

Paperwork Reduction Act Submission to OMB for CISS

April 20, 2018



SUPPORTING STATEMENT

FOR

P.L. 89-663, Title 1, Section 106, 108, 112. - COLLECTION OF CRASH DATA

OMB Control Number: 2127-0706

Abstract: The collection of crash data that support the establishment and enforcement of motor vehicle regulations that reduce the severity of injury and property damage caused by motor vehicle crashes is authorized under the National Traffic and Motor Vehicle Safety Act of 1966 (Public Law 89-563, Title 1, Sec. 106, 108, and 112). The newly redesigned investigation-based acquisition system, the Crash Investigation Sampling System (CISS), is a nationally-representative sample of passenger vehicle crashes. CISS was implemented in 2015 with a goal of thirty-two (32) sites operational by July 2018.

Data on passenger vehicle crashes are collected weekly and recorded by crash technicians. For the investigation-based acquisition process, once a crash has been selected for investigation, crash technicians locate, visit, measure, and photograph the crash scene; locate, inspect, and photograph vehicles; conduct a telephone or personal interview with the involved individuals or surrogate; and obtain and record injury information received from various medical data sources. These data are voluntary and used to describe and analyze circumstances, mechanisms, and consequences of serious motor vehicle crashes in the United States. The collection of voluntary interview data aids in this effort and is not released to the public.

CISS data file and accompanying documentation will be released annually which is available to the public for clinical review and analysis on the Internet in September for the previous calendar year. For example, data collection during calendar year 2017 will be available for public release in September 2018. Motor vehicle manufacturers, highway safety research organizations, and insurance and consumer groups, who use the data for their own analyses, have acquired copies of NHTSA's databases. NHTSA uses the data files to answer hundreds of questions received from federal, state and local governments, businesses, and private citizens.

A. JUSTIFICATION

1. Explain the circumstances that make the collection of information, necessary. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

Motor vehicle crash information is collected to support the establishment and enforcement of motor vehicle regulations that reduce the severity of injury and property damage caused by motor vehicle crashes. The Department's strategic goal that is supported is "safety, by working towards the elimination of highway safety related deaths, injuries and accidents".

The National Highway Traffic Safety Administration (NHTSA), under the National Traffic and Motor Vehicle Safety Act of 1966 (Public Law 89-563, Title 1, Sec. 106, 108, and 112) (Attachment 1) is charged with the collection of crash data. These data support the establishment and enforcement of motor vehicle regulations that reduce the severity of injury and property damage caused by motor vehicle crashes. Crash Investigation Sampling System (CISS) will be the mechanism through which NHTSA collects nationally representative data on motor vehicle crashes.

1. Indicate how, by whom, and for what purpose the information is to be used. Indicate the actual use the agency has made of the information received from the current collection.

Crash Investigation Sampling System (CISS) data will be used to describe and analyze circumstances, mechanisms, and consequences of high severity motor vehicle crashes in the United States. These descriptions and analyses in turn will help to describe the magnitude of vehicle damage and injury severity as related to traffic safety problems. It will give motor vehicle researchers an opportunity to specify areas in which improvements may be possible, design countermeasure programs, and evaluate the effects of existing and proposed safety measures. Users include virtually every program area in NHTSA, other federal agencies such as the Federal Highway Administration, Federal Motor Carrier Safety Administration, state and local governments, domestic and foreign motor vehicle manufacturers, insurance and consumer organizations, safety research organizations, universities, foreign government agencies, and individual citizens.

NHTSA has undertaken a modernization effort to upgrade our data systems by improving the information technology infrastructure, updating the data to be collected and reexamining the sample sites. The goal of this overall modernization effort was to develop a crash data system

that meets current and future data needs. The former Crashworthiness Data System (CDS) of the National Automotive Sampling System (NASS) ended on December 31, 2015 and the new system (CISS) began data collection on January 1, 2016 for a period of five (5) years. The new system began pilot testing data collection procedures on July 1, 2015 while new CISS sampling sites were phased into operation.

The implementation plan began phasing in the first twelve (12) CISS data collection sites in 2015. The plan pilot tested five (5) new CISS data collection sites in 2015 with an additional seven (7) sites by the end of 2015. Twelve (12) more sites were added in 2016, with a goal of twenty-four (24) sites fully operational in January of 2017. It is estimated that approximately 4,000+ cases will be investigated each year. The number of collection sites and estimated annual case investigations recommended for CISS are not considered ideal. In NHTSA's 2017 budget, an additional \$11.5 million was requested for data collection. With additional funding, the strategy is to add twelve (12) more sites to CISS in 2017 and 2018. In January of 2019, thirty-two (32) sites will be fully operational.

2. Describe whether, or to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology.

Most of the data collection burden will come from in-person or telephone interviews with vehicle occupants that take about twenty minutes. This cannot be automated because each crash is unique; therefore, the amount collected is zero percent. In addition, information from this interviewee, scene inspection, vehicle inspection, and other occupants will usually cause the interviewer to ask additional questions.

Training sessions are used to inform researchers of new and improved interview techniques and to test their interview skills.

The burden on police, medical records personnel, and tow yards is usually providing access to existing records and crash vehicles.

3. Describe efforts to identify duplication. Show why any similar information already available cannot be used or modified.

This item does not apply since no similar information is available.

4. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

The crash researchers minimize the burden by establishing rapport and trust with tow yard operators. Typically, the researcher knows the operators and simply asks for the location of the vehicle and permission to inspect it.

5. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently.

NHTSA needs nationally representative, real-world crash data to support creation or modification of Federal Motor Vehicle Safety Standards (FMVSS), which cover areas such as air bags, safety belts, safety glazing, and rollover protection. CISS data will help NHTSA staff determine which systems work well and which do not. Rulemaking often follows, and the crash data is required to defend this rulemaking in court when necessary, or to prevent the rulemaking from being challenged in court.

If these rules were not made, there would be a significant increase in highway crash deaths and injuries.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with the guidelines set forth in CFR 1320.6.

The procedures specified for this information collection are consistent with the guidelines set forth in 5 CFR 1320.6.

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.

NHTSA has undertaken a modernization effort to upgrade our data systems by improving the information technology infrastructure, updating the data to be collected and reexamining the sample sites. The goal of this overall modernization effort is to develop a crash data system that meets current and future data needs.

NHTSA published a notice in the Federal Register with a 60-day public comment period to announce this proposed information collection on December 28, 2017, Volume 82, Number 248, pages 61661 and 61662. See Attachment 2.

NHTSA published a notice in the Federal Register with a 30-day public comment period to announce forwarding of the information collection request to OMB for approval on March 20, 2018, Volume 83, Number 54, pages 12237 and 12238. See Attachment 4.

NHTSA received one comment in response to the 60-day notice. NHTSA's response to the comments is discussed below. See Attachment 5 for these comments.

1 Alliance for Automotive Manufacturers, Inc. (Alliance)

1. More data collection sites and cases:
 - a. Alliance concern: The intended 32 sites may result in an insufficient number of cases to meet the needs of countermeasure development and evaluation.

National Automotive Sampling System Crashworthiness Data System (NASS-CDS) was sunsetted with 24 sites producing data. The Crash Investigation Sampling System (CISS) was designed with 73 sites selected. Current resources only allow for the operation of 32 sites. These 32 sites will produce approximately 3650 cases per year at the current caseload of 1.5 cases per Crash Technician per week. NHTSA is exploring options through Information Technology (IT) improvements and data collection procedures that will increase the caseloads to 2.0 cases per week and result in around 5000 cases per year at 32 sites. If additional funding becomes available, the number of CISS sites and/or Crash Technicians can be increased.

2. Reasonable case weights

- a. Alliance concern: The Alliance is concerned that using a subset of the 73 PSUs (i.e., 32) will not produce the same improvement to the case weights.

NHTSA expects to release the first weighted CISS file, the 2017 data year, in September of 2018. Until the file is complete, how much the CISS case weights changed from the National Automotive Sampling System Crashworthiness Data System (NASS-CDS) are still somewhat uncertain. The reduced PSU sample size indeed will have an impact to the CISS estimates. However, CISS used the updated PSU and PJ frame information, improved case acquisition rate and case weighting methodology. Analysis of the first file produced by the CISS sister program, the Crash Report Sampling System (CRSS), has shown significant improvements over its predecessor the NASS General Estimates System (GES). NHTSA expects similar improvements in CISS.

3. Focus on later model year vehicles

- a. Alliance concern: The Alliance is concerned that using a subset of the 73 PSUs (i.e., 32) will likely limit the number of crashes involving later model year vehicles.

CISS sample design changes will yield a higher percentage of recent model year vehicles (≤ 4 years old) compared to NASS-CDS. In CDS, injuries on the police crash report were the primary criteria for stratification, CISS instead uses model year of the vehicle. Oversampling of recent model year vehicles continues in CISS, with a target sample allocation of 45% for recent model year injury and non-injury crashes although these crashes represent only 27% of the towed crash population (see Table 1, NHTSA technical report, *Crash Investigation Sampling System: Sample Design and Estimation*, in press). Since CISS serves as a multi-purpose database for many types of end users, inclusion of mid and older model year domain vehicles are still a necessity for CISS to remain a nationally representative database of towed light vehicle crashes for a larger spectrum of data users. Other sampling enhancements have reduced the amount of missing data in CISS, making more recent model year vehicles available for study.

4. Precrash information

- a. Alliance concern: The Alliance is concerned that the CISS methodology will not yield the crucial pieces of precrash information needed for the development and evaluation of crash avoidance technologies or behavioral safety programs intended to reduce distraction and other driver errors.

NHTSA acknowledges that on-scene data collection methodology such as in the National Motor Vehicle Crash Causation Survey (NMVCCS) provides more robust precrash information than is found in the follow-on crash investigations CISS conducts. However, on-scene data collection costs per case are higher and require an increased level of cooperation from local authorities compared to a follow-on investigation-based study. During CISS study design, NHTSA made the decision to initially implement a follow-on study with hopes of eventually receiving additional funding for an on-scene study focused on crash causation, or modify the existing data collection methodology. CISS collects seven precrash elements, including critical event and distraction, and codes the presence and activation of eleven crash avoidance features such as lane keeping support, forward collision warning, and blind spot detection.

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

No payment or gift will be provided to any respondent.

10. Describe any assurance of confidentiality provided to respondents.

The identification in any data files of interviewees by name or other identifying labels is not permitted and is not entered into any system of records. The CISS files are not a system of records that are subject to the Privacy Act. No names of individuals are entered into automated or hard copy case files. Reports of crash data collections must be made available to the public in a manner that does not identify individuals (Public Law 89-564). Thus, cases will not be retrievable by any unique number, symbol, or other identifying variable assigned to the individual. The safeguards for privacy which will be afforded by the CISS files are greater than those afforded by the Privacy Act because the personal information which the Privacy Act is designed to protect will be deleted from all CISS files. Each respondent is read or provided with a copy of the NHTSA approved confidentiality pledge. This pledge states, "The National Highway Traffic Safety Administration (NHTSA) is authorized by Congress (Title 49 U.S.C., Section 30166 and 30168 and Title 23, Section 403) to collect statistical data on motor vehicle traffic crashes to aid in the development, implementation and evaluation of motor vehicle and highway safety countermeasures. CISS is the mechanism through which NHTSA collects nationally representative data on motor vehicle traffic crashes. Your cooperation in this study

can aid us in improving highway safety conditions. Your response is needed to ensure the validity of this study. A representative of NHTSA who is involved in the quality review of the data may contact you only to verify that an interview did occur. Otherwise, any information that identifies you will be held CONFIDENTIAL."

It is anticipated that information on 4,200 motor vehicle crashes will be collected and entered into the CISS file every year. For each of these crashes, every precaution is taken to safeguard against personal identifying information from appearing in the database. The potential that a person can uniquely be identified by the crash and vehicle characteristics from the more than 700 data elements collected is not likely. The reason for this is that the geographic location of the crash will not be automated in the CISS file. Without the geographic location, the suspected crash could not be matched to a specific police report. Throughout many police jurisdictions in the country, a police report will only be released to the crash victims, lawyers of the victims, or insurance companies.

11. Provide additional justification for questions on matters that are commonly considered private.

Experience in motor vehicle occupant interviewing has demonstrated that discussion of the crash is not a private subject with the respondent if the subject of culpability is excluded. Culpability will not be discussed in the CISS interviews.

The CISS program seeks to identify injuries and correlate those injuries to interior features of the motor vehicle. This allows NHTSA engineers and the motor vehicle industry to evaluate the performance of interior components to improve its design to protect the motoring public from harm. All data collected for occupant assessment and injury is voluntary. Permission must be obtained from the victims to review that portion of their medical record, which contains only crash-related injury information. Simply stated, if the respondents do not cooperate then no data is collected. Therefore, all information from respondents will be acquired with their permission. Sensitive or private personal information is not recorded in the database available for government research and public perusal.

The Department of Health and Human Services recognizes NHTSA as a Public Health Authority, allowing the medical community to provide access to its records. Medical records are the primary source of data on the nature and severity of injuries.

See Attachment 6.

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

The estimated number of respondents is obtained by multiplying the approximate number of crashes investigated each year by the average number of interviews per crash. Based on existing data from the National Automotive Sampling System, each crash involves approximately 2.25 victims. The respondents are contacted only once unless reinvestigations are warranted because of data falsification.

In addition to interviews, researchers must obtain official records to complete the case report. These include police crash reports and medical records. The estimate of burden to police jurisdictions is obtained by multiplying the average number of visits per year by the average burden hours per visit by the number of police jurisdictions. Based on existing data, sampled jurisdictions are visited approximately 52 times per year (once per week) and require approximately 3 minutes of staff time. Non-sampled jurisdictions are visited twice annually and involve approximately 15 minutes of staff time. The estimate of burden to hospitals is obtained by multiplying the average number of records per year by the average number of burden hours (approximately 5 minutes per record) for record processing. The burden to tow fatalities is estimated by multiplying the estimated number of visits to these facilities for vehicle inspections per year by the burden hours per visit.

ESTIMATE OF REPORTING BURDEN				
a. Respondent Burden				
Crashes Per Year	Average Number of Respondents Per Crash	Estimated Number of Respondents	Average Number of Hours	Burden Hours
(A)	(B)	(A)*(B)=(C)	(D)	(C)*(D)
4,200	2.25	9,450	.45	4,253

Source: National Automotive Sampling System (NASS)

ESTIMATE OF REPORTING BURDEN				
b. Police Jurisdiction Burden				
Average Number of Visits Per Year (A)	Average Number of Hours Per Visit (B)	Number of Police Jurisdictions (C)		Burden Hours (A)*(B)*(C)
52	0.05	181	Sampled	471
2	0.25	340	Non-sampled	170

Source: National Automotive Sampling System (NASS)

ESTIMATE OF REPORTING BURDEN			
c. Hospital Burden			
Average Number of Records Per Year (A)	Average Burden Hours Per Record (B)		Burden Hours (A)*(B)
7,288	0.08		583

Source: National Automotive Sampling System (NASS)

ESTIMATE OF REPORTING BURDEN			
d. Tow Facilities Burden			

Average Number of Visits Per Year (A)	Average Burden Hours Per Vehicle Inspection Visit (B)		Burden Hours (A)*(B)
7,515	0.017		128

Source: National Automotive Sampling System (NASS)

ESTIMATE OF REPORTING BURDEN	
TOTAL BURDEN HOURS (A)	5,605
AVERAGE COST PER HOUR (B)	\$25
COST ASSOCIATED WITH BURDEN HOURS (A)*(B)	\$140,125

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

Interviewees keep no records of the interview. Hospitals and police simply allow access to copy their existing records. Tow yards merely direct the researchers to the crash vehicles. Therefore, there are no recordkeeping costs to any of the respondents.

14. Provide estimates of annualized costs to the Federal government.

The following figures come from the FY-2017 Budget Execution Plan.

FY-2017	Estimated Cost Per Year (\$K)
a. Data Collection Operations (contracts)	10,598
b. Administrative Salaries, Overhead, Printing of Forms	534
c. Analysis and IT costs	5,194
TOTAL	16,326

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

There are neither changes nor adjustments.

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

After completion of quality control, there will be two annual CISS files made available to the public. These files are for clinical review and analysis. CISS data file and accompanying documentation will be released annually which is available on the Internet in September for the previous calendar year. For example, data collection during calendar year 2017 will be available for public release in September 2018. Motor vehicle manufacturers, highway safety research organizations, and insurance and consumer groups, who use the data for their own analyses, have acquired copies of NHTSA's databases. NHTSA uses the data files to answer hundreds of questions received from federal, state and local governments, businesses, and private citizens.

17. OMB approval of the information collection, explain the reasons that display would be inappropriate.

NHTSA will display the expiration date for OMB approval.

18. Explain each exception to the certification statement identified in Item 19 of OMB Form 83-I.

No exceptions requested.