap-shoulder belts on school bus behavior, the study inquiries should be limited to those districts with enforceable usage policies.*”

Response to Comments:

NHTSA recognizes that bus drivers’ perception of safety belts, and thus their responses to certain survey questions, could be influenced by seat belt usage rates and by whether or not they have enforceable usage policies and requirements. However, NHTSA does not agree that the study inquiries should be limited to only those school districts with enforceable usage policies. Rather, in both the detailed interviews/discussions with school districts and the bus driver surveys, NHTSA will ask about usage policies (whether they have one in place, how it is enforced, etc.) in order to better highlight any differences in school districts who do and do not have such policies, and to incorporate this information into the Best Practices document for other states and local agencies to use in their planning process. Examining actual usage rates is not within the scope of the project as originally contracted, and would cost considerably more. However, the bus driver survey will also include questions regarding drivers’ opinions on usage rates (with the understanding that these are subjective and that bus drivers are primarily focused on driving safely). Furthermore, in discussing the survey and overall project results, NHTSA will, to the extent possible, highlight any differences in responses of bus drivers from schools with and without enforceable usage policies.

ADDITIONAL INFORMATION TO GATHER

Summary of Comments:

One commenter (NSTA) expressed their hope that NHTSA would focus not only on the impact of belts for the school bus driver, but also the effects on the children as well. They indicated that operationally and anecdotally their members report an overall improvement

on buses with seat belts, however they also report an increase in other complications (e.g. backpacks being entangled in lap belts, children using the seat belts to hit other children, vandalism of seat belts, etc.). The commenter also encouraged NHTSA to “*query drivers as to any concerns they may have with seat belts, including whether or not they serve as an impediment during evacuation, especially during thermal or water events.*”

Another commenter (NAPT) also quoted a recent GAO report which discusses the NHTSA and FMCSA grant programs and indicates that, at present, no states identified school bus safety as a priority area in their applications for these programs; the commenter suggested that this topic should be discussed as part of this project, indicating that it would be helpful to understand state reluctance to engage in federal safety grant programs that include or focus on school transportation. Response to Comments:

Although not described in detail in the 60-day Federal Register Notice, NHTSA plans to develop bus driver survey questions that will be useful in providing a full picture of how safety belts have influenced behavior on school buses. This will include questions regarding the driver (e.g. the degree to which their perceived levels of stress and distraction have changed, if at all), the students (e.g. if/how their behavior has changed, details on type of behavior, etc.), as well as any important details such as the type of behavior change or any unexpected effects. The questions will be structured to gather information not only on whether bus drivers feel that safety belts deter student misbehavior, but also providing insight into how much of a change there is.

In regard to the comment about federal safety grant programs, NHTSA will use the detailed interviews with school districts to reveal strategies for recouping the cost of safety belts and policies that have funded them. NHTSA will also look into, on the State level, why school districts may not be utilizing federal safety grant programs.

WORDING/TERMINOLOGY USED

Summary of Comments:

One commenter (NASDPTS) indicated that it is important to note the distinction between the ambiguous terms “seat belts” or “safety belts” and the various specific technologies that fall within those terms. They (NASDPTS) strongly recommends against the use of “seat belts”, as it can be easily misunderstood, and believes that descriptions of “belts” in buses should use specific and accurate terms, i.e. “two-point lap belts” or “three-point lap/shoulder belts”.

Response to Comments:

NHTSA understands the importance of being clear and specific in regard to the terminology that is used. In any reports or documents resulting from this project, NHTSA will use the general term of “safety belts” or “seat belts” only when describing the project activities in general terms. However, in any case where NHTSA is speaking about a specific school district or example, the appropriate and specific term will be used so that it is clear exactly what technology is being discussed at a given time.

MISCELLANEOUS

The following provides other comments that were made that did not correspond with the general categories listed above. Each comment is also followed by a response.

- NASDPTS encourages NHTSA to include the proper wearing and use of belt

systems in any educational materials and guidance the agency may release.

Response to Comment: Although NHTSA recognizes the importance of also developing educational materials and guidance on the proper wearing and use of belt systems, this is out of the scope of the current project as it was originally contracted, and thus would need to be conducted as part of a separate project.

- One commenter (NASDPTS) indicated that they believe that NHTSA’s estimate of the voluntary burden imposed on the agency and others in collecting the data is a reasonably accurate estimate. However, they believe that “*the conversations with national associations and 100 individuals in various jurisdictions about their use of belt systems are, however, likely to take considerably longer than NHTSA’s estimate of five minutes each*”. NASDPTS also suggested the following: “*In addition to the proposed initial and follow-up telephone conversations, we also encourage electronic reporting, such as the web-based data reporting described by the agency, to the extent practical*”

Response to Comment: NHTSA recognizes that, depending on the level of conversation and level of experience, the initial conversations may take longer than 5 minutes. However, since these are intended to be brief, information gathering discussions to identify school districts who might be interested in participating in the project, NHTSA felt that an average of 5 minutes would be a sufficient estimate.

- NASDPTS suggested that “*In order to enhance the quality, utility, and clarity of the information to be collected, we suggest that NHTSA establish initially an informal group to advise the agency further on the scope and content of the information needed and the methods used to collect it..*”

Response to Comment: NHTSA appreciates feedback from all organizations, and has limited the scope of this particular survey to focus narrowly on funding and other obstacles to installing seat belts on school buses.

c. Expert Consultation

Numerous pupil transportation and logistics stakeholders were involved in the ideation phase of this project. NHTSA also recently conducted a school bus safety summit where experts came up with ideas for technical resources that NHTSA could potentially fund, this project being one of them.

As indicated in the previous section, NHTSA has received comments from many experts in the field, including those from three national organizations. Comments were received from the National School Transportation Association (NSTA), SafeGuard/IMMI, the American School Bus Council (ASBC), the National Association for Pupil Transportation (NAPT), the National Association of State Directors of Pupil Transportation (NASDPTS); these comments have all been considered and/or used to guide this project moving forward.

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

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

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

Throughout the project, the privacy of all participants will be protected. Specific interview and survey responses will only be published in an aggregate form that preserves the anonymity of the respondents; the Model Policy and Best Practices Guide, or any other reports developed as a result of this data collection effort, will not identify any individuals by name.

Prior to beginning the interviews and discussions with the participating school district representatives, the project team will describe to the interviewee the measures that will be taken to ensure participant confidentiality. In some cases, e.g. to highlight a Best Practice, it may be beneficial to identify a school district by name so that other school districts who are using the Model Policy and Best Practices Guide can follow-up and gather additional information to help them as they are attempting to acquire or implements safety belts in their own school buses. However, school districts will only be identified by name if permission is given to NHTSA by the school district. Additionally, any school district who gives approval to be identified in the Model Policy and Best Practices Guide will be given the opportunity to review and edit any text referring, directly or indirectly, to their school district.

As soon as respondents click the link to take the bus driver survey, they will be taken to an Informed Consent page which describes the purpose of the survey, how the information will be used, and describes the measures that will be taken to ensure participant confidentiality. Respondents must then make a selection indicating that they have thoroughly read this information and agree to participate before they will be able to answer any survey questions.

Though survey respondents will be asked to indicate their school district, they will not be required to provide their name or contact information unless they wish to provide additional information to the project team. Any personally identifiable information that is provided will be kept separate from the data collected. Respondents will only be asked to indicate their school district so that the project team can highlight any general differences in types of responses based on policy or program features. For example, NHTSA may choose to highlight any differences in responses from school districts with and without enforceable usage policies. However, this type of information will be presented in aggregate form and will not identify any responses by school district name. In other words, NHTSA will not identify which types of responses came from which school districts specifically.

The online bus driver survey results will be password protected and access will only be given to project team members who have been authorized by the Project Manager. They survey data will be exported to an Excel file and stored in a SharePoint site folder that is also only visible to those who have been authorized by the Project Manager. The research team will check the data file as soon as it is exported to the secure SharePoint folder to ensure that no personally identifiable information (e.g. bus driver name or email address) is included.

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 or bus driver survey.

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

The estimated total respondent burden for this data collection is 133.3 hours.

NHTSA anticipates speaking with approximately 100 individuals across the country to identify school districts that have implemented, or have considered implementing, safety belts on their school buses. NHTSA will hold brief, general discussions with these partners and contacts via telephone, email, and/or in person in order to identify those who would be interested in participating in the project. It is expected that these conversations will take no longer than 5 minutes. (100 individuals x 5 minutes = 8.3 hours).

After NHTSA has identified people who are willing to participate in the project, the detailed discussions/informal interviews will then be held. In some cases, the necessary information may be retrieved through a one-time telephone or in-person discussion, while in other cases discussions may continue via telephone and email as an on-going discussion throughout the course of the project as school districts think of more information to provide or if they provide additional contacts to follow up with in their district. NHTSA is seeking to gather as much information as the school districts are willing to provide, and frequency of response and discussion will be driven by how involved the school district would like to be in the conversation. It is anticipated that the informal interviews and discussions will be held with approximately 25 individuals for a collective total of 100 hours, or an average of 4 hours per individual over an extended period. (25 individuals x 4 hours = 100 hours).

The bus driver survey will take approximately 15 minutes to complete, with approximately 100 people for a total of 25 hours. (100 individuals x 15 minutes = 25 hours).

Bus Driver Survey 100 people/15 minutes/25 hours

The interviews with school district personnel will take approximately 60 minutes per interview (with a potential for follow up questions over the course of the project in the total amount of 4 hours) for a total of 100 hours

**Interview 25 people (from the pool of initial 100 people screened)/ 4 hours/ 100 hours
(25 individuals x 4 hours = 100 hours)**

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 \$130,316 over 36 months, which amounts to an annual cost of approximately \$43,438.67 per year for 3 years. In addition to administering interviews and surveys, this cost includes the development of the Model Policy and Best Practices Guide, development of the final project report, 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

This is a new information collection to understand the decisions that states and local agencies face when deciding to implement safety belts on school buses and the funding mechanisms that are used to pay for safety belt installation. As such, it requires a program change to add the estimated 133 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.

This data collected for this project will not be published. The data will be used in the development of the final project report as well as the Model Policy and Best Practices guide.

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.