**Pilot Project: Work Organization Risks to Short-haul Truck Drivers’ Health & Safety (Survey)**

**Supporting Statement Section A**

**New**

**Request for Office of Management and Budget (OMB) Review and Approval for a Federally Sponsored Data Collection**

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**Attachment C. Survey**

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**A. Justification**

* **Goals of the study:** The first goal is to conduct pilot research of work organization factors that may affect the health and safety of local/short haul (L/SH) truck drivers. The second goal is to identify the perceived safety and health needs and concerns of L/SH truck drivers. The third goal is to assist in generating hypotheses for future research on health and safety topics in this workforce.
* **Intended use of the resulting data:** To guide the development of a future proposal to design an intervention that follows the principles of Total Worker Health (TWH) by addressing work-related and personal factors through coordination of health protection (i.e., safety), work redesign (i.e., work organization), and health promotion efforts, as applicable, to protect and promote driver health and safety.
* **Methods to be used to collect:** In-person convenience sample of drivers on a voluntary basis.
* **The subpopulation to be studied:** Currently employed L/SH truck drivers in the U.S.
* **How data will be analyzed:** Descriptive analyses (prevalence and trends); multivariate logistic regression and other statistical methods to analyze associations between work and non-work related protective factors, risk factors, and injuries/illness.

# A.1. Circumstances Making the Collection of Information Necessary

This is a new information collection request (ICR) from the National Institute for Occupational Safety and Health (NIOSH), Centers for Disease Control and Prevention (CDC). The request is for 2 years to complete data collection. This data collection is authorized by Section 20(a)(1) of the Occupational Safety and Health Act (29 U.S.C. 669) (Attachment A).

The mission of NIOSH is to promote safety and health at work for all people through research and prevention. The Occupational Safety and Health Act of 1970, Public Law 9-596 (Section 20) [a][1] authorizes NIOSH to conduct research to advance the health and safety of drivers.

This research effort involves conducting a survey (Attachment C) of U.S. local/short haul (L/SH) truck drivers to collect occupational safety and health information. There is currently limited research in the L/SH trucking industry; whereas, industries like long haul trucking have had research to support improvements in work organization factors impacting health and safety outcomes.

This will be the first time that a comprehensive epidemiological survey on safety and health topics will be administered to this population. This information will: 1) provide a preliminary exploration of potential work organization risk factors that may affect the health and safety of L/SH truck drivers, 2) provide a snapshot of perceived safety and health needs and concerns of L/SH truck drivers, 3) assist in generating hypotheses for future research on health and safety topics in this workforce, and 4) provide information to the L/SH industry and the research community about driver concerns and preliminary research priorities.

Truck driving operations represent a critical component of the U.S. economy but is also considered a high hazard occupation due to an increase of 17% in driver fatalities since 20111. There are a number of speculations for this increase without the proper evidence for support.

Truck driving operations are subject to economic paradigms of supply and demand with many interpretations of scheduling, compensation, and employment arrangements. Moreover, the spike in e-commerce has added pressure to the subpopulation of L/SH truck drivers amid driver shortages. The work itself has increased, but that does not necessarily mean that workforce numbers in the L/SH industry have met this demand leading to a host of health and safety implications.

This study will provide important information on the health and safety of L/SH truck drivers that is not available elsewhere. The proposed data collection will provide an initial step towards achieving several prioritized strategic goals identified by the National Occupational Research Agenda (NORA) Transportation, Warehousing and Utilities Sector Council (https://www.cdc.gov/nora/councils/twu/agenda.html). NORA is a partnership program to stimulate innovative research and improved workplace practices. Unveiled in 1996, NORA has become a research framework for NIOSH and the nation. Diverse parties (industry, academia, government, insurance, etc.) collaborate to identify the most critical issues in workplace safety and health. NORA is divided into industry sector councils. The objectives of the NORA Transportation, Warehousing and Utilities Sector Council addressed by this survey include:

# Objective 3: Promote and improve the health and well-being of TWU drivers

# Objective 4: Increase knowledge about the association between TWU driver exposures and adverse health outcomes, and effective prevention and control strategies

# Objective 5: Increase knowledge about the role of driver characteristics and impairment on TWU driver safety, health and well-being, and effective prevention strategies

# A.2. Purpose and Use of Information Collection.

The purpose of this effort is to collect data that will guide health and safety research and outreach in this underrepresented workforce. In particular, this information will: 1) provide a preliminary exploration of potential work organization risk factors (e.g., workplace policies, practices, and procedures) that may affect the health and safety of L/SH truck drivers, 2) provide a snapshot of perceived safety and health needs and concerns of L/SH truck drivers, 3) assist in generating hypotheses for future research on health and safety topics in this workforce, and 4) provide information to the L/SH industry and the research community about driver concerns and preliminary research priorities.

This survey will be administered on site to a convenience sample of approximately 600 drivers over a period of three to six months (or up to two years, if challenges are encountered with data collection due to the ongoing pandemic). Participant sampling will occur within the following: company partners with L/SH operations, professional organizations (e.g., state level trucking organizations) with L/SH members, and L/SH weigh station inspections.

COVID-19 safety protocols will be in place for all those involved in the data collection process. These protocols have been provided by [CDC](https://www.cdc.gov/coronavirus/2019-ncov/community/disinfecting-building-facility.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fcommunity%2Freopen-guidance.html) and include the following: [self-check](https://www.cdc.gov/coronavirus/2019-ncov/symptoms-testing/symptoms.html), masks, face shields, and gloves for data collectors, six foot social distancing, sanitized data collection materials (writing utensils, clipboards, hard copy questionnaires and consent forms, etc.), and contact tracing procedures to notify at risk participants and to be notified by at risk participants. Additionally, the following information has been included on the consent form as mandated by Institutional Review Board [Guidelines](https://research.kennesaw.edu/coronavirus/index.php) for Resuming In-Person Human Subjects Research.

For any company or individual participant no longer comfortable with in-person data collection despite these protocols, an online survey option will be provided via secure electronic link sent through their company email or secure training portal if available.

A company survey (see Attachment J) will be administered to points of contact within each company participating in the study. These survey items will facilitate the collection of general information about the company and workforce that does not have to be placed upon the driver to provide. The approximate time of company survey completion is five minutes.

NIOSH is committed to the concept of Research to Practice (r2p), meaning that we strive to ensure that NIOSH-generated knowledge is used to create practical interventions to reduce illness and injury among drivers. We engage stakeholders (e.g., other government agencies, industry partners, subject matter experts, L/SH drivers, etc.) throughout the process. For example, we are working with the NIOSH NORA Transportation, Warehousing, and Utilities Sector Council which has representation from the Federal Motor Carriers Safety Association, the Occupational Safety and Health Agency, and the Owner Operator Independent Drivers Association, among others. This ensures that we focus on issues that are of importance to the drivers of the specific industry and can be translated into interventions and activities with practical utility within that industry.

The information resulting from this survey will be used as follows:

* Results of the survey will be published in peer-reviewed journals to contribute to the body of scientific knowledge surrounding L/SH truck drivers, such as the following:
  1. Journal of Occupational Health Psychology
  2. Journal of Transport and Health
  3. Journal of Occupational Environmental Medicine
  4. Accident Analysis and Prevention
  5. American Journal of Industrial Medicine
* The survey results will aid in identification and prioritization of future research activities and resources.
* NIOSH will provide results of survey and relevant recommendations to the National Occupational Research Agenda (NORA) Transportation, Warehousing and Utilities Sector Council, a council tasked with stimulating innovative research and interventions to reduce the occurrence of injury and illness at work for the trucking sector. Results and recommendations will also be provided to federal organizations and trade associations within the L/SH industry: Federal Motor Carrier Safety Administration (FMCSA), American Trucking Association (ATA), National Highway Traffic Safety Administration (NHTSA), National Association of Small Trucking Companies (NASTC), Truckload Carriers Association (TCA), Women in Trucking, etc. The results and recommendations will highlight areas of concern regarding health and safety for L/SH truck drivers.
* Evidence-based key safety and health messages will be developed and disseminated to L/SH truck drivers, based on concerns identified in the survey and scientific evidence of intervention effectiveness or standard OSH practices.
* Once disseminated, Health, Safety, and Environmental teams within the trucking industry can use the key health messages we provide to develop targeted trainings and information dissemination.

This study will also stimulate a heightened awareness of the safety and health issues encountered by this driver population and lead to improved decision making by all stakeholders involved in this industry.

If this survey were not administered, we would continue to rely on information from surveys of drivers from other industries (e.g., long haul) to extrapolate the health concerns for the population of L/SH truck drivers. By assuming that L/SH truck drivers are like other driver populations, we risk not identifying important industry-specific health issues and injury hazards, which could lead to wasted resources on unnecessary research projects and lack of overall impact in the safety and health of L/SH drivers. It is feasible that we will find some health concerns among this population which mirror those in other industries with established health and safety messaging; in this case, we can save resources by adapting those resources to L/SH truck driver needs.

While this survey is planned as a one-time data collection, it is possible that there will be additional uses for the data that have not yet been determined by the investigators (for example, using this cohort as a comparison group for future surveys). However, any additional use of the data for such purposes would not change any burden estimates or create additional privacy issues for participants of this study.

NIOSH has fully funded this program and is a part of the NIOSH budget through Fiscal Year 2021.

# A.3. Use of improved information technology and burden reduction.

It is estimated that 99% of participants will complete the survey using the provided hard copy. All survey components will be provided in this manner. During recruitment, researchers will also offer the driver the option to have the entire survey administered by an interviewer. By doing so, this increases the likelihood that low-literacy individuals will be able to participate in the survey.

The questionnaire has been reviewed by subject matter experts from the industry with titles at the stakeholder, management, and driver level using the following evaluation criteria:

* Applicability of the survey questions
* Clarity and understandability of the survey questions as written
* Completeness or comprehensiveness of the survey topics and questions
* How well the survey captures important health, safety, and well-being topics applicable to L/SH truck drivers
* The overall quality of the survey

Subject matter experts also evaluated the length of the survey and approximated 30 minutes for completion.

# A.4. Effort to Identify Duplication and Use of Similar Information

There is very little known about the work organization factors that affect L/SH driver safety and health, especially as it relates to the psychosocial factors that lead to these outcomes. What research has been done is limited to the following areas: fatigue2-4, trunk posture5, safety6-7, self-management8, and injury9. Although this literature provides a foundation of work in the L/SH field, it also demonstrates that there is much more work to be done when compared to other populations within the trucking industry, namely the long haul (LH) literature.

With that being said, a recent study10 of LH truck drivers was conducted by NIOSH that collected similar information on health conditions, health behavior, injuries and sleep, which has informed similar examinations in the L/SH survey. While this is a different driver population, LH might be a useful comparison group for estimates found in this study.

The NIOSH research team conducted an extensive literature review at the onset of this project regarding occupational safety and health research related to the L/SH trucking industry. This review yielded a robust review of truck driving literature in general with few primarily focused on the L/SH population. Per the literature review and subject matter expertise, we are unaware of any data collection being conducted that features an examination of work organization associations among a comprehensive set of variables dedicated to the health and safety of L/SH truck drivers.

# A.5. Impact on Small Businesses or Other Small Entities.

A proportion of this industry is comprised of drivers employed by small businesses. However, participation in the survey is voluntary and will only be conducted when the driver and supervisor agree that there is time for the driver to complete the survey without interfering with or delaying the work operation. The number of questions has been kept to a minimum and address only what are considered essential topics.

# A.6. Consequences of Collecting Information Less Frequently.

This request is for a one-time data collection. If this data collection does not take place, industry leaders and federal programs will not be able to make evidence-based decisions regarding the safety and health concerns of L/SH truck drivers. Additionally, this data collection will inform NIOSH’s research agenda by aiding in prioritization of research activities and resources. There are no legal or technical obstacles to reduce the burden as this is a one-time data collection.

# A.7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

This request fully complies with the regulation 5 CFR 1320.5

# A.8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency

**A**. A 60-day Federal Register Notice was published in the *Federal Register* on November 20, 2019, vol. 84, No. 224, pp. 64076-64077 (see Attachment B). CDC did not receive public comments related to this notice.

**B.** The following individuals outside the agency were consulted on this ICR during 2019.

Rebecca Brewster, President and Chief Operating Officer at American Transportation Research Institute (ATRI) (Marietta, GA), [RBrewster@trucking.org](mailto:RBrewster@trucking.org), (703) 838-1966

Jerri Gentry-Moore, Operations Manager at FedEx (Hapeville, GA), [jjgentry@fedex.com](mailto:jjgentry@fedex.com), 404-305-2933

Herschel Evans, L/SH truck driver for Holland, Inc., [bhejr@yahoo.com](mailto:bhejr@yahoo.com), 770-354-7428

# A.9. Explanation of Any Payment or Gift to Respondents

It is important to maximize response rates during information collection. There have been limited information collection efforts in the L/SH truck driver workforce, so it is difficult to determine drivers’ willingness to participate. Additionally, the typical L/SH truck driver is on duty for long shifts (upwards of 12 hours) and may have long commutes; therefore, flexibility of survey completion will be built into data collection requests allowing participants to take the survey with them and complete when time allows off or on duty. Based on the experience of NIOSH survey teams with similar populations (such as the Long Haul Truck Driver Survey team), we believe small tokens of appreciation are important for building awareness of a program and increasing participation in survey activities. Therefore, we feel that offering appreciative tokens to the L/SH truck drivers will serve to increase response rates from individual drivers. Additionally, these tokens will serve as recruitment for participating in the survey, further increasing our overall response rate.

We plan to offer all L/SH truck drivers that we contact about the survey (whether in person or via email communication) a keepsake (e.g., sticker, pen, notepad, bag, etc.). These keepsakes are likely to attract additional participants. We will offer an additional token of appreciation to those eligible drivers who agree to participate in the form of a $10 gift card. Though we edited the survey to include only essential questions to meet our goal, it is relatively lengthy; thus, we feel that this additional token of appreciation will encourage participants to fully complete the survey (i.e., it will help ensure that data quality at the end of the survey is similar to that of the beginning of the survey).

For those drivers who refuse the full survey but are willing to complete the brief non-respondent questionnaire (Attachment D), we will offer a keepsake. This will maximize participation in the non-respondent survey, allowing us to compare those who did not respond to those who did (increasing our ability to generalize our findings).

Note that if we are on a work site and the company does not want us to distribute these tokens of appreciation to their drivers while they are on-duty, we will respect the company’s decision and not distribute tokens of appreciation. We will keep record of any such instances by recording the number of companies that opt out, but not the names of the organizations.

# A.10. Protection of the Privacy & Confidentiality of Information Provided by Respondents

This submission has been reviewed by the Privacy Officer of the CIO (NIOSH) who determined that the Privacy Act does not apply. The privacy act does not apply because the survey responses (i.e., records) will not be retrieved using a personal identifier. Further noted is that no personal identifying information (PII) will be recorded (e.g. names, social security numbers, or any other unique identifier) as a part of the data collection.

Informed consent will be obtained from participating L/SH truck drivers (Attachment F) in which NIOSH will explain risks of participation, describe intended uses of the information, explain that participation is voluntary, and emphasize that participants may discontinue the questionnaire at any time. The questionnaire will collect potentially sensitive information about health status, injury, and safety and health concerns. Benefits to participants include increased knowledge of safety and health issues of drivers in this industry and targeted prevention programs based on the information NIOSH gains from this survey. The questionnaire will be completed in an area where privacy to the driver is secure.

This survey is anonymous. We are not collecting any personal identifying information. NIOSH is authorized to collect data by Section 20(a)(1) of the Occupational Safety and Health Act (29 U.S.C. 669). NIOSH will protect this data to the extent allowed by law. Reporting of results will be in summary presentation only. L/SH industry sources providing access to participants will not receive data on individual drivers, and reports will not contain company identifiers. Any possibility of indirectly identifiable information will be considered carefully when stratifying results by age, gender, occupation, etc.

In the field, authorized NIOSH staff will be in continuous possession of hard copy surveys as they are completed by participants. Information from hard copy surveys will be entered and stored within a secure computer system. Computers containing survey response data related to this project will be kept secure by NIOSH research team members at all times. Long-term data storage will be on secure servers. Access to the data will be limited to authorized NIOSH project staff for the purpose of performing research with regard to project goals.

This dataset will not contain PII.

**A.10.1. Privacy Impact Assessment Information**

Data collection does not involve records containing information in identifiable form.

# A.11. Institutional Review Board (IRB) and Justification for Sensitive Questions

IRB Approval

The proposed data collection is has been reviewed and approved by contractor’s academic institutional review board. (Attachment E).

Sensitive Questions

The proposed questionnaire contains questions that may be sensitive in nature, including questions regarding chronic diseases (heart disease, diabetes, cancer), health and personal habits, driving habits, awareness of hazards, history of injuries on the job, health and safety concerns, and opinions regarding the emphasis that their employer places on the health and safety of drivers.

Because some questions are sensitive in nature, data will be treated in a secure manner and will not be disclosed, unless otherwise compelled by law. Responses will be aggregated to a level that ensures responses will not be identifiable. Employers will receive a summary of the entire study, individual company data will not be shared with individual employers.

The potentially sensitive questions are needed to determine key safety and health hazards and concerns for these drivers so that appropriate recommendations can be made regarding the best policies, interventions, or work practices to prevent or mitigate these hazards. To effectively improve the safety and health of L/SH truck drivers, NIOSH also needs an understanding of the risk factors for injuries and illness for this workforce. Therefore, it is important to collect data regarding health and personal habits, driving and other on-the-job safety habits, and elements of the work environment (including safety climate and safety policies). An understanding of 1) the prevalence of these risk/protective factors and 2) the associations between these factors and a history of injury or illness will allow NIOSH to develop recommendations to improve the safety and health of L/SH truck drivers. This knowledge will also be used to assist the L/SH industry in making changes to improve the safety and health of their drivers and to guide future research on specific hazards among L/SH truck drivers.

# A.12. Provide estimates of the hour burden of the collection of information.

A. Annualized Burden to Respondents (Drivers & Company Representatives)

No direct costs will accrue to respondents other than their time to complete the participant eligibility screening form and questionnaire. We estimate a total annual estimated response burden of 173.75 hours for this information collection. This burden will be incurred over an 18 month period. This estimate is based upon an annual estimated 600 drivers to be screened, with 300 eligible drivers that agree to complete the survey (50% response rate). We estimate that 99% of drivers will complete the questionnaire using the provided hard copy (297 drivers) and 1% of drivers will opt to complete a survey via researcher interview (3 drivers). This estimate accounts for the time each respondent spends reading the consent form and completing the survey. The average burden per response is based on estimates from the subject matter expert review. Table A12.1 provides an estimates of the annualized burden hours.

No direct costs will accrue to company representatives other than their time to complete the company survey. We estimate a total annual estimated response burden of 1 hour for this information collection. This burden will be incurred at the onset of data collection. Table A12.2 provides an estimates of the annualized burden hours.

**Table A12.1 Estimated Annualized Time Burden to Respondents (L/SH Truck Drivers)**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Type of Respondent** | **Form Name** | **Number of Respondents** | **Number of responses per respondent** | **Average burden per response (in minutes per hour)** | **Total burden (in hours)** |
| Participant Eligibility Screening of drivers | Participant Eligibility Screening Form | 300 | 1 | 5/60 | 25 |
| L/SH truck drivers | Non Respondent Questionnaire | 3 | 1 | 5/60 | .25 |
| L/SH truck drivers | **Hardcopy**  Survey Sections 1-7 | 297 | 1 | 25/60 | 148.5 |
| Total |  |  |  |  | 173.75 |

**Table A12.2 Estimated Annualized Time Burden to Respondents (Company Representatives)**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Type of Respondent** | **Form Name** | **Number of Respondents** | **Number of responses per respondent** | **Average burden per response (in minutes per hour)** | **Total burden (in hours)** |
| Company Representative (point of contact) | Company Survey | 12 | 1 | 5/60 | 1 |
| Total |  |  |  |  | 1 |

B. Annualized Cost to Respondents (Drivers & Company Representatives)

## The estimated annualized cost to the respondent population for the L/SH truck driver questionnaire is $3,195 based on the average costs per burden hour and the burden hours as shown in Table A12.3. This burden will occur over a six month period for information collection.

## The estimated annualized cost to the respondent population for the company survey is $50.53 based on the average costs per burden hour and the burden hours as shown in Table A12.4. This burden will occur at the onset of information collection.

**Table A12.3 Estimated Annualized Cost Burden to Respondents (L/SH Truck Drivers)**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Type of Respondent** | **Form Name** | **Total Burden Hours** | **Hourly Wage Rate\*** | **Total Respondent Costs** |
| Participant Eligibility Screening of drivers | Participant Eligibility Screening Form | 25 | $18.38 | $460 |
| L/SH truck drivers | Non-respondent questionnaire | .25 | $18.38 | $4.60 |
| L/SH truck drivers | **Hardcopy**  Survey Sections 1-7 | 148.5 | $18.38 | $2730 |
| **Total** |  | 173.75 |  | **$3195** |

**Table A12.4 Estimated Annualized Cost Burden to Respondents (Company Representatives)**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Type of Respondent** | **Form Name** | **Total Burden Hours** | **Hourly Wage Rate\*\*** | **Total Respondent Costs** |
| Company Representative (point of contact) | Company Survey | 1 | $50.53 | $50.53 |
| **Total** |  | 1 |  | $50.53 |

\*The wage estimate was obtained from the Department of Labor, Bureau of Labor Statistics, National Occupational Employment and Wage Estimates- Current Employment and Wages from Occupational Employment Statistics (OES) Survey (<http://www.bls.gov/oes> ) using the 2017 annual estimates. The estimated range of hourly wages for the category ‘Local, van delivery drivers and route drivers’ is between $8.67 and $28.10 per hour. The average of this range was calculated for Table A12.3.

\*\* The wage estimate was obtained from the Department of Labor, Bureau of Labor Statistics, National Occupational Employment and Wage Estimates- Current Employment and Wages from Occupational Employment Statistics (OES) Survey (<http://www.bls.gov/oes> ) using the 2017 annual estimates. The estimated range of hourly wages for the category ‘Transportation, Storage, and Distribution Managers’ is between $27.39 and $78.91 per hour. The average of this range was calculated for Table A12.3.

# A.13. Estimates of Other Total Annual Cost Burden to Respondents or Record Keepers

There are no additional cost burdens to respondents or record keepers.

# A.14. Annualized Cost to the Government

The annualized cost to the government is approximately $96,871 for the next two years of the study including data collection. Costs include personnel charges for NIOSH personnel, including contractors, equipment, supplies and printing costs, and travel-related costs.

Table A14.1. Estimated Annualized Cost to the Federal Government

|  |  |  |
| --- | --- | --- |
|  |  | **Annualized Cost** |
| NIOSH Personnel |  | $51,212 |
| Contracts/Services |  | $20,767 |
| Supplies |  | $1,000 |
| Travel |  | $14,058 |
| Equipment |  | $2,334 |
| Other (Tokens of Appreciation, Printing, Shipping) |  | $7,500 |
| Total |  | $96,871 |

# A.15. Explanation for Program Changes or Adjustments

This is a new data collection.

# A.16. Plans for Tabulation and Publication and Project Time Schedule

Descriptive and statistical methods will be used to analyze the data. Responses for each question will be aggregated and reported with simple proportions. Results may be stratified by occupation, company type, or another logical stratification. However, results will not be stratified where the numbers are too small and could result in unintentional identification of respondents. Multivariate logistic regression will be used to evaluate associations between work organization protective and risk factors and outcomes related to injury/illness, health and personal habits, driving and other on-the-job safety habits, and elements of the work environment (including safety climate and safety policies).

Table A.16.1. Project Time Schedule

|  |  |
| --- | --- |
| Activity | Time Schedule |
| Develop database to collect survey responses | During OMB Review |
| Outreach to L/SH industry sources to identify and recruit potential participants | During OMB Review |
| Data Collection | 1-18 months after OMB Approval |
| Data Cleaning | 18-21 months after OMB Approval |
| Data Analysis | 21-24 months after OMB Approval |
| Dissemination Activities (Publications, Presentations, etc.) | 24–36 months after OMB Approval |

# A.17. Reason(s) Display of OMB Expiration Date is Inappropriate

The display of the OMB expiration date is not inappropriate.

# A.18. Exceptions to Certification for Paperwork Reduction Act Submissions

There are no exceptions to the certification.

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# References

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