#### Information Collection Request Supporting Statements: Part A Investigation-Based Crash Data Studies OMB Control No. 2127-0706

#### Abstract:<sup>1</sup>

The National Highway Traffic Safety Administration (NHTSA) is seeking approval from OMB of this information collection request (ICR) for extension with modification of its currently approved information collection for Investigation-Based Crash Data Studies. 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 the severity of injury and property damage caused by motor vehicle crashes. These Investigation-Based Crash Data Studies -- Crash Investigation Sampling System (CISS), Special Crash Investigations (SCI), and Special Studies -- involve voluntary information collections through which NHTSA collects detailed data on real world motor vehicle crashes. Specifically, these systems collect data, on vehicle safety system performance, occupant injury information including their kinematic interaction with interior components and scene geometry, marking and traffic controls.

Respondents are police agencies that collection information on police-reported motor vehicle crashes, employees of tow yards where crashed vehicles are stored, people involved in these crashes, and hospitals with medical records for the people injured in the crash.

For the standard investigation-based crash data studies acquisition process, once a crash has been selected for investigation, crash technicians or investigators locate, visit, measure, and photograph the crash scene; locate, inspect, and photograph vehicles; conduct a telephone or personal interview with the involved individuals or surrogate (another person who can provide occupant or crash information, such as parents for minor, or a parent or spouse for decreased individual); and obtain and record crash injury information received from various medical data sources.

These information collections support NHTSA's mission to save lives and prevent injuries due to traffic crashes. The data collected from these systems are used to describe and analyze circumstances, mechanisms, and consequences of serious motor vehicle crashes in the United States. Additionally, these data are used by NHTSA to identify the primary factors related to the source of crashes and their injury outcomes, develop and evaluate effective safety

<sup>&</sup>lt;sup>1</sup> 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.

countermeasures, the establishment and enforcement of motor vehicle regulations, that reduce the severity of injury and property damage caused by motor vehicle crashes.

On November 15, 2021, the Infrastructure Investment and Jobs Act (Pub. L. 117-58), also referred to as the Bipartisan Infrastructure Law (BIL), was signed into law. The Crash Data section (section 24108) of the BIL authorizes the Secretary of Transportation (NHTSA by delegation) to use funds to enhance the collection of data under CISS by, among other things, including additional data collection sites. In the 60-day notice NHTSA published on January 26, 2022 (87 FR 4099), NHTSA estimated that there would be 32 data collection sites in each of the next three years. As a result of the additional funding provided by the BIL, NHTSA now plans to phase in 24 additional data collection sites in CISS over the next 3 years. NHTSA is now accounting for the increases in burden hours for interviewees, Police, Tow Yards and Medical Facilities for an additional 24 data collection sites. The total data collection sites will incrementally increase from 32 to 56 over the next three years. The increase in burden hours and cost for these additional data collection sites are reflected in the Burden to Respondent section of this document.

The previous request for CISS (2017) indicated 5,605 burden hours, this request increases the burden to 12,063. The request for the collection of information is revised due to a) Increasing the number of crashes investigated by Crash Technicians for 2021 and future years, b) adding Special Study crashes into this package, and c) adding Special Crash Investigation (SCI) crashes into this package. The combined impact is an increase of 6,458 burden hours to NHTSA's overall total.

#### 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's Investigation-Based Crash Data Studies each have a unique and essential role in supporting the Agency's primary mission of saving lives and preventing injuries associated with motor vehicle crashes. NHTSA addresses this mission in three ways: primary prevention (e.g., preventing the crash from occurring), motor vehicle crashworthiness (e.g., elimination of injuries and fatalities during a crash), and effective post-crash response (e.g. mitigation of crash consequences through an effective system of emergency medical services). NHTSA believes that combining sound science with quality crash data are absolutely essential to reducing the human and economic cost of motor vehicle crashes.

NHTSA collects investigation-based motor vehicle crash information to identify the primary factors related to the source of crashes, severity and their injury outcomes, which aids in developing and evaluating effective safety countermeasures, and the establishment and enforcement of motor vehicle regulations that reduce the severity of injury and property damage caused by motor vehicle crashes.

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 the severity of injury and property damage caused by motor vehicle crashes. This ICR covers NHTSA's three Investigation-Based Crash Data Studies CISS, SCI, and Special Studies are the data collection studies, through which NHTSA collects information on motor vehicle crashes.

- CISS 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 vehicle level through vehicle damage assessment together with injury sources and coding.
- SCI provides NHTSA with the most in-depth and detailed 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.
- Special Studies use the CISS infrastructure and SCI infrastructure to remotely collect targeted data to answer questions on a specific issue directly related to vehicle and highway safety. Using the CISS and SCI infrastructure allows NHTSA to quickly and easily utilize the already in-place CISS and SCI field offices, trained and experience crash technicians and investigators, the cooperation they have with law enforcement, and in-place Information Technology equipment. The cases may be selected from an agency's data set (i.e., CISS, SCI, or Fatality Analysis Reporting System (FARS)) or through other means (i.e., internet searches, news articles, and public notification). The cases may or may not be selected to provide a nationally-representative sample of crashes. In the past, using the National Automotive Sampling System-Crashworthiness Data System (NASS-CDS) infrastructure, NHTSA conducted several issue-based special studies including studies on child occupant protection, air bag effectiveness, and pedestrians. NASS-CDS, operated from 1979 through 2015 and was the predecessor study for CISS. Three currently planned special studies that will use the CISS and SCI infrastructure are:

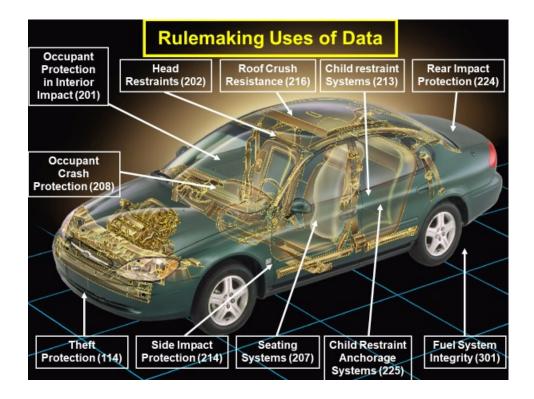
- **o** Medium Duty Truck Special Study: This study will provide detailed crash reconstruction data for fatal crashes involving at least one medium duty truck, trucks with gross vehicle weight between 10,001 and 26,000 lbs. Fatal crashes involving a medium duty truck have been increasing in urban areas in the past three years. CISS technicians will collect the case materials from law enforcement agencies and code the required information. The cases will be selected using a random sample of fatal crashes from the FARS 2018 final file.
- Pedestrian or Pedalcyclist Special Study: This study will provide detailed crash reconstruction data for fatal crashes involving at least one pedestrian or pedalcyclist. Fatal pedestrian and pedalcyclist crashes have been increasing in the past few years. Like the Medium Duty Truck Special Study, CISS infrastructure will be used and the cases will be selected using a random sample of fatal crashes from the FARS 2018 final file.
- Move Over Special Study: This study will provide NHTSA with detailed crash data based on police crash reports, scene and vehicle inspections that can be used to identify causal factors in crashes involving a first responders or construction or maintenance workers stuck while performing official duties on the road.

NHTSA will also use the information collected to support NHTSA's Non-Traffic Surveillance (NTS). CISS Technicians review over a hundred and fifty thousand crash reports each year, and some of these reports are not applicable to the CISS but they may be applicable to NTS data collection. 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. Non-traffic motor vehicle crashes are a class of crashes that occur off the public trafficways. These crashes, subsequently referred to as "non-traffic crashes," are mostly single-vehicle crashes on private roads, two-vehicle crashes in parking facilities, or collisions with pedestrians in driveways. In addition, there are non-traffic incidents such as a vehicle falling on a person underneath or an unintentional carbon monoxide poisoning inside the vehicle. Non-traffic crash data is obtained through NHTSA's CISS, SCI, Crash Reporting Sampling System (CRSS), and the FARS.

# 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.

The purpose of NHTSA's three investigation-based data collection studies is to investigate realworld crashes, collect detailed crash data and identify the primary factors related to the source of crashes and their injury outcomes. These detailed factors are utilized to develop and evaluate effective safety countermeasures including the establishment and enforcement of motor vehicle regulations that reduce the severity of injury and property damage caused by motor vehicle crashes. NHTSA's investigation-based data are needed for timely national estimates on real-world traffic crash data for fatalities, injuries, causation factors (primary prevention), occupant protection (crashworthiness), and safety program evaluations. NHTSA's CISS system is the only source for nationally-representative data on crashes and the data, and published reports, fact sheets, and research notes are used routinely by various users and stakeholders. NHTSA's investigation-based data are used throughout the world by stakeholders, researchers, manufacturers, other Federal agencies, and safety advocates for making safer vehicles and highways. Therefore, while NHTSA's data systems provide substantial support to the Agency's own programs and activities, they also have tremendous national and international relevance and value to many others interested in supporting traffic safety.

49 U.S.C. 30111 authorizes the Secretary (NHTSA by delegation) to issue Federal Motor Vehicle Safety Standards (FMVSS) that set performance standards for motor vehicles and items of motor vehicle equipment, and the crash investigation-based data is instrumental in the establishment of new FMVSS. These FMVSS are regulations written in terms of minimum safety performance requirements for motor vehicles or items of motor vehicle equipment. These requirements are specified in such a manner that the public is protected against unreasonable risk of crashes occurring as a result of the design, construction, or performance of motor vehicles and is also protected against unreasonable risk of death or injury in the event crashes do occur. While the crash record-based studies such as FARS and the CRSS (formerly NASS General Estimate System) provide the counts and trends, the investigation-based data provided the details required for the development of the countermeasures.



NHTSA published an evaluation report in May 2015 titled "Lives Saved by Vehicle Safety Technologies and Associated Federal Motor Vehicle Safety Standards, 1960 to 2012 – Passenger Cars and LTVs – With Reviews of 26 FMVSS and the Effectiveness of Their Associated Safety Technologies in Reducing Fatalities, Injuries, and Crashes" (DOT HS 812 069).<sup>2</sup>

We estimate that it would cost billions of dollars each year to collect detailed crash data on the over 6 million police-reported crashes. Therefore, in the late 1970s, NHTSA devised a method that employed a sample-based program that utilizes the existing State crash reports to provide nationally representative traffic crash data on a timely basis and at a small fraction of this cost. The predecessor to CISS was the NASS-CDS that operated from 1979 through 2015 at up to 50 data collection sites.

CISS is a nationally representative sample of passenger vehicle crashes which focuses on detailed investigations of passenger vehicle crashes. It provides nationally representative data on fatal and nonfatal motor vehicle crashes for use in developing and evaluating federal motor vehicle safety standards and other safety countermeasures. The CISS began implementation in 2015 and by 2018 was collecting crash data from thirty-two (32) fully operational sites.

The crash data from CISS is used to describe and analyze circumstances, mechanisms, and consequences of motor vehicle crashes in the United States. These descriptions and analyses in turn will help to describe the magnitude of vehicle damage and injury severity as related to traffic safety issues. It gives motor vehicle researchers an opportunity to specify areas in which improvements may be possible, design countermeasure programs, and evaluate the effects of existing and proposed safety measures. Users include nearly all program areas in NHTSA, other federal agencies such as the Federal Highway Administration, and the Federal Motor Carrier Safety Administration, State and local governments, domestic and foreign motor vehicle manufacturers, insurance and consumer organizations, safety research organizations, universities, foreign government agencies, and individual citizens.

The SCI is used to provide NHTSA with the most in-depth and detailed level of crash investigation data collected by the agency. The data collected ranges from basic data contained in routine police and insurance crash reports to comprehensive data from special reports 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 approximately 100 crashes designated for study annually.

The SCI does not employ a statistical sample. Instead, because SCI cases are intended to be an anecdotal data set useful for examining special crash circumstances or outcomes from an engineering perspective, a convenience sample is sufficient. The benefit of the SCI program is its

<sup>&</sup>lt;sup>2</sup> Available at https://crashstats.nhtsa.dot.gov/Api/Public/ViewPublication/812069.

ability to locate unique real-world crashes anywhere in the country and perform in-depth clinical investigations in a timely manner that can be used by the agency to fulfill its mission. SCI crash investigations are conducted to evaluate safety countermeasure effectiveness and support Agency rulemaking actions. Investigations are also conducted to provide early detection of alleged or potential vehicle safety defects. Motor vehicle crash investigations play a vital role in that effort by providing supporting data concerning real world events to aid in the development, and subsequent evaluation of these programs and standards. The general objectives of crash investigation and analysis include:

- The determination of factors involved in crashes;
- The identification of injury causation and sources of those injuries for all crash conditions;
- The evaluation of effectiveness of safety countermeasures; and
- The early detection of design and functional problems of the vehicle and the highway.

These crash investigations typically involve new or emerging safety technologies, vehicles equipped with crash avoidance technologies, vehicles equipped with Automated Driving Systems (ADS), safety defects, school buses, motor coaches, child restraint systems, alternative fuel and hybrid vehicles, adaptive control equipped vehicles, fires, crashes involving air bag deployment related fatalities and serious injuries, and other special interest crashes as they arise. Reports are generated from investigations and all are made available to the public.

Special Studies will help to identify pre-crash movement, casual factors, and injury outcome for unusual crashes or new and emerging issues that can be used to direct additional vehicle or behavior research or develop new guidance or countermeasures to mitigate these crashes. Three currently planned special studies will collect information on crashes the involve medium duty trucks (trucks between 10,001 and 26,000lbs), pedestrians or pedalcyclists, and first responders or construction workers.

As an example of specifically how NHTSA uses information from special studies, information from the Medium Duty Truck and Pedestrian or Pedalcyclist special studies will be used to better align research programs and focus efforts on appropriate countermeasures, research and behavioral programs to reduce these crashes, injuries, and fatalities. NHTSA will use the data collected in these studies to evaluate whether crash avoidance technologies could have lessened the severity of the crash or injury outcome of the crash.

The data from the study involving first responders and construction workers is to provide NHTSA with detailed crash data based on police crash reports, scene and vehicle inspections, and if necessary, interviews that can be used to identify causal factors in crashes involving a subject vehicle, occupant, or non-occupant defined as either:

• A first responder or their vehicle, while on scene in response to a traffic crash or other traffic related incident occurring on a trafficway. First responders include emergency responders, towing and recovery operators, safety patrol personnel, or others providing job-related support in response to the traffic related incident;

#### OR

• A highway construction or maintenance crew member or their vehicle, while performing work related to the trafficway.

With this essential data, NHTSA will be able to further refine research programs and focus efforts on appropriate countermeasures, research and/or behavioral programs.

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.

Most of the data collection burden will come from in-person or telephone interviews with vehicle occupants that take about twenty minutes. This cannot be automated because each crash provides a unique set of circumstances which must be identified and explored with the driver/occupant. Information from this interviewee, along with additional information from a scene inspection, a vehicle inspection, and other occupants will likely lead the interviewer to ask additional specific questions.

Training sessions are provided to Crash Technicians to impart improved interview techniques and to improve their interview skills and focus on the crash data needed.

The burden on police, medical records personnel, and tow yard staff is minimal, typically simply providing access to existing records and crash vehicles. The majority of police agencies and hospitals have shifted from paper-based crash data collection to utilizing automated technology to report crash information. When possible, the CISS, SCI and Special Studies leverages this technology to electronically transfer data to NHTSA's Crash Data Acquisition Network (CDAN) to minimize any burden on law enforcement. In some of the CISS data collection sites, the electronically transferred data will pre-populate the data required for case selection and an algorithm will automatically select cases to be investigated.

The CDAN is an integrated, web-based information technology system that provides a single, central IT platform that maintains the data NHTSA collects from its CISS, SCI and Special Studies. These crash data collections are centered on the Police Accident Report (PAR), the forms law enforcement agencies use to document a motor vehicle crash. NHTSA collects a PAR from cooperating police jurisdictions and custodial agencies in each State. In addition to data

derived from the PAR, NHTSA may obtain additional information to further the understanding of a crash, its causal factors, or outcomes. This information may be obtained from medical records from treatment of crash injuries, on-site crash investigations, toxicology reports, etc. This additional information is also stored and maintained in CDAN. NHTSA has conducted a Privacy Impact Assessment (PIA) for CDAN and has made that assessment publicly available.<sup>3</sup>

## 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.

There is no duplication because no similar crash data collection programs exist.

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

The information collection impacts tow yard operators, which can be small businesses. The Crash Technicians and SCI Investigators minimize the burden on a small business by establishing rapport and trust with tow yard operators. Typically, the Crash Technician is very familiar with the operators and they simply ask for the location of the vehicle within their facility and permission to inspect it.

# 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.

The National Highway Traffic Safety Administration (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. 49 U.S.C. 30111 authorizes the Secretary (NHTSA by delegation) to issue Federal Motor Vehicle Safety Standards (FMVSS) that set performance standards for motor vehicles and items of motor vehicle equipment. NHTSA needs nationally representative, real-world crash data to support creation or modification of FMVSS, which cover vehicle performance and features such as air bags, safety belts, safety glazing, rollover protection, crash avoidance technologies, advanced driver assistance systems (ADAS) and the emerging technologies like ADS. The CISS crash data is needed to both support all rulemaking actions and evaluate the effectiveness of existing FMVSS.

SCI data helps NHTSA staff determine which safety systems perform well and which do not. Typically, rulemaking actions are reviewed, upgraded or modified based on the information

<sup>&</sup>lt;sup>3</sup> See: <u>https://www.transportation.gov/individuals/privacy/crash-data-acquisition-network-cdan-pia</u>

documented in CISS and SCI cases. In addition, the SCI investigations are conducted to provide early detection of alleged or potential vehicle safety defects.

Special Studies will help to identify pre-crash movement, casual factors, and injury outcome for unusual crashes or new and emerging issues that can be used to direct additional vehicle or behavior research or develop new guidance or countermeasures to mitigate these crashes.

If the CISS, SCI and Special Studies data was not available, many more deaths and serious injuries would be suffered by the driving public while waiting for issues to be identified in other random crash data collection efforts.

- **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.

NHTSA has determined that there are special circumstances that would cause this collection to be collected in a manner inconsistent with 5 CFR 1320.5(d)(2). Specifically, this ICR involves respondents providing information more often than quarterly and less than 30 days after receipt of request. It is critical the crash investigators obtain the requested information shortly after the crash. The law enforcement agencies need to provide the PAR shortly after the crash to start the investigation. The crash investigators need to visit the crash scene before critical evidence disappears, inspect the vehicles before the vehicles are repaired or driven outside of the area and talk to individuals before they forget or do not recall specific facts and details about the crash. For the three crash studies, requests for information usually occur between a week to 10 days after the crash (although it is not mandatory) and sampled police jurisdictions are queried, on

average, once a week, or 52 times per year. Hospitals in CISS are queried, on average, 35 times per year.

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 60-day notice on January 26, 2022 requesting comment on NHTSA's intention to submit this ICR to OMB for approval (87 FR Doc. 2022-01436, Volume 87, Number 17, Pages 4099-4103).

NHTSA received no comments in response to the 60-day notice.

NHTSA published a 30-day notice on April 19, 2022 requesting comment on NHTSA's intention to submit this ICR to OMB for approval (87 FR Doc. 2022-08275, Volume 87, Number 75, Pages 23314-23318).

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

No payment or gift will be provided to any respondent 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.

The data collected in CISS, SCI and SS adheres to applicable privacy law and U.S. Department of Transportation policy to ensure that information maintained on individuals is secure and only used for its intended purposes. NHTSA employees and contractors who have access to CISS, SCI or SS data must follow NHTSA policy and procedures to ensure that the data collected, regardless of form, is protected from any misuse or unauthorized disclosure. The CISS, SCI, and SS data is collected and maintained as an integrated, web-based information technology system that provides a single, central IT platform called CDAN. These crash data collections are centered on the PAR, the form law enforcement agencies use to document a motor vehicle crash. NHTSA collects a PAR from cooperating police jurisdictions and custodial agencies in each State. In addition to data derived from the PAR, NHTSA obtains additional information to further the understanding of a crash, its causal factors, or outcomes. This information may be obtained from medical records from treatment of crash injuries, on-site

crash investigations, and interview with people involved in the crash. This additional information is also stored and maintained in CDAN. Furthermore, NHTSA employees and contractors with access to CDAN are required to take additional CDANspecific Security Training and sign an additional CDAN Rules of Behavior (ROB) document prior to obtaining access to any CDAN system assets

NHTSA has conducted a Privacy Impact Assessment (PIA) for the CDAN system and has made that assessment publicly available.<sup>4</sup>

No names of individuals are entered into automated case files. Pursuant to 23 U.S.C. 403(e), NHTSA may only make any report related to highway traffic accident or the investigation of such accident available to the public in a manner which does not identify individuals.

Typically, in CISS and SCI each respondent is provided an introductory letter and a brochure which details how the National Highway Traffic Safety Administration (NHTSA) is authorized by Congress (49 U.S.C. 30182and 23 U.S.C. 403) to collect statistical data on motor vehicle traffic crashes to aid in the development, implementation and evaluation of motor vehicle and highway safety countermeasures. The letter also informs respondents that CISS is the mechanism through which NHTSA collects nationally representative data on motor vehicle traffic crashes. The letter emphasizes that cooperation by the respondent is crucial to help identify causal issues, crash avoidance technology activation and injury sources. The respondent is assured that any personally identifiable information (PII) that identifies the person or the specific vehicle or crash location remains confidential.

It is anticipated that information on 5,300 motor vehicle crashes will be collected and entered into the CISS file every year and information on about 100 motor vehicle crashes will be collected in the SCI each year. If required, data collection for Special Studies data may occur on an additional 1,000 cases per year. For each of these crashes, all precautions are taken to safeguard against personal identifying information from remaining in the published case. The potential that a person can uniquely be identified by the crash and vehicle characteristics from the more than 700 data elements collected is not likely. Since public CISS, SCI and Special Study cases do not indicate the exact date of the crash, the names of the occupants, nor the specific location of the crash, identifying one specific crash is unlikely from the nearly seven million police reported crashes each year. Without the geographic location, names or dates, the suspected crash could not be matched to one specific police report.

**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

<sup>&</sup>lt;sup>4</sup> See: <u>https://www.transportation.gov/individuals/privacy/crash-data-acquisition-network-cdan-pia</u>

## 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 Investigation-Based Crash Data Studies do 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. Years of experience shows that interviewing individuals involved in crashes in a way directed specifically towards crash circumstances, avoids the collection of private information. This, along with the protection of privacy and the assurance that we are not seeking culpability but safety performance, do not fall within areas considered private information. Culpability, or fault is not discussed in the CISS, and SCI interviewing process.

The crash data collection studies seek to identify injuries and correlate those injuries to interior components of the motor vehicle. This allows engineers at NHTSA and the motor vehicle industry to evaluate the performance of interior components. This helps NHTSA determine whether there is a need for new crashworthiness FMVSS and provides information to motor vehicle manufacturers that could be used to improve their vehicle designs to better protect the motoring public from harm. All data collected for occupant assessment and injury is voluntary. Permission must be obtained from the involved individuals to review that portion of their medical record which contains only crash-related injury information. Simply stated, if the respondents do not wish to cooperate then the case will be lacking specific data sought from them regarding their crash. Sensitive or PII is not available for government research nor released to the public.

NHTSA is recognized by the Department of Health and Human Services as a Public Health Authority, allowing the medical community to provide access to its records. Medical records are the primary source of data on the nature and severity of injuries. See Attachment 2 [HIPAA letter].

## 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.

This ICR covers 10 information collections that fall under the three Investigation-Based Crash Data Studies (CISS, SCI, and Special Studies).

For the standard investigation-based data acquisition process, once a crash has been selected for investigation, crash technicians locate, visit, measure, and photograph the crash scene; visit, locate, inspect, and photograph vehicles; conduct a telephone or personal interview with the involved individuals or surrogate; and obtain and record crash injury information received from various medical data sources. The respondents are:

- Individuals interviewed that where involved in or relevant to the selected motor vehicle crashes.
- Law enforcement jurisdictions that provide access to and a copy of the crash report where the data is not electronic.

- Hospitals that provide a copy of the injured occupant's medical treatment of injuries.
- Tow or salvage lot facilities that provide access to the storage facility to inspect the vehicle.

Table 1 provides a list of the information collections.

#### **Table 1: List of Information Collections**

Information Collections in this ICR
1. CISS: Collection of Information from Individuals Involved in Crashes (or their Surrogates)
2. CISS: Collection of Police Records from Sampled Police Jurisdictions
3. CISS: Collection of Police Records from Non-Sampled Police Jurisdictions
4. CISS: Collection of Medical Records from Hospitals
5. CISS: Collection to Gain Access to Vehicles at Tow Yards
6. SCI: Collection of Information from Individuals Involved in Crashes (or their Surrogates)
7. SCI: Collection of Police Records from Police Jurisdictions
8. SCI: Collection of Medical Records from Hospitals
9. SCI: Collection to Gain Access to Vehicles at Tow Yards
10. Special Studies: Collection of Police Records from Police Jurisdictions

#### CISS:

The CISS crash data acquisition system includes 5 information collections. The first information collection covers the collection of information from individuals involved in crashes via interview. The estimated number of interview respondents is obtained by multiplying the approximate number of crashes investigated each year by the average number of interviews per crash. Based on existing data, each CISS crash involves an average of approximately 2.25 individuals. NHTSA estimates that CISS conducts investigations on 9,275 crashes per year. Therefore, NHTSA estimates that there will be 20,869 respondents per year (9,275 crashes × 2.25 respondents per crash).

The respondents are contacted only once; however, in rare circumstances follow-up questions may be needed to clarify data. The interview requires approximately 20 minutes of a respondent's time on average. CISS conducts interviews for approximately 9,275 crashes per year, which NHTSA estimates takes about 45 minutes per crash (2.25 respondents × 20 minutes). Therefore, the estimated total annual burden hours for the collection of information from individuals involved in crashes for CISS is 6,956 hours ((9,275 crashes × 45 minutes)  $\div$  60 minutes/hour).

In addition to interviews, Crash Technicians and investigators must obtain official records to initiate and complete the cases. These records include police crash reports and medical records. The second information collection under CISS is for the collection of crash records from sampled police jurisdictions. NHTSA estimates that there are 316 sample police jurisdictions annually. To estimate the burden to sampled police jurisdictions, NHTSA multiplied the average number of visits per year by the average burden per visit and the number of police jurisdictions. On average, each of the 316 sampled police jurisdictions are queried weekly (or 52 times per

year) and each query is estimated to take 3 minutes. Accordingly, NHTSA estimates the total annual burden for sampled police jurisdictions to be 2.6 hours per respondent (3 minutes  $\times$  52 visits) and 822 hours for all respondents (2.6 hours  $\times$  316 police jurisdictions = 821.6 hours).

The third information collection under CISS is for the collection of crash records from nonsampled police jurisdictions. Based on existing CISS data, there are 340 non-sampled jurisdictions annually. To estimate the burden to non-sample police jurisdictions, NHTSA multiplied the average number of visits per year by the average burden per visit and the number of non-sampled police jurisdictions. On average, each of the 595 non-sampled police jurisdictions are visited twice annually and each query is estimated to take 15 minutes. Accordingly, NHTSA estimates the total burden for non-sampled police jurisdictions to be 30 minutes per respondent (15 minutes × 2 visits) and 298 hours for all respondents (30 minutes × 595 non-sampled police jurisdictions = 298 hours).

The fourth information collection under CISS is for the collection of medical records from hospitals. Based on existing data, CISS collects an average of 16,695 records each year from an average of 480 hospitals. NHTSA estimates that a hospital spends 10 minutes for each record requested. Accordingly, NHTSA estimates the total annual burden to be 2,783 hours ((16,695records × 10 minutes)  $\div$  60 minutes/hour) and estimates that each hospital will, on average, spend 5.78 hours providing the requested information each year (2,783 hours  $\div$  480 hospitals).

The fifth information collection under CISS is for the collection of from tow yards necessary to gain access to and locate a vehicle that was involved in a crash. Typically, a tow facility operator just needs to give the Crash Technician permission to enter the yard to inspect the vehicle and involves approximately 5 minutes of staff time. CISS data shows an average of 11,130 visits to tow facilities per year, and NHTSA estimates 1,960 tow facilities will be visited annually. Accordingly, NHTSA estimates the total annual burden to be 928 hours ((11,130 visits  $\times$  5 minutes)  $\div$  60 minutes/hour) and estimates that each tow facility will, on average, spend 28.39 minutes providing the requested information each year ((928 hours  $\times$  60 minutes)  $\div$  1,960 facilities).

Accordingly, NHTSA estimates that the total burden associated with the CISS data acquisition system is 11,787 hours (6,956 + 822 + 298 + 2,783 + 928).

#### SCI:

The SCI crash data acquisition system includes 4 information collections. The first information collection covers the collection of information from individuals involved in crashes via interview. The estimated number of interview respondents is obtained by multiplying the approximate number of crashes investigated each year by the average number of interviews per crash. Based on existing data, each SCI crash involves an average of approximately 2 individuals. NHTSA estimates that SCI conducts investigations on approximately 100 crashes per year. Therefore, NHTSA estimates that there will be 200 respondents per year (100 crashes × 2 respondents per crash).

The respondents are contacted only once; however, in rare circumstances follow-up questions may be needed to clarify data. The interview requires approximately 20 minutes of a respondent's time on average. SCI conducts interviews for approximately 100 crashes per year, which NHTSA estimates takes about 40 minutes per crash (2 respondents × 20 minutes). Therefore, the estimated total annual burden hours for the collection of information from individuals involved in crashes for SCI is approximately 67 hours ((100 crashes × 40 minutes)  $\div$  60 minutes/hour = 66.67).

In addition to interviews, Crash Technicians and investigators must obtain official records to initiate and complete the cases. These records include police crash reports and medical records. The second information collection under SCI is for the collection of crash records from police jurisdictions. The SCI investigators contact an estimated 100 police jurisdictions once per year and require approximately 10 minutes of staff time per police jurisdiction. To estimate the burden to these police jurisdictions, NHTSA multiplied the average number of visits per year by the average burden per visit and the number of police jurisdictions. Accordingly, NHTSA estimates the total annual burden for police jurisdictions to be 10 minutes per respondent (10 minutes ×1 query per year) and 17 hours for all respondents ((10 minutes × 100 police jurisdictions)  $\div$  60 minutes/hour = 16.67 hours).

The third information collection under SCI is for the collection of medical records from hospitals. Based on existing data, SCI collects an average of 100 records each year from 100 hospitals (1 request per hospital per year). NHTSA estimates that a hospital spends 10 minutes for each record requested. Accordingly, NHTSA estimates the total annual burden to be 17 hours ((100 records × 10 minutes)  $\div$  60 minutes/hour = 16.67 hours) and estimates that each hospital will, on average, spend 10 minutes providing the requested information each year (10 minutes ×1 record request per year).

The fourth information collection under SCI is for the collection from tow yards necessary to gain access to and locate a vehicle that was involved in a crash. Typically, a tow facility operator just needs to give the Crash Technician permission to enter the yard to inspect the vehicle and involves approximately 5 minutes of staff time. SCI conducts approximately 100 visits to tow facilities per year, and NHTSA estimates that 100 tow facilities will be visited annually (1 request per facility per year). Accordingly, NHTSA estimates the total annual burden to be 8 hours ((100 visits × 5 minutes)  $\div$  60 minutes/hour = 8.33 hours) and estimates that each tow facility will, on average, spend 5 minutes providing the requested information each year.

Accordingly, NHTSA estimates that the total burden associated with the SCI data acquisition system is 109 hours (67 + 17 + 17 + 8).

#### **Special Studies:**

There is only one information collection for Special Studies in this ICR. This ICR only covers special studies involving remote level investigations.<sup>5</sup> Accordingly, these remote-level investigations do not involve interviews of individuals involved in crashes, collection of medical

<sup>&</sup>lt;sup>5</sup> If NHTSA intends to conduct a special study that is not remote, it will seek separate clearance.

records from hospitals, or visits to tow facilities. Instead, these special studies only involve the collection of information from police jurisdictions.

NHTSA estimates that the special studies will involve, on average, 1,000 police jurisdictions each year and require approximately 10 minutes of staff time per police jurisdiction. The total annual hour burden on jurisdictions for special studies information is estimated to be 167 hours ((1 visit × 10 minutes × 1,000 jurisdictions)  $\div$  60 minutes/hour = 166.67 hours).

The total estimated annual burden hours to all respondents for this ICR is 12,063 hours. The table below provides a summary of the estimated annual burden hours.

Information Collection Title	Number of Respondents	<b>Number of</b> <b>Responses</b> (per Respondent)	Burden per Response	Burden per Respondent	Total Burden
CISS: Interviews with Individuals Involved in Crashes	20,869	20,869 <i>(1)</i>	20 minutes	20 minutes	6,956 hours
CISS: Collection of Police Records from Sampled Jurisdictions	316	16,432(52)	3 minutes	156 minutes (2.6 hours)	821.6 hours <b>822 hours</b>
CISS: Collection of Police Records from Non-Sampled Jurisdictions	595	1,190(2)	15 minutes	30 minutes	298 hours
CISS: Collection of Medical Records	480	16,695 <i>(34.78)</i>	10 minutes	5.78 hours	2,783 hours
CISS: Access to Tow Yards	1960	11,130 (5.6785)	5 minutes	28.39 minutes	928 hours
SCI: Interviews with Individuals Involved in Crashes	200	200 (1)	20 minutes	20 minutes	67 hours
SCI: Collection of Police Records	100	100 (1)	10 minutes	10 minutes	17 hours
SCI: Collection of Medical Records	100	100 (1)	10 minutes	10 minutes	17 hours
SCI: Access to Tow Yards	100	100 (1)	5 minutes	5 minutes	8 hours
Special Studies: Collection of Police Records	1,000	1,000 (1)	10 minutes	10 minutes	167 hours

**Table 2: Summary of Burden Hour Estimates** 

Total:			12,063

#### **Costs Associated with Labor Hours:**

For each of the four categories of respondent, NHTSA has estimated the costs associated with the burden hours. There is no labor cost associated with interviewing individuals involved in crashes. Instead, for these respondents, NHTSA calculates an opportunity cost for the time associated with interviews. NHTSA used the national average hourly earnings of all employees on private nonfarm payrolls which the Bureau of Labor Statistics lists at \$29.92.<sup>6</sup> Using the estimated annual burden hours, NHTSA estimates the annual opportunity cost to interview individuals involved in crashes is \$210,135.64 ((CISS 6,956 hours × \$29.92 = \$208,131.00) + (SCI 67 hours × \$29.92 = \$2,004.64).

To calculate the labor cost associated with collecting investigation-based motor vehicle crash information, NHTSA looked at wage estimates for the type of personnel involved with assisting the investigators in obtaining crash information. NHTSA estimates the total labor costs associated with these burden hours by looking at the average wage for police and hospital records clerks and tow facility workers. The Bureau of Labor Statistics (BLS) estimates that the average hourly wage for a Protective Service Workers for police jurisdictions (BLS Occupation code 33-9000) in local government is \$16.67.<sup>7</sup> BLS estimates that local government workers' wages represent 61.9% of total labor compensation costs.<sup>8</sup> Therefore, NHTSA estimates the hourly labor costs to be \$26.93 for Protective Service Workers. BLS estimates that the average hourly wage for an Information and Record Clerk (BLS Occupation code 43-4000) in hospitals (privately owned) is \$18.14.<sup>9</sup> BLS estimates that private industry workers' wages represent 70.3% of total labor costs; therefore, the estimated total hourly compensation cost is \$25.80. The average hourly wage for Material Moving Workers (BLS Occupation code 53-7199) in tow facilities (privately owned) is \$18.16;<sup>10</sup> therefore, the estimated total hourly compensation cost is \$25.83.

The total estimated opportunity or labor costs associated with this information collection is \$341,669 (rounded), as detailed in the Table 3 below.

#### Table 3: Estimated Labor and Opportunity Costs Associated with Burden Hours

<sup>&</sup>lt;sup>6</sup> January 2021, Average hourly and weekly earnings of all employees on private nonfarm payrolls by industry sector, seasonally adjusted, <u>https://www.bls.gov/news.release/empsit.t19.htm</u>.

<sup>&</sup>lt;sup>7</sup> May 2020 National Occupational Employment and Wage Estimates by ownership, Local government, including schools and hospitals, <u>https://www.bls.gov/oes/current/999301.htm#33-0000</u>

<sup>&</sup>lt;sup>8</sup> Employer Costs for Employee Compensation by ownership [Dec. 2020],

https://www.bls.gov/news.release/ecec.t01.htm

<sup>&</sup>lt;sup>9</sup> https://www.bls.gov/oes/current/622000\_5.htm#43-0000

<sup>&</sup>lt;sup>10</sup> https://www.bls.gov/oes/current/oes\_nat.htm#53-0000

Progra m	Responden t Type	Total Burden Hours	% Burde n Hours	Cost per Burden Hour (Labor Cost or Opportunity Cost)	Total Opportunity/Labor Cost Associated with Burden Hours
	Interviewe e	6,956	59	\$29.92	\$208,131.00
CISS	Police Jurisdiction	1,120	10	\$26.93	\$30,161.60
	Hospital	2,783	24	\$25.80	\$71,801.40
	Tow c Facility		8	\$25.83	\$23,970.24
Total CISS		11,787			\$334,064.24
	Interviewe e	67	61	\$29.92	\$2,004.64
SCI	Police Jurisdiction	17	16	\$26.93	\$457.81
Н	Hospital	17	16	\$25.80	\$438.60
	Tow Facility	8	7	\$25.83	\$206.64
Total SCI		109			\$3,107.69
Special Studies	Police Jurisdiction	167		\$26.93	\$4,497.31
Total		12,063			\$341,669.24

## 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.

NHTSA estimates that there are no recordkeeping costs to any of the respondents: interviewees keep no records of the interview; hospitals and police simply allow access to copy their existing records; and tow yards merely direct the researchers to the crash vehicles.

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 annual cost to the Federal government for CISS, SCI and Special Studies is estimated to be \$14,196,000.

Data collection operations for CISS and SCI is estimated at \$11,600,000. Most of this cost is the \$10,800,000 cost to operate the CISS data collection contracts across the United States. The total value of awarded contracts includes additional equipment needed for data collection.

Data Collection for special studies is estimated at 2,200,000. This is the cost associated with the operation of special study data collection sites across the United States, for 1,000 special study cases. To calculate the costs for Special Studies, the total CISS and/or SCI costs per year were divided by the number of cases to come up with a per-case cost. The "per case cost" was then multiplied by the 1,000 special studies cases. (11.6M / 5,400 = 2,148 per case times 1,000 cases = 2,148,000 was rounded to 2.2M).

The administrative cost for salaries, overhead and printing of forms for CISS and SCI is \$286,000. It takes four federal staff on a part time basis (50%) to operate these contracts. The estimated cost for staff was based on one GS-13, two GS-14's and one GS-15 at a Step 5 of each GS scale, using the Washington, DC Locality Schedule. Five thousand dollars was estimated for printing brochures and any other marketing materials for the CISS and SCI studies.

The administrative cost or salaries, overhead and printing of forms for SS is \$54,000. The cost to operate these contracts was calculated by taking the overall Administrative costs for CISS cases, divided by the number of cases (5,300) to determine Administrative costs per case (~\$54.00) and multiplying by the number of Special Study cases (1,000).

The statistical support cost is \$47,000. This federal staff time to create the initial sampling parameters to select the crashes, monitoring the sample selection throughout data collection, adjusting the sampling parameter if needed, and producing the weight for the annual file. The estimated cost for staff was based on nineteen percent of a GS-14, Step 4 time; five percent each of GS-15, Step 7, GS-14, Step 9, and GS13, Step 2 time using on 2021 GS scale and the Washington, DC Locality Schedule.

The statistical support cost of \$9,000 to operate these contracts was calculated by taking the overall statistical support costs CISS cases, divided by the number of cases (5,300) to determine statistical support cost per case (~\$9.00) and multiplying by the number of Special Study cases (1,000).

FY 2021	Estimated Cost Per Year
a. Data Collection Operations (CISS and SCI data collection contracts	\$11,600,000
b. Data Collection - Special Studies	\$2,200,000

**Table 4: Costs to Federal Government** 

c. Administrative Salaries, Overhead, Printing of Forms for CISS/SCI	\$286,000
d. Administrative Salaries, Overhead, Printing of Forms for Special Studies	\$54,000
e. Statistical Support for CISS	\$47,000
f. Statistical Support for Special Studies	\$9,000
TOTAL	\$14,196,000

# 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.

The previous request for CISS (2017) indicated 5,605 burden hours, this request increases the burden to 12,063. The request for the collection of information is revised due to a) increasing the number of crashes investigated by Crash Technicians for 2021 and future years, b) adding Special Study crashes into this package, and c) adding Special Crash Investigation (SCI) crashes into this package. The combined impact is an increase of 6,458 burden hours to NHTSA's overall total. Table 5 provides a breakdown of the additional burden hours added for the additional listed above.

Information Collections	Previous Burden Hours	New Burden Hours	Difference	Reasoning
CISS	5,605	0	-5,605	Removal, replace with individual information collections that comprise CISS
CISS: Collection of Information from Individuals Involved in Crashes (or their Surrogates)	0	6,956	+6,956	Added (to separate individual ICs). Adjustment in estimate (miscalculation in last package and increase from 4,200 crash investigations to 5,300 crash investigations).
CISS: Collection of Police	0	822	+822	Added (to separate

Table 5: S	Summary	of A	dditional	Burden
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Records from Sampled Police Jurisdictions				individual ICs). Same as prior estimate.
CISS: Collection of Police Records from Non-Sampled Police Jurisdictions	0	298	+298	Added (to separate individual ICs). Same as prior estimate.
CISS: Collection of Medical Records from Hospitals	0	2,783	+2,783	Added (to separate individual ICs). Increase in expected request records (from 7,288 to 9,540) and change in rounding methodology.
CISS: Collection to Gain Access to Vehicles at Tow Yards	0	928	+928	Added (to separate individual ICs). Adjustment in estimate.
SCI: Collection of Information from Individuals Involved in Crashes (or their Surrogates)	0	67	+67	New IC.
SCI: Collection of Police Records from Police Jurisdictions	0	17	+17	New IC.
SCI: Collection of Medical Records from Hospitals	0	17	+17	New IC.
SCI: Collection to Gain Access to Vehicles at Tow Yards	0	8	+8	New IC.
Special Studies: Collection of Police Records from Police Jurisdictions	0	167	+167	New IC.
	5,605	12,063	+6,458	

# 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.

NHTSA has plans to publish results from each of the three data collections (CISS, SCI, and Special Studies). The CISS files will be made available to the public in two formats (SAS and CSV) each year after completion of quality control. These files are for clinical review and analysis. The CISS data files and accompanying documentation will be released annually and will be available on NHTSA's Crash Data Collection web page in August of the following data collection year. For example, data collection during calendar year 2021 will typically be available for public release in August 2022.

The SCI crash reports and data associated with the case are made available to the public after completion of quality control. Both the reports and crash data are made available to the public on the crash data section of the NHTSA website.

Special Study reports will be available when the study is complete and may or may not encompass a complete calendar year. These reports summarize the data collection process and the data analysis performed. Special Study investigations may produce one overall report for the study and/or release the underlying data.

## **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.<sup>11</sup>

No exceptions to the certification statement are requested.

In accordance with the requirement at 5 CFR 1320.9(g), the following statement will be provided to respondents:

"A federal agency may not conduct or sponsor, and a person is not required to respond to, nor shall a person be subject to a penalty for failure to comply with, a collection of information subject to the requirements of the Paperwork Reduction Act unless that collection of information displays a current valid OMB Control Number. The OMB Control Number for this information collection is 2127-0706. Public reporting for this collection of information is estimated to be approximately 20 minutes for interviewee, 3-15 minutes for police jurisdiction, 10 minutes for medical record, and 5 minutes for tow yard employees. All responses to this collection of information are voluntary. Send comments regarding this burden estimate or any other aspect of this collection of information formation for reducing this burden to: Information Collection

<sup>&</sup>lt;sup>11</sup> 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.

Clearance Officer, National Highway Traffic Safety Administration, 1200 New Jersey Ave, S.E., Room W45-205, Washington, DC, 20590."