

Information Collection Request Supporting Statements: Part A
Evaluation of the Model Minimum Uniform Crash Criteria
OMB Control No. 2127-New

Abstract:¹

The National Highway Traffic Safety Administration (NHTSA) is seeking OMB approval to conduct a voluntary national survey of active law enforcement officers. The purpose of the survey would be to solicit officers' opinions about the crash data variables described in the current fifth edition of the [Model Minimum Uniform Crash Criteria \(MMUCC\) Guideline \(DOT HS 812 433, July 2017\)](#), as well as to test officers' abilities to accurately report crash data using both existing MMUCC variables and proposed new or modified variables.

The MMUCC guideline identifies a minimum set of motor vehicle crash data variables and their attributes that States should consider collecting and including in their State crash data systems. MMUCC is a voluntary, minimum set of standardized data variables for describing motor vehicle traffic crashes. MMUCC promotes data uniformity within the highway safety community by creating a foundation for State crash data systems to provide the information necessary to improve highway safety. The crash data is used to identify issues, determine highway safety messages and strategic communication campaigns, optimize the location of selective law enforcement, inform decision-makers of needed highway safety legislation, and evaluate the impact of highway safety countermeasures. NHTSA developed MMUCC with the Governors Highway Safety Association (GHSA) in 1998 and have regularly updated the guidelines together, with the most recent fifth edition published in 2017.

NHTSA intends to conduct this information collection to inform a committee of State experts as they meet to provide input into the content of the next edition of MMUCC. NHTSA will collect the information using online surveys and analyze it to identify problematic crash data elements and concepts. A discussion of the aggregate results of this research will be published as an appendix to the next edition of MMUCC. This is a new data collection that will be conducted once to inform the sixth edition of MMUCC. Responding to this data collection is voluntary and each participant will be provided an honorarium.

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.**

¹ The Abstract must include the following information: (1) whether responding to the collection is mandatory, voluntary, or required to obtain or retain a benefit; (2) a description of the entities who must respond; (3) whether the collection is reporting (indicate if a survey), recordkeeping, and/or disclosure; (4) the frequency of the collection (e.g., bi-annual, annual, monthly, weekly, as needed); (5) a description of the information that would be reported, maintained in records, or disclosed; (6) a description of who would receive the information; (7) if the information collection involves approval by an institutional review board, include a statement to that effect; (8) the purpose of the collection; and (9) if a revision, a description of the revision and the change in burden.

NHTSA uses police-reported motor vehicle traffic crash data to conduct research, analyze traffic crash trends, support safety programs, and make data-driven decisions daily. Understanding States' crash data capabilities is critical to ensuring accuracy for all data-driven programs. Historically, each State developed their own methods for collecting, managing, and analyzing data on motor vehicle crashes. Consequently, crash data varied substantially between States. The lack of uniform data elements and attributes made it challenging to understand national crash trends.

In 1998, NHTSA and GHSA published the first MMUCC Guideline. This provided States voluntary guidance on the minimal set of standardized data elements and attributes necessary to describe the characteristics the vehicles, the persons, and the environment involved in motor vehicle crashes. NHTSA and GHSA encouraged States to adopt MMUCC to increase crash data uniformity. Greater standardization of crash data enables State highway safety agencies to more efficiently and cost-effectively share data with other agencies in their State (such as public safety), compare their crash data with other States, and exchange crash data with Federal data systems.

Since the initial release of the MMUCC Guideline in 1998, NHTSA and GHSA have revised MMUCC four times in response to technological changes and evolving traffic safety needs. Early editions of the MMUCC Guideline did not provide States with implementation guidance, resulting in each State adopting MMUCC differently. As States developed their own data collection guidelines regarding what crash data to collect, what is a reportable crash, and what data to maintain on their Crash Databases, the variance between States' crash data increased. In 2015, NHTSA published ["Mapping to MMUCC: A Process for Comparing Police Crash Reports and State Crash Databases to the Model Minimum Uniform Crash Criteria" \(DOT 812184\)](#), a set of rules to assist States in evaluating their alignment to MMUCC. In 2018 and again in 2020, NHTSA measured States' alignment to MMUCC and found that the national alignment to MMUCC is less than 50 percent, which begs the question, why?

Before embarking on the sixth edition of MMUCC, NHTSA seeks to examine the feasibility of collecting the data in MMUCC, to identify problematic data elements and factors that impede States from adopting MMUCC. Currently, MMUCC has 116 data elements, of which 77 data elements are collected by officers at the scene of the crash, and 39 are linked or derived from other State data bases (such as roadway inventory). NHTSA plans to survey law enforcement officers on 62 MMUCC data elements collected at the scene of a crash, for which national alignment is less than 50 percent. To reduce the burden on individual respondents, this will be done using two surveys, one of which has 30 data elements and a second with 32 data elements.

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.

2. Indicate how, by whom, and for what purpose the information will be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

The data collection is a two-step process. First, NHTSA will contact police chiefs within the 397 sampling units used by NHTSA's Crash Reporting Sampling System (CRSS) to request the nomination of four law enforcement officers in their department who collect crash data to participate in the study. Specifically, NHTSA is requesting the police chiefs to provide personally identifiable information (PII) about the nominated law enforcement officers, including names, contact information (email, phone number, and address) so that NHTSA can contact these officers to administer a survey on MMUCC data elements and arrange payment of an honorarium.

Second, NHTSA will send the officers who were nominated to participate in this study a unique link to an online survey, which will examine the feasibility of collecting the MMUCC crash data. The survey will collect limited information about each respondent including the State where they work as a law enforcement officer, the extent of their training for collecting crash data, and the number of years the respondents have completed crash reports. The surveys will collect information about respondents' beliefs and abilities to accurately collect crash data according to the MMUCC guidelines. The survey will ask respondents to rate the difficulty of accurately collecting specific MMUCC data elements, assess respondents' ability to collect information using MMUCC data elements for fictitious crash scenarios, and ask for suggestions on how MMUCC data elements can be improved. This information will allow NHTSA to understand law enforcement officers' beliefs and abilities to collect MMUCC data accurately and identify problematic data elements in MMUCC that officers cannot collect accurately or interpret differently. The results will be used to inform the expert panelists as they meet to deliberate the content of the next edition of MMUCC and a summary of this research will be published as an appendix to the next edition of MMUCC.

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.

NHTSA will hire a contractor to collect data from both sets of respondents, (police chiefs and law enforcement officers) using an online electronic survey. The contractor will ensure that any files with PII are secured and access is limited to authorized staff. Specifically, the information collected in the first phase from police chiefs will contain PII about the law enforcement officers nominated to participate in the survey on MMUCC.

In the second stage the contractor will send each nominated respondent a unique link to complete an online survey about MMUCC data elements. Online surveys are the most efficient mode for collecting and storing this information and tracking who completed the

survey to arrange payment. NHTSA estimates it will take the chiefs 10 minutes to complete and they will receive an honorarium for their participation. The target audience for the second data collection is law enforcement officers who collect crash data as part of their current job responsibilities. To reduce the respondent's burden, fatigue, and risk of uncompleted surveys, NHTSA is using two surveys, one of which has questions on a set of 30 data elements (Survey A) and a second with questions on a separate set of 32 data elements (Survey B). The NHTSA contractor will randomly assign two Survey As and two Survey Bs to the four respondents in each of the 397 police jurisdictions in our sample. NHTSA estimates it will take the officers one hour to complete the survey for which they will receive an honorarium. The data collected from the law enforcement officers, which NHTSA will analyze to identify problematic MMUCC data elements, will not contain any PII that can be traced back to an individual officer.

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.

The information that NHTSA seeks to collect is not duplicative and has not been collected by any existing means.

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

The proposed collection of information will be limited to law enforcement officers and will not impact small businesses or entities.

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

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.

There are no statutes or regulations requiring this collection. However, if NHTSA does not evaluate the feasibility of the data recommended by MMUCC, it jeopardizes NHTSA's goal of promoting crash data uniformity, and undermines efforts to economically analyze state crash data for NHTSA's CRSS, Fatality Analysis Reporting System (FARS), and the State Data Transfer (SDT) studies. Currently, NHTSA intends to collect the information to inform the sixth edition of MMUCC. New editions of MMUCC are published approximately every 5 years, and NHTSA may conduct similar studies in the future to inform those future editions.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

There are no special circumstances that would cause this collection to be collected in a manner inconsistent with 5 CFR 1320.5(d)(2).

a. requiring respondents to report information to the agency more often than quarterly;

This is a one-time collection. Respondents will only be asked to respond once.

b. requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;

This is a voluntary survey; therefore, NHTSA will not require respondents to respond in fewer than 30 days. However, after two weeks NHTSA will send participants who have not responded a reminder to complete the survey.

c. requiring respondents to submit more than an original and two copies of any document;

NHTSA will be conducting an online survey and will not ask respondents to submit any documents.

d. requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;

NHTSA will not require respondents to retain any records as part of this data collection. This is not applicable.

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;

This information collection is a statistical survey the details of which are explained in Part B.

f. requiring the use of a statistical data classification that has not been reviewed and approved by OMB;

This data collection is seeking OMB approval for its statistical methods.

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

This is not applicable for this information collection.

h. requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

This data collection does not require respondents to submit proprietary trade secrets or other confidential information.

- 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 March 29, 2022 (87 FR 18065), requesting comments on NHTSA's intention to request approval from the Office of Management and Budget (OMB) for a new information collection to survey a national sample of law enforcement officers on their knowledge and understanding of MMUCC. NHTSA received two comments on the 60-day notice. One organization, Trucking with the Schmitt's, asked about the expense of the data collection and recommended data to collect for crashes involving commercial motor vehicles. The National Association of Mutual Insurance Companies (NAMIC) wrote a letter in support of NHTSA's proposed collection of information, stating that the information collection is necessary and appropriate and that it believes that the information collected will have significant practical utility. In addition, NHTSA discussed plans for this survey at 2021 meeting with the Governors Highway Safety Association (GHSA) and at the 2021 Traffic Records Forum sponsored by the Association of Traffic Safety Information Professionals (ATSIP). Both GHSA and ATSIP support the goals of this study.

None of the comments necessitate a revision of the scope of the information collection or the estimates of the annual cost or burden hours. NHTSA notes that this information collection only seeks information to better understand why alignment to current MMUCC variables is low and how to improve alignment. Therefore, considering additional data variables regarding CMV is outside the scope of this ICR. NHTSA also notes that the estimated cost to the Federal government associated with this information collection is \$441,852.74.

NHTSA published a 30-day notice on August 29, 2022 requesting comment on NHTSA's intention to submit this ICR to OMB for approval (87 FR 52840, Pages 52840-52842).

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

In order to incentivize participation in the study, NHTSA will be paying each law enforcement officer and police chief \$100 for their participation. NHTSA has determined that providing compensation is critical for successfully recruiting officers to participate in this study and provide information necessary to determine the feasibility of collecting MMUCC data elements. NHTSA decided on a payment of \$100 because the agency determined that the incentive needed to be more than a law enforcement officer's overtime hourly rate in order to be effective.

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.

NHTSA will provide assurance to respondents of the survey that their answers will be anonymous and will only be analyzed in the aggregate. As described above, the information collection involves the collection of PII. NHTSA will hire a contractor to conduct the study and the contractor will be collecting PII to contact respondents and administer payments for participating in the survey. The contractor will ensure that any files with PII are secured, and access is limited to authorized staff. The names and addresses of police officers participating in the study will not be released.

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.

This study will not include any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

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

To calculate the hour burden and labor cost associated with submitting the *Evaluation of the Model Minimum Uniform Crash Criteria*, NHTSA looked at wage estimates for Front Line Supervisors of Police and Detectives and Police and Sheriff's Patrol Officers who complete crash forms. NHTSA estimates the total opportunity costs associated with these burden hours by looking at the average wage for (1) Front line Supervisors of Police and Detectives and (2) Police and Sheriff's Patrol Officers. The Bureau of Labor Statistics (BLS) estimates that the average hourly wage for Front line Supervisors of Police and Detectives (BLS Occupation Code 33-1012)² is \$46.72 and Police and Sheriff's Patrol Officers (BLS Occupation code 33-3051) is \$33.66.³ The Bureau of Labor Statistics estimates that wages represent 62.2 percent of total compensation for State and local government workers, on average.⁴ Therefore, NHTSA estimates the hourly labor costs to be \$75.11(\$46.72 / .622) for Supervisors of Police and Sheriff's Patrol Officers and \$54.12 (\$33.66 / .622) for Police and

² See May 2020 National Occupational Employment and Wage Estimates. National Estimates for First-Line Supervisors of Police and Detectives. Available at <https://www.bls.gov/oes/2020/may/oes331012.htm> (accessed July 1, 2021).

³ See May 2020 National Occupational Employment and Wage Estimates. National Estimates for Police and Sheriff's Patrol Officers. Available at <https://www.bls.gov/oes/2020/may/oes333051.htm> (accessed July 1, 2021).

⁴ . Employer Costs for Employee Compensation-March 2020, https://www.bls.gov/news.release/archives/ecec_06182020.pdf. Accessed 12/21/2021.

Sheriff's Patrol Officers. NHTSA estimates that it will take about 10 minutes (0.17 of an hour) for the police chiefs to nominate four law enforcement officers who investigate motor vehicle crashes, resulting in 67.49 (0.17 x 397) hours for 397 police chiefs. From pilot testing the survey instruments with six former law enforcement officers who work at NHTSA, the agency estimates that it will take the law enforcement officers one hour to complete the survey. Therefore, 1,588 hours for 1,588 law enforcement officers. NHTSA estimates the total hourly compensation cost for police chiefs to be \$5,069.17 ($\75.11×67.49 hours). NHTSA estimates the total hourly compensation cost for law enforcement officers to be \$85,942.56 ($\$54.12 \times 1,588$). Table 1 provides a summary of the estimated burden hours and labor costs associated with those respondents

Table 1: Burden Estimates

	Responses	Estimated Burden Per Response	Average Hourly Labor Cost	Labor Cost Per Response	Total Burden Hours	Total Labor Costs
Police Chiefs nomination of law enforcement officer for study participation	397	0.17 hour (10 minutes)	\$75.11	\$12.76	67.49	\$5,069.17
Survey of Law Enforcement Officers	1,588	1 hour	\$54.12	\$54.12	1,588.00	\$85,942.56
Total	1,985				1655.49	\$91,011.73

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

This collection is not expected to result in any increase in costs to respondents other than the opportunity cost associated with the burden hours. Both the police chiefs who will nominate respondents and the law enforcement officers completing the survey on MMUCC possess the information needed to complete each survey.

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.

Below is a table describing the estimated annualized costs to the Federal government to manage the data collection contractor, analyze the data, develop the survey sample, the cost of the honorarium to respondents, and the costs of the contractor to administer the survey.

Task	Cost
NHTSA estimates the annual staff time to manage the data collection contractor and analyze the data is 417 hours (5% of FTE). The hourly rate of a GS-13 Step 1 in Washington, D.C. is \$51.18 ⁵ . The Bureau of Labor Statistics estimates that wages represent 62.2 percent of total compensation for State and local government workers, on average. ⁶ Therefore, NHTSA estimates the total hourly compensation cost to be \$34,535.94 ($(\$51.18 / .622) \times 417$ hours).	\$34,535.94

⁵ Complete set of locality pay tables 2022, <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2022/salhlr1.pdf>. Accessed 03/11/2022.

⁶ . Employer Costs for Employee Compensation-March 2020, https://www.bls.gov/news.release/archives/ecec_06182020.pdf. Accessed 12/21/2021.

Task	Cost
The NHTSA staff time to develop survey sample was 80 hours. The hourly rate of a GS-14 Step 5 in Washington, D.C. is \$68.55 ⁷ . The Bureau of Labor Statistics estimates that wages represent 62.2 percent of total compensation for State and local government workers, on average. ⁸ Therefore, NHTSA estimates the total hourly compensation cost to be \$8,816.80 ((68.55/.622) x 80 hours).	\$8,816.80
NHTSA will provide a \$100 honorarium for each Police Chief (N=397) and law enforcement officer (N=1,588). \$100 multiplied by 1,985 participants is equal to \$198,500.00.	\$198,500.00
Estimated Contractor cost for data collection	\$200,000.00
Total annualized costs to the Federal government.	\$441,852.74

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

This is a new collection. Therefore, the entire burden cost and number of burden hours represents a program change. The program change is adding 1,655 burden hours into NHTSA's overall total for this new collection.

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

NHTSA plans to begin collecting information in June 2022 and continue to January 2023. The aggregate results from this data collection will be discussed in the sixth edition of the Model Minimum Uniform Crash Criteria in 2024 to justify any changes. The sixth edition of the MMUCC Guideline will be published on the NHTSA website.

- 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 on the electronic forms used in this data collection effort.

⁷ Complete set of locality pay tables 2022, <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2022/salhlrl.pdf>. Accessed 03/11/2022.

⁸ . Employer Costs for Employee Compensation-March 2020, https://www.bls.gov/news.release/archives/ecec_06182020.pdf. Accessed 12/21/2021.

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 1320.9.⁹

There are no exceptions to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions" found at 5 CFR 1320.9.

NHTSA's online surveys to police chiefs and law enforcement officers will contain the following statement:

"This collection of information is voluntary and will be used to identify problematic crash data elements, and concepts in MMUCC. 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 XXXXX. Public reporting for this collection of information is estimated to be approximately 60 minutes per response, including the time for reviewing instructions, completing and reviewing the collection of information. All responses to this collection of information are voluntary. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to: Information Collection Clearance Officer, National Highway Traffic Safety Administration, 1200 New Jersey Ave, S.E., Washington, DC, 20590."

⁹ 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.