

Information Collection Request Supporting Statement: Part A Countermeasures That Work

OMB Control Number 2127-0727

Abstract: The National Highway Traffic Safety Administration (NHTSA) of the U.S. Department of Transportation is seeking approval to reinstate with modification a previously approved information collection (OMB Control No. 2127-0727) to (1) collect user feedback on the NHTSA guides, *Countermeasures That Work* (10th edition – Venkatraman et. al., 2021¹) and *Countermeasures At Work* (1st edition to be published in 2022), and (2) collect program information from program administrators to develop countermeasure case studies for *Countermeasures At Work* (2nd edition to be published in 2023).

This information collection request (ICR) seeks approval to conduct a survey and structured interviews that will inform the development of the 12th edition of *Countermeasures That Work* and the 2nd edition of *Countermeasures At Work*. The *Countermeasures That Work* guide was developed for State Highway Safety Offices (SHSOs) to assist them in developing programs for implementing safety countermeasures in ten program areas including (1) alcohol- and drug-impaired driving, (2) seat belts and child restraints, (3) speeding and speed management, (4) distracted driving, (5) drowsy driving, (6) motorcycle safety, (7) young drivers, (8) older drivers, (9) pedestrian safety, and (10) bicycle safety. The *Countermeasures That Work* guide covers each of these program areas in separate chapters that include a short background section relaying current data trends, which is followed by a description of applicable countermeasures, and an explanation of their effectiveness, use, costs, and time to implement. The *Countermeasures At Work* companion guide expands on the most effective countermeasures contained in the *Countermeasures That Work* guide by providing real world examples and details on localities where specific countermeasures were put into place. The countermeasure descriptions include details about locality size, implementation issues, cost, stakeholders, challenges, evaluation, and outcomes.

NHTSA proposes to conduct an end user feedback survey of up to 120 representatives from SHSOs and/or local jurisdictions, in addition to representatives from the Governors Highway Safety Association (GHSA), State Coordinators from across the United States, and other important stakeholders. While previous feedback surveys (with the most recent in 2018) were conducted via phone, the proposed feedback survey will be administered using an online platform. Participation by respondents would be voluntary. This collection only asks respondents to report their answers; there are no record-keeping costs to the respondents. Responses will not be publicly reported, but NHTSA will use the aggregated information to revise and improve the *Countermeasures That Work* and *Countermeasures At Work* guides. Specifically, feedback will be used to determine which aspects of the guides should be improved and if there are features or topics that the guides do not currently have that users would like to have included.

¹ Venkatraman, V., Richard, C. M., Magee, K., & Johnson, K. (2021, July). *Countermeasures that work: A highway safety countermeasure guide for State Highway Safety Offices, 10th edition* (Report No. DOT HS 813 097). National Highway Traffic Safety Administration.

NHTSA also proposes to conduct up to 60 structured in-person or phone interviews with representatives from jurisdictions that currently administer effective countermeasures. The findings of interviews conducted for *Countermeasures At Work* will be reported separately for each individual locality so that the reader can get an idea about the size and type of the featured locality and issues specific to that locality. The *Countermeasures At Work* guide will include general contact information for the locality (i.e., State DOT or SHSO office) or the contact information of key individuals (only if permission is granted by the interview participant), so that readers of the document can follow-up, if desired, with the locality to obtain more information about the countermeasure.

The respondents for the end user feedback survey and structured interviews will be selected based on their job position, knowledge of domain, management of effective countermeasure implementations as noted in the literature, and recommendation from NHTSA or GHSA Subject Matter Experts. These criteria will be used with the intent to reach regular users of the documents to help improve the documents and to reach program administrators of effective countermeasures to help populate and enrich countermeasure descriptions. Respondents for the feedback survey and structured interviews will be contacted once over the course of the project. The survey and interviews were determined to be exempt from IRB review. The project reports will be shared with SHSOs, local governments, and those who develop traffic safety programs that aim to change problematic behaviors with the goal of reducing crashes and the resulting injuries and fatalities. The total estimated burden for contacting 120 traffic safety representatives for the feedback survey (50 hours) and 60 traffic safety representatives for the program case study interviews (79 hours) is 129 hours. When NHTSA last received approval of this information collection in 2017, the estimated burden was 375 hours. The decrease in burden of 246 hours for the proposed collection is a result of significantly reducing the number of structured interviews for the case studies because NHTSA is only collecting responses for one planned edition of *Countermeasures At Work* instead of the two editions that were included in the last ICR. Additional reduction in burden is a result of reducing the collection time required to complete the feedback survey as the current survey will use a computerized survey delivery system instead of a phone survey.

A.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.

a. Circumstances making the collection necessary

NHTSA was established by the Highway Safety Act of 1970 (Pub. L. No. 91-605, §202(a), 84 Stat. 1713, 1739-40) and its mission is to reduce deaths, injuries, and economic losses resulting from motor vehicle crashes on the Nation's highways. To further this mission, NHTSA is authorized to conduct research for the development of traffic safety programs (23 U.S.C. 403). The agency develops, promotes, and implements effective educational and enforcement programs with the goal of ending preventable tragedies and reducing economic costs associated with vehicle use and highway travel. In 2020, an estimated 38,680 people were killed in motor

vehicle traffic crashes on U.S. roadways.² While the number of people killed has increased since the U.S. hit its lowest number of fatalities in 2014, over the past 40 years there has been a general downward trend. Effective behavioral safety countermeasures such as those described in *Countermeasures That Work* and detailed in *Countermeasures At Work* have contributed to these reductions.

This project addresses the issue of providing information to traffic safety professionals about countermeasures that have been demonstrated to be effective in addressing certain traffic safety problems.

The public health approach to traffic safety which establishes injuries and fatalities as preventable has resulted in a mix of countermeasures, and the choices among them are driven by research on their effectiveness. Successful approaches typically include some combination of countermeasures designed to improve vehicles, roadways, education, road user perceptions and behavior, and enforcement of traffic safety laws.

In 2005, the Governors Highway Safety Association (GHSA) and NHTSA developed the *Countermeasures That Work* guide for the State Highway Safety Offices (SHSOs). Currently, this guide addresses countermeasures in the ten program areas of alcohol- and drug-impaired driving, seat belts and child restraints, speeding and speed management, distracted driving, drowsy driving, motorcycle safety, young drivers, older drivers, pedestrian safety, and bicycle safety. This guide is a basic reference to assist SHSOs in selecting effective, science-based traffic safety countermeasures for major highway safety problem areas. The guide:

- Describes major strategies and countermeasures that are relevant to SHSOs;
- Summarizes their use, effectiveness, costs, and implementation time; and
- Provides references to the most important research summaries and individual studies.

Given that SHSO's and other State practitioners responsible for implementing these countermeasures use *Countermeasures That Work* as an aid to make decisions, it is important to solicit their opinions about the document and its content. Specifically, it is important to know which aspects of the guide should be improved and if there are features or topics that the guide does not currently have that they would like to have included.

This same framework was used to develop the companion piece: *Countermeasures At Work*. This document built upon the effective countermeasure descriptions contained in *Countermeasures That Work* with case studies of localities that have implemented the targeted countermeasures. *Countermeasures At Work* allows decision-makers to explore some of the pros and cons of implementing, sustaining, and evaluating countermeasures in similar communities. In addition, program contact information and relevant program links are included if the reader desires additional information about the countermeasure's use in that locality. As the *Countermeasures At Work* document has not been released to date, NHTSA has not solicited feedback from users of the document. It is important to know what specific information readers would like to see about the localities that have implemented countermeasures and what information would be most

² National Center for Statistics and Analysis. (2021, October). Early estimate of motor vehicle traffic fatalities for the first half (January–June) of 2021 (Crash•Stats Brief Statistical Summary. Report No. DOT HS 813 199). National Highway Traffic Safety Administration.
<https://crashstats.nhtsa.dot.gov/Api/Public/ViewPublication/813199>

helpful when deciding whether to implement a countermeasure. The data collected in this study will help us better understand user needs and information requirements, which will be used to update the content of the *Countermeasures At Work* guide.

b. Statute authorizing the collection of information

Title 23, United States Code, Section 403 authorizes NHTSA to conduct research and development activities, including demonstration projects and the collection and analysis of highway and motor vehicle safety data and related information needed to carry out this section, with respect to all aspects of highway and traffic safety systems and conditions relating to vehicle, highway, driver, passenger, motorcyclist, bicyclist, and pedestrian characteristics; accident causation and investigations; and human behavioral factors and their effect on highway and traffic safety. [See 23 U.S.C. 403(b)(1)(A)(i)-(ii); 23 U.S.C. 403(b)(1)(B)].

A.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 University of North Carolina's Highway Safety Research Center (HSRC) will conduct this study under a task order on an Indefinite Delivery/Indefinite Quantity contract with NHTSA. Participation in this study will be voluntary, and participants will be U.S. adults (18 years old and older) and representatives from the SHSOs and/or local jurisdictions, in addition to representatives from Governors Highway Safety Association (GHSA), State Coordinators from across the United States, and other important stakeholders. Up-to-date information from stakeholders and program managers will help NHTSA refine the *Countermeasures That Work* and *Countermeasures At Work* documents and add additional case study information to the latter document.

To solicit user feedback to refine *Countermeasures That Work* and *Countermeasures At Work*, the survey form (NHTSA Form 1343) will be self-administered and completed via the web. Survey invitation materials, delivered by email, will inform participants about the study and explain how to take the survey online, which is a component of NHTSA Form 1343. Following this information, participants will complete a survey that covers familiarity with, helpfulness of, and improvements for both documents, as well as identification of successful countermeasure programs. The survey will ask the representatives for the following information:

- Their background, including job roles and responsibilities, which provides context for document use.
- Their key information needs for the *Countermeasures At Work* document, including details of specific use-case examples.
- Opinions on both the *Countermeasures That Work* and *Countermeasures At Work* documents' structure, format, and content.
- Opinions about specific aspects and potential changes or improvements pertaining to alternative presentation formats for both documents.

- Opinions about how the *Countermeasures At Work* document would be used, what information should be included, and if stakeholders have information about good locality examples.
- Opinions about features or topics that should be included in both documents, such as the addition of figures and illustrations, and adjustments to the design of topic subsections.

The data from this study will provide NHTSA with information that will guide updates to the *Countermeasures That Work* and *Countermeasures At Work* documents. Data collected from the surveys have been used and/or will be used primarily to (1) update the content, format, and structure of information provided in *Countermeasures That Work* and *Countermeasures At Work*, and (2) identify the localities/implementation of countermeasures that should be presented as case studies in *Countermeasures At Work*. For example, previous survey feedback was used to revise the *Countermeasures That Work* document to more clearly delineate higher versus lower rated countermeasures, add additional information about evaluation needs for lower rated countermeasures, and separate the combined distracted and drowsy driving chapter into individual distracted driving and drowsy driving chapters.

To solicit program manager input to develop content for *Countermeasures At Work*, a structured interview (NHTSA Form 1344) will be conducted with representatives from jurisdictions who currently administer effective countermeasures. Invitation materials will inform participants about the study and how to arrange an interview. HSRC will administer these interviews in person or by telephone. During the structured interview, program managers will be asked to describe their program's history, size, scope, and operation of the program, funding sources, stakeholder involvement, media coverage (if appropriate), evaluation efforts, and other key aspects of the program.

The findings of the program manager interviews conducted for *Countermeasures At Work* will be reported separately for each individual locality so that the reader can get an idea about the size and type of the featured locality and issues specific to that locality. The next edition of the guide will include approximately 15 additional localities that have implemented successful countermeasures. The *Countermeasures At Work* guide will include general contact information for the locality (i.e., State DOT or SHSO office) or the contact information of key individuals (only if permission is granted by the interview participant), so that readers of the document can follow-up, if desired, with the locality to obtain more information about the countermeasures. The case studies will also highlight challenges encountered in the process of implementing and sustaining countermeasures.

Countermeasures That Work is used by SHSOs to assist them in developing programs for implementing safety countermeasures in the top ten traffic safety program areas. The new *Countermeasures At Work* expands on the most effective countermeasures contained in the *Countermeasures That Work* guide by providing real world examples and details on implementations of countermeasures. The countermeasure descriptions include details about locality size, implementation issues, cost, stakeholders to involve, challenges, evaluation, and outcomes to help officials determine which countermeasures may be effective in their jurisdictions. Per Section 1300.11 of the Uniform Procedures for State Highway Safety Grant

Programs,³ each fiscal year, as part of the highway safety planning process for a State’s Highway Safety Plan, a list of information and data sources consulted must be included in the plan (23 CFR Part 1300). *Countermeasures That Work* is commonly referenced as a consulted source.

A.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.

End User Feedback Surveys

Surveys will be conducted of representatives from SHSOs and/or local jurisdictions, in addition to representatives from GHSA, State Coordinators from across the United States, and other important stakeholders. Up to 120 potential participants will be contacted to participate in the survey. In past years of the project, structured interviews were conducted by telephone. During the proposed three-year ICR, NHTSA will administer the feedback survey using an online platform. Participant data will be collected using Computer Assisted Web Interviewing (CAWI)—a programmed, self-administered web survey. This will facilitate reaching a large number of users of *Countermeasures That Work* and *Countermeasures At Work* and will improve standardization of administration. It will also expedite the compiling and analysis of survey results as the information will be automatically recorded in the cloud’s memory. Additionally, the online survey will reduce the burden to survey participants because they will be able to complete the survey more quickly at a time and place of their convenience.

Structured Interviews

For the *Countermeasures At Work* guide, up to 60 structured interviews will be conducted with representatives from jurisdictions that currently administer effective countermeasures. NHTSA will conduct these interviews in person or by telephone. The findings of interviews conducted for *Countermeasures At Work* will be reported separately for each individual locality so that the reader can get an idea about the size and type of the featured locality and issues specific to that locality. The *Countermeasures At Work* guide will include general contact information for the locality (i.e., State DOT or SHSO office) or the contact information of key individuals (only if permission is granted by the interview participant), so that readers of the document can follow-up, if desired, with the locality to obtain more information about the countermeasure.

A.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.

Overall, the following criteria were applied to determine whether existing information may be duplicative:

- Currency of information – The data must be current to have utility for making sound

³ Available at <https://www.nhtsa.gov/document/uniform-procedures-state-highway-safety-grant-programs>.

strategic decisions concerning future programmatic and research activities, especially regarding emerging countermeasures and technologies.

- National basis – The safety efforts of NHTSA are national in scope. NHTSA therefore seeks representation from across the nation for development of these resource guides.
- Focus on NHTSA program concerns – The items within the proposed survey instruments concern issues crucial to developing appropriate strategies for reducing crashes.

This data collection entails no duplication. NHTSA has previously conducted interviews to obtain feedback on the *Countermeasures That Work* guide (most recently conducted for the 9th edition published in 2018); however, it is important to obtain feedback on the most recent version of the document, the 10th edition published in 2021, to identify how it can be improved to better assist the States. Additionally, the project aims to obtain feedback about the soon-to-be published *Countermeasures At Work* guide, which will present information about countermeasure implementations and case studies of these implementations. No end user data has yet been collected about this document.

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

This information collection does not involve small businesses or other small entities. Information for this study will only be collected from individuals.

A.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.

If the end user survey was not implemented for *Countermeasures That Work* and *Countermeasures At Work*, NHTSA would lack current data on the needs of traffic safety officials to help with refinement of the guides and countermeasure selection and development. The consequence would be that the agency would not have adequate information to determine how best to modify and improve the *Countermeasures That Work* guide and the new *Countermeasures At Work* guide. New literature evaluating countermeasures is released continuously and the guides require updates every two years in order to keep pace with this evolving evaluation literature and current program implementations. As cited in Section A.2 above, per Section 1300.11 of the Uniform Procedures for State Highway Safety Grant Programs, each fiscal year, as part of the highway safety planning process for a State's Highway Safety Plan a list of information and data sources consulted must be included in the plan. *Countermeasures That Work* is commonly referenced as a consulted source. As such the document should be updated frequently to be of most use to SHSOs. There are no legal or technical obstacles to reducing burden as demonstrated by the shift from telephone interviews to completing the user feedback survey via web.

A.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.

No special circumstances require this collection to be conducted in a manner inconsistent with 5 CFR 1320.5(d)(2).

A.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.

The 60-day Federal Register Notice, which notified the public of NHTSA's intent to conduct this collection of information and provided a 60-day comment period, was published on April 18, 2022 (Federal Register/Vol. 87, No. 74, Pages 23013-23017). NHTSA received no responses to the notice.

A copy of a second, 30-day Federal Register Notice (Vol. 87, No. 124, Pages 38824-38827), which announced that this information collection request will be forwarded to OMB, was published on June 29, 2022.

For previous editions of *Countermeasures That Work*, experts from NHTSA as well as the Federal Highway Administration, SHSOs, GHSA, and the Battelle Memorial Institute (the previous contractor) provided significant end user feedback that was used to refine the guide.

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

For this study, respondents will not be compensated for their time and the effort they give to the study. Participation is voluntary.

A.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 system of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.

End User Feedback Survey

The end user feedback survey does not include any assurance of confidentiality. The survey includes a notification statement, which promises that no individual results and no personally identifiable information will be published, and that no personal results will be shared. All responses for the feedback survey will only be used for internal project purposes, and will only be shared in aggregated form that preserves participant anonymity via a short report of overall findings to the project manager. This findings report will provide only summary statistics that cannot be used to identify any individual or individual's responses. There will not be any identifying information such as names, addresses, telephone numbers, or social security numbers in the report delivered to NHTSA. Participation in the survey is voluntary. The introduction read by respondents of the *Countermeasures That Work* and *Countermeasures At Work* end user feedback survey describes the measures that will be taken to ensure participant anonymity. Specifically, the text states that: "Your responses will be treated in a **secure and anonymous** manner." The Contractor's IRB has reviewed the protocol and does not require an Informed Consent Process for this survey.

A SORN is not required for this research as PII will not create a Privacy Act System of records.

Structured Interviews

All interviewees for the *Countermeasures At Work* guide will be government employees that are in-charge of the selected department/program; their official contact information is already publicly available. Therefore, no assurance of confidentiality will be provided to the interviewees about their official contact information. Interviewees for the *Countermeasures At Work* guide will be made aware that their responses, their official contact information including department/program contact, and information about the locality will be published in the reference document. However, if a participant prefers that their personal work-related contact information not be published, then office-specific information can be substituted. This contact information is needed to allow interested readers to follow-up with the responsible department to obtain additional information about the countermeasure and the process of countermeasure implementation. Participation in the *Countermeasures At Work* interviews is voluntary, and interviewees will be fully informed about the options regarding publication of their work-related contact information prior to their agreeing to participate.

A SORN is not required for this research as PII will not create a Privacy Act System of records.

NHTSA has published a PIA for research and studies performed by its Office of Behavioral Safety Research. The Department's Senior Agency Official for Privacy adjudicated the PIA on June 10, 2019, and it is available at <https://www.transportation.gov/individuals/privacy/nhtsa-office-behavioral-safety-research-obsr-research-studies>.

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

No information of a sensitive nature will be collected in the survey or interviews. The focus of the survey will be getting feedback on the format, structure, and content of *Countermeasures That Work* and *Countermeasures At Work* and for the interviews collecting information on localities that have implemented countermeasures for *Countermeasures At Work*.

A.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.

End User Feedback Survey

Potential participants will be contacted up to 3 times by email. Each emailed survey invitation is estimated to take 1 minute to read. Initially 120 potential participants will be contacted. Each contact wave is expected to result in 30 completed surveys. While the anticipated response rate is high, this is the result of selecting recipients from SHSOs and/or local jurisdictions, GHSA, State Coordinators from across the United States, and other important stakeholders. The estimated completion time to complete the online feedback survey that solicits opinions on improving the *Countermeasures That Work* and *Countermeasures At Work* documents is 30 minutes. The total estimated burden if 75% of solicited participants respond is approximately 50 hours, rounded up (((assuming 90 completed surveys out of 120 contacted potential participants: 45 hours for completed surveys (90 survey participants x 30 minutes to complete the survey) + ~4.5 hours for reading invitations ((Wave 1 – 120 contacts x 1 minute) + (Wave 2 – 90 contacts x 1 minute) + (Wave 3 – 60 contacts x 1 minute))). Each respondent will be administered the survey once.

Structured Interviews

Potential interviewees will be contacted up to 4 times by email or phone. Each interview invitation is estimated to take 2 minutes to read. Initially, 60 potential participants will be contacted. Each contact wave is expected to result in 12 completed interviews. While the anticipated response rate is high, this is the result of selecting recipients to interview based on

such criteria as their job position and management of an effective program, scan of literature for effective countermeasure implementations, and recommendation from a NHTSA regional specialist or GHSA Office Subject Matter Expert. The estimated completion time for interviews to gather information from localities that are implementing effective countermeasures for the 2nd edition of *Countermeasures At Work* is 1.5 hours per interview. The total estimated burden, if 75% of solicited participants respond, is approximately 79 hours, rounded up per wave ((assuming 48 completed interviews out of 60 contacted potential participants: 72 hours (48 completed interviews x 90 minutes for each interview) + ~5.6 hours ((Wave 1 – 60 contacts x 2 minutes) + (Wave 2 – 48 contacts x 2 minutes) + (Wave 3 – 36 contacts x 2 minutes) + (Wave 4 – 24 contacts x 2 minutes))). Each respondent will be administered the survey once.

Table 1 summarizes the estimated burden hours for participants for the end user feedback survey. The average annual estimated burden is 16.67 hours (50 total hours over the course of the 3-year project). Table 2 summarizes the estimated burden hours for participants for the structured interviews. The average annual estimated burden is 26.33 hours (79 total hours over the course of the 3-year project). Table 3 summarizes the total estimated burden for both information data collection components. For both data collections, participants will incur no costs and no record keeping burden from the information collection. Participants will also receive no compensation from the project for their involvement in the survey or interviews.

Table 1. Estimated Total Burden for End User Feedback Survey.

Wave	Number of Contacts	Participant Type	Estimated Time Burden per Participant (in minutes)	Frequency of Burden	Number of Participants	Burden Hours*	Burden Hours per Wave*	Average Annual Total Burden
Wave 1 (Initial Email Invitation)	120	Contacted potential participant (read email)	1	1	120	2	17	
		Recruited participant (completed Form 1343)	30	1	30	15		
Wave 2 (Reminder Email #1)	90	Contacted potential participant (read email)	1	1	90	2	17	
		Recruited participant (completed Form 1343)	30	1	30	15		
Wave 3 (Reminder)	60	Contacted potential participant (read email)	1	1	60	1	16	

Email #2)		Recruited participant (completed Form 1343)	30	1	30	15		
Total							50	16.67

* Rounded up to the nearest hour.

Table 2. Estimated Total Burden for Structured Interviews.

Wave	Number of Contacts	Participant Type	Estimated Time Burden per Participant (in minutes)	Frequency of Burden	Number of Participants	Burden Hours*	Burden Hours per Wave*	Average Annual Total Burden
Wave 1 (Initial Email Invitation)	60	Contacted potential participant (read email)	2	1	60	2	20	
		Recruited participant (completed Form 1344)	90	1	12	18		
Wave 2 (Reminder Email #1)	48	Contacted potential participant (read email)	2	1	48	2	20	
		Recruited participant (completed Form 1344)	90	1	12	18		
Wave 3 (Reminder Email #2)	36	Contacted potential participant (read email)	2	1	36	2	20	
		Recruited participant (completed Form 1344)	90	1	12	18		
Wave 4 (Reminder Email #3)	24	Contacted potential participant (read email)	2	1	24	1	19	
		Recruited participant (completed Form 1344)	90	1	12	18		
Total							79	26.33

* Rounded up to the nearest hour.

Table 3. Overall Estimated Total Burden.

Information Collection Component	Frequency	Number of Respondents Per Assessment	Burden Hours Per Collection	Average Annual Total
End User Feedback Survey (Form 1343)	1	120	50 hours	16.67 hours
Structured Interviews (Form 1344)	1	60	79 hours	26.33 hours
Total		180	129 hours	43 hours

Since respondents will be contacted at work, the interviews will not be an actual cost to the respondents (i.e., they will be participating during work hours as part of their traffic safety jobs); however, the time respondents spend on the interviews can still be looked at in terms of what it would have cost if the respondents had spent that amount of time on a task while on the job. The opportunity cost to respondents could be computed using an average hourly wage. Based on mean per capita wage for Project Management Specialists and Business Operations Specialists in the United States, the maximum total burden cost is estimated as follows:

$$\$40.53 \text{ per hour}^4 \times 129 \text{ hours} = \$5,228.37$$

Table 4 summarizes the estimated opportunity costs.

Table 4. Estimated Opportunity Costs.

Information Collection Component	Frequency	Number of Respondents	Burden Hours Per Collection	Hourly Opportunity Cost	Total Opportunity Costs	Average Annual Total Opportunity Costs
End User Feedback Survey (Form 1343)	1	120	50	\$40.53	\$2,026.50	\$675.50
Structured Interviews (Form 1344)	1	60	79	\$40.53	\$3,201.87	\$1,067.29
Total		180 Respondents	129 Hours		\$5,228.37	\$1,742.79

⁴ U.S. Department of Labor, Bureau of Labor and Statistics, May 2020 National Occupational Employment and Wage Estimates United States: https://www.bls.gov/oes/current/oes_nat.htm#00-0000.

A.13. Provide an estimate of the total annual cost to the 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.

Participation in this study is voluntary, and there are no costs to respondents beyond the time spent completing the end user feedback survey or structured interviews.

A.14. Provide estimates of the annualized cost 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.

This is one-time data collection. The total cost to the Federal Government for this study is \$587,691 over 50 months which is the awarded amount of the task order. This amounts to an annual cost of approximately \$141,045 per year. In addition to administering the survey and structured interviews, this cost includes updating and development of the countermeasure reports, and other project planning and administrative costs.

The estimated cost in terms of Federal Government time per year is approximately 120 hours for the Contracting Officer's Representative (COR) and 20 hours for the supervisor. NHTSA estimates the cost associated with the COR's hours using the hourly wage for a GS-14 employee (\$60.49⁵) and dividing by 61.7% to estimate total compensation costs.⁶ Therefore, using an hourly cost of \$94.04, NHTSA estimates the total cost for the COR's hours is \$35,294.40 (\$94.04 × 360 hours). NHTSA estimates the cost associated with the COR's supervisor hours using the hourly wage for a GS-15 employee (\$71.15⁶) and dividing by 61.7% to estimate total compensation costs.⁷ Therefore, using an hourly cost of \$115.32, NHTSA estimates the total cost for the supervisor's hours is \$6,919.20 (\$115.32 × 60 hours). The estimated cost in terms of Federal Government time per year is approximately \$14,071.20 annually.

A.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 the entire burden cost and number of burden hours reported in response to questions 12 and 13. If this is a renewal or reinstatement, the change is the difference between the new burden estimates and the burden estimates from the last OMB approval.

This is a request to reinstate a previously approved collection and will result in a decrease of 246 hours. The previous administration of this survey expired: OMB# 2127-0727.

This ICR is being updated as the number of interviews and costs have changed. For the first

⁵ https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2022/DCB_h.pdf, last accessed April 12, 2022.

⁶ The Bureau of Labor Statistics (BLS) estimates that wages represent 61.7% of compensation for State and local government workers. Employer Costs for Employee Compensation, U.S. Bureau of Labor Statistics, https://www.bls.gov/news.release/archives/ecec_09162021.pdf, last accessed April 12, 2022.

time, the end user feedback survey for *Countermeasures That Work* and *Countermeasures At Work* will be conducted using the web versus the previous mode of phone. Although an increase in respondents is requested, survey completion time is greatly reduced using the web version. In addition, fewer interviewees are requested for the case study interviews for *Countermeasures At Work* as only one collection is planned and the document framework is established thereby reducing the number of required interviews to populate the countermeasure information.

Table 5. Estimated Burden for Current and Previous Collection.

	Last OMB Collection Approval	Current Collection ICR	Difference (Current-Last)
End User Feedback Survey			
N Respondents	50	120	+70
Cost Burden	\$1,703.25	\$2,026.50	+\$323.25
Time Burden (hours)	75	50	-25
Structured Interviews - Round 1			
N Respondents	100	60	-40
Cost Burden	\$3,406.50	\$3,201.87	-\$204.63
Time Burden (hours)	150	79	-71
Structured Interviews - Round 2			
N Respondents	100	--	-100
Cost Burden	\$3,406.50	--	-\$3,406.50
Time Burden (hours)	150	--	-150
TOTAL			
N Respondents	250	180	-70
Cost Burden	\$8,516.25	\$5,228.37	-\$3,287.88
Time Burden (hours)	375	129	-246

A.16. For collection 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.

End User Feedback Survey

The end user feedback data collected for *Countermeasures That Work* and *Countermeasures At Work* will not be published. The data will only be used for internal purposes to inform the content, design, and structure of the *Countermeasures That Work* and *Countermeasures At Work* guides. Under the current contract, two updated editions will be produced for *Countermeasures That Work* (11th ed. and 12th ed.), and will be published in 2022 and 2024, respectively. The feedback data collection from users will be completed in 2023; thus, the feedback will only be incorporated in the 12th edition of the document. The current task order involves updating the 11th and 12th edition of the document and is being conducted by a different contractor than the contractor for the 9th and 10th editions. As such NHTSA and the new contractor have planned updates for the 11th edition that will be evaluated before the revision of the 12th edition. End user feedback is not being solicited for the 10th edition but is being solicited for the 11th edition to aid in revising the 12th edition.

Structured Interviews

For the structured interviews to populate and update *Countermeasures At Work*, information collected from respondents on countermeasure specifics (implementation problems, stakeholder involvement, evaluation information, etc.) will be published by locality. Official contact information for the interviewee who is in-charge of the department/program or official contact information for the department/program that is being featured will be published so that interested readers may obtain more information. As these respondents are government officials, official contact information is already readily available on the internet. The 2nd edition of the guide will be published in 2023.

A.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.

A.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 1320.9.⁷

No exceptions to the certification statement are made.

The following statement will be provided to respondents on the survey documents:

⁷ Specifically explain how the agency 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.

Under the Paperwork Reduction Act, a Federal agency may not conduct or sponsor, and a person is not required to respond to, 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 2127-0727. The average amount of time to complete this survey is 30 minutes. All responses to this collection of information are voluntary. If you have comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, send them to: Information Collection Clearance Officer, National Highway Traffic Safety Administration, 1200 New Jersey Ave SE, Washington, DC, 20590.

In addition, the purpose of the information collection and the specific use of the information collected will be provided in the invitation and reminder emails and at the beginning of the survey.