

**Department of Transportation  
Federal Motor Carrier Safety Administration**

**SUPPORTING STATEMENT**

**Crash Causal Factors Program: Knowledge of Systems and Processes**

**SUMMARY**

This information collection (IC) includes four component ICs. After publishing the 60-day Federal Register notice for this information collection request (ICR), the Federal Motor Carrier Safety Administration (FMCSA) revised the survey protocols associated with each IC, based on subject matter expert input. The Agency also reduced the number of local jurisdictions to include in the IC, based on historical commercial motor vehicle (CMV) crash data. As a result, the annual respondents and the burden estimates in the 30-day Federal Register notice and this supporting statement are lower than what was published in the 60-day Federal Register notice.

Each of the four component ICs has a specific focus, as follows:

- IC-1: Identifying Points of Contact
- IC-2: Sample Design; Partnerships and Coordination
- IC-3: Crash Data Collection
- IC-4: CMV Enforcement Resources and Funding

IC-1 includes a web-based survey that will be administered by FMCSA Division Administrators (DAs) for the purpose of identifying the appropriate contacts who can respond to the survey questions in IC-2, IC-3, and IC-4. Some FMCSA DAs will also be asked to obtain contact information for select local jurisdictions via an Excel spreadsheet, which will be hosted on a secure FMCSA SharePoint site. The web-based survey for IC-1 is provided in Attachment E. An example Excel spreadsheet for local jurisdiction contact information is provided in Attachment J.

IC-2, IC-3, and IC-4 consist of a series of web-based surveys focused on specific topic areas. FMCSA will distribute these surveys to the appropriate contacts identified in IC-1. Several of the surveys include requests for supporting documents (e.g., written data collection policies, data dictionaries, etc.). Document requests will be sent via email to appropriate contacts. The surveys for IC-2, IC-3, and IC-4 are provided in Attachments F, G, and H, respectively. The document request emails are provided in Attachment I.

**INTRODUCTION**

FMCSA is requesting the Office of Management and Budget's (OMB) approval for the IC titled "Crash Causal Factors Program: Knowledge of Systems and Processes" (OMB Control No. 2126-00XX). This is a new ICR.

**Part A. Justification**

**1. CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY**

On December 27, 2020, the Consolidated Appropriations Act, 2021 (Public Law No: 116-260; see Attachment A), was signed into law, appropriating \$30 million to FMCSA to “carry out [a] study of the cause[s] of large truck crashes.” On November 14, 2021, the President signed into law the Infrastructure Investment and Jobs Act (IIJA, Public Law No: 117-58; see Attachment B), which contains requirements for a larger study under Section 23006, “Study of Commercial Motor Vehicle Crash Causation.” The requirements under Section 23006 define the scope of the study to include all CMVs as defined in 49 U.S.C. Section 31132 (see Attachment C).

Section 23006(b)(1) of the IIJA requires the Secretary to “carry out a comprehensive study to determine the causes of, and contributing factors to, crashes that involve a commercial motor vehicle.” Section 23006(b)(2) further requires the Secretary to:

- A. Identify data requirements, data collection procedures, reports, and any other measures that can be used to improve the ability of States and the Secretary to evaluate future crashes involving commercial motor vehicles;
- B. Monitor crash trends and identify causes and contributing factors; and
- C. Develop effective safety improvement policies and programs.

To meet the requirements of Section 23006, FMCSA is establishing a CMV Crash Causal Factors Program. Through this program, FMCSA will execute a multi-phased CMV Crash Causal Factors Study, with Phase 1 focused on fatal crashes involving Class 7/8 large trucks. This Phase 1 effort is referred to as the Large Truck Crash Causal Factors Study (LTCCFS) throughout this document. Future phases of the study will focus on different CMV populations (such as medium-duty trucks) or crash severities (i.e., serious injury crashes).

To plan and execute this study, FMCSA must collect information from the States and local jurisdictions to understand their ability to participate in the study; existing crash data collection processes, systems, and resources; and CMV enforcement funding mechanisms and sources. This IC will help the Agency understand what necessary study data are already being collected by the States. Where possible, the Agency plans to leverage these already-collected study data in the LTCCFS and future study phases, to reduce duplicative collection of data and associated costs.

This IC will focus on identifying and documenting States’ and local jurisdictions’ ability to participate in the study, agreements that the States or jurisdictions will require to participate in the study, existing crash data collection processes, systems, training, and quality control processes, and CMV enforcement funding mechanisms and sources. Collected information will inform various elements of the study plan, including the sample design, data collection plans, participation agreements, resourcing plans, and development of the study database.

Congress anticipated that FMCSA would need to consult with the States and a variety of other experts when planning and executing the study, as noted in Section 23006(d), which reads: “In designing and carrying out the study, the Secretary may consult with individuals or entities with expertise on—

- 1. Crash causation and prevention;
- 2. Commercial motor vehicles, commercial drivers, and motor carriers, including

- passenger carriers;
3. Highways and noncommercial motor vehicles and drivers;
  4. Federal and State highway and motor carrier safety programs;
  5. Research methods and statistical analysis; and
  6. Other relevant topics, as determined by the Secretary.”

The ICs described in this statement will collect data from Federal and State (and local) highway and motor carrier safety programs.

Study findings will ultimately inform the identification and development of countermeasures to prevent crashes involving CMVs. As part of the CMV Crash Causal Factors Program, this IC supports the DOT Strategic Goal of Safety.

## **2. HOW, BY WHOM, AND FOR WHAT PURPOSE IS THE INFORMATION USED**

FMCSA has established an agreement with the USDOT Volpe Center to collect the majority of the information associated with this ICR. Under FMCSA guidance, trained Volpe Center support staff will administer the web-based surveys for each IC and analyze the collected information.

With analytical support from the Volpe Center, FMCSA will use collected information from four ICs:

- IC-1: Identifying Points of Contact
- IC-2: Sample Design; Partnerships and Coordination
- IC-3: Crash Data Collection
- IC-4: CMV Enforcement Resources and Funding

Information collected under these four ICs will inform various elements of the study plan, including the sample design, data collection plans, participation agreements, resourcing plans, and development of the study database.<sup>1</sup>

Before collecting information for ICs 2, 3, and 4, FMCSA will first need to conduct IC-1, to identify the appropriate points of contact in each State/jurisdiction for the remaining IC components. FMCSA will approach select representatives from each State to obtain the correct points of contact. Once FMCSA obtains contact information from the States, the Agency will distribute a web-based survey for each remaining IC component to the relevant point of contact in each State or jurisdiction. Table 1 summarizes the key IC components for IC-2, IC-3, and IC-4, with example questions and a description of how the information will be used.

---

<sup>1</sup> There are multiple web-based surveys associated with each of the ICs described in this document. Attachment K (a spreadsheet) maps out the various web-based surveys, document requests, and respondent categories for each IC.

**Table 1. How FMCSA will use collected information, by IC component.**

IC Component	Example Questions	How the Information Will Be Used
<b>IC-1: Identifying Points of Contact</b>		
1.1 Identify points of contact for ICs 2, 3, and 4	<ul style="list-style-type: none"> <li>• Who are the best points of contact in your State to provide information on State police crash report data quality review processes?</li> <li>• At the State level, who can make decisions about participating in a Federal research study, such as the LTCCFS?</li> </ul>	Points of contact provided under IC-1 will be used to identify respondents for ICs 2, 3, and 4.
<b>IC-2: Sample Design; Partnerships and Coordination</b>		
2.1 Study Participation	<ul style="list-style-type: none"> <li>• What challenges, if any, would your State need to overcome to participate in this study?</li> </ul>	Sample design—identify candidate jurisdictions for inclusion in a nationally representative sample
2.2 Agreements	<ul style="list-style-type: none"> <li>• If your agency were to participate in the LTCCFS, what data sharing or other agreements would your State require to participate?</li> </ul>	Study agreements—identify required agreements, understand need for legal support, reviews
<b>IC-3: Crash Data Collection</b>		
3.1 Crash Notification Processes	<ul style="list-style-type: none"> <li>• How does your agency currently notify post-crash inspectors of fatal crashes involving a Class 7/8 large truck?</li> <li>• If your agency were to participate in the LTCCFS, could your agency change or enhance its crash notification processes to notify post-crash inspectors of all (or nearly all) fatal crashes involving a Class 7/8 large truck?</li> </ul>	Study notification processes—determine whether FMCSA can leverage existing notification processes or whether the Agency will need to develop new processes
3.2 Crash Data Collection System(s)	<ul style="list-style-type: none"> <li>• Does your State have an electronic crash data repository for police crash reports?</li> <li>• Does your State upload CMV supplemental forms to the State crash data repository?</li> <li>• How does your agency store crash reconstruction data?</li> </ul>	Study database development—understand when and how FMCSA can obtain crash data that States are already collecting for in-scope crashes

IC Component	Example Questions	How the Information Will Be Used
3.3 Post-Crash Inspection Data Elements	<ul style="list-style-type: none"> <li>• Does your agency collect additional post-crash inspection data for fatal crashes involving at least one Class 7/8 large truck — beyond what is sent to the Motor Carrier Management Information System?</li> <li>• If your agency participates in the LTCCFS, would your agency be willing to collect additional post-crash inspection data—beyond what you already collect—for fatal crashes involving at least one Class 7/8 large truck?</li> </ul>	Study database development—understand when, how, and in what format FMCSA can obtain crash data that States are already collecting for in-scope crashes
3.4 Crash Data Collection Training	<ul style="list-style-type: none"> <li>• Does your agency provide advanced post-crash inspection training for CMV crashes?</li> <li>• Does your agency provide CMV crash reconstruction training?</li> </ul>	Data collector training plan—understand what data collection training States are already conducting, what additional data collection training FMCSA will need to provide as part of the study
3.5 Data Quality	<ul style="list-style-type: none"> <li>• Is your State’s police crash report data quality review process electronic, manual, or a combination of the two?</li> <li>• When does your State conduct post-crash inspection data quality reviews?</li> </ul>	Data quality control plan—understand States’ existing data quality review processes, determine whether, when, and to what extent FMCSA needs to conduct additional data quality reviews and with what resources
<b>IC-4: CMV Enforcement Resources and Funding</b>		
4.1 CMV Enforcement Resources and Policies	<ul style="list-style-type: none"> <li>• Which entities in your State are involved in collecting CMV crash data for police crash reports?</li> <li>• To what severities of CMV crashes are post-crash investigators dispatched?</li> <li>• Does your agency have an established crash reconstruction team?</li> </ul>	Resourcing plans—understand what resources are already collecting study data, what additional resources will be required to meet study data collection needs
4.2 CMV Enforcement Grant Funding	<ul style="list-style-type: none"> <li>• Does your State have regulations and/or policies regarding which agencies can or cannot conduct North American Standard (NAS) Level I inspections, including post-crash inspections?</li> <li>• Does your State allow sub-grantees to receive MCSAP grant funding?</li> </ul>	<p>Sample design and resourcing plans—determine whether there is a mechanism for the jurisdiction (if not the lead MCSAP agency) to receive study funding through FMCSA’s grant programs</p> <p>Data collection plan—understand what resources can collect relevant study data in each State</p>

Below are additional details on how FMCSA will use collected information to develop various study plan elements.

### **Sample Design; Partnerships and Coordination**

The original Large Truck Crash Causation Study (LTCCS) conducted from 2001-2003 leveraged the sample design from the National Highway Traffic Safety Administration's (NHTSA's) National Automotive Sampling System (NASS) Crashworthiness Data System (CDS). NHTSA has since developed a new Crash Investigation Sampling System (CISS), which replaces NASS CDS.<sup>2</sup> Both NASS CDS and CISS are focused on crashes involving passenger vehicles (i.e., passenger cars, light trucks, vans, and utility vehicles). Neither sampling system was designed to collect data on a representative sample of crashes involving CMVs. NHTSA acknowledged this in its 2019 sample design and weighting documentation for CISS,<sup>3</sup> stating in a discussion on special crash populations, "The most efficient way to study a rare population is to design a special study that solely targets that particular rare population." As a result, FMCSA is planning to develop a new sample design specific to crashes involving CMVs. However, FMCSA cannot simply select a random sample of State and local jurisdictions to include in the sample design. The Agency will need to identify an appropriate mix of State and local jurisdictions to allow for a nationally representative sample design.

For the nationally representative LTCCFS sample design, FMCSA will focus primarily on fatal crashes that involve at least one Class 7/8 large truck (although the Agency will include serious injury crashes, when possible, as part of a separate convenience sample). The Agency is referring to fatal crashes involving at least one Class 7/8 large truck as "qualifying crashes," for study purposes. FMCSA plans to include a representative sample of States and local jurisdictions in the LTCCFS. A criterion for inclusion in the study is occurrence of qualifying crashes within a jurisdiction. FMCSA analyzed three years of Motor Carrier Management Information System (MCMIS) crash data (for calendar years 2019-2021), to identify local jurisdictions reporting an average of at least six crashes per year involving (1) a CMV with a gross vehicle weight rating of at least 26,000 pounds and (2) at least one fatality. The Agency identified 27 local jurisdictions in 13 States that meet these criteria. To limit the burden to local agencies for this IC, FMCSA will only survey local jurisdictions that meet these criteria. The Agency will survey all 50 States and the District of Columbia, at the State level.

States and local jurisdictions selected for inclusion in the LTCCFS will be asked to collect and share the required study data and troubleshoot study-related issues as they arise. The information collected under IC-2 will inform the sample design for this study. It will also provide important information about State- or jurisdiction-required participation agreements, which will have an impact on FMCSA legal and/or IT resources, as each agreement will require legal review, and some agreements (e.g., data sharing agreements) may require IT reviews.

---

<sup>2</sup> NHTSA, Crash Investigation Sampling System: Motor Vehicle Crash Data Collection, accessed July 5, 2022 at <https://www.nhtsa.gov/crash-data-systems/crash-investigation-sampling-system>

<sup>3</sup> Zhang, F., Noh, E. Y., Subramanian, R., & Chen, C.-L. (2019, September). *Crash Investigation Sampling System: Sample Design and Weighting* (Report No. DOT HS 812 804). Washington, DC: National Highway Traffic Safety Administration. Accessed July 5, 2022 at <https://crashstats.nhtsa.dot.gov/Api/Public/Publication/812804>

## Data Collection Plans

FMCSA is planning to leverage existing State and local jurisdiction resources (where possible) to collect required study data. This will be a complex effort that will require substantial information sharing and coordination between participating States/jurisdictions and FMCSA.

Under IC-3, FMCSA will seek to learn more about the data elements that State and local jurisdictions are already collecting; State and local jurisdiction CMV crash reporting criteria and notification processes; State and local jurisdiction crash data collection systems and processes (e.g., what systems exist, who owns the system(s), what data sharing mechanisms exist, etc.); existing crash data collection trainings offered by the State/jurisdiction; existing State/jurisdiction crash data collection tools; and crash data quality reviews that States and local jurisdictions currently conduct. Additional details on how FMCSA will use the data collected under IC-3 are provided below.

- **Data elements.** To lessen the burden for participating States and jurisdictions, the Agency is planning to identify required study data elements that enforcement resources are already collecting for in-scope crashes (e.g., direction of travel of vehicles involved, posted speed limit in the crash area, whether there were workers on the road in a crash that occurred in a work zone, etc.) and incorporate those data elements into a study database rather than require an additional resource to be on-scene to fill out a separate data collection form for each eligible crash. Once FMCSA has an understanding of the data consistently collected by State and local jurisdictions, the Agency can develop supplementary study forms for capturing necessary data not already captured in routine crash data collection.
- **CMV crash reporting criteria and notification processes.** CMV crash reporting criteria (i.e., which crashes CMV enforcement officers must report to) vary by State and jurisdiction, as do crash notification processes. To ensure participating States and jurisdictions collect sufficient study data, the Agency must identify or develop an effective notification process with clear CMV crash reporting criteria. Information collected under IC-3 will inform this effort.
- **Crash data collection processes and systems.** Obtaining and processing information on State- and jurisdiction-specific crash data collection systems and processes to inform study database plans will be challenging, as crash data collection systems and processes can vary widely across the States and local jurisdictions. Information collected under IC-3 will inform the Agency on how existing State/jurisdiction data can be incorporated into a study database. If it is possible, the IC will help the Agency design a database that interfaces with State and local jurisdiction systems, collecting the relevant data for in-scope crashes. If it is not possible, the IC will help the Agency develop a comprehensive study data collection form that feeds into a study database that does not interface with State or jurisdiction systems.
- **Study training plans.** Data collectors for the study will require training to ensure they understand what data elements are required, how to report certain data elements,

where to go for technical support, etc. Some State and local jurisdictions offer data collection training to enforcement officers. The Agency is seeking information from the States/jurisdictions on the existing data collection training programs that they offer, to inform training development and to identify opportunities to sync or streamline training efforts.

- **Quality review plans.** FMCSA will be developing a quality review plan for collected study data. To inform that plan, the Agency needs to understand what quality reviews States already conduct on their crash data, and when. Collected quality review information will help the Agency determine when to conduct quality reviews on collected study data, and to what extent.

### **CMV Enforcement Resources and Funding**

FMCSA must collect information from States and local jurisdictions to understand whether existing commercial vehicle enforcement resources can meet the study needs, and if not, to determine how much additional funding or resources jurisdictions will require to collect the necessary data. IC-4 will identify available CMV enforcement resources within States/jurisdictions, funding sources for existing commercial vehicle enforcement resources and activities (e.g., State-funded versus FMCSA grant-funded), and whether there is a mechanism for the local jurisdiction to receive study funding through FMCSA's grant programs (i.e., as a sub-grantee). Information collected under IC-4 will also inform FMCSA resourcing plans outside of the States/jurisdictions (e.g., whether the Agency will need to hire third-party interviewers to interview involved drivers, motor carriers, and witnesses).

### **3. EXTENT OF AUTOMATED INFORMATION COLLECTION**

FMCSA resources will collect the required information from IC-1 respondents via email or phone, then transfer that information into a web-based survey tool and/or Excel spreadsheet. For ICs 2, 3, and 4, FMCSA will leverage a web-based survey tool combined with email (for select respondents) to collect information. FMCSA believes that all respondents will have State or local Government-provided IT equipment (e.g., laptops, mobile devices, etc.) and internet access; as such, the Agency believes electronic submissions will be most cost-effective and efficient for respondents (as opposed to mail-based submissions or some other means). FMCSA estimates that 100% of submissions will be electronic.

### **4. EFFORTS TO IDENTIFY DUPLICATION**

Some information that FMCSA requires is available from other sources. Specifically, FMCSA will be able to obtain crash data collection manuals, crash data collection forms, data dictionaries, and crash reconstruction policies for some States from the Commercial Vehicle Safety Alliance (CVSA) and NHTSA. However, CVSA and NHTSA do not have detailed information on State or local jurisdiction CMV-specific crash data collection processes, systems, or data elements, and they cannot speak for the States or jurisdictions regarding ability to participate in the study, availability of CMV enforcement resources to collect study data, etc.



The ICs described in this statement will help the Agency understand what necessary study data are already being collected by the States. If possible, the Agency may be able to leverage these already-collected study data, potentially reducing duplicative collection of data and associated costs.

## **5. EFFORTS TO MINIMIZE THE BURDEN ON SMALL BUSINESSES**

The ICs described in this statement will not impact any small businesses. FMCSA will be collecting information from State and local jurisdictions responsible for investigating or reconstructing crashes involving CMVs.

## **6. IMPACT OF LESS FREQUENT COLLECTION OF INFORMATION**

Each IC will be conducted once ahead of each phase of the CMV Crash Causal Factors Study (only in year 1 of the current ICR).

Failure to conduct these ICs at the planned frequency could negatively impact the Agency's study data collection effort. IC-1 and IC-2 will inform the study sample design and development of agreements with States and local jurisdictions. FMCSA requires information from the States and jurisdictions, including ability to participate in the study, to develop a representative sample design. IC-3 and IC-4 will inform data collection, resourcing, and study database development plans. The Agency requires accurate, up-to-date information on States' crash data collection processes and systems for various crash types, to inform study sample design, data collection and analysis plans, and development/revision of the study database.

## **7. SPECIAL CIRCUMSTANCES**

There are no special circumstances associated with this IC.

## **8. COMPLIANCE WITH 5 CFR 1320.8:**

A 60-day Federal Register notice was published on December 27, 2022 (87 FR 79419). It announced FMCSA's intent to submit this ICR to OMB for approval and requested comments from the public for 60 days. FMCSA received six comments, two of which were unrelated to this ICR request or the LTCCFS. Below are summaries of the four relevant comments received, along with FMCSA's responses.

*Eric Hein (two comments)*

Eric Hein submitted two comments. The first comment included (1) a letter that discussed underreporting of fatal side underride crashes in NHTSA's Fatality Analysis Reporting System (FARS) and requested inclusion of side underride guard research in the Large Truck Crash Causal Factors Study, and (2) a report examining underreporting of side underride crashes in FARS. The second comment included revised versions of the letter and report that Mr. Hein had submitted earlier in the comment period.

*Agency Response:* Mr. Hein's comments are not related to the proposed IC, but they are

relevant to the LTCCFS in general. While the Agency cannot predict what types of crashes will occur in study locations during the data collection period, if side underride crashes do occur, FMCSA plans to collect relevant data to enable detailed analysis of such crashes. Before collecting crash data for the study, FMCSA will issue a separate 60-day notice announcing the proposed IC and requesting comments from the public. FMCSA invites Mr. Hein to submit additional comments at that time.

#### *Industry Associations (two comments)*

The American Trucking Associations (ATA) submitted a letter expressing support for the proposed IC, along with a copy of the comments they submitted in response to FMCSA's request for information (RFI) on the LTCCFS, published January 15, 2020 (85 FR 2481-2483).

The Owner-Operator Independent Drivers Association (OOIDA) submitted a letter that 1) expressed support for the proposed IC, and 2) reiterated several comments the association had previously submitted in response to FMCSA's January 2020 RFI on the LTCCFS.

*Agency Response:* FMCSA acknowledges and appreciates ATA's and OOIDA's support of the proposed IC and the LTCCFS. The Agency previously reviewed ATA's and OOIDA's comments on the January 2020 RFI and has taken those comments, along with all other comments received on the docket for that RFI, into consideration during the study planning process. The Agency will take ATA's and OOIDA's comments into consideration when developing the crash data collection ICR.

## **9. PAYMENTS OR GIFTS TO RESPONDENTS**

There are no payments or gifts to respondents for this IC.

## **10. ASSURANCE OF CONFIDENTIALITY**

None of the information collected will be confidential.

## **11. JUSTIFICATION FOR COLLECTION OF SENSITIVE INFORMATION**

There are no questions of a sensitive nature.

## **12. ESTIMATE OF BURDEN HOURS FOR INFORMATION REQUESTED**

As described in the response to Item 2, there are four ICs associated with this ICR:

- IC-1: Identifying Points of Contact
- IC-2: Sample Design; Partnerships and Coordination
- IC-3: Crash Data Collection
- IC-4: CMV Enforcement Resources and Funding

FMCSA met with representatives from three States (Arizona, New Mexico, and Maine) to inform these burden estimates. During these meetings, representatives provided information

on what resources within the State (to include titles and/or labor categories) would be able to provide information on the IC components summarized in Table 1. The burden estimates below are based on the outputs of these discussions with the States, as well as subject matter expert input from FMCSA Division Administrators. Because there is some variation within the States, FMCSA erred conservatively (i.e., towards higher burden) when developing these burden estimates.

The number of anticipated respondents per IC are shown in Table 2.

**Table 2. Number of respondents by IC and year of collection.**

<b>IC Sub-Component / Sub-Component Grouping</b>	<b>Year 1</b>	<b>Year 2</b>	<b>Year 3</b>	<b>Annual Average</b>
IC-1: Identifying Points of Contact	153	n/a	n/a	51
<b>IC-1 Total</b>	<b>153</b>	n/a	n/a	<b>51</b>
IC-2: Sample Design; Partnerships and Coordination	414	n/a	n/a	138
<b>IC-2 Total</b>	<b>414</b>	n/a	n/a	<b>138</b>
3.1 Crash Notification Processes	78	n/a	n/a	26
3.2.1 Crash Data Collection System(s): Police Crash Reports	78	n/a	n/a	26
3.2.2 Crash Data Collection Systems: Post-Crash Investigations and Crash Reconstructions	78	n/a	n/a	26
3.3 Post-Crash Inspection Data Elements				
3.4.1 Crash Data Collection Training: Post-Crash Inspections	78	n/a	n/a	26
3.4.2 Crash Data Collection Training: Post-Crash Investigations and Crash Reconstructions	78	n/a	n/a	26
3.5.1 Data Quality: Police Crash Reports	78	n/a	n/a	26
3.5.2 Data Quality: Post-Crash Inspections	78	n/a	n/a	26
3.5.3 Data Quality: Post-Crash Investigations and Crash Reconstructions	78	n/a	n/a	26
<b>IC-3 Total</b>	<b>624</b>	n/a	n/a	<b>208</b>
4.1 Agency Participation in Enforcement Activities and Related Policies: <ul style="list-style-type: none"> <li>• 4.1.1 Police Crash Reports</li> <li>• 4.1.2 Post-Crash Inspections</li> <li>• 4.1.3 Agency Involvement and Funding Sources</li> </ul>				
4.2 Use of MCSAP Funding	51	n/a	n/a	17
4.1 Agency Participation in Enforcement Activities and Related Policies: <ul style="list-style-type: none"> <li>• 4.1.4 Post-Crash Investigations</li> <li>• 4.1.5 Reconstructions</li> <li>• 4.1.6 Crash Reconstruction Team(s)</li> </ul>				
4.1.7 Impairment Detection	78	n/a	n/a	26
<b>IC-4 Total</b>	<b>129</b>	n/a	n/a	<b>43</b>
<b>Total (All ICs)</b>	<b>1,320</b>	n/a	n/a	<b>440</b>

**Note:** After publishing the 60-day Federal Register notice for this ICR, FMCSA revised the survey protocols associated with each IC, based on subject matter expert input. The Agency also reduced the number of local jurisdictions to collect information from, based on historical CMV crash data. As a result, the annual respondents and the burden estimates in the 30-day Federal Register notice and this supporting statement are lower than what was published in

the 60-day Federal Register notice.

**IC-1: Identifying Points of Contact**

To conduct ICs 2, 3, and 4, the Agency must identify relevant points of contact within each surveyed State (to include all 50 States and the District of Columbia) and select local jurisdictions.<sup>1</sup> IC-1, which will be repeated once for each study phase (only in year 1 of the current ICR), will focus on identifying these points of contact for each of the IC sub-components summarized in Table 1. Based on discussions with three different States, FMCSA expects it will be able to obtain the required contact information from the State Crash Records Manager, the State MCSAP Coordinator, and a supervisory-level law enforcement representative from the State’s DPS or equivalent.<sup>2</sup> Table 3 summarizes which State representatives will be asked to provide contact information for each IC sub-component.

**Table 3. State representatives who will be asked to provide contact information, by IC sub-component.**

IC Component	Who Can Provide Contact Information
<b>IC-2: Sample Design; Partnerships and Coordination</b>	
2.1 Study Participation	Supervisory-level DPS representative
2.2 Agreements	Supervisory-level DPS representative
<b>IC-3: Crash Data Collection</b>	
3.1 Crash Notification Processes	Supervisory-level DPS representative
3.2 Crash Data Collection System(s)	State Crash Records Manager
3.3 Post-Crash Inspection Data Elements	State Crash Records Manager
3.4 Crash Data Collection Training	State Crash Records Manager
3.5 Data Quality	State Crash Records Manager
<b>IC-4: CMV Enforcement Resources and Funding</b>	
4.1 Agency Participation in Enforcement Activities and Related Policies	State MCSAP Coordinator
4.2 Use of MCSAP Funding	State MCSAP Coordinator

FMCSA estimates it will take each State Crash Records Manager, State MCSAP Coordinator, and supervisory-level DPS representative approximately 2 hours (average) to provide the requested information, as follows:

- 15 minutes reviewing the information request with FMCSA.

<sup>1</sup> The Agency is referring to fatal crashes involving at least one Class 7/8 large truck as “qualifying crashes,” for study purposes. FMCSA plans to include a representative sample of States and local jurisdictions in the LTCCFS. A criterion for inclusion in the study is occurrence of qualifying crashes within a jurisdiction. FMCSA analyzed three years of MCMIS crash data (for calendar years 2019-2021), to identify local jurisdictions reporting an average of at least six crashes per year involving (1) a CMV with a gross vehicle weight rating of at least 26,000 pounds and (2) at least one fatality. The Agency identified 27 local jurisdictions in 13 States that meet these criteria. To limit the burden to local agencies for this IC, FMCSA will only survey local jurisdictions that meet these criteria.

<sup>2</sup> FMCSA staff will be reaching out to State representatives via email or phone to obtain contact information. State representatives will provide requested contact information via email, and FMCSA staff will enter the provided contact information into a survey tool (for States) or an Excel spreadsheet (for select local jurisdictions). The survey protocol that FMCSA staff will populate for IC-1 is included as Attachment E. An example Excel spreadsheet that FMCSA staff will populate for select local jurisdictions is included as Attachment J.

- 1.5 hours searching directories and verifying contacts (this may involve contacting others/waiting for responses).
- 15 minutes copying/pasting and/or forwarding information (via email).

As noted above, FMCSA expects to contact three representatives from each State and the District of Columbia to obtain the necessary information for IC-1, for a total of 153 respondents (50 States + the District of Columbia = 51 \* 3 = 153 representatives). The Agency estimates that each of these representatives will spend approximately 2 hours providing the requested information. For year 1, FMCSA estimates a burden of 306 hours (153 representatives \* 2 hours = 306 hours). The Agency does not anticipate repeating IC-1 in year 2 or year 3, as the LTCCFS (phase 1 of the overarching CMV Crash Causal Factors Study) will still be underway at the time. The Agency will repeat IC-1 to support phase 2 of the CMV Crash Causal Factors Study, following a future renewal of this ICR. Table 4 summarizes the estimated annualized burden for State representatives who will be asked to provide information for IC-1.

**Table 4. Estimated annualized burden for State representatives (IC-1).**

Year	States Contacted (a)	Respondents per State (b)	Number of Responses per Respondent (c)	Estimated Number of Respondents (a*b = d)	Estimated Number of Responses a(b*c) = e	Hours per Task (f)	Burden Hours (e*f)
1	51	3	1	153	153	2	306
2	0	0	0	0	0	N/A	0
3	0	0	0	0	0	N/A	0
<b>Annual Average</b>	-	-	-	<b>51</b>	<b>51</b>	-	<b>102</b>
<b>Totals</b>	-	-	-	<b>153</b>	<b>153</b>	-	<b>306</b>

Given the assumptions noted above regarding how frequently FMCSA will repeat this IC and how long it will take respondents to provide the requested information, the Agency estimates the following burden for the identified State representatives:

- Identification of points of contact and submission of contact information for the IC sub-components summarized in Table 3 is estimated to result in 102 average annual burden hours (51 average respondents per year \* 2 hours per response = 102 burden hours).

For the purposes of estimating costs associated with the annual burden, we assume that respondent occupations correspond to the following Bureau of Labor Statistics (BLS) Occupation Codes:

- State Crash Records Managers correspond to BLS Occupation Code 11-3021, Computer and Information Systems Managers. The median hourly wage of Computer and Information Systems Managers in the State Government, excluding schools and hospitals industry (NAICS code 999200) is \$52.61.<sup>3</sup>

<sup>3</sup> U.S. Department of Labor (DOL), Bureau of Labor Statistics (BLS). "Occupational Employment Statistics (OES). National. May 2021. National Industry-Specific Occupational Employment and Wage Estimates. NAICS 999200

- State MCSAP Coordinators correspond to BLS Occupation Code 33-3051, Police and Sheriff’s Patrol Officers. The median hourly wage of Police and Sheriff’s Patrol Officers in the State Government, excluding schools and hospitals industry (NAICS code 999200) is \$37.66.<sup>4</sup>
- Supervisory-level DPS representatives correspond to BLS Occupation Code 33-1012, First-Line Supervisors of Police and Detectives. The median hourly wage of First-Line Supervisors of Police and Detectives in the State Government, excluding schools and hospitals industry (NAICS code 999200) is \$48.74.<sup>5</sup>

To arrive at a loaded wage, FMCSA takes the cost of *total compensation* (\$54.05) per hour and divides by the cost of only *wages and salary* per hour (\$31.18) in the *Employer Costs for Employee Compensation (ECEC)* June 2022 data release.<sup>6</sup> This results in a load rate of 1.73 ( $\$54.05 / \$31.18 = 1.73$ ). The loaded hourly wages for IC-1 respondents are as follows:

- State Crash Records Managers: \$52.61 (median hourly wage) \* 1.73 (load rate) = \$91.02.
- State MCSAP Coordinators: \$37.66 (median hourly wage) \* 1.73 (load rate) = \$65.15.
- Supervisory-level DPS representatives: \$48.74 (median hourly wage) \* 1.73 (load rate) = \$84.32.

The average annual burden is estimated at 102 hours. Divided evenly across the three respondent types, we arrive at 34 burden hours per respondent type (102 hours / 3 respondent types = 34 hours per respondent type). Applying the fully loaded hourly wages described above to these burden hour estimates results in the following estimated annual costs to respondents:

- State Crash Records Managers: 34 annual burden hours \* \$91.02 = \$3,094.68
- State MCSAP Coordinators: 34 annual burden hours \* \$65.15 = \$2,215.10
- Supervisory-level DPS representatives: 34 annual burden hours \* \$84.32 = \$2,866.88

This results in a total annual burden of \$8,176.66 for IC-1 (\$3,094.68 for State Crash Records Managers + \$2,215.10 for State MCSAP Coordinators + \$2,866.88 for supervisory-level DPS representatives = \$8,176.66).

### ***IC-1 Summary***

Estimated Average Annual Burden Hours: 102

---

(State Government, excluding schools and hospitals industry).” Available at [https://www.bls.gov/oes/current/naics4\\_999200.htm](https://www.bls.gov/oes/current/naics4_999200.htm) (accessed September 26, 2022).

<sup>4</sup> DOL, BLS. “Occupational Employment Statistics (OES). National. May 2021. National Industry-Specific Occupational Employment and Wage Estimates. NAICS 999200 (State Government, excluding schools and hospitals industry).” Available at [https://www.bls.gov/oes/current/naics4\\_999200.htm](https://www.bls.gov/oes/current/naics4_999200.htm) (accessed September 26, 2022).

<sup>5</sup> DOL, BLS. “OES. National. May 2021. National Industry-Specific Occupational Employment and Wage Estimates. NAICS 999200 (State Government, excluding schools and hospitals industry).” Available at [https://www.bls.gov/oes/current/naics4\\_999200.htm](https://www.bls.gov/oes/current/naics4_999200.htm) (accessed September 26, 2022).

<sup>6</sup> DOL, BLS. *Employer Costs for Employee Compensation (ECEC)*, June 2022. Table 3. Employer Costs for Employee Compensation for State and local government workers by occupational and industry group (public administration), <https://www.bls.gov/news.release/pdf/ecec.pdf> (accessed 09/28/2022).

Estimated Average Annual Number of Respondents: 51  
Estimated Average Annual Number of Responses: 51  
Estimated Annual Burden Hour Cost to Respondents: \$8,176.66

### **IC-2: Sample Design; Partnerships and Coordination**

For each phase of the CMV Crash Causal Factors Study, FMCSA will develop a sample design specific to the applicable crash type (e.g., for the LTCCFS, FMCSA will develop a nationally representative sample design specific to fatal crashes involving Class 7/8 large trucks, with the option to include serious injury crashes in a convenience sample). However, FMCSA cannot simply select a random sample of State and local jurisdictions to include in the sample design. The Agency will need to identify an appropriate mix of State and local jurisdictions that have sufficient numbers of qualifying crashes, are willing and able to participate in the study, collect and share the required study data, and troubleshoot study-related issues as they arise. IC-2 will gauge States' and local jurisdictions' ability to participate in the study, and it will identify the types of agreements they will require to participate.

For IC-2, FMCSA will distribute web-based surveys to the points of contact identified by State representatives in IC-1 for IC sub-components 2.1 (Study Participation) and 2.2 (Agreements). The Agency is planning to distribute the survey to 306 State representatives (six from each of the 50 States and the District of Columbia =  $6(50+1) = 306$ ) and 108 local jurisdiction representatives (four representatives from 27 local jurisdictions meeting minimum qualifying crash criteria for the LTCCFS =  $4 * 27 = 108$ ).<sup>7</sup> The Agency estimates it will take each respondent approximately 2.25 hours to complete their respective web-based survey, as follows:

- 10 minutes to review the instructions and read through the survey<sup>8</sup>
- 2 hours to discuss the study parameters with FMCSA or other State representatives to inform responses/decision-making
- 5 minutes to complete the web-based survey

For year 1, FMCSA estimates a burden of 931.5 hours (306 State representatives + 108 local representatives = 414 representatives \* 2.25 hours = 931.5 hours). The Agency does not anticipate repeating IC-2 in year 2 or year 3, as the LTCCFS (phase 1 of the overarching CMV Crash Causal Factors Study) will still be underway at the time. Table 5 summarizes the estimated annual burden for State representatives and Table 6 summarizes the estimated annual burden for local representatives who will be asked to provide information for IC-2.

---

<sup>7</sup> The Agency is referring to fatal crashes involving at least one Class 7/8 large truck as "qualifying crashes," for study purposes. The Agency analyzed three years of MCMIS crash data (for calendar years 2019-2021) and identified 27 local jurisdictions in 13 States that meet these criteria. To limit the burden to local agencies for this IC, FMCSA will only survey local jurisdictions that meet these criteria.

<sup>8</sup> Survey invitation letters for all four ICs are included as Attachment D. Survey protocols for IC-2 are included as Attachment F.

**Table 5. Estimated annualized burden for State representatives (IC-2).**

<b>Year</b>	<b>Estimated Number of Respondents (6 representatives per State + DC) (a)</b>	<b>Number of Responses per Respondent (b)</b>	<b>Estimated Number of Responses (a*b = c)</b>	<b>Hours per Task (d)</b>	<b>Burden Hours (c*d)</b>
1	306	1	306	2.25	688.5
2	0	0	0	N/A	0
3	0	0	0	N/A	0
<b>Annual Average</b>	<b>102</b>	<b>-</b>	<b>102</b>	<b>2.25</b>	<b>229.5</b>
<b>Totals</b>	<b>306</b>	<b>-</b>	<b>306</b>	<b>2.25</b>	<b>688.5</b>

**Table 6. Estimated annualized burden for local jurisdiction representatives (IC-2).**

<b>Year</b>	<b>Estimated Number of Respondents (4 representatives each from 27 jurisdictions) (a)</b>	<b>Number of Responses per Respondent (b)</b>	<b>Estimated Number of Responses (a*b = c)</b>	<b>Hours per Task (d)</b>	<b>Burden Hours (c*d)</b>
1	108	1	108	2.25	243
2	0	0	0	N/A	0
3	0	0	0	N/A	0
<b>Annual Average</b>	<b>36</b>	<b>-</b>	<b>36</b>	<b>2.25</b>	<b>81</b>
<b>Totals</b>	<b>108</b>	<b>-</b>	<b>108</b>	<b>2.25</b>	<b>243</b>

We arrive at a total annual average burden of 310.5 hours by adding the annual average burden hours shown in Table 5 (229.5 hours for State representatives) and Table 6 (81 hours for local jurisdiction representatives) (229.5 hours + 81 hours = 310.5 hours).

The Agency is assuming that the surveys associated with IC-2 will be sent to State and local jurisdiction staff whose positions correspond to the following BLS Occupation Codes:

- BLS Occupation Code 11-1021, General and Operations Managers:
  - The median hourly wage of General and Operations Managers in the State Government, excluding schools and hospitals industry (NAICS code 999200) is \$49.57.<sup>9</sup>
  - The median hourly wage of General and Operations Managers in the Local Government, excluding schools and hospitals industry (NAICS code 999300) is \$48.19.<sup>10</sup>
- BLS Occupation Code 11-1011, Chief Executives:

<sup>9</sup> DOL, BLS. “OES. National. May 2021. National Industry-Specific Occupational Employment and Wage Estimates. NAICS 999200 (State Government, excluding schools and hospitals industry).” Available at [https://www.bls.gov/oes/current/naics4\\_999200.htm](https://www.bls.gov/oes/current/naics4_999200.htm) (accessed September 26, 2022).

<sup>10</sup> DOL, BLS. “OES. National. May 2021. National Industry-Specific Occupational Employment and Wage Estimates. NAICS 999300 (Local Government, excluding schools and hospitals industry).” Available at [https://www.bls.gov/oes/current/naics4\\_999300.htm](https://www.bls.gov/oes/current/naics4_999300.htm) (accessed September 28, 2022).



- o The median hourly wage of Chief Executives in the State Government, excluding schools and hospitals industry (NAICS code 999200) is \$63.08.<sup>11</sup>
- o The median hourly wage of Chief Executives in the Local Government, excluding schools and hospitals industry (NAICS code 999300) is \$47.66.<sup>12</sup>

To arrive at a loaded wage, FMCSA takes the cost of *total compensation* (\$54.05) per hour and divides by the cost of only *wages and salary* per hour (\$31.18) in the *Employer Costs for Employee Compensation* (ECEC) June 2022 data release.<sup>13</sup> This results in a load rate of 1.73 ( $\$54.05 / \$31.18 = 1.73$ ). The loaded hourly wages for IC-2 respondents are as follows:

- State General and Operations Managers: \$49.57 (median hourly wage) \* 1.73 (load rate) = \$85.76.
- Local General and Operations Managers: \$48.19 (median hourly wage) \* 1.73 (load rate) = \$83.37
- State Chief Executives: \$63.08 (median hourly wage) \* 1.73 (load rate) = \$109.13
- Local Chief Executives: \$47.66 (median hourly wage) \* 1.73 (load rate) = \$82.45.

The average annual burden is estimated at 229.5 hours for State respondents (six respondents, two respondent types per State—three General and Operations Managers and three Chief Executives) and 81 hours for local jurisdiction respondents (four respondents, two respondent types per jurisdiction—two General and Operations Managers and two Chief Executives).

Table 7 applies the loaded hourly wages for State respondents (described above) to the annual burden hours for each IC sub-component and respondent type, to arrive at an estimated annual cost for State respondents.

**Table 7. Estimated annual costs for State representatives (IC-2).**

IC Sub-Component	Respondent Category	Loaded Hourly Wage (a)	Annual Burden Hours (b)	Annual Cost (a*b)
2.1 Study Participation	11-1011, State Chief Executives	\$109.13	114.7 5	\$12,522.67
2.2 Study Agreements	11-1021, State General and Operations Managers	\$85.76	114.7 5	\$9,840.96
<b>Total</b>	-	-	<b>229.5</b>	<b>\$22,363.63</b>

<sup>11</sup> DOL, BLS. “OES. National. May 2021. National Industry-Specific Occupational Employment and Wage Estimates. NAICS 999200 (State Government, excluding schools and hospitals industry).” Available at [https://www.bls.gov/oes/current/naics4\\_999200.htm](https://www.bls.gov/oes/current/naics4_999200.htm) (accessed September 26, 2022).

<sup>12</sup> DOL, BLS. “OES. National. May 2021. National Industry-Specific Occupational Employment and Wage Estimates. NAICS 999300 (Local Government, excluding schools and hospitals industry).” Available at [https://www.bls.gov/oes/current/naics4\\_999300.htm](https://www.bls.gov/oes/current/naics4_999300.htm) (accessed September 28, 2022).

<sup>13</sup> DOL, BLS. *Employer Costs for Employee Compensation (ECEC)*, June 2022. Table 3. Employer Costs for Employee Compensation for State and local government workers by occupational and industry group (public administration), <https://www.bls.gov/news.release/pdf/ecec.pdf> (accessed 09/28/2022).

Table 8 applies the loaded hourly wages for local jurisdiction respondents (described above) to the annual burden hours for each IC sub-component and respondent type, to arrive at an estimated annual cost for local jurisdiction respondents.

**Table 8. Estimated annual costs for local jurisdiction representatives (IC-2).**

IC Sub-Component	Respondent Category	Loaded Hourly Wage (a)	Annual Burden Hours (b)	Annual Cost (a*b)
2.1 Study Participation	11-1011, Local Chief Executives	\$82.45	40.5	\$3,339.23
2.2 Study Agreements	11-1021, Local General and Operations Managers	\$83.37	40.5	\$3,376.49
<b>Total</b>	-	-	<b>81</b>	<b>\$6,715.72</b>

By adding together the total annual burden shown for State respondents (\$22,363.63, shown in Table 7) with the total annual burden for local jurisdiction respondents (\$6,715.72, shown in Table 8), we arrive at a total annual cost of \$29,079.35 for IC-2 (\$23,363.63 for State respondents + \$6,715.72 for local jurisdiction respondents = \$29,079.35).

**IC-2 Summary**

Estimated Average Annual Burden Hours: 310.5 (229.5 for State representatives + 81 for local jurisdiction representatives)

Estimated Average Annual Number of Respondents: 138 (102 State representatives annually + 36 local representatives annually)

Estimated Average Annual Number of Responses: 138 (1 response per respondent, annually)

Estimated Annual Burden Hour Cost to Respondents: \$29,079.35

**IC-3: Crash Data Collection**

As noted in the response to Item 2 above, FMCSA is planning to leverage existing State and local jurisdiction resources (where possible) to collect required study data. IC-3 will collect initial information about States’ current crash data collection activities, systems, processes, tools, forms, training, and quality control efforts. For more details on the type of information FMCSA plans to collect for IC-3 and how the Agency plans to use it, see the response to Item 2.

For IC-3, FMCSA will distribute web-based surveys<sup>14</sup> to the points of contact identified by State representatives in IC-1 for the following IC sub-components:

- 3.1 Crash Notification Processes
- 3.2 Crash Data Collection System(s)
  - o 3.2.1 Police Crash Reports\*
  - o 3.2.2 Post-Crash Investigations and Reconstructions
- 3.3 Post-Crash Inspection Data Elements
- 3.4 Crash Data Collection Training

<sup>14</sup> The survey protocols for IC-3 are included as Attachment G.

- o 3.4.1 Post-Crash Inspections
- o 3.4.2 Post-Crash Investigations and Reconstructions
- 3.5 Data Quality
  - o 3.5.1 Police Crash Reports\*
  - o 3.5.2 Post-Crash Inspections\*
  - o 3.5.3 Post-Crash Investigations and Reconstructions\*

\* For these IC sub-components, FMCSA has included survey questions asking whether respondents would be willing to share State/local technical documentation (e.g., data quality plans, coding manuals, etc.). For respondents who say they are willing to share the documentation, FMCSA will send a follow-up email with instructions for submitting those documents. The burden estimates in this supporting statement (1) assume that all respondents will submit the requested documents and (2) reflect the estimated time respondents will spend locating and submitting this documentation.<sup>15</sup>

In year 1, the Agency is planning to distribute the web-based surveys associated with IC-3 to 408 State representatives (eight from each of the 50 States and the District of Columbia = 8 (50+1) = 408) and 216 local jurisdiction representatives (eight representatives from 27 jurisdictions meeting minimum qualifying crash criteria = 8 \* 27 = 216).<sup>16</sup> The Agency does not anticipate repeating IC-3 in year 2 or year 3, as the LTCCFS (phase 1 of the overarching CMV Crash Causal Factors Study) will still be underway at the time.

Burden hours for IC-3 will vary by IC subcomponent, as shown in Table 9.

**Table 9. Estimated burden hours for IC-3 respondents, by IC sub-component.**

IC Sub-component	Anticipated Burden Hours
3.1 Crash Notification Processes	<b>30 minutes</b> (5 minutes to read the instructions + 25 minutes to respond to the survey, including time to consult with staff to verify responses)
3.2.1 Crash Data Collection System(s): Police Crash Reports	<b>1 hour</b> (5 minutes to read the instructions + 15 minutes to respond to the survey + 40 minutes to locate and email requested documents)
3.2.2 Crash Data Collection Systems: Post-Crash Investigations and Crash Reconstructions	<b>30 minutes</b> (5 minutes to read the instructions + 25 minutes to respond to the survey, including time to consult with staff to verify responses)
3.3 Post-Crash Inspection Data Elements	<b>1 hour</b> (5 minutes to read the instructions + 15 minutes to respond to the survey + 40 minutes to locate and email requested documents)
3.4.1 Crash Data Collection Training: Post-Crash Inspections	<b>15 minutes</b> (5 minutes to read the instructions + 10 minutes to respond to the survey)
3.4.2 Crash Data Collection Training: Post-Crash Investigations and Crash Reconstructions	<b>1 hour</b> (5 minutes to read the instructions + 15 minutes to respond to the survey + 40 minutes to locate and email requested documents)
3.5.1 Data Quality: Police Crash Reports	<b>1 hour</b> (5 minutes to read the instructions + 15 minutes to respond to the survey + 40 minutes to locate and email requested documents)

<sup>15</sup> Document request emails for all relevant ICs are included as Attachment I.

<sup>16</sup> The Agency is referring to fatal crashes involving at least one Class 7/8 large truck as “qualifying crashes,” for study purposes. The Agency analyzed three years of MCMIS crash data (for calendar years 2019-2021) and identified 27 local jurisdictions in 13 States that meet these criteria. To limit the burden to local agencies for this IC, FMCSA will only survey local jurisdictions that meet these criteria.

IC Sub-component	Anticipated Burden Hours
3.5.2 Data Quality: Post-Crash Inspections	<b>1 hour</b> (5 minutes to read the instructions + 15 minutes to respond to the survey + 40 minutes to locate and email requested documents)
3.5.3 Data Quality: Post-Crash Investigations and Crash Reconstructions	<b>1 hour</b> (5 minutes to read the instructions + 15 minutes to respond to the survey + 40 minutes to locate and email requested documents)
<b>Total</b>	<b>6 hours 15 minutes (6.25 hours)</b>

As shown in Table 9, FMCSA estimates it will take a total of 6.25 hours for each set of respondents (eight per State or local jurisdiction) to provide the requested information. FMCSA thus estimates a burden of 487.5 hours (408 State representatives + 216 local jurisdiction representatives = 624 \* 6.25 hours = 3,900 hours / 8 respondents per State or local jurisdiction = 487.5 hours) for this IC.

Table 10 summarizes the estimated annual burden for State representatives and Table 11 summarizes the estimated annual burden for local jurisdiction representatives who will be asked to provide information for IC-3.

**Table 10. Estimated annualized burden for State representatives (IC-3).**

Year	IC Sub-Component	Estimated Number of Respondents (a)	Number of Responses per Respondent (b)	Estimated Number of Responses (a*b = c)	Hours per Task (d)	Burden Hours (c*d = e)	Annual Burden Hours (e / 3)
1	3.1 Crash Notification Processes	51	1	51	0.5	25.5	8.5
1	3.2.1 Crash Data Collection System(s): Police Crash Reports	51	1	51	1	51	17
1	3.2.2 Crash Data Collection Systems: Post-Crash Investigations and Crash Reconstructions	51	1	51	0.5	25.5	8.5
1	3.3 Post-Crash Inspection Data Elements <i>and</i> 3.4.1 Crash Data Collection Training: Post-Crash Inspections	51	1	51	1	51	17
1	3.4.2 Crash Data Collection Training: Post-Crash Investigations and Crash	51	1	51	0.25	12.75	4.25

Year	IC Sub-Component	Estimated Number of Respondents (a)	Number of Responses per Respondent (b)	Estimated Number of Responses (a*b = c)	Hours per Task (d)	Burden Hours (c*d = e)	Annual Burden Hours (e / 3)
	Reconstructions						
1	3.5.1 Data Quality: Police Crash Reports	51	1	51	1	51	17
1	3.5.2 Data Quality: Post-Crash Inspections	51	1	51	1	51	17
1	3.5.3 Data Quality: Post-Crash Investigations and Crash Reconstructions	51	1	51	1	51	17
2	All sub-components	0	0	0	N/A	0	0
3	All sub-components	0	0	0	N/A	0	0
<b>Annual Average</b>	-	<b>136</b>	-	<b>136</b>	-	<b>106.25</b>	<b>106.25</b>
<b>Totals</b>	-	<b>408</b>	-	<b>408</b>	-	<b>318.75</b>	-

**Table 11. Estimated annualized burden for local jurisdiction representatives (IC-3).**

Year	IC Sub-Component	Estimated Number of Respondents (a)	Number of Responses per Respondent (b)	Estimated Number of Responses (a*b = c)	Hours per Task (d)	Burden Hours (c*d = e)	Annual Burden Hours (e / 3)
1	3.1 Crash Notification Processes	27	1	27	0.5	13.5	4.5
1	3.2.1 Crash Data Collection System(s): Police Crash Reports	27	1	27	1	27	9
1	3.2.2 Crash Data Collection Systems: Post-Crash Investigations and Crash Reconstructions	27	1	27	0.5	13.5	4.5
1	3.3 Post-Crash Inspection Data Elements <i>and</i> 3.4.1 Crash Data Collection Training: Post-Crash Inspections	27	1	27	1	27	9

Year	IC Sub-Component	Estimated Number of Respondents (a)	Number of Responses per Respondent (b)	Estimated Number of Responses (a*b = c)	Hours per Task (d)	Burden Hours (c*d = e)	Annual Burden Hours (e / 3)
1	3.4.2 Crash Data Collection Training: Post-Crash Investigations and Crash Reconstructions	27	1	27	0.25	6.75	2.25
1	3.5.1 Data Quality: Police Crash Reports	27	1	27	1	27	9
1	3.5.2 Data Quality: Post-Crash Inspections	27	1	27	1	27	9
1	3.5.3 Data Quality: Post-Crash Investigations and Crash Reconstructions	27	1	27	1	27	9
2	All sub-components	0	0	0	N/A	0	0
3	All sub-components	0	0	0	N/A	0	0
<b>Annual Average</b>	-	<b>72</b>	-	<b>72</b>	-	<b>56.25</b>	<b>56.25</b>
<b>Totals</b>	-	<b>216</b>	-	<b>216</b>	-	<b>168.75</b>	-

We arrive at a total annual average burden of 162.5 hours by adding the annual average burden hours shown in Table 10 (106.25 hours for State representatives) and Table 11 (56.25 hours for local jurisdiction representatives) (106.25 hours + 56.25 hours = 162.5 hours).

FMCSA expects to distribute the IC-3 survey, divided by IC sub-component, to State and local jurisdiction representatives whose positions correspond to the BLS Occupation Codes shown in Table 12.

**Table 12. State and local representatives who will be asked to provide information for IC-3, by IC sub-component.**

IC Sub-component	Corresponding BLS Occupation Codes for Respondents
3.1 Crash Notification Processes	33-1012, First-Line Supervisors of Police and Detectives
3.2.1 Crash Data Collection System(s): Police Crash Reports	11-3021, Computer and Information Systems Managers
3.2.2 Crash Data Collection Systems: Post-Crash Investigations and Reconstructions	33-1012, First-Line Supervisors of Police and Detectives
3.3 Post-Crash Inspection Data Elements <i>and</i>	33-3051, Police and Sheriff's Patrol Officers (same respondent for both IC sub-components)
3.4.1 Crash Data Collection Training: Post-	

IC Sub-component	Corresponding BLS Occupation Codes for Respondents
Crash Inspections	
3.4.2 Crash Data Collection Training: Post-Crash Investigations and Reconstructions	33-1012, First-Line Supervisors of Police and Detectives
3.5.1 Data Quality: Police Crash Reports	15-0000, Computer and Mathematical Operations
3.5.2 Data Quality: Post-Crash Inspections	15-0000, Computer and Mathematical Operations
3.5.3 Data Quality: Post-Crash Investigations and Reconstructions	33-1012, First-Line Supervisors of Police and Detectives

Estimated median wages for State and local jurisdiction staff who will be asked to respond to IC-3 are as follows:

- BLS Occupation Code 33-1012, First-Line Supervisors of Police and Detectives:
  - The median hourly wage of First-Line Supervisors of Police and Detectives in the State Government, excluding schools and hospitals industry (NAICS code 999200) is \$48.74.<sup>17</sup>
  - The median hourly wage of First-Line Supervisors of Police and Detectives in the Local Government, excluding schools and hospitals industry (NAICS code 999300) is \$47.53.<sup>18</sup>
- BLS Occupation Code 11-3021, Computer and Information Systems Managers:
  - The median hourly wage of Computer and Information Systems Managers in the State Government, excluding schools and hospitals industry (NAICS code 999200) is \$52.61.<sup>19</sup>
  - The median hourly wage of Computer and Information Systems Managers in the Local Government, excluding schools and hospitals industry (NAICS code 999300) is \$60.35.<sup>20</sup>
- BLS Occupation Code 33-3051, Police and Sheriff’s Patrol Officers:
  - The median hourly wage of Police and Sheriff’s Patrol Officers in the State Government, excluding schools and hospitals industry (NAICS code 999200) is \$37.66.<sup>21</sup>

<sup>17</sup> DOL, BLS. “OES. National. May 2021. National Industry-Specific Occupational Employment and Wage Estimates. NAICS 999200 (State Government, excluding schools and hospitals industry).” Available at [https://www.bls.gov/oes/current/naics4\\_999200.htm](https://www.bls.gov/oes/current/naics4_999200.htm) (accessed September 26, 2022).

<sup>18</sup> DOL, BLS. “OES. National. May 2021. National Industry-Specific Occupational Employment and Wage Estimates. NAICS 999300 (Local Government, excluding schools and hospitals industry).” Available at [https://www.bls.gov/oes/current/naics4\\_999300.htm](https://www.bls.gov/oes/current/naics4_999300.htm) (accessed September 28, 2022).

<sup>19</sup> DOL, BLS. “OES. National. May 2021. National Industry-Specific Occupational Employment and Wage Estimates. NAICS 999200 (State Government, excluding schools and hospitals industry).” Available at [https://www.bls.gov/oes/current/naics4\\_999200.htm](https://www.bls.gov/oes/current/naics4_999200.htm) (accessed September 26, 2022).

<sup>20</sup> DOL, BLS. “OES. National. May 2021. National Industry-Specific Occupational Employment and Wage Estimates. NAICS 999300 (Local Government, excluding schools and hospitals industry).” Available at [https://www.bls.gov/oes/current/naics4\\_999300.htm](https://www.bls.gov/oes/current/naics4_999300.htm) (accessed September 28, 2022).

<sup>21</sup> DOL, BLS. “OES. National. May 2021. National Industry-Specific Occupational Employment and Wage Estimates. NAICS 999200 (State Government, excluding schools and hospitals industry).” Available at [https://www.bls.gov/oes/current/naics4\\_999200.htm](https://www.bls.gov/oes/current/naics4_999200.htm) (accessed September 26, 2022).

- o The median hourly wage of Police and Sheriff’s Patrol Officers in the Local Government, excluding schools and hospitals industry (NAICS code 999300) is \$31.06.<sup>22</sup>
- BLS Occupation Code 15-0000, Computer and Mathematical Operations:
  - o The median hourly wage of Computer and Mathematical Operations workers in the State Government, excluding schools and hospitals industry (NAICS code 999200) is \$38.32.<sup>23</sup>
  - o The median hourly wage of Computer and Mathematical Operations workers in the Local Government, excluding schools and hospitals industry (NAICS code 999300) is \$37.56.<sup>24</sup>

To arrive at a loaded wage, FMCSA takes the cost of *total compensation* (\$54.05) per hour and divides by the cost of only *wages and salary* per hour (\$31.18) in the *Employer Costs for Employee Compensation (ECEC)* June 2022 data release.<sup>25</sup> This results in a load rate of 1.73 ( $\$54.05 / \$31.18 = 1.73$ ). The loaded hourly wages for IC-3 respondents are as follows:

- State First-Line Supervisors of Police and Detectives: \$48.74 (median hourly wage) \* 1.73 (load rate) = \$84.32
- Local First-Line Supervisors of Police and Detectives: \$47.53 (median hourly wage) \* 1.73 (load rate) = \$82.23
- State Computer and Information Systems Managers: \$52.61 (median hourly wage) \* 1.73 (load rate) = \$91.02
- Local Computer and Information Systems Managers: \$60.35 (median hourly wage) \* 1.73 (load rate) = \$104.41
- State Police and Sheriff’s Patrol Officers: \$37.66 (median hourly wage) \* 1.73 (load rate) = \$65.15
- Local Police and Sheriff’s Patrol Officers: \$31.06 (median hourly wage) \* 1.73 (load rate) = \$53.73
- State Computer and Mathematical Operations workers: \$38.32 (median hourly wage) \* 1.73 = \$66.29
- Local Computer and Mathematical Operations workers: \$37.56 (median hourly wage) \* 1.73 = \$64.98

The annual burden is estimated at 106.25 hours for State respondents (eight respondents per State) and 56.25 hours for local jurisdiction respondents (eight respondents per qualifying jurisdiction). Table 13 applies the loaded hourly wages for State respondents (described

<sup>22</sup> DOL, BLS. “OES. National. May 2021. National Industry-Specific Occupational Employment and Wage Estimates. NAICS 999300 (Local Government, excluding schools and hospitals industry).” Available at [https://www.bls.gov/oes/current/naics4\\_999300.htm](https://www.bls.gov/oes/current/naics4_999300.htm) (accessed September 28, 2022).

<sup>23</sup> DOL, BLS. “OES. National. May 2021. National Industry-Specific Occupational Employment and Wage Estimates. NAICS 999200 (State Government, excluding schools and hospitals industry).” Available at [https://www.bls.gov/oes/current/naics4\\_999200.htm](https://www.bls.gov/oes/current/naics4_999200.htm) (accessed September 26, 2022).

<sup>24</sup> DOL, BLS. “OES. National. May 2021. National Industry-Specific Occupational Employment and Wage Estimates. NAICS 999300 (Local Government, excluding schools and hospitals industry).” Available at [https://www.bls.gov/oes/current/naics4\\_999300.htm](https://www.bls.gov/oes/current/naics4_999300.htm) (accessed September 28, 2022).

<sup>25</sup> DOL, BLS. *Employer Costs for Employee Compensation (ECEC)*, June 2022. Table 3. Employer Costs for Employee Compensation for State and local government workers by occupational and industry group (public administration), <https://www.bls.gov/news.release/pdf/ecec.pdf> (accessed 09/28/2022).



above) to the annual burden hours for each IC sub-component and respondent category, to arrive at an estimated annual cost for State respondents.

**Table 13. Estimated annual costs for State representatives (IC-3).**

IC Sub-Component	Respondent Category	Loaded Hourly Wage (a)	Annual Burden Hours (b)	Annual Cost (a*b)
3.1 Crash Notification Processes	33-1012, First-Line Supervisors of Police and Detectives	\$84.32	8.5	\$716.72
3.2.1 Crash Data Collection System(s): Police Crash Reports	11-3021, Computer and Information Systems Managers	\$91.02	17	\$1,547.34
3.2.2 Crash Data Collection Systems: Post-Crash Investigations and Crash Reconstructions	33-1012, First-Line Supervisors of Police and Detectives	\$84.32	8.5	\$716.72
3.3 Post-Crash Inspection Data Elements <i>and</i> 3.4.1 Crash Data Collection Training: Post-Crash Inspections	33-3051, Police and Sheriff's Patrol Officers (same respondent for both IC sub-components)	\$65.15	17	\$1,107.55
3.4.2 Crash Data Collection Training: Post-Crash Investigations and Crash Reconstructions	33-1012, First-Line Supervisors of Police and Detectives	\$84.32	4.25	\$358.36
3.5.1 Data Quality: Police Crash Reports	15-0000, Computer and Mathematical Operations	\$66.29	17	\$1,126.93
3.5.2 Data Quality: Post-Crash Inspections	15-0000, Computer and Mathematical Operations	\$66.29	17	\$1,126.93
3.5.3 Data Quality: Post-Crash Investigations and Crash Reconstructions	33-1012, First-Line Supervisors of Police and Detectives	\$84.32	17	\$1,433.44
<b>Total</b>	-	-	<b>106.25</b>	<b>\$8,133.99</b>

Table 14 applies the loaded hourly wages for local jurisdiction respondents (described above) to the annual burden hours for each IC sub-component and respondent category, to arrive at an estimated annual cost for local jurisdiction respondents.

**Table 14. Estimated annual costs for local jurisdiction representatives (IC-3).**

IC Sub-Component	Respondent Category	Loaded Hourly Wage (a)	Annual Burden Hours (b)	Annual Cost (a*b)
3.1 Crash Notification Processes	33-1012, First-Line Supervisors of Police and Detectives	\$82.23	4.5	\$370.04
3.2.1 Crash Data Collection System(s): Police Crash Reports	11-3021, Computer and Information Systems Managers	\$104.41	9	\$939.69
3.2.2 Crash Data Collection Systems: Post-Crash Investigations and Crash Reconstructions	33-1012, First-Line Supervisors of Police and Detectives	\$82.23	4.5	\$370.04

IC Sub-Component	Respondent Category	Loaded Hourly Wage (a)	Annual Burden Hours (b)	Annual Cost (a*b)
Reconstructions				
3.3 Post-Crash Inspection Data Elements <i>and</i>				
3.4.1 Crash Data Collection Training: Post-Crash Inspections	33-3051, Police and Sheriff's Patrol Officers (same respondent for both IC sub-components)	\$53.73	9	\$483.57
3.4.2 Crash Data Collection Training: Post-Crash Investigations and Crash Reconstructions	33-1012, First-Line Supervisors of Police and Detectives	\$82.23	2.25	\$185.02
3.5.1 Data Quality: Police Crash Reports	15-0000, Computer and Mathematical Operations	\$64.98	9	\$584.82
3.5.2 Data Quality: Post-Crash Inspections	15-0000, Computer and Mathematical Operations	\$64.98	9	\$584.82
3.5.3 Data Quality: Post-Crash Investigations and Crash Reconstructions	33-1012, First-Line Supervisors of Police and Detectives	\$82.23	9	\$740.07
<b>Total</b>	-	-	<b>56.25</b>	<b>\$4,258.06</b>

By adding together the total annual burden shown for State respondents (\$8,133.99, shown in Table 13) with the total annual burden for local jurisdiction respondents (\$4,258.06, shown in Table 14), we arrive at a total annual cost of \$12,392.05 for IC-3 (\$8,133.99 for State respondents + \$4,258.06 for local jurisdiction respondents = \$12,392.05).

### ***IC-3 Summary***

Estimated Annual Burden Hours: 162.5 (106.25 for State representatives + 56.25 for local jurisdiction representatives)

Estimated Annual Number of Respondents: 208 (136 average annual State representatives + 72 average annual local jurisdiction representatives)

Estimated Annual Number of Responses: 208 (1 response per respondent, annually)

Estimated Annual Burden Hour Cost to Respondents: \$12,392.05

### **IC-4: CMV Enforcement Resources and Funding**

IC-4 will collect information about States' existing CMV crash enforcement resources and funding sources for CMV enforcement activities. For more details on the type of information FMCSA plans to collect for IC-4 and how the Agency plans to use it, see the response to Item 2.

For IC-4, FMCSA will distribute web-based surveys<sup>26</sup> to the points of contact identified by State representatives in IC-1 for the following IC sub-components:

- 4.1 Agency Participation in Enforcement Activities and Related Policies
  - 4.1.1 Police Crash Reports

<sup>26</sup> The survey protocols for IC-4 are included as Attachment H.

- o 4.1.2 Post-Crash Inspections\*
- o 4.1.3 Agency Involvement and Funding Sources
- o 4.1.4 Post-Crash Investigations\*
- o 4.1.5 Reconstructions\*
- o 4.1.6 Crash Reconstruction Team(s)
- o 4.1.7 Impairment Detection\*
- 4.2 Use of MCSAP Funding

\* For these IC sub-components, FMCSA has included survey questions asking whether respondents would be willing to share State/local documentation (e.g., policies for which agencies can respond to crashes, criteria for when to respond to a crash, etc.). For respondents who say they are willing to share the documentation, FMCSA will send a follow-up email with instructions for submitting those documents. The burden estimates in this supporting statement (1) assume that all respondents will submit the requested documents and (2) reflect the estimated time respondents will spend locating and submitting this documentation.<sup>27</sup>

In year 1, the Agency is planning to distribute the surveys associated with IC-4 to 102 State representatives (two from each of the 50 States and the District of Columbia) and 27 local jurisdiction representatives (one representative each from 27 local jurisdictions meeting minimum qualifying crash criteria).<sup>28</sup> The Agency will not repeat IC-4 in year 2 or year 3, as the LTCCFS (phase 1 of the overarching CMV Crash Causal Factors Study) will still be underway at the time.

IC-4 sub-components will be grouped by subject matter area and sent to identified State and local representatives. Burden hours will vary by IC subcomponent grouping, as shown in Table 15.

**Table 15. Estimated burden hours for IC-3 respondents, by IC sub-component grouping.**

IC Sub-Component Groupings	Who Will Receive the Survey	Anticipated Burden Hours
4.1 Agency Participation in Enforcement Activities and Related Policies: <ul style="list-style-type: none"> <li>• 4.1.1 Police Crash Reports</li> <li>• 4.1.2 Post-Crash Inspections</li> <li>• 4.1.3 Agency Involvement and Funding Sources</li> </ul>	51 State Respondents	<b>4 hours</b> (10 minutes to read the instructions + 3 hours and 10 minutes to respond to the survey, including time to consult with leadership to verify responses + 40 minutes to locate and email requested documents)
4.2 Use of MCSAP Funding		
4.1 Agency Participation in Enforcement Activities and Related Policies: <ul style="list-style-type: none"> <li>• 4.1.4 Post-Crash Investigations</li> <li>• 4.1.5 Reconstructions</li> <li>• 4.1.6 Crash Reconstruction Team(s)</li> <li>• 4.1.7 Impairment Detection</li> </ul>	51 State Respondents 27 Local Jurisdiction Respondents	<b>2.5 hours</b> (10 minutes to read the instructions + 1 hour and 10 minutes to respond to the survey, including time to consult with staff to verify responses + 40 minutes to locate and email requested documents)

<sup>27</sup> Document request emails for all relevant ICs are included as Attachment I.

<sup>28</sup> The Agency is referring to fatal crashes involving at least one Class 7/8 large truck as “qualifying crashes,” for study purposes. The Agency analyzed three years of MCMIS crash data (for calendar years 2019-2021) and identified 27 local jurisdictions in 13 States that meet these criteria. To limit the burden to local agencies for this IC, FMCSA will only survey local jurisdictions that meet these criteria.

IC Sub-Component Groupings	Who Will Receive the Survey	Anticipated Burden Hours
<b>Total</b>	<b>State Respondents</b>	<b>6.5 hours</b>
<b>Total</b>	<b>Local Jurisdiction Respondents</b>	<b>2.5 hours</b>

As shown in Table 15, FMCSA estimates it will take a total of 6.5 hours for each set of State respondents (two per State) to provide the requested information and a total of 2.5 hours for local jurisdiction respondents to provide the requested information. As noted above, the Agency will only be conducting IC-4 in year 1 of the current ICR. The Agency estimates a burden of 331.5 hours for State representatives (102 State representatives \* 6.5 hours = 663 hours / 2 respondents per State = 331.5 hours) and a burden of 67.5 hours for local jurisdiction representatives (27 local jurisdiction representatives \* 2.5 hours = 67.5 hours) for this IC. This amounts to a total of 399 burden hours for IC-4 (331.5 hours for State representatives + 67.5 hours for local jurisdiction representatives = 399 hours).

Table 16 summarizes the estimated annual burden for State representatives and Table 17 summarizes the estimated annual burden for local jurisdiction representatives who will be asked to provide information for IC-4.

**Table 16. Estimated annualized burden for State representatives (IC-4).**

Year	IC Sub-Component Grouping	Estimated Number of Respondents (a)	Number of Responses per Respondent (b)	Estimated Number of Responses (a*b = c)	Hours per Task (d)	Burden Hours (c*d = e)	Annual Burden Hours (e / 3)
1	4.1 Agency Participation in Enforcement Activities and Related Policies: <ul style="list-style-type: none"> <li>4.1.1 Police Crash Reports</li> <li>4.1.2 Post-Crash Inspections</li> <li>4.1.3 Agency Involvement and Funding Sources</li> </ul>	51	1	51	4	204	68
1	4.2 Use of MCSAP Funding	51	1	51	2.5	127.5	42.5
1	4.1 Agency Participation in Enforcement Activities and Related Policies: <ul style="list-style-type: none"> <li>4.1.4 Post-Crash Investigations</li> <li>4.1.5 Reconstructions</li> <li>4.1.6 Crash Reconstruction Team(s)</li> </ul>	51	1	51	2.5	127.5	42.5

Year	IC Sub-Component Grouping	Estimated Number of Respondents (a)	Number of Responses per Respondent (b)	Estimated Number of Responses (a*b = c)	Hours per Task (d)	Burden Hours (c*d = e)	Annual Burden Hours (e / 3)
	<ul style="list-style-type: none"> <li>4.1.7 Impairment Detection</li> </ul>						
2	All sub-components	0	0	0	N/A	0	0
3	All sub-components	0	0	0	N/A	0	0
<b>Annual Average</b>	-	<b>34</b>	-	<b>34</b>	-	<b>110.5</b>	<b>110.5</b>
<b>Totals</b>	-	<b>102</b>	-	<b>102</b>	-	<b>331.5</b>	-

**Table 17. Estimated annualized burden for local jurisdiction representatives (IC-4).**

Year	IC Sub-Component Grouping	Estimated Number of Respondents (a)	Number of Responses per Respondent (b)	Estimated Number of Responses (a*b = c)	Hours per Task (d)	Burden Hours (c*d = e)	Annual Burden Hours (e / 3)
1	4.1 Agency Participation in Enforcement Activities and Related Policies: <ul style="list-style-type: none"> <li>4.1.4 Post-Crash Investigations</li> <li>4.1.5 Reconstructions</li> <li>4.1.6 Crash Reconstruction Team(s)</li> <li>4.1.7 Impairment Detection</li> </ul>	27	1	27	2.5	67.5	22.5
2	All sub-components	0	0	0	N/A	0	0
3	All sub-components	0	0	0	N/A	0	0
<b>Annual Average</b>	-	<b>9</b>	-	<b>9</b>	-	<b>22.5</b>	<b>22.5</b>
<b>Totals</b>	-	<b>27</b>	-	<b>27</b>	-	<b>67.5</b>	-

We arrive at a total annual average burden of 133 hours by adding the annual average burden hours shown in Table 16 (110.5 hours for State representatives) and Table 17 (22.5 hours for local jurisdiction representatives) (110.5 hours + 22.5 hours = 133 hours).

FMCSA expects to distribute the IC-4 survey (by sub-component grouping, as described above) to State and local jurisdiction representatives whose positions correspond to the BLS Occupation Codes shown in Table 17.

**Table 18. State and local representatives who will be asked to provide information for IC-4, by IC sub-component.**

IC Sub-component	Corresponding BLS Occupation Codes for Respondents
4.1 Agency Participation in Enforcement Activities and Related Policies: <ul style="list-style-type: none"> <li>• 4.1.1 Police Crash Reports</li> <li>• 4.1.2 Post-Crash Inspections</li> <li>• 4.1.3 Agency Involvement and Funding Sources</li> </ul>	
4.2 Use of MCSAP Funding	33-3051, Police and Sheriff's Patrol Officers
4.1 Agency Participation in Enforcement Activities and Related Policies: <ul style="list-style-type: none"> <li>• 4.1.4 Post-Crash Investigations</li> <li>• 4.1.5 Reconstructions</li> <li>• 4.1.6 Crash Reconstruction Team(s)</li> <li>• 4.1.7 Impairment Detection</li> </ul>	33-1012, First-Line Supervisors of Police and Detectives

Estimated median wages for State and local jurisdiction staff who will be asked to respond to IC-4 are as follows:

- BLS Occupation Code 33-3051, Police and Sheriff's Patrol Officers:
  - The median hourly wage of Police and Sheriff's Patrol Officers in the State Government, excluding schools and hospitals industry (NAICS code 999200) is \$37.66.<sup>29</sup>
  - The median hourly wage of Police and Sheriff's Patrol Officers in the Local Government, excluding schools and hospitals industry (NAICS code 999300) is \$31.06.<sup>30</sup>
- BLS Occupation Code 33-1012, First-Line Supervisors of Police and Detectives:
  - The median hourly wage of First-Line Supervisors of Police and Detectives in the State Government, excluding schools and hospitals industry (NAICS code 999200) is \$48.74.<sup>31</sup>
  - The median hourly wage of First-Line Supervisors of Police and Detectives in the Local Government, excluding schools and hospitals industry (NAICS code 999300) is \$47.53.<sup>32</sup>

<sup>29</sup> DOL, BLS. "OES. National. May 2021. National Industry-Specific Occupational Employment and Wage Estimates. NAICS 999200 (State Government, excluding schools and hospitals industry)." Available at [https://www.bls.gov/oes/current/naics4\\_999200.htm](https://www.bls.gov/oes/current/naics4_999200.htm) (accessed September 26, 2022).

<sup>30</sup> DOL, BLS. "OES. National. May 2021. National Industry-Specific Occupational Employment and Wage Estimates. NAICS 999300 (Local Government, excluding schools and hospitals industry)." Available at [https://www.bls.gov/oes/current/naics4\\_999300.htm](https://www.bls.gov/oes/current/naics4_999300.htm) (accessed September 28, 2022).

<sup>31</sup> DOL, BLS. "OES. National. May 2021. National Industry-Specific Occupational Employment and Wage Estimates. NAICS 999200 (State Government, excluding schools and hospitals industry)." Available at [https://www.bls.gov/oes/current/naics4\\_999200.htm](https://www.bls.gov/oes/current/naics4_999200.htm) (accessed September 26, 2022).

<sup>32</sup> DOL, BLS. "OES. National. May 2021. National Industry-Specific Occupational Employment and Wage

To arrive at a loaded wage, FMCSA takes the cost of *total compensation* (\$54.05) per hour and divides by the cost of only *wages and salary* per hour (\$31.18) in the *Employer Costs for Employee Compensation (ECEC)* June 2022 data release.<sup>33</sup> This results in a load rate of 1.73 ( $\$54.05 / \$31.18 = 1.73$ ). The loaded hourly wages for IC-3 respondents are as follows:

- State Police and Sheriff’s Patrol Officers: \$37.66 (median hourly wage) \* 1.73 (load rate) = \$65.15
- Local Police and Sheriff’s Patrol Officers: \$31.06 (median hourly wage) \* 1.73 (load rate) = \$53.73
- State First-Line Supervisors of Police and Detectives: \$48.74 (median hourly wage) \* 1.73 (load rate) = \$84.32
- Local First-Line Supervisors of Police and Detectives: \$47.53 (median hourly wage) \* 1.73 (load rate) = \$82.23

The annual burden is estimated at 110.5 hours for State respondents (two respondents per State) and 58.5 hours for local jurisdiction respondents (one respondent per qualifying jurisdiction). Table 19 applies the loaded hourly wages for State respondents (described above) to the annual burden hours for each IC sub-component grouping and respondent category, to arrive at an estimated annual cost for State respondents.

**Table 19. Estimated annual costs for State representatives (IC-4).**

IC Sub-Component	Respondent Category	Loaded Hourly Wage (a)	Annual Burden Hours (b)	Annual Cost (a*b)
4.1 Agency Participation in Enforcement Activities and Related Policies: <ul style="list-style-type: none"> <li>• 4.1.1 Police Crash Reports</li> <li>• 4.1.2 Post-Crash Inspections</li> <li>• 4.1.3 Agency Involvement and Funding Sources</li> </ul>	33-3051, Police and Sheriff's Patrol Officers	\$65.15	68	\$4,430.20
4.2 Use of MCSAP Funding				
4.1 Agency Participation in Enforcement Activities and Related Policies: <ul style="list-style-type: none"> <li>• 4.1.4 Post-Crash Investigations</li> <li>• 4.1.5 Reconstructions</li> <li>• 4.1.6 Crash Reconstruction Team(s)</li> <li>• 4.1.7 Impairment Detection</li> </ul>	33-1012, First-Line Supervisors of Police and Detectives	\$84.32	42.5	\$3,583.60
<b>Total</b>	-	-	<b>110.5</b>	<b>\$8,013.80</b>

Estimates. NAICS 999300 (Local Government, excluding schools and hospitals industry).” Available at [https://www.bls.gov/oes/current/naics4\\_999300.htm](https://www.bls.gov/oes/current/naics4_999300.htm) (accessed September 28, 2022).

<sup>33</sup> DOL, BLS. *Employer Costs for Employee Compensation (ECEC)*, June 2022. Table 3. Employer Costs for Employee Compensation for State and local government workers by occupational and industry group (public administration), <https://www.bls.gov/news.release/pdf/ecec.pdf> (accessed 09/28/2022).

Table 20 applies the loaded hourly wages for local jurisdiction respondents (described above) to the annual burden hours for the applicable IC sub-component, to arrive at an estimated annual cost for local jurisdiction respondents.

**Table 20. Estimated annual costs for local jurisdiction representatives (IC-4).**

IC Sub-Component	Respondent Category	Loaded Hourly Wage (a)	Annual Burden Hours (b)	Annual Cost (a*b)
4.1 Agency Participation in Enforcement Activities and Related Policies: <ul style="list-style-type: none"> <li>4.1.4 Post-Crash Investigations</li> <li>4.1.5 Reconstructions</li> <li>4.1.6 Crash Reconstruction Team(s)</li> <li>4.1.7 Impairment Detection</li> </ul>	33-1012, First-Line Supervisors of Police and Detectives	\$82.23	22.5	\$1850.18

By adding together the total annual burden shown for State respondents (\$8,013.80, shown in Table 19) with the total annual burden for local jurisdiction respondents (\$1,850.18, shown in Table 20), we arrive at a total annual cost of \$9,863.98 for IC-3 (\$8,013.80 for State respondents + \$1,850.18 for local jurisdiction respondents = \$9,863.98).

**IC-4 Summary**

Estimated Average Annual Burden Hours: 133 (110.5 for State representatives + 22.5 for local jurisdiction representatives)

Estimated Average Annual Number of Respondents: 43 (34 annual State representatives + 9 annual local jurisdiction representatives)

Estimated Average Annual Number of Responses: 43 (1 response per respondent, annually)

Estimated Annual Burden Hour Cost to Respondents: \$9,863.98

**Total for All ICs**

The estimated burden hours associated with each IC are shown in Table 21.

**Table 21. Burden hours associated with each IC.**

IC Sub-Component / Sub-Component Grouping	Number of Respondents	Year 1	Year 2	Year 3	Annual Average Burden Hours	Annual Average Respondents
IC-1: Identifying Points of Contact	153	306 hours	n/a	n/a	102 hours	51
<b>IC-1 Total</b>	<b>153</b>	<b>306 hours</b>	n/a	n/a	<b>102 hours</b>	<b>51</b>
IC-2: Sample Design; Partnerships and Coordination	414	931.5 hours	n/a	n/a	310.5 hours	138
<b>IC-2 Total</b>	<b>414</b>	<b>931.5 hours</b>	n/a	n/a	<b>310.5 hours</b>	<b>138</b>
3.1 Crash Notification Processes	78	39 hours	n/a	n/a	13 hours	26
3.2.1 Crash Data Collection System(s): Police Crash Reports	78	78 hours	n/a	n/a	26 hours	26
3.2.2 Crash Data Collection Systems: Post-Crash	78	39 hours	n/a	n/a	13 hours	26



IC Sub-Component / Sub-Component Grouping	Number of Respondents	Year 1	Year 2	Year 3	Annual Average Burden Hours	Annual Average Respondents
Investigations and Crash Reconstructions						
3.3 Post-Crash Inspection Data Elements						
3.4.1 Crash Data Collection Training: Post-Crash Inspections	78	78 hours	n/a	n/a	26 hours	26
3.4.2 Crash Data Collection Training: Post-Crash Investigations and Crash Reconstructions	78	19.5 hours	n/a	n/a	6.5 hours	26
3.5.1 Data Quality: Police Crash Reports	78	78 hours	n/a	n/a	26 hours	26
3.5.2 Data Quality: Post-Crash Inspections	78	78 hours	n/a	n/a	26 hours	26
3.5.3 Data Quality: Post-Crash Investigations and Crash Reconstructions	78	78 hours	n/a	n/a	26 hours	26
<b>IC-3 Total</b>	<b>624</b>	<b>487.5 hours</b>	n/a	n/a	<b>162.5 hours</b>	<b>208</b>
4.1 Agency Participation in Enforcement Activities and Related Policies: <ul style="list-style-type: none"> <li>• 4.1.1 Police Crash Reports</li> <li>• 4.1.2 Post-Crash Inspections</li> <li>• 4.1.3 Agency Involvement and Funding Sources</li> </ul>						
4.2 Use of MCSAP Funding	51	204 hours	n/a	n/a	68 hours	17
4.1 Agency Participation in Enforcement Activities and Related Policies: <ul style="list-style-type: none"> <li>• 4.1.4 Post-Crash Investigations</li> <li>• 4.1.5 Reconstructions</li> <li>• 4.1.6 Crash Reconstruction Team(s)</li> </ul>						
4.1.7 Impairment Detection	78	195 hours	n/a	n/a	65 hours	26
<b>IC-4 Total</b>	<b>129</b>	<b>399 hours</b>	n/a	n/a	<b>133 hours</b>	<b>43</b>
<b>Total (All ICs)</b>	<b>1,320</b>	<b>2,124 hours</b>	n/a	n/a	<b>708 hours</b>	<b>440</b>

- **Estimated Annual Burden Hours:** 708 hours (102 hours for IC-1 + 310.5 hours for IC-2 + 163.5 hours for IC-3 + 133 hours for IC-4 = 708)
- **Estimated Time per Response (average, across all ICs):** 1.61 hours<sup>34</sup> (708 annual average burden hours / 440 annual average respondents = 1.61 hours)
- **Estimated Annual Number of Respondents:** 440 (51 for IC-1 + 138 for IC-2 + 208 for IC-3 + 43 for IC-4 = 440)
- **Estimated Annual Number of Responses:** 440 (51 for IC-1 + 138 for IC-2 + 208 for IC-3 + 43 for IC-4 = 440)

<sup>34</sup> Rounded to the nearest hundredth.

- **Estimated Annual Burden Hour Cost to Respondents:** \$41,245.08 (\$8,176.66 for IC-1 + \$29,079.35 for IC-2 + \$12,392.05 for IC-3 + \$9,863.98 for IC-4 = \$59,512.04)

### **13. ESTIMATE OF TOTAL ANNUAL COSTS TO RESPONDENTS**

There are no costs to respondents beyond those associated with the annual hourly burden (not to be included here).

### **14. ESTIMATE OF COST TO THE FEDERAL GOVERNMENT**

FMCSA has established an agreement with the USDOT Volpe Center to develop the survey instruments for this study, administer the web-based survey, and analyze the collected information. FMCSA has funded this task area at a total value of \$500,000.

FMCSA will be leveraging support from FMCSA Office of Safety staff to collect information for IC-1. For the purposes of estimating the Federal cost associated with IC-1, we are assuming GS-14 employees will do this work. FMCSA is estimating 51 mid-level GS-14 employees (one for each State plus the District of Columbia) will spend approximately 12 hours supporting this IC. Because Office of Safety staff are located nationally and locality pays vary, we used the base GS pay table for 2022 to estimate an average, mid-level GS-14 annual salary of \$110,368.50, plus 28 percent fringe (estimated at \$30,903.18), for a total annual salary of 141,271.68.<sup>1</sup> Assuming 2,080 hours in a work year, the hourly salary for a mid-level GS-14 employee would be \$67.92 ( $\$141,271.68 / 2,080$  hours = \$67.92). Applying this hourly rate to the estimated 12 hours of labor required to collect information for IC-1, we estimate a cost of \$815.04 per GS-14 employee. FMCSA estimates a total cost of \$41,567.04 for all 51 FMCSA employees who will support this IC (51 mid-level GS-14 employees \* \$815.04 = \$41,567.04).

Additional staff costs to the Government will include 30% of full-time hours for one mid-level GS-14 at the Washington, D.C. locality pay rate, to conduct contracting officer's representative and task lead activities for all years and all ICs described in this statement. We used the 2022 DC locality GS salary table to estimate an average DC-based mid-level GS-14 salary of \$145,167.70, plus 28 percent fringe (estimated at \$40,646.96), for a total annual salary of \$185,814.66. A 30 percent time commitment from this GS-14 this will cost the Government \$55,744.40 per year. Multiplied by three years, this results in a total cost of \$167,233.20 ( $\$55,744.40 * 3$  years = \$167,233.20).

There are no additional costs to the Government beyond those cited above, as all employees working on this program are within their normal position duties and there is no anticipated travel or overtime.

Based on the estimates presented above, total costs to the Government for the ICs described in this statement will be \$708,800.24 ( $\$500,000 + \$41,567.04 + 167,233.20 = \$708,800.24$ ).

### **15. EXPLANATION OF PROGRAM CHANGES OR ADJUSTMENTS**

<sup>1</sup> Office of Personnel Management, 2022 General Schedule (Base), Salary Table 2022-GS, accessed 10/14/2022 at <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2022/GS.pdf>

This is a new IC. There are no program changes or adjustments reported in items 12 and 13 of the supporting statement.

## **16. PUBLICATION OF RESULTS OF DATA COLLECTION**

FMCSA does not plan to publish results from this data collection. Results from this data collection, which will be descriptive and/or qualitative in nature, will inform the study sample design, participation agreements, data collection plans, resource plans, and study database requirements. No complex analytical techniques will be used. Final results from the overall study, once completed, will be published in a final study report.

## **17. APPROVAL FOR NOT DISPLAYING THE EXPIRATION DATE OF OMB APPROVAL**

The Agency is not requesting approval for not displaying the expiration date.

## **18. EXCEPTIONS TO CERTIFICATION STATEMENT**

FMCSA is claiming no exception to any element of the certification statement.

### **ATTACHMENTS:**

Attachment A: Consolidated Appropriations Act, 2021 (Public Law No: 116-260)

Attachment B: Infrastructure Investment and Jobs Act (IIJA, Public Law No: 117-58)

Attachment C: 49 U.S.C. Section 31132

Attachment D: Draft Survey Invitation Letters (all ICs)

Attachment E: IC-1 Survey Protocols

Attachment F: IC-2 Survey Protocols

Attachment G: IC-3 Survey Protocols

Attachment H: IC-4 Survey Protocols

Attachment I: Draft Document Request Emails

Attachment J: Example Local Jurisdiction Contacts Spreadsheet

Attachment K: Survey-to-Respondent Mapping Spreadsheet