

## **DEPARTMENT OF TRANSPORTATION**

### **INFORMATION COLLECTION** **SUPPORTING STATEMENT**

#### **Uniform Procedures for State Highway Safety Grant Programs** **OMB Control Number 2127-XXXX**

#### **INTRODUCTION**

The request is for public comment on a proposed collection of information for State grants under Chapter 4 of Title 23, U.S.C., covering State Highway Safety Program Grants.

#### **JUSTIFICATION**

1. **Explain the circumstances that make the collection of information necessary.**

The Fixing America's Surface Transportation Act (FAST Act), Pub. L. 114-94, authorizes the National Highway Traffic Safety Administration to issue highway safety grants to States under Chapter 4 of Title 23, U.S.C. These grant programs include the Highway Safety Program grants (23 U.S.C. 402 or Section 402), the National Priority Safety Program grants (23 U.S.C. 405 or Section 405) and a separate grant on racial profiling data collection contained in a previous authorization and restored under the FAST Act (Pub. L. 109-59, Sec. 1906 or Section 1906, as amended by Sec. 4011, Pub. L. 114-94).

Consistent with the statute, NHTSA has implemented a final rule (83 FR 3466, Jan. 25, 2018) that creates a consolidated application process for States to apply for grant funds. In order to meet the statutory requirements, a State will be required to submit a Highway Safety Plan (HSP) that supports its qualifications for receiving grant funds. Specifically, the HSP consists of information on the highway safety planning process, performance report, performance plan, problem identification, highway safety countermeasure strategies, planned activities and funding amounts, certifications and assurances, and application materials that cover Section 405 grants and the reauthorized Section 1906 grant. States also must submit an annual report evaluating their progress in achieving performance targets. In addition, as part of the statutory criteria for Section 405 grants covering the areas of occupant protection, traffic safety information system improvement and impaired driving countermeasures, States may be required to receive an assessment of their State programs in order to receive a grant. States must provide information and respond to questions as part of the assessment process.

The individual grant programs covered under the rulemaking include the following:

a. **Highway Safety Program Grants (Section 402):**

The purpose of this program is to fund a State highway safety program, approved by the Secretary, which is designed to reduce traffic crashes and the resulting deaths, injuries, and property damage. States are required to submit an HSP with performance measures and targets as a condition of approval of the State's highway safety program.

To qualify for grant funding under Section 402, a State's HSP must include the following: (1) a description of its highway safety planning process that includes the data sources and processes used by the State to identify its highway safety problems; (2) a performance plan containing quantifiable and measurable highway safety performance targets that are data-driven, including performance measures that are used as a basis for the development of the performance targets; (3) a description of highway safety strategies and projects, explaining how the State plans to implement the projects to reach the performance targets identified; (4) a performance report that describes the State's success in meeting State performance targets; and (5) certifications and assurances signed by the Governor's Representative for Highway Safety, indicating that the State will comply with applicable laws and regulations.

The State's HSP also may include application information for the National Priority Safety Program Grants under Section 405 and a separate grant on racial profiling data collection under Section 1906, as described below.

b. National Priority Safety Program Grants (Section 405):

The National Priority Safety Program Grants section of the FAST Act includes seven targeted grant programs available to help States address national priorities for reducing highway deaths and injuries. Specifically, these programs cover the following: (1) Occupant Protection Grants; (2) State Traffic Safety Information System Improvements Grants; (3) Impaired Driving Countermeasures Grants; (4) Distracted Driving Grants; (5) Motorcyclist Safety Grants; (6) State Graduated Driver Licensing Grants; and (7) Nonmotorized Safety Grants.

- i. Occupant Protection Grants: The purpose of this program is to encourage States to adopt and implement occupant protection laws and programs to reduce highway deaths and injuries from individuals riding unrestrained or improperly in motor vehicles.

A State may qualify for a grant under one of two categories as either a (1) high seat belt use rate State – a State that has an observed seat belt use rate of 90 percent or higher or (2) lower seat belt use rate – a State has an observed seat belt use rate below 90 percent. Depending on the seat belt use rates, States will be required to submit additional information indicating compliance with certain statutorily-specified programmatic requirements.

- ii. State Traffic Safety Information System Improvements Grants: The purpose of this program is to support State efforts to improve the data systems needed to help identify priorities for Federal, State and local highway and traffic safety programs, to link intra-State data systems, to improve the compatibility and

interoperability of these data systems with national data systems and the data systems of other States, and to enhance the ability of the Secretary to observe and analyze national trends in crash occurrences, rates, outcomes and circumstances.

A State may qualify for a grant under this program if it demonstrates that it: (1) has a functioning traffic records coordinating committee (TRCC); (2) has established a traffic records strategic plan that describes specific, quantifiable, and measurable improvements to its safety databases; and (3) has demonstrated quantitative improvement in the data attributes of accuracy, completeness, timeliness, uniformity, accessibility, or integration of a core highway safety database. A State must also certify that an assessment of the State's highway safety data and traffic records system was conducted or updated during the preceding five years.

- iii. Impaired Driving Countermeasures Grants: The purpose of this program is to support State efforts to reduce the problem of impaired driving.\_

A State may qualify for a grant based on the State's average impaired driving fatality rate. Specifically, a State may qualify under one of three categories: (1) Low-range State (based on an average rate of .30 or lower); (2) Mid-range State (based on an average rate higher than .30 and lower than .60); or (3) High-range State (based on an average rate of .60 or higher). A State may receive additional grant funding under this program by implementing and enforcing a mandatory ignition interlock law for all individuals convicted of driving under the influence of alcohol or driving while intoxicated and/or by implementing a statewide 24-7 sobriety program.

- iv. Distracted Driving Grants: The purpose of this program is to encourage States to enact and enforce distracted driving legislation.

A State may qualify for a distracted driving grant by having a law or laws that prohibit drivers from texting while driving and prohibit young drivers from using cell phones while driving. The law must also make the violation a primary offense and establish a minimum fine of \$25.

- v. Motorcyclist Safety Grants: The purpose of this program is to encourage the implementation of effective programs to reduce the number of single-and multi-vehicle crashes involving motorcyclists.

A State may qualify for a grant by meeting two of the six following criteria: (1) conducting a state-wide motorcycle rider training course; (2) conducting a state-wide program to enhance motorists' awareness of the presence of motorcycles; (3) achieving a reduction in fatalities and crashes involving motorcycles from a prior year; (4) conducting a statewide program to reduce impaired motorcycle operation; (5) achieving a reduction in fatalities and accidents involving impaired

motorcyclists from a prior year; and (6) using all fees collected from motorcyclists for the purpose of funding motorcycle training and safety programs.

- vi. State Graduated Driver Licensing Grant: The purpose of this program is to encourage States to develop and implement a graduated driver's licensing system in law that consists of a multi-stage process for issuing driver's licenses to young, novice drivers and meets certain minimum requirements.

A State may qualify for a grant by having a graduated driver's licensing law that creates a multi-stage process, including a learner's permit stage that remains in effect until the driver reaches age 16, and an intermediate stage that remains in effect until the driver reaches age 17. The FAST Act sets statutory conditions that must be met by a driver at each stage.

- vii. Nonmotorized Safety Grant: The purpose of this program is to support State efforts to decrease pedestrian and bicyclist fatalities and injuries that result from crashes involving a motor vehicle.

A State may qualify for a grant if the State's combined fatalities for pedestrians and bicyclists exceeds 15 percent of its total annual crash fatalities using the most recently available final data from NHTSA's Fatality Analysis Reporting System (FARS).

c. Racial Profiling Data Collection Grant (Section 1906):

The purpose of the Section 1906 grant program under the FAST Act is to encourage States to maintain and allow public inspection of statistical information on the race and ethnicity of the driver for all motor vehicle stops made on all public roads except those classified as local or minor rural roads.

A State may qualify for a grant by submitting documents that demonstrate that the State maintains and allows public inspection of statistical information on the race and ethnicity of drivers stopped by law enforcement officers on Federal-aid highways. The State also may provide assurances that the State will undertake activities to do so and provide a list of one or more projects to support such assurances.

d. Annual Report

In addition to the application requirements for each grant, States also must submit an annual report evaluating the State's progress in achieving performance targets. The information is necessary to verify performance under the grants and to provide a basis for improvement. The annual report includes an assessment of the performance targets identified in the prior HSP and a description of how the State will adjust its upcoming HSP to better meet performance targets if a State has not met them; a description of the planned activities funded and implemented along with the amount of Federal funds obligated and expended under the prior year HSP; a description of the State's evidence-

based enforcement program activities; information regarding mobilization participation; an explanation of reasons for projects that were not implemented; and a description of how the projects funded under the prior year HSP contributed to meeting the State's highway safety performance targets. The annual report is submitted electronically to the agency within 90 days after the end of the fiscal year.

e. Assessments

States may be required to receive an assessment of certain covered programs in order to be eligible for some grants under Section 405.<sup>1</sup> NHTSA uses two different assessment approaches based on the traffic safety area covered. For occupant protection and impaired driving countermeasures grants, State programs are assessed against uniform guidelines by a team of subject matter experts.<sup>2</sup> States provide written materials to the assessment team and participate in interviews as part of the process. For traffic safety information systems, States respond to questions based on an assessment advisory.<sup>3</sup> In each case, the assessment process results in a final report that provides recommendations to the State on how it can improve its program.

2. Indicate how, by whom, and for what purpose the information is to be used.

A State would submit, through its State Highway Safety Agency, a Highway Safety Plan which includes the required information to qualify for each grant program (as stated above). For Section 402, the primary focus of the required information would be to identify traffic safety projects with performance targets and measures to determine whether progress is made towards those targets. For Section 405, the State would identify the grant criteria under which it seeks to qualify and submit the information necessary to demonstrate that it meets the minimum qualification requirements. NHTSA would use the information provided to determine the State's eligibility to receive grant funds under the program. The annual report tracks progress in achieving the aims of the grant program and provides a basis for gauging improvement. As specified in statute, States may be required to receive an assessment of certain covered programs. The information provided by a State allows subject matter experts to provide recommendations for the purpose of improving programs in the covered areas.

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<sup>1</sup> Under occupant protection grants, one criterion that a State with a lower belt use rate may use to get a grant is to complete an assessment of its occupant protection program once every three years (23 U.S.C. § 405(b)(3)(B)(ii)(VI)(aa)) and another criterion is a comprehensive occupant protection program that includes a program assessment conducted every five years as one of its elements (23 U.S.C. § 405(b)(3)(B)(ii)(V)(aa)). 23 CFR 1300.21(e)(5)(i)). Under traffic safety system information system improvement grants, a State must have an assessment of its highway safety data and traffic records system once every 5 years in order to receive a grant (23 U.S.C. § 405(c)(3)(E)). Under impaired driving countermeasures grants, a State with high average impaired driving fatality rates must have an assessment of its impaired driving program once every 3 years in order to receive a grant (23 U.S.C. § 405(d)(3)(C)(i)(I)).

<sup>2</sup> The Uniform Guidelines for State Highway Safety Programs are available online at <https://one.nhtsa.gov/nhtsa/whatsup/tea21/tea21programs/index.htm>.

<sup>3</sup> The Traffic Records Program Assessment Advisory is available online at <https://www.nhtsa.gov/research-data/traffic-records>.

3. Describe whether, and to what extent, the collection of information is automated.

The collection of information primarily consists of an application process. Although the Highway Safety Plan (HSP) itself is submitted to NHTSA electronically, currently no other parts of the process are automated. For FY 2019 grants, the agency intends to implement the submission process with the Grants Management Solutions Suite (GMSS), an electronic system that States will use to submit their HSP to apply for grants. The system also will allow State users to receive grant funds, make HSP amendments throughout the fiscal year, manage grant funds and invoice expenses. GMSS represents an improved electronic system that will allow States to apply for and receive grants in a more streamlined environment.

NHTSA currently is working with States on user acceptability testing to allow the States to use GMSS in a test environment and provide feedback to NHTSA prior to official deployment. Using this feedback, in conjunction with its own planned development process, NHTSA will be able to further simplify the application process. For example, GMSS will align directly with applicable program requirements, tying each discrete field within GMSS to the specific regulatory component, methodically cross-walking and integrating all requirements. NHTSA expects the process to reduce uncertainty among States as to what level of information is required to satisfy application criteria. The annual report requirements will be part of the GMSS system as well. States will be able to submit the required reports and make modifications to them through the system.

The assessment used for traffic safety improvement grants also relies on a web-based interface. Through this application, States submit responses that are reviewed later by a team of experts.

4. Describe efforts to identify duplication.

In general, because the information is unique to the requirements directed in Federal statute and the implementing regulation, there is virtually no possibility that this data is being collected through another source in the manner requested in the final rule that would allow a grant determination to be made.

5. Describe efforts to minimize burden on small businesses.

This item does not apply. State governments are the only eligible recipients for these grant programs.

6. Describe the impact if the collection of information is not collected or collected less frequently.

This collection of information occurs annually or, for assessments (as directed in statute), on either a three or five year basis.<sup>4</sup> Federal law requires the submission of this

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<sup>4</sup> States also may request assessments as well.

information in order to determine whether States qualify for grants each fiscal year.<sup>5</sup> Without the collection of information or with a collection that occurs on a less frequent basis, States would not be able to make the required showings under law that entitle them to receive grant funds.

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.

Due to the statutory deadlines for FY 2019 awards, we are requesting an expedited review of this collection of information so that NHTSA can provide States with as much as time as possible to familiarize themselves with GMSS and to input the required information in the system. The application deadline for grants is July 1, 2018, but States typically begin compiling application information months in advance. Consequently, we are requesting the ability to allow States to use GMSS for application submissions by March 23, 2018.

8. Provide a copy of the FEDERAL REGISTER document soliciting comments on the collection of information, a summary of all public comments responding to the notice, and a description of the agency's actions in response to the comments.

A Federal Register Notice published on November 27, 2017 (82 FR 56114) solicited public comment. In response, the Governor's Highway Safety Association (GHSA) and the Departments of Transportation of Idaho, Montana, North Dakota, South Dakota and Wyoming (5-State DOTs) submitted comments. In general, both commenters request simplification of the application requirements contained in the Interim Final Rule published on May 23, 2016 (81 FR 32554) that condition the receipt of highway safety grant funds under Federal law. To the degree that such issues are raised here, NHTSA has addressed similar comments from both commenters through a separate process that established the grant application requirements in the final rule published on January 25, 2018 (83 FR 3466).

Similarly, for the statutorily-mandated assessments that also are part of the final rule and about which the commenters raise issues, NHTSA developed the assessment tools through a separate public comment process. For occupant protection and impaired driving grants, the assessment tools are identified in the final rule as the Highway Safety Uniform Guidelines that have been in place for many years and are familiar to all States under the grant program.<sup>6</sup> States use the guidelines as a basis to develop the Section 402 portion of their HSPs. For traffic records assessments, NHTSA developed the current approach based on comments provided by several States and other interested parties. Currently, NHTSA is reviewing this assessment tool under a separate public comment process that recently closed. (82 FR 49473, Oct. 25, 2017) We note that these commenters provided comments to that process as well and their comments are being

<sup>5</sup> For example, Section 402 requires that each State, as a condition of the approval of the State's highway safety program for each fiscal year, must develop and submit to the Secretary of Transportation for approval a highway safety plan that complies with the statutory requirements. 23 U.S.C. § 402(k).

<sup>6</sup> Federal statute requires State highway safety offices to comply with Uniform Guidelines promulgated by NHTSA (23 U.S.C. § 402(a)(2)).

considered as part of the agency's effort to refine the traffic records assessment process.

Assessments serve as a critical evaluation of a State's traffic safety programs, resulting in recommendations from a panel of experts. Federal grant funds are available to States to defray the costs of these assessments. While we understand that some funds may be diverted from the program itself to support the assessment process (as the 5-State DOTs assert), a State that continues its same approach without review may spend funds in inefficient ways or focus on areas that do not improve traffic safety. Assessments are not carried out on an annual basis, but rather occur on a 3- or 5-year basis depending on the statutory requirement. Some anecdotal examples of assessment costs cited by the commenters may not have taken this into account. For example, for FY19 grants, NHTSA estimates that 6 States will need occupant protection assessments and 2 States will need traffic records assessments to qualify for grants. (These States will not need another assessment for several years.) This is far smaller than the 57 jurisdictions that are eligible for grants. In addition, the period between assessments may be even longer if a State improves its performance in certain grant areas, as the statute identifies assessment need for programs such as occupant protection and impaired driving on the basis of performance in key safety metrics (e.g., seat belt usage rate or average impaired driving fatality rate).

Separately, both commenters expressed concern about the number of questions that might be raised during an assessment. Assessments are intended to be comprehensive and by their nature can entail an extensive review. The occupant protection and impaired driving countermeasures assessment does not limit the number of questions that may be asked but instead sets a time limit on the actual process. States provide background materials in advance, which are reviewed by a team of experts prior to the assessment, with the actual assessment process taking place over a single week. States participate in an interview process (based on the review of background material) during the first half of the week (2.5 days), with the remaining period spent by the team of experts producing and presenting recommendations. For this type of assessment, the agency estimated 80 hours of time needed for State participation. This covers the background material collection, responding to questions and participating in interviews during the assessment week. For traffic records assessments, NHTSA estimated 165 hours of time needed to respond to questions through a web-based interface. These responses are reviewed by a team of experts separately, and a final report is provided to the State. NHTSA developed this estimate based on system usage time by States (i.e., records of time logged in to the system). It also presumes that States have access to a Traffic Records Coordinating Committee – a requirement of the Section 405 grant statute – that represents each of the traffic records disciplines in a State. With this mechanism in place, the State should be able to draw on the required expertise to answer the questions, limiting the amount of time needed to respond.

We appreciate the anecdotal examples of time and cost provided by both commenters. We plan to reach out to GHSA to gain more specific information about the information provided and will work with those States that may be spending an excessive amount of time (and cost) on application or assessment activities. In this context, we agree with



GHSA that the exercise to produce a burden average based on hours and costs across all States is difficult. As GHSA points out, States have different size grant programs and staff.

With one exception explained below, we do not believe that our estimated burden hours (and associated costs) need to be revised on the basis of these comments. Our view is that they reflect the average time spent on providing the required plan and assessment response. For the application process, the agency estimated 240 hours for Section 402 and 160 hours for Section 405.<sup>7</sup> As GHSA notes, this amounts to 52.5 days to provide the required HSP and annual report under this program. In most cases, HSP applications are between 100 and 200 pages in length and consist of revising or updating a previously produced document. The agency's estimated burden is in line with a State employee revising and updating the application over a 50-day period. Recognizing that variability exists among States, we believe that is a reasonable estimate of the average burden. As we explained above, for similar reasons, we think the estimated burdens for the assessment process also are reasonable and reflect an average process representative of most States' experience.

We also note that NHTSA is planning to deploy the application process through the Grants Management Solutions Suite (GMSS). As noted in a prior section, we believe that this approach will result in additional simplification to the process. GMSS will align directly with the applicable program requirements, tying each discrete field within GMSS to the specific regulatory component. This approach will reduce uncertainty about what level of information must be provided to meet the application requirements, and will result in increased efficiency in States' applications.

Finally, as noted above, based on GHSA's comment regarding the costs of on-site assessment teams used for occupant protection and impaired driving assessments, we are revising the cost estimates to include the travel, per diem, and honoraria paid to assessment team members. Although States are allowed to use Section 402 grant funds to cover these costs, we believe that they should be included in the estimate of overall cost under this collection of information. Although GHSA's anecdotal examples indicate these costs are lower, NHTSA's estimate is that the States will spend \$25,000 per assessment. Using the average number of assessments for impaired driving and occupant protection grants (13), the overall increase in cost for this collection would be \$325,000.

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

This item is not applicable. No payments or gifts are provided to the respondents.

10. Describe any assurance of confidentiality provided to respondents.

This item is not applicable. The information is collected from public documents, records and other sources and is not subject to confidentiality.

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<sup>7</sup> The additional amounts for Section 402 reflect the need to provide an annual report.

11. Provide additional justification for any collection of sensitive information.

This item is not applicable. There is no personal or sensitive information collected.

12. Provide estimate of the burden hours for the collection of information requested.

(1) *Estimated number of respondents.....*

The estimated number of respondents for the grant application and annual report part of the collection of information is based on all eligible respondents each year for each of the grants.<sup>8</sup>

- Section 402 Grants: 57 respondents (fifty States, the District of Columbia, Puerto Rico, U.S. Virgin Islands, Guam, American Samoa, and the Commonwealth of the Northern Mariana Islands, and the Secretary of the Interior).
- Section 405 Grants (except Impaired Driving Countermeasures, Motorcyclist Safety and Nonmotorized Grants) and Section 1906 Grant: 56 respondents (fifty States, the District of Columbia, Puerto Rico, U.S. Virgin Islands, Guam, American Samoa, and the Commonwealth of the Northern Mariana Islands).
- Section 405 Impaired Driving Countermeasures, Motorcyclist Safety and Nonmotorized Grants: 52 respondents (fifty States, the District of Columbia, and Puerto Rico).

The estimated number of respondents for the assessment part of the collection of information is based on the average number of State assessments that are carried out each year in each of the covered grant areas:<sup>9</sup>

- Section 405, Occupant Protection Grants, 9 assessments.
- Section 405, Traffic Safety Information System Improvement Grants, 11 assessments.
- Section 405, Impaired Driving Countermeasures Grants, 4 assessments.

(2) *Estimated hours per respondent.....*

- Section 402 and 405 Grant Applications / Annual Report: 420
- Occupant Protection Grant Assessments: 80

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<sup>8</sup> The total number of respondents is based on every eligible respondent submitting the required information for every available grant, which results in an overstatement as not every State applies for every grant each year.

<sup>9</sup> Assessment average is based on the total number of assessments conducted each year and divided by the number of years since the inception of assessment requirements for certain grants under MAP-21, Pub. L. 112-141.

- Traffic Safety Information System Improvement Grant Assessments: 165
- Impaired Driving Countermeasures Grant Assessments: 80

(3) *Estimated annual burden hours*.....26,615

Under the grant application and annual report requirements for Sections 402 and 405, we estimate that it will take each respondent approximately 420 hours to collect, review and submit the required information to NHTSA. For traffic safety information system improvement grants, we estimate that it will take 165 hours to respond to questions under the assessment. For occupant protection and impaired driving countermeasures grants, we estimate that it will take 80 hours to provide the required information and respond to questions under an assessment. Based on the above information, the estimated annual burden hours for all respondents are 26,615 hours.

Assuming the average salary of the individuals preparing the application materials or assessment responses is \$50.00 per hour,<sup>10</sup> the estimated cost for each respondent to respond is \$23,350. If all eligible States applied for and received grants for all programs (and including the annual number of assessment responses required from States), the total labor costs on all respondents would be \$1,330,750.

In addition to these labor costs, NHTSA is revising the total costs to include the assessment team costs paid for by States under occupant protection and impaired driving assessments. Annually, these additional costs are \$25,000 per assessment, totaling \$325,000 based on the average estimated number of assessments (13) conducted each year for these programs. Based on these additional costs, the overall total cost is revised to be \$1,655,750.

In our view, these estimates represent the highest possible burden hours and amounts possible. All States do not apply for and receive a grant each year under each of these programs. In addition, under Section 405 grants, some requirements permit States to submit a single application covering multiple years allowing States simply to recertify in subsequent years. As noted, the agency is taking steps to streamline the current submission process and its traffic records assessment advisory. In particular, NHTSA is working with States on enhancements to GMSS that will include an increased use of pre-populated information fields and specific references to the statutory/regulatory criteria (thereby reducing duplicative entries and the submission of unnecessary information).

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<sup>10</sup> In deciding to use \$50 as the hourly rate of the State employee(s) completing the application, NHTSA consulted its regional offices to confirm their understanding of the wages normally paid to employees that provide application information. NHTSA also reviewed publicly available information about the State salaries of highway safety office directors—the highest rate that would reasonably apply to an applicant. We reviewed 25 States, including 17 of the top 20 States in population, and calculated the average rate from that information. Based on this exercise, the average hourly rate equaled \$49.53 and was rounded up for ease of calculations. However, it is likely that those State employees tasked with completing the application would have a lower hourly rate, so the use of director salaries may overstate the average hourly rate.

These steps should result in further decreases in burden on States responding to the requirements.

13. Provide estimate of the total annual cost burden.

Not applicable. There are no capital, start-up or annual operation and maintenance costs involved with the collection of information.

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

The estimated annualized costs to the Federal Government are based on the amount of time spent on grant application review by NHTSA staff. We estimate that, at an average cost of \$50 per hour and an estimated level of 10 hours per respondent, the total cost, if every State applies for each grant program, would be \$250,500. For traffic records assessments, the agency pays about \$50,000 per assessment. These costs cover the use of contractor experts to review State responses and prepare a final report. Based on the average estimated number of traffic records assessments (11) conducted each year, we estimate the total cost to be \$550,000. For occupant protection and impaired driving countermeasure assessments, the agency incurs travel / per diem costs associated with sending a staff member to observe the assessment process in a State, which lasts about 5-6 days. We estimate the average travel / per diem cost to be \$1,750 per assessment. Based on the average estimated number of these types of assessments (13) conducted each year, we estimate the total cost to be \$22,750.

The overall estimated annualized cost to the Federal Government is \$823,250.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14.

This is a new information in for implementing a consolidated application process for States to apply for grant funds. This new information collection creates a program change of adding an additional 26,615 burden hours to NHTSA's overall burden hour total.

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

NHTSA plans to post all Highway Safety Plans on its website. Assessment reports are disclosed only at the discretion of the State being reviewed.

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.

Approval is not being sought to not display the expiration date for OMB approval of the information collection.

18. Explain each exception to the certification statement identified in Item 19, “Certification for Paperwork Reduction Act Submissions,” of OMB Form 83-1.

There are no exceptions.

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