

## A. JUSTIFICATION

### Summary:

The Crash Report Sampling System (CRSS) collects data from police-reported crashes involving all types of motor vehicles, pedestrians, and cyclists; this includes property damage only crashes as well as those resulting in injuries and fatalities. CRSS obtains its data from a nationally representative probability sample selected from the estimated six million police-reported crashes that occur annually in the United States. By focusing attention on police-reported crashes, CRSS concentrates on the crashes of greatest concern to the highway safety community and the general public.

CRSS depends on the voluntary participation and cooperation of State and law enforcement agencies. This allows the National Highway Traffic Safety Administration (NHTSA) and its contractors to access the crash reports to review, list, and categorize the crashes. The crash reports provide essential data: detailed information regarding the location of the crash, the vehicles, and the people involved. The reports are official local and State government forms that include the location of the crash and the pre-crash environment, explains the number and types of vehicles involved as well as describing the persons, injuries and other variables to express how the person was involved in the crash. No personally identifiable information is collected or released via the CRSS program. Selected crashes are released to the public in the annual CRSS file following quality control processes conducted by NHTSA. These data files are used by NHTSA and the general public for highway safety research purposes. This is a modification to the previously approved as OMB Control No. 2127-0714 (current expiration Date: 10/31/19).

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

Improving transportation safety—saving lives, reducing injuries, and preventing motor vehicle crashes—is the number one priority of the U.S. Department of Transportation and NHTSA. CRSS and NHTSA’s other crash data systems are a vital source of the traffic safety information required to assess the overall state of traffic safety, identify potential traffic safety problems, and develop countermeasures in service of that safety priority.

In contrast to the Fatality Analysis Reporting System (FARS), NHTSA’s annual census of traffic fatalities, CRSS collects crash data from a representative sample of police jurisdictions across the country that provides an estimate-based dataset of fatal, serious injury, and property-damage-only (PDO) crashes nationwide. Absent the data collected and disseminated via the CRSS program, US DOT, State Highway Safety Offices, and other traffic safety analysts would not have information crucial to problem identification and countermeasure development for non-fatal crashes.

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

**actual use of information received from the current collection.**

CRSS data estimates fatal, serious injury, and property-damage-only (PDO) crashes nationwide. This unique dataset is used to identify highway safety problem areas, measure trends, drive consumer information initiatives, and form the basis for cost and benefit analyses of highway safety initiatives and regulations. It gives traffic safety researchers an opportunity to assess the overall state of highway safety and identify existing and emerging highway safety trends as well as assess the effectiveness of motor vehicle safety standards and highway safety programs.

Users include virtually every NHTSA program area, other federal agencies such as the Federal Highway Administration (FHWA) and Federal Motor Carrier Safety Administration (FMCSA), State and local governments, domestic and foreign motor vehicle manufacturers, insurance and consumer organizations, safety research organizations, universities, foreign government agencies, and individual citizens.

**3. Describe whether the collection of information involves the use of technological collection techniques or other forms of information technology.**

NHTSA relies on a variety of methods to access crash reports in participating CRSS States; whenever possible, the program leverages advanced technologies to increase efficiency and reduce burden. These technologies include the Electronic Data Transfer (EDT) program, access to State websites, and web service transfers.

The EDT program consists of a routine automated transfer of crash data from the State crash database to NHTSA in support of crash data collection efforts, CRSS in particular. EDT reduces the level of effort required to share crash data with NHTSA for its record-based data systems and crash investigation studies.

Additionally, States may provide CRSS samplers with access to their crash data collection database. Samplers are then able to retrieve crash report data directly, thereby eliminating the physical visits to individual police jurisdictions and their respective records managers.

States may also provide data to NHTSA through secure web service portals on a routine basis. The State transfers the data and NHTSA will retrieve the data.

Once NHTSA accesses the crash report data, it's made available through the Police Accident Report Sampling Engine (PARSE). The PARSE application is a centralized, web-based repository in which CRSS applicable crash reports are listed, categorized, and selected for further coding.

**4. Describe efforts to identify duplication. Show specifically why similar information cannot be used.**

CRSS does not duplicate efforts with any other Federal crash data collection. No existing survey or other source provides the data required to support highway safety research needs, particularly for serious injury and PDO crashes.

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

The CRSS data collection does not involve small business or other small entities.

**6. Describe the consequences to Federal program or policy activities if the information is not collected or collected less frequently.**

If NHTSA does not collect this information, the agency and its modal partners would lose its ability to obtain nationally representative police-reported motor vehicle traffic crash data and would be unable to carry out its life-saving efforts to identify highway safety problem areas, develop effective countermeasures, and provide general data trends.

**7. Explain any special circumstances that would cause an information collection to be conducted in a manner:**

- **requiring respondents to report information to the agency more often than quarterly;**
- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **requiring respondents to submit more than an original and two copies of any document;**
- **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;**
- **in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

The information will be collected more often than quarterly. When respondent entities agree to grant access to their crash reports, the frequency of sharing data is based on their internal

processes and the volume of crash reports collected. For respondents that submit using Electronic Data Transfer and States who provide access to their websites, the collection will occur daily. For respondents that provide physical access to the police jurisdiction, crash reports are accessed weekly. For respondents that provide crash reports via mail courier or other electronic means such as secure email, the crash reports are accessed monthly. Typically, the schedule is determined based on the police agencies' internal processes for sharing crash reports with the State-level agency responsible for the State crash file. For instance, a police jurisdiction will transmit its crash reports to the States on a monthly basis and at the same time a copy is provided to the CRSS program via one of the methods noted above.

With the exclusion of the information collection's frequency, explained above, the CRSS program does not encounter any of the special circumstances specified.

**8. Provide a copy of the FEDERAL REGISTER notice 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.**

Docket number DOT-NHTSA-2019-0066 was established as a repository for comments received in response to the Federal Register 60 Day Notice and Request for Comments (attached as part of this package in pdf) published on July 12, 2019 at 84 FR 33314. NHTSA received one comment on the 60-day notice, stating the importance of gathering crash data, leveraging technology, and engaging in analysis to find commonalities in crashes and better protect the public. NHTSA has concluded that it is not necessary to make any changes to the information collection based on this comment.

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

No payments or gifts are provided to respondents.

**10. Describe any assurances of confidentiality provided to respondents.**

The CRSS files are not a system of records subject to the Privacy Act. No names of individuals are entered into the data collection application nor released to the public. The data acquired for CRSS is obtained from State public record files. Personal identifiers are not required, requested, or recorded on analytical files released to the public.

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

The CRSS program does not collect any data on matters that are commonly considered private.

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

NHTSA estimates the CRSS program generates a total of 35,680 burden hours to law enforcement organizations annually as outlined in Table 1. This hourly burden was calculated using the Bureau of Labor Statistics' mean wage estimate for Court, Municipal, and License Clerks (Standard Occupational Classification #43-4031)<sup>1</sup> from May 2018 of \$19.76. Therefore, NHTSA estimates the the hourly wage associated with the estimated 35,680 burden hours to be \$705,036.80 (35,680 hours × \$19.76 per hour = \$705,036.80). The Bureau of Labor Statistics estimates that for State and local government workers, wages represent 62.4% of total compensation.<sup>2</sup> Therefore, the total cost associated with this collection is estimated to be \$1,129,866.67.

**Table 1. Estimated Annual CRSS Burden**

Access Method	Hours per Jurisdiction	Jurisdiction (PJ/State)	Total Hours
EDT (Implementation)	200	3	600
EDT (Maintenance)	5	8	40
State Website	10	14	140
Web Service	60	2	120
Manual	470	74	34,780
		<b>Grand Total</b>	<b>35,680</b>

Within the 60 CRSS Primary Sampling Units (PSUs) there are Police Jurisdictions (PJs), from which a CRSS sampler must obtain PCRs for listing, categorization, and sampling. Currently, 46 PSUs provide NHTSA data electronically—through EDT, State website access, or web service portal. However, there are three States representing a total of 10 PSUs where PCR collection is conducted in the field using a combination of electronic and manual methods as dictated by the sample PJ's PCR collection methods. These PJs required field samplers and incur an increased burden due to the labor-intensive administrative practices and privacy protections associated with manually accessing the crash reports.

The annual burden estimate detailed in Table 1 is produced by identifying the crash report access method for each PSU and PJ and assigning the appropriate burden hours for that method as outlined below.

- For PSUs providing crash reports via a State repository/website or database, the burden is estimated at 10 hours annually. This represents time to process user account requests, establish credentials, and routine maintenance of the State's data repositories.

<sup>1</sup> US Office of Management and Budget. *Standard Occupation Classification Manual, 2018*.

<sup>2</sup> Employer Costs for Employee Compensation-March 2019, <https://www.bls.gov/news.release/pdf/ecec.pdf>, last accessed June 28, 2019.

- For PSUs providing crash reports directly to NHTSA via web service, the burden is estimated at 60 hours annually. This represents implementation, data transfer monitoring, and communications with NHTSA and its contractors.
- For PSUs providing crash reports to NHTSA via manual PCR access methods (i.e., weekly physical visits to a PJ), the burden is estimated at 470 hours annually. This represents—but is not limited to—maintaining a law enforcement presence while the crash reports are being reviewed, and/or providing resources to the CRSS sampler in order to access the crash reports. This is the most labor intensive access type due to the administrative burden and the additional processes required to protect PII. Other local police jurisdictions may photocopy crash reports and FedEx to the contractors or download electronic crash reports to submit electronically via secure email or thumbdrive on a monthly basis.

Annually, there is the potential to reselect police jurisdictions, which is dependent on maintenance of cooperation and access to crash reports. If cooperation is lost, replacement jurisdictions are sought. We are not able to predict cooperation but we have one police jurisdiction that will need to be replaced for the upcoming sample year (2020). Regardless, the PJ frame is updated and the PJ sample is reselected every year. However, the changes in the sampled PJs are minimal because Pareto sampling method is used for PJ sample selection. For more details, please refer to Pages 29-32 of the Technical Report: <https://crashstats.nhtsa.dot.gov/Api/Public/ViewPublication/812706>.

For the purposes of this CRSS clearance request, the estimated burden of EDT implementation and maintenance has been included in the burden calculation. The initial setup of EDT is more labor intensive as it includes data mapping webinars, IT infrastructure changes, testing, and implementation of the data transfer. However, once EDT is implemented, the burden is reduced to maintaining the data transfer and making updates to data elements and mappings as required. NHTSA recently began collecting data from States using EDT as a method for States to provide crash data to NHTSA in a way that, after implementation, should reduce burden on States. NHTSA is currently in the process of seeking PRA clearance for this collection as it moves from being a pilot with a limited number of States participating. After NHTSA receives clearance for its EDT program, NHTSA intends to consolidate all of its existing data collections that are impacted by EDT into a single PRA package to eliminate double counting of burdens associated with EDT implementation and maintenance.

**13. Provide estimates of the total annual cost to the respondents or record keepers.**

There are no additional costs to respondents participating in the CRSS program.

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

Per the current CRSS contract, the annualized program cost to the Federal government is \$2,846,491.

**15. Explain the reasons for any changes or adjustments reported in Item 13 or 14 of the OMB Form 83-1.**

The total burden hour estimate of 35,680 hours represents an increase of 28,400 hours over the previously estimated burden of 7,280 hours. The change in burden hours represents a recalculation designed to more accurately estimate the time required to comply with the collection. The previous calculation was estimated prior to CRSS's implementation and didn't take into account the burden of establishing and maintaining cooperation with police jurisdictions and State agencies, to access crash report data. Additional administrative processes and more formalized arrangements which are in place to protect personal identifiable information have been encountered while establishing CRSS. Additionally, the CRSS data collection efforts involves a variety of methods to access crash reports, both manual and electronic processes which were unknown at the prior submission.

While CRSS leverages new technology to reduce the burden on respondents wherever possible, initial CRSS burden estimates were calculated based on assumptions rooted in the legacy National Automotive Sampling System General Estimates System (NASS GES) that CRSS has since replaced. With increasing concerns related to liability and privacy protection, police jurisdictions have in many cases implemented stringent and time-consuming oversight requirements related to accessing crash reports. These additional needs include but are not limited to requiring respondent representatives be present while the CRSS sampler is reviewing the crash reports during collection site visits. Administrative burdens such as making paper copies of crash reports and/or uploading electronic crash reports for the CRSS sampler to access when the police jurisdiction is not able to provide a physical work space is also included in the burden estimate.

Additionally, the process of establishing cooperation is taking more time than it did under NASS GES with police jurisdictions taking more time to verify the purpose and intent of the program and frequently seeking approval from police chiefs and local legal counsel before providing access. Respondent jurisdictions are now frequently reviewing the CRSS contractor's statement of work, consulting legal counsel, and requiring specific memoranda of understanding with NHTSA prior to agreeing to participate in the program. These additional activities germane to establishing cooperation and managing manual data collection activities were not anticipated when the original CRSS burden estimate was developed.

The total cost associated with this collection is estimated to be \$1,129,867. This is an increase of \$1,129,867 over the last estimate of the cost of this information collection because the previous estimate did not include the costs associated with the burden hours.

**16. For collections of information whose results are planned to be published, outline plans for tabulation, and publication.**

It is anticipated that approximately 50,000 motor vehicle crashes will be collected and entered into the CRSS analytical user's file every year after quality control, imputation, and weighting

activities have been completed. The CRSS data file and accompanying documentation is released annually in the fall, for the prior data collection year here: <ftp://ftp.nhtsa.dot.gov/CRSS/> For example, data collected during calendar year 2018 will be available for public release in the fall of 2019.

**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 intends to display the expiration date for OMB approval and the PRA burden statement.

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

No exception is made to any of the items in the certification statement.