

**Justification for Nonmaterial/Nonsubstantive Change for
OMB Control Number 2126-0070 ICR**

Beyond Compliance

This Justification for a Nonmaterial/Nonsubstantive Change is to request the Office of Management and Budget’s (OMB) approval for nonsubstantive changes to the Federal Motor Carrier Safety Administration’s (FMCSA) “Beyond Compliance” information collection (IC), OMB control number 2126-0070. The change is to clarify the response options on one of the survey questions to make the choices clearer and more succinct. Additionally, it will correct the terminology to more commonly utilized terminology.

Changing the term “Recordable” to “Reportable” will correct the survey to use the term established in regulation, as opposed to a term that is used interchangeably with the regulatory term by some in industry.

Additionally, FMCSA’s Office of Analysis, Research, and Technology has received a request from Deputy Administrator Joshi, in support of the Secretary of Transportation’s desire to address supply chain disruptions, to include the topic of Driver Retention in the survey. This is due to a renewed industry interest in whether driver retention is related to an improved safety culture, as evidenced by whether carriers who are going above and beyond to achieve higher levels of safety also see higher levels of driver retention. By changing the first item on the list to “driver retention rates,” FMCSA will receive enhanced survey results, as the original choice of “crash rates” was repetitive given the three subsequent choices. This would result in a minimal, if any, change in burden to the responder.

FMCSA is thereby requesting the following change to the survey (question found on Page 13):

Original Question:	Revised Question:
<p>54. What safety measures of effectiveness do you track (check all that apply):</p> <ul style="list-style-type: none"> • Crash rates • Preventable crash rates • DOT Recordable crash rates • Preventable DOT Recordable crash rates • Critical events (e.g., hard braking, aggressive driving, speeding, motorist complaint calls, etc.) • Other (please specify): [_____] • None 	<p>54. What safety measures of effectiveness do you track (check all that apply):</p> <ul style="list-style-type: none"> • Driver retention rates • Preventable crash rates • DOT Reportable crash rates • Non-DOT Reportable crash rates • Critical events (e.g., hard braking, aggressive driving, speeding, motorist complaint calls, etc.) • Other (please specify): [_____] • None