

Information Collection Request Supporting Statements: Part A
State Data Transfer
OMB Control No. 2127-(New)

Abstract:¹

The State Data Transfer (SDT) program is a voluntary collection of motor vehicle crash data. State agencies collect information about motor vehicle crashes on Police Accident Reports (PARs)² for their own needs. In general, a PAR includes information about the vehicles and individuals involved in a crash, injuries or fatalities resulting from a crash, roadway information, environmental information, and information to reconstruct the crash scenes, etc. The SDT is a process through which participating States transfer their PAR data to the National Highway Traffic Safety Administration (NHTSA). SDT has two components that NHTSA's National Center for Statistics and Analysis (NCSA) calls protocols:

1. The State Data System (SDS) protocol obtains PAR crash data from States that submit data on an annual basis to NCSA. The data is submitted via electronic media, such as encrypted CD-ROM/DVD, or through secured mail or a secure file transfer protocol (SFTP). Files submitted through the SDS protocol are referred to as "annual crash files."
2. The Electronic Data Transfer (EDT) protocol obtains PAR crash data, crash reports, and crash images from participating State crash systems through an electronic data transfer. Generally, this transfer occurs on a nightly basis following State data quality control checks and acceptance by each State's centralized database. The information is transmitted using Extensible Markup Language (XML) or JavaScript Object Notation (JSON) files through a web service using the Hypertext Transfer Protocol Secure (HTTPS) protocol between a State's crash data system and NHTSA.

The SDT process allows States to submit all their PAR data to NHTSA. NCSA will then use this data to develop a census of the participating State's crashes. This dataset will help NCSA identify existing and emerging highway safety trends and assess the effectiveness of motor vehicle safety standards and new and emerging technologies. NHTSA will also use the dataset to support NHTSA's Corporate Average Fuel Economy (CAFE) program. Specifically, NHTSA will use the data to complete the cost-benefit analyses for CAFE rulemakings, including using the data to evaluate the effects vehicle mass has on fatalities.

¹ The Abstract must include the following information: (1) whether responding to the collection is mandatory, voluntary, or required to obtain or retain a benefit; (2) a description of the entities who must respond; (3) whether the collection is reporting (indicate if a survey), recordkeeping, and/or disclosure; (4) the frequency of the collection (e.g., bi-annual, annual, monthly, weekly, as needed); (5) a description of the information that would be reported, maintained in records, or disclosed; (6) a description of who would receive the information; (7) the purpose of the collection; and (8) if a revision, a description of the revision and the change in burden.

² Police Accident Reports are also known as Police Crash Reports (PCRs) in some jurisdictions.

NHTSA will also use the information collected to support NHTSA's Fatality Analysis Reporting System (FARS), Crash Report Sampling System (CRSS), Crash Investigation Sampling System (CISS), Special Crash Investigation (SCI), Non-Traffic Surveillance (NTS), Crash Injury Research and Engineering Network (CIREN), and other data collection programs by pre-populating data where possible and leveraging the data for sample selection, etc. NHTSA will also share the data with other Department of Transportation (DOT) agencies that analyze crash data for motor vehicle and traffic safety trends.

A. Justification

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal and 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.**

NHTSA is authorized by 49 U.S.C. § 30182 and 23 U.S.C. § 403 to collect data on motor vehicle traffic crashes to aid in the identification of issues and the development, implementation, and evaluation of motor vehicle and highway safety countermeasures. The information collected serves to identify and develop safety countermeasures that will reduce deaths, injuries, and economic losses resulting from motor vehicle crashes.

The SDT data will be used to generate a census of police reported crashes occurring within the participating States. The State agencies already collect the information on PARs for their own needs. The data are collected in various formats and timelines according to each State's collection programs and systems. SDT will enable NHTSA to develop a census of participating States' injury and property-damage-only crashes not available through any other NHTSA data collection program.

NHTSA also collects the PAR information via SDT for additional uses in several existing data collection programs and special studies. The following are brief descriptions of these data collection programs:

- FARS (OMB Control No. 2127-0006) is a nationwide census of fatalities caused by motor vehicle traffic crashes. In addition to PAR data, FARS includes detailed information regarding the location of the crash, the vehicles, and the people involved. FARS cases can also include toxicology report data, medical records, medical examiner reports, etc.³
- CRSS (OMB Control No. 2127-0714) is a nationally representative sample of police-reported crashes involving all types of motor vehicles, pedestrians, and

³ Additional details about FARS and how the agency collects this information are available in the supporting statements for the ICR with OMB Control No. 2127-0006.

cyclists, ranging from property-damage-only crashes to those that result in fatalities. CRSS data elements are a subset of the data elements on each State's PAR.⁴

- CISS (OMB Control Number 2127-0706) is a nationally representative sample of minor, serious, and fatal crashes involving at least one passenger vehicle—cars, light trucks, sport utility vehicles, and vans—towed from the scene. CISS collects data at both the crash level through scene analysis and the vehicle level through vehicle damage assessment together with injury coding. Data collected through CISS expands upon the information that is collected in a PAR.⁵
- The SCI Program provides NHTSA with the most in-depth crash data collected by the agency. The data collected ranges from basic information contained in routine police and insurance crash reports, to comprehensive data from special reports produced by professional crash investigation teams. Hundreds of data elements relevant to the vehicle, occupants, injury mechanisms, roadway, and safety systems are collected for each of the over 100 crashes designated for study annually.
- NTS is a virtual data collection system designed to provide counts and details regarding fatalities and injuries that occur in non-traffic crashes and in non-crash incidents. NTS non-traffic crash data is obtained through NHTSA's CRSS and FARS information collections. NTS non-crash injury data is based upon emergency department records from a special study conducted by the Consumer Product Safety Commission's National Electronic Injury Surveillance System (NEISS) All Injury Program. NTS non-crash fatality data is derived from death certificate information from the Centers for Disease Control's National Vital Statistics System.
- CIREN combines crash data collection with professional multidisciplinary analysis of medical and engineering evidence to determine injury causation in every crash investigation conducted. The mission of the CIREN is to improve the prevention, treatment, and rehabilitation of motor vehicle crash injuries to reduce deaths, disabilities, and human and economic costs.

Until recently, the transfer of crash data from a State's crash data system to NHTSA's FARS, CRSS, and CISS required individuals to manually enter State crash data into each of these systems. The SDT program's EDT protocol will allow NHTSA to automate the transfer of participating States' motor vehicle crash data to NHTSA, which will support the data collection efforts that use this information. This is now possible as a result of States building centralized databases for their motor vehicle crash data and the increased adoption of the Model Minimum Uniform Crash Criteria (MMUCC).

⁴ Additional details about CRSS and how the agency collects this information are available in the supporting statements for the ICR with OMB Control No. 2127-0714.

⁵ Additional details about CISS and how the agency collects this information are available in the supporting statements for the ICR with OMB Control No. 2127-0706.

NHTSA's SDT program will reduce the burden of manual data entry and result in more accurate and timely data to help save lives, prevent injuries, and reduce economic costs due to motor vehicle crashes.

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.

NHTSA plans to utilize the SDT data to identify existing and emerging highway safety trends, assess the effectiveness of motor vehicle safety standards, and study the impact of new and emerging technologies on vehicle and highway safety programs. For example, NHTSA plans to combine data from SDT with information about the type of advanced driver assistance systems (ADAS) on crash-involved vehicles to estimate the effectiveness of vehicles equipped with ADAS technologies such as lane keeping support, automatic emergency braking, blind spot detection, etc.

NHTSA also plans to use the SDT to support the cost-benefit analysis for the Corporate Average Fuel Economy (CAFE) rulemaking. NHTSA will use the SDT data to estimate what effect vehicle mass has on fatalities. Without the volume of data from the States in the sample, it would not be feasible to estimate meaningful fatality rates or their relationship with vehicle mass.

NHTSA also plans to use the motor vehicle crash data it collects from States through SDT to pre-populate several studies that support NHTSA's mission: FARS, CRSS, CISS, SCI, NTS, CIREN and other application special studies.

In addition, the SDT data will be made available to other DOT agencies, such as the Federal Highway Administration and the Federal Motor Carrier Safety Administration, to support their mission to save lives on our national roadways.

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 forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also, describe any consideration of using information technology to reduce burden.

SDT currently consists of two data transfer protocols. The SDS protocol relies on electronic data received through submitted electronic media, or electronic file transfer protocol on an annual basis. The SDS protocol is being phased out as States establish centralized crash data systems and are able to support automated processes.

The EDT protocol is an automated electronic information process that will reduce the burden on State respondents by limiting manual data entry for other NHTSA data

collections. EDT data can be used to pre-populate some of the information in these other data collections and will reduce the State resources required to provide data to NHTSA. NHTSA will work with States that choose to participate in EDT to establish automatic data feeds. This data is then populated into NHTSA's data collection systems wherever possible to reduce the burden on States. During the implementation phase, NHTSA and its IT contractor will carry out most of the development work to reduce the burden on States to a minimum. Following implementation, NHTSA and the State will review the data transfer process annually to determine if there are any required updates to the data feed from either NHTSA or States, including adding or removing fields, data schema changes, data attribute changes, etc. Eventually, NHTSA hopes that SDT will fully replace SDS and other legacy collection methods.

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.

Although information collected via SDT overlaps with data collected through FARS, CRSS, CISS, SCI, NTS, and CIREN, there is no duplication. Instead, SDT's EDT protocol will enable NHTSA to reduce the burden of several of NHTSA's existing motor vehicle crash data collections from the States. The EDT protocol does this by pre-populating data into NHTSA's FARS, CRSS, and CISS databases, thus reducing existing redundancy. This will reduce the burden of manually entering data. States that have elected to participate in the pilot have seen improved efficiencies and improved accuracy of data in the areas of FARS and CRSS data collection. SDT will continue to be voluntary, with participation based on States' interest and capabilities.

Broader SDT adoption by more States will support further efficiencies in FARS, CRSS, CISS, SCI, NTS, CIREN and safety analysis throughout DOT. This is a goal typically shared by both the States and the Federal offices responsible for management of the data. As a result, DOT will advocate for SDT adoption in the States as a best practice to improve the data management between State and Federal entities specific to crash and associated safety data.

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

All respondents to this information collection effort will be State governments, which are not considered small entities.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

SDT will provide the most comprehensive PAR information for participating State injury and property-damage-only crashes in one consolidated data feed. This information is not available through any other NHTSA data collection program. SDT data will be used to identify, evaluate and respond to changes in safety on our nations roadways. Studies in safety include vehicle; vehicle technology use; roadway; passenger safety, other road users and underserved populations. Absent the SDT program and the data it will collect, NHTSA will not be able to identify existing and emerging highway safety trends, assess the effectiveness of motor vehicle safety standards, and study the impact of new and emerging technologies as effectively.

For example, NHTSA plans to utilize the SDT data to identify crash-involved vehicles with advanced driver assistance technologies and evaluate effectiveness of the systems. Without SDT data, NHTSA would be unable to estimate the effectiveness of vehicles equipped with advanced driver assistance technologies. Advanced driver assistance technologies are relatively new and are only offered in new vehicles, which represent a small proportion of all vehicles—and an even smaller proportion of vehicles involved in crashes. SDT will be the most effective way to collect data on vehicles with these new technologies. The SDT data collection will speed and enhance NHTSA’s ability to estimate effectiveness of these new technologies.

NHTSA also plans to use the SDT to support the cost-benefit analysis for its Corporate Average Fuel Economy (CAFE) rulemaking. NHTSA will use the SDT data to estimate the effects of reducing vehicle mass (to help meet fuel economy targets) on fatalities. Without the volume of data from the States in the sample, it would not be feasible to estimate meaningful fatality rates or their relationship with vehicle mass.

Furthermore, the SDT program will allow NHTSA to decrease the burden on States associated with NHTSA’s existing motor vehicle crash data collections as described above. Absent implementation of the SDT program, States will continue to provide the data separately for each motor vehicle crash data collection, which frequently requires manual data entry. By establishing one electronic transfer of State motor vehicle crash data under SDT, the burden on the participating States will be reduced and the data timeliness and accuracy increased. The electronic nature of the SDT program provides higher frequency data transfer with lower effort.

- 7. Explain any special circumstances that would cause an information collection to be conducted in a manner:**
 - a. requiring respondents to report information to the agency more often than quarterly;**
 - b. requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
 - c. requiring respondents to submit more than an original and two copies of any document;**

- d. **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;**
- e. **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;**
- f. **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- g. **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**
- h. **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.**

This collection involves respondents providing information more often than quarterly—submitted electronically using secure protocols and at a frequency agreed upon by both State and Federal offices. With the States participating in the EDT protocol, the data submission is automated and happens each night electronically. The electronic-only submittal is intended to decrease the data management and communication burden on all involved parties. When instituted, SDT replaces costly and time-consuming manual or paper-based processes.

This collection does not require respondents to submit more than an original and two copies of any document, though respondents may send several copies of one PAR if there are updates to a crash. The process is automated and happens without human intervention. If there are any updates for a crash after the information has been sent to NHTSA, the States' electronic systems send updates automatically and NHTSA's EDT process receives the information and updates its records automatically.

This collection does not require respondents to retain records for more than three years.

This collection is not part of a statistical survey and does not require statistical data classification.

The collection does pledge confidentiality and protects confidential information to the extent permitted by law.

8. **If applicable, 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 the comments. Specifically address**

comments received on cost and hour burden. Describe efforts to consult with persons outside the agency to obtain their views.

NHTSA published a notice in the Federal Register with a 60-day public comment period to announce the proposed EDT protocol part of SDT information collection on May 31, 2018 (83 FR 25112). See Attachment 2. On July 23, 2018, NHTSA extended the comment period to September 14, 2018, at the request of State-based stakeholders. Four comments were received before the deadline. One additional comment was received on September 17, 2018. NHTSA received comments from:

- Oregon Department of Transportation (DOT);
- Transportation Departments of Idaho, Montana, North Dakota, South Dakota, and Wyoming;
- Insurance Institute for Highway (IIHS);
- Commercial Vehicle Safety Alliance (CVSA); and
- Governors Highway Safety Association (GHSA)

In addition to receiving positive comments supporting NHTSA in its mission of improving highway safety, NHTSA received comments expressing concerns about participation, funding, confidentiality/privacy/data sharing, and burden estimations. A summary of the comments and NHTSA's responses to those comments will be published in a 60-day notice by, or soon after, OIRA's approval of this request for emergency processing.

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 in connection with this information collection.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.

All data collected via the SDT program is handled in accordance with established Memoranda of Understanding with participating States. In addition, all applicable Federal statutes, including but not limited to the Privacy Act, HIPAA Privacy Rights, FISMA, and OMB and DOT data protection mandates and policies are being followed.

SDT is part of NHTSA's Crash Data Acquisition Network (CDAN). CDAN's PIA is published at <https://www.transportation.gov/individuals/privacy/crash-data-acquisition-network-cdan-pia>.

The SDT program collects information from States' crash databases. The information comes from PARs and may contain personally identifiable information (PII). Whether a State submits PII to NHTSA via SDT is determined by each participating State. As discussed above, NHTSA will not publicly disclose PII in State crash data.

The types of PII found in a crash report include: name, address, contact information for drivers, passengers, pedestrians, witnesses and vehicle owners involved in automotive crashes resulting in death and/or injury. Specifically, SDT may obtain: crash date, crash time, crash location, driver license number, driver license State, name, address, gender, date of birth (to calculate age), vehicle license plate number, 4-digit GSA city code, 2-digit State number, Vehicle Identification Number (VIN), and the diagram and narrative of the police report. This data is used by NHTSA for crash analysis to identify national trends in road safety and influence the development, deployment, and evaluation of lifesaving safety countermeasures.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

The SDT program does not collect answers to questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, or other matters that are commonly considered private.

12. Provide estimates of the hour burden of the collection of information on the respondents and estimates of the annualized labor cost to respondents associated with that hour burden.

SDT receives the crash data from States in two different ways: the SDS protocol and EDT protocol. There are currently 38 States participating the SDT: 31 States participating using the SDS protocol and 19 States participating using the EDT protocol. There are 15 States providing data using both protocol, but for some of these States, we do not get the same information with both protocols. For example, for some States we receive all crashes through EDT, but we only get crashes that meet the State's specific threshold for reportable crashes through SDS.

SDS information is obtained annually from States submitted in a more traditional method via electronic media through secured mail or a Secure File Transfer Protocol (SFTP). NHTSA assumes a participating State already has a centralized electronic crash database. Currently, 31 States are voluntarily submitting their annual crash database to NHTSA, with five States sending electronic media and 26 states uploading the database to an

SFTP site. Since NHTSA accepts the States' centralized electronic crash database without changes, NHTSA estimates that it will require eight hours for a State Database Administrator to save a copy of the State's annual crash database onto a SFTP site or electronic media. We estimate an additional four hours will be required for an administrative assistant to package and send the electronic media to NHTSA.

To estimate the labor cost associated with submitting the SDS information, NHTSA looked at wage estimates for the type of personnel involved with copying, packaging and sending the database. NHTSA estimates the total labor costs associated with copying the database by looking at the average wage for Database and Network Administrator and Architects. The Bureau of Labor Statistics (BLS) estimates that the average hourly wage for Database and Network Administrator and Architects (Standard Occupational Classification #15-1240, May 2020) is \$47.80.⁶ The Bureau of Labor Statistics estimates that State and local government workers' wages represent 61.9% of total labor compensation costs.⁷ Therefore, NHTSA estimates the hourly labor costs for copying the database to be \$77.22 ($\$47.80 \div 61.9\%$) for Database and Network Administrator and Architects. The cost associated with the eight hours of Database and Network Administrator labor is estimated to be \$617.76 per respondent.

For the 5 States sending electronic media, NHTSA estimates the total labor costs for packing and sending the database by looking at the average wage for Secretaries and Administrative Assistants. The BLS estimates that the average hourly wage for Secretaries and Administrator Assistants (Standard Occupational Classification #43-6014, May 2020) is \$19.43.⁸ By using the same estimate that wages represent 61.9% of the total compensation cost of labor, NHTSA estimates the total labor hour cost for packing and sending the database on electronic media to be \$31.39. Therefore, the cost associated with the four hours to send the electronic media is estimated to be \$125.56 per respondent.

Combining these copying and packing and sending burden estimates for SDS, NHTSA estimates that the total burden hours associated with this collection will be 268 (248 + 20 hours) hours and total labor cost associated with the collection will be \$19,151 ($\617.76×31 States) for copying and \$628 ($\125.56×5 States) for packing and sending, for a total of \$19,779 ($\$19,151 + \628) for the SDS protocol.

The EDT protocol burden hour estimate is based on the level of effort reported by the States that have fully implemented SDT. NHTSA estimates that in each of the next three

⁶ See May 2020 National Occupational Employment and Wage Estimates United States, available at https://www.bls.gov/oes/current/oes_nat.htm (accessed April 16, 2021).

⁷ See Table 1. Employer Costs for Employee Compensation by ownership (Dec. 2020), available at <https://www.bls.gov/news.release/ecec.t01.htm> (accessed April 16, 2021).

⁸ See May 2020 National Occupational Employment and Wage Estimates United States available at https://www.bls.gov/oes/current/oes_nat.htm (accessed April 16, 2021).

years, there will be two new States joining the 19 States already participating in SDT program using the EDT protocol. Therefore, NHTSA estimates that there will be, on average, 23 EDT protocol States in each of the next three years. Cost and burden estimates for the EDT protocol are divided in two: a one-time implementation effort, and an annual maintenance effort. Both estimates assume a participating State already has a centralized electronic crash database. The burden for the one-time implementation for the EDT protocol is estimated at 200 hours. NHTSA estimates that these hours will account for work done by State IT (150hrs) and FARS program personnel (50hrs).

Once implemented, the hourly burden on States associated with EDT maintenance is estimated at five hours per year, based upon currently participating States' experiences. This time is generally used to troubleshoot any connection issues or refine mapping protocols for any data elements that have changed.

NHTSA estimates the cost for IT personnel burden hours using the Bureau of Labor Statistics' mean wage estimate for Software and Web Developers, Programmers, and Testers (Standard Occupational Classification #15-1250, May 2020) of \$52.86.⁹ The Bureau of Labor Statistics estimates that for State and local government workers, wages represent 61.9% of total compensation.¹⁰ Therefore, the total hourly cost associated with the IT burden hours is estimated to be \$85.40 ($\$52.86 \div 61.9\%$) per hour. The cost associated with the 150 hours of IT personnel labor is estimated to be \$12,810.00 ($\85.40×150 hours) per respondent. Initial SDT implementation is also expected to involve 50 hours of FARS program personnel time. There is no additional cost to the States associated with these hours because these costs may be charged to the Federal Government through the FARS cooperative agreements. Thus, total labor cost for EDT implication costs per State are estimated to be \$12,810.00. The total annual implementation burden cost per year is estimated to be \$25,620 ($\$12,810.00 \times 2$ new State respondents).

After initial implementation of a SDT interface, the ongoing cost burden to participating States is estimated at 5 hours per State annually, based on a survey of currently participating States. Per the loaded labor rates for State IT staff outlined above, 5 hours of work translates to an estimated total annual maintenance burden of \$427.00 ($\85.40×5 hours) per State respondent maintaining participation in the SDT program. NHTSA estimates that there will be, on average, 23 States participating in EDT program in each of the next three years. Therefore, the annual maintenance cost for the States is a total of \$9,821 ($\427.00×23 States) per year.

⁹ May 2020 National Occupational Employment and Wage Estimates United States, Occupational Employment Statistics, Bureau of Labor Statistics, U.S. Department of Labor, https://www.bls.gov/oes/current/oes_nat.htm#15-0000, last accessed April 16, 2021.

¹⁰ Employer Costs for Employee Compensation by ownership (Dec. 2020), available at <https://www.bls.gov/news.release/ecec.t01.htm> (accessed April 16, 2021).

Combining these implementation and maintenance burden estimates for the EDT protocol, NHTSA estimates that the total burden hours associated with this collection will be 415 hours and total labor cost associated with the collection will be \$35,441.

The total estimated burden for SDT is 683 (268 SDS + 415 EDT) and the total estimated labor cost is \$55,220 (\$ 19,779 SDS + \$35,441 EDT).

A summary of the burden estimates is provided in the table below.

SDT Burden Estimate Summary						
Burden Type	Respondents	Burden Per Respondent	Total Burden Hours	Cost Per Burden Hour	Cost Per Respondent	Total Labor Cost
SDS Copying	31	8	248	\$77.22	\$617.76	\$19,150.56 \$19,151
SDS Packing and sending	5	4	20	\$31.39	\$125.56	\$627.80 \$628
EDT IT Implementation	2	150	300	\$85.40	\$12,810.00	\$25,620.00 \$25,620
EDT Maintenance	23	5	115	\$85.40	\$427.00	\$9,821.00 \$9,821
			683			\$55,220

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. Do not include the cost of any hour burden already reflected in the response provided in question 12.

This collection is not expected to result in any increase in costs to respondents other than the labor cost associated with the burden hours.

14. Provide estimates of annualized costs to the Federal government. Provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

The total annual costs for SDS to the Federal government are estimated to be \$1,437,122 per year. Approximately, 80 percent of the time of one employee is devoted to managing the SDS part of SDT. Eighty percent of 2,087 work hours a year is about 1,670 hours. NHTSA estimates the cost of this time using the salary of a GS 14 step 5 employee in the Washington, DC, area, which is \$66.54 per hour. The estimated federal staff needed to manage the SDS will be \$111,122 (\$66.54 × 1,670 hours). Since the States supply the data in various layouts and formats, the federal contracting support needed to process this data into a useable common form is \$1,326,000 per year for the estimated 31 participating States.

The total annual costs for EDT to the Federal government are estimated to be \$404,118 per year. Approximately, 10 percent of one employee's time is devoted to managing the EDT part of SDT. Ten percent of 2,087 work hours a year is about 209 hours. NHTSA estimates the cost of this time using the salary of a GS 14 step 8 employee in the Washington, DC, area, which is \$72.41 per hour. The estimated federal staff needed to manage the SDS will be \$15,134 ($\72.41×209 hours). Additionally, federal contracting support is needed to implement and maintain the electronic data transfer process for EDT to ensure NHTSA receives the data securely and accurately. The implementation cost per State is estimated to be \$52,996 and the annual maintenance cost per State is estimated to be \$12,304 based on NHTSA's IT contract. Therefore, the total contract cost for the federal government is estimated to be about \$388,984 per year for 23 States.

15. Explain the reasons for any program changes or adjustments reported on the burden worksheet. If this is a new collection, the program change will be entire burden cost and number of burden hours reported in response to questions 12 and 13. If this is a renewal or reinstatement, the change is the difference between the new burden estimates and the burden estimates from the last OMB approval.

This is a new collection. The total burden cost is estimated to be \$0 and the number of burden hours is estimated to be 683 for this new collection.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions as applicable.

SDT data is not directly published or made available to analysts outside of DOT because of States' concerns. NHTSA has found that States are more likely to participate in SDT if we do not publish the data directly. However, the data collected via the SDT program will be used to pre-populate NHTSA's FARS, CRSS, and CISS programs; in addition, a sanitized, i.e. PII removed, SDT dataset will be used by NHTSA and DOT modal partners for analytical use. The quality-controlled datasets produced by the FARS, CRSS, and CISS programs are publicly released for analytical use to the broader highway safety community. The FARS, CRSS, and CISS datasets provide the basis for numerous NHTSA and other DOT operating administrations' publications; behavioral and vehicle safety research; rulemaking; focused analyses; defects investigations; annual departmental and modal target setting; lives saved; regulatory analysis and research; and various data tools like the Fatality and Injury Reporting System Tool (FIRST), the FARS Encyclopedia, the Annual Report portal, the State Traffic Safety Information (STSI) website, the Crash Viewer tool, and others. The sanitized SDT dataset will be used for ad

hoc analyses and to support novel programs at the agency and Departmental levels. The SDT aggregated data may also be published in reports where the SDT data was analyzed.

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.

18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions." The required certifications can be found at 5 CFR 1320.9.¹¹

The expiration date for the OMB approval for the SDT information collection will be displayed on the Memoranda of Understanding (agreement with participating States) or emails sent to the States point of contact for the SDT data. There are no exceptions.

Attachments

Attachment 1 – 49 U.S.C 30182 and 23 U.S.C 403

Attachment 2 – Published 60-day notice DOT-NHTSA-2018-0034

¹¹ Specifically explain how the agency display the OMB control number and expiration date and will inform potential respondents of the information required under 5 CFR 1320.8(b)(3); the reasons the information is planned to be and/or has been collected; the way such information is planned to be and/or has been used to further the proper performance of the functions of the agency; an estimate, to the extent practicable, of the average burden of the collection (together with a request that the public direct to the agency any comments concerning the accuracy of this burden estimate and any suggestions for reducing this burden); whether responses to the collection of information are voluntary, required to obtain or retain a benefit (citing authority), or mandatory (citing authority); the nature and extent of confidentiality to be provided, if any (citing authority); and the fact that an agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.