

Supporting Statement: Part A

Information Collection Request Supporting Statements: Part A Alcohol-Impaired Driving Segmentation Study OMB Control No. 2127-(New)

Abstract:¹

The National Highway Traffic Safety Administration (NHTSA) is seeking approval of this new information collection request (ICR) to allow the agency to conduct a one-time voluntary study to obtain information to better understand attitudes and behaviors related to alcohol-impaired driving that will be used to enhance and refine communication strategy and tactics (i.e., more effectively target and message at-risk drivers and motorcycle riders). The study will survey drivers and motorcycle riders ages 21- to 54-years-old because this age range represents the greatest number of alcohol-related driving/riding fatalities according to NHTSA's Fatality Analysis Reporting System (FARS).²

The research study will include two components, both being one-time collections. The first component will involve a series of online webcam interviews that will collect qualitative information that will be used to improve the quantitative survey that will be administered in the second component. The quantitative survey will be administered online and by phone (and potentially supplemented by mail if needed). After collecting the data, segmentation analysis will be done to classify drivers and motorcycle riders according to segments based on common demographics, drinking behaviors, attitudes about drinking and driving/motorcycle riding, and lifestyle characteristics. The segmentation profiles will be used by NHTSA's Office of Communications and Consumer Information (OCCI) to better target and reach intended audiences with communications messages and techniques that are relevant and meaningful to people within the target market.

A. Justification

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal and administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

The National Highway Traffic Safety Administration (NHTSA), under the U.S. Department of Transportation (USDOT), was established to reduce the number of deaths, injuries and economic

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

² 2020 Alcohol Impaired Driving (Traffic Safety Facts. Report No. DOT HS 813 294).

losses resulting from motor vehicle crashes on the nation’s highways. In keeping with this mission and to fulfill a congressional mandate to improve highway traffic safety, NHTSA’s Office of Communications and Consumer Information (OCCI) is dedicated to eliminating risky behaviors on our nation’s roads through public awareness campaigns. One of the most significant NHTSA’s OCCI seeks to address through these efforts is drunk driving.

Drunk driving is a significant cause of highway fatalities, injuries and economic losses. Alcohol-impaired driving fatalities totaled 11,654 in 2020, accounting for 30% of all motor-vehicle-crash fatalities.³ On average, in 2020, there was an alcohol-impaired driving fatality every 45 minutes.⁴ Among motorcycle riders, in particular, 27% of riders in fatal crashes were legally drunk—a rate exceeding that of passenger car drivers (23%) and the highest among all vehicle types measured.⁵ Aside from the fatalities, alcohol-impaired driving crashes carried an economic cost of an estimated \$44 billion in 2010 (the most recent year for which cost data is available).⁶

In order for NHTSA’s public awareness campaigns on drunk driving to be effective, they must effectively “compete” for audience attention in the public domain among hundreds of other major marketers, including those in the alcoholic beverage industry who strategically target messages to particular groups of the public marketplace. In the consumer marketing context and environment, NHTSA must work to convince members of the driving/riding public not to operate vehicles when impaired by alcohol. Accordingly, NHTSA finds that it is necessary to conduct research, as authorized by the National Traffic and Motor Vehicle Safety Act (Pub. L. 89-563), to conduct research that will allow NHTSA to tailor its communication strategies better.

Specifically, NHTSA believes a segmentation analysis would be especially useful to NHTSA. More closely understanding and segmenting drunk drivers and motorcycle riders will enable more effective communication programs. Insights about drunk drivers’/motorcycle riders’ lifestyle characteristics, alcohol-consumption behaviors and attitudes towards drunk driving will provide useful, pragmatic information for NHTSA’s continuing efforts to address the drunk driving/motorcycle riding issue responsible for so many deaths.

Accordingly, NHTSA is seeking approval to conduct a one-time voluntary study to obtain information to better understand attitudes and behaviors related to alcohol-impaired driving that will be used to enhance and refine communication strategy and tactics (i.e., more effectively target and message at-risk drivers and motorcycle riders). The study will survey drivers and motorcycle riders ages 21- to 54-years-old because this age range represents the greatest number of alcohol-related driving/riding fatalities according to NHTSA’s Fatality Analysis Reporting System (FARS).⁷

³ 2020 Alcohol Impaired Driving (Traffic Safety Facts. Report No. DOT HS 813 294)

⁴ Ibid.

⁵ Ibid.

⁶ National Center for Statistics and Analysis. (2015, July). Overview: 2013 data. (Traffic Safety Facts. Report No. DOT HS 812 169). Washington, DC: National Highway Traffic Safety Administration.

⁷ 2020 Alcohol Impaired Driving (Traffic Safety Facts. Report No. DOT HS 813 294).

The research study will include two components, both being one-time collections. The first component will involve a series of online webcam interviews that will collect qualitative information that will serve as a cognitive test to improve the quantitative survey that will be administered in the second component. The quantitative survey will be administered online and by phone (and potentially supplemented by mail if needed). After collecting the data, segmentation analysis will be done to classify drivers and motorcycle riders according to segments based on common demographics, drinking behaviors, attitudes about drinking and driving/motorcycle riding, and lifestyle characteristics. The segmentation profiles will be used by NHTSA's Office of Communications and Consumer Information (OCCI) to better target and reach intended audiences with communications messages and techniques that are relevant and meaningful to people within the target market.

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

The data collected in the cognitive test will be used to refine question-wording and response options in the survey instrument, ensuring that each question is clear, consistently understood and offers an appropriate range of responses that can be selected. The data collected in the quantitative survey will be developed into segmentation profiles that will be used to assist NHTSA in its ongoing responsibilities to improve communications programs and campaigns to decrease the incidence of drunk driving/motorcycle riding to decrease the number of vehicle and/or motorcycle crash fatalities in which alcohol-impaired drivers/motorcycle riders are a factor. By knowing the segments of the population of drunk drivers/motorcycle riders—and by typifying each segment according to demographic characteristics, lifestyle traits, drinking behaviors, and attitudes about drinking and driving/motorcycle riding and enforcement—NHTSA will be better informed and equipped to develop more compelling communications strategies, messages and materials that will help convince potential drunk drivers/motorcycle riders not to operate vehicles/motorcycles when impaired. More specifically, the insights about at-risk drivers/motorcycle riders will help inform NHTSA about the most effective words, images, media, message tonalities and other communications tactics to use that will be the most meaningful, relevant, and impactful for people in a given segment.

Target market segmentation profiles (such as the type desired by NHTSA) have been proven useful and effective by companies and non-profit organizations throughout the United States for marketing, communications, sales, product/service development and customer service. The results will also be available to state partners for their information and communications program campaign efforts.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of

responses, and the basis for the decision for adopting this means of collection. Also, describe any consideration of using information technology to reduce burden.

The data for the cognitive test will be collected via online webcam interviews. The data for the quantitative survey will primarily be collected online but supplemented with outbound phone calls and mail surveys as needed. NHTSA proposes using a mixed-mode design to access hard-to-reach populations and ensure a probability sample (one where results can be reliably projected from the sample to a broader population). Samples that are exclusively online and rely on opt-in panels potentially exclude segments of the population. As a result, findings cannot be reliably projected beyond the sample to the larger population. Most completes will be collected online, which will help with cost and efficiency considerations.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

A similar study was conducted in 2017, but that data is now five years old, and an entirely new age cohort has reached the legal drinking age. It is critical to refresh the research with new data that reflects the current market and expands the sample to include populations not represented in the 2017 work. For example, the 2017 study relied exclusively on a convenience panel and was only offered in English. The proposed study would use a mixed-mode design to increase reach to include audiences difficult, if not impossible, to reach with an online panel and would include an option for participants to complete the survey in Spanish.

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

The collection of information involves individuals and will not impact small businesses or other small entities.

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

If the study is not implemented, NHTSA will be limited to using outdated target market and segmentation data. In this circumstance, NHTSA would risk using resources and money for anti-drunk driving/motorcycle riding communication campaigns, which may be less effective among the current target audience of drunk drivers/motorcycle riders. Therefore, NHTSA's efforts to reduce alcohol-impaired driving/motorcycle riding fatalities would be hampered by a lack of more up-to-date data and knowledge about effective messaging.

There are no legal or technical obstacles to reducing the burden.

7. **Explain any special circumstances that would cause an information collection to be conducted in a manner:**
 - a. **requiring respondents to report information to the agency more often than quarterly;**
 - b. **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
 - c. **requiring respondents to submit more than an original and two copies of any document;**
 - d. **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**
 - e. **in connection with a statistical survey that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
 - f. **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
 - g. **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
 - h. **requiring respondents to submit proprietary trade secrets or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

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

8. **If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to the comments. Specifically, address comments received on cost and hour burden. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format, and on the data elements to be recorded, disclosed, or reported.**

NHTSA published a 60-day notice on June 7, 2023, requesting comment on NHTSA's intention to submit this ICR to OMB for approval under Docket Number NHTSA-2022-077. The period to receive public comments closed on August 7, 2023.

60-Day Notice:

A Federal Register notice with a 60-day comment period soliciting public comments on the following information collection was published on June 7, 2023 (FR Doc. 2023-12102). NHTSA received two (2) comments. NHTSA received comments from the National Association of

Mutual Insurance Companies (NAMIC) and Responsibility.org. Both NAMIC and Responsibility.org supported NHTSA's alcohol-segmentation study efforts to inform communications initiatives to prevent alcohol-impaired driving and both requested future consideration to collaborate on communications efforts. [insert whether we received comments and if so, how many.

NHTSA Response: NHTSA appreciates the support from NAMIC and Responsibility.org. NHTSA recognizes the actions that both are taking to help communicate the dangers of impaired driving and the efforts that they are taking to decrease this behavior on US roadways. NHTSA looks forward to completing this study, sharing the results, and having discussions with both NAMIC and Responsibility.org on how we can work together to decrease impaired-driving crashes, injuries and fatalities in the US.

NHTSA published a 30-day notice on October 19, 2023, that stated NHTSA's intention to submit this ICR to OMB for approval (FR Doc. 2023-23076).

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

Participants who qualify and complete the cognitive test (online webcam in-depth interview (IDI) estimated length of 60 minutes) would receive an incentive of \$100, keeping with industry standards. Participants who qualify and complete the quantitative survey would receive an incentive in the form of a cash equivalent point system and would earn \$5 worth of points that could be redeemed for gift cards, a pre-paid debit card or a charitable donation. The \$5 value is based on the amount of incentive participants typically receive for completing a 28-minute survey. The higher industry-standard incentive for the qualitative compared to the quantitative research results from several factors, including the extra time needed to screen for the qualitative research and the added burden of scheduling the qualitative research in advance, in addition to the extra time needed for the research itself (60 minutes compared to an estimated 28 minutes).

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If the collection requires a system of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.

In the research introduction, respondents will be informed that participation is voluntary, and their answers will be kept confidential and will be used only for statistical purposes. The summary report from the cognitive test and the quantitative survey that is shared with NHTSA will not include identifying information such as names, addresses, telephone numbers or social security numbers. Upon completion of either the cognitive test or survey, it will not be possible to identify a specific respondent based on their responses to the survey questions. The research team will potentially use audio and video recordings from the research to assist with writing the summary report; however, audio and video recordings will not be shared with NHTSA and will be destroyed six months following the conclusion of the research as per our Data Retention policy. During the research period and up to the destruction of the data, all audio and video recordings will be stored on a secured Microsoft Teams channel that is only accessible by authorized Heart+Mind employees involved in the research. All of these authorized accounts are

password protected with multifactor authentication to ensure data security. The summary report will only share findings in aggregate and will not identify any of the participants.

The following text will either be read to the respondent or will appear in an introductory window before an invitee sees the first question of the survey:

Thank you for agreeing to participate in this study that is being conducted on behalf of the National Highway Traffic Safety Administration (NHTSA). This collection of information is voluntary and will be used for communications campaigns and programs to help reduce the number of fatal alcohol crashes on roads and highways. We will not collect any personal information that would allow anyone to identify you. A federal agency may not conduct, or sponsor and a person is not required to respond to, nor shall a person be subject to a penalty for failure to comply with, a collection of information subject to the requirements of the Paperwork Reduction Act unless that collection of information displays a current valid OMB Control Number. The OMB Control Number for this information collection is 2127-XXXX.

Completion of this survey is estimated to take an average of [FOR COGNITIVE TEST READ “60 minutes”; FOR SURVEY DISPLAY/READ “28 minutes”], including the time for reviewing instructions, completing, and reviewing the collection of information. All responses to this collection of information are voluntary. If you have comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, send them to: Information Collection Clearance Officer, National Highway Traffic Safety Administration, 1200 New Jersey Ave, SE, Washington, DC, 20590.

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

Some of the subject matter of this survey would be considered sensitive, particularly attitudes and experiences related to drinking, driving, or motorcycle riding. Yet the collection of this information is critically important to the insights sought by the survey. Measures will be in place to allow respondents to decline to answer any question. Agreement to answer questions will be strictly voluntary and all responses will be anonymous.

No questions will be asked pertaining to sexual behavior, religious beliefs, and other sensitive matters unrelated to drinking and driving/motorcycle riding.

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

Respondents will be sourced from the recruiter database and online panels for this research. They will be recruited using online outreach (and supplemented with other forms of outreach such as phone or mail as needed). A total of n=18 respondents will participate in the qualitative phase (a cognitive test of the survey instrument). The qualitative phase will be split evenly between n=9 interviews among English-speaking respondents and n=9 interviews among Spanish-speaking respondents. Past experience shows that nine (n=9) interviews serve as a sufficient number for cognitive testing. Since the survey will be available in both English and Spanish, our design includes a total of n=18 interviews for the cognitive test. Using the incidence rate of 25.8% assumed for qualitative recruiting and the quantitative survey, we expect that the recruiter will need to screen n=140 participants to obtain the desired target of n=36 who qualify to participate in the survey.⁸ Of those who qualify, previous experience indicates that around half will be available and interested in participating in cognitive testing. Those who qualify, are available and agree to participate (n=18) will complete the cognitive test (online webcam in-depth interview (IDI) estimated length of 60 minutes).

For the quantitative phase, respondents will complete an online survey with screening questions (estimated length of 28 minutes). Approximately 20,930 respondents will be screened to identify 5,400 who will qualify. A sample size of 5,400 was selected for the segmentation because such a sample will provide a robust basis for creating statistically sound segments and because it verges on the upper bound of the AmeriSpeak panel's feasibility.⁹ A larger sample size also enables the creation of larger segments, which in turn allows for more detailed profiling within any given segment. Finally, the larger sample size will provide a more substantial sample of motorcycle riders, the incidence of whom is estimated to be 8% in the general population.

To calculate the labor cost associated with submitting the Alcohol-Impaired Driver/ Motorcycle Rider Segmentation Research, NHTSA looked at wage estimates for the type of personnel involved with compiling and submitting the documents. NHTSA estimates the total labor costs associated with these burden hours by looking at the average wage for all occupations, which is \$33.36 per hour.¹⁰ Therefore, NHTSA estimates the total labor cost associated with the 3,569 burden hours to be \$119,062 (rounded). Table 1 provides a summary of the estimated burden hours and labor costs associated with those submissions.

Because the number of respondents and the amount of time required is different for each phase of the research, burden estimates are calculated based on each phase and then summed to create a total.

⁸ This number is derived from the 25.8% incidence of binge alcohol use from SAMHSA, Center for Behavioral Health Statistics and Quality, National Survey on Drug Use and Health, 2018 and 2019. - Table 2.20B – Binge Alcohol Use in Past Month among Persons Aged 12 or Older, by Age Group and Demographic Characteristics: Percentages, 2018 and 2020 See <https://www.samhsa.gov/data/sites/default/files/reports/rpt29394/NSDUHDetailedTabs2019/NSDUHDetTabsSect2pe2019.htm#tab2-20b>

⁹ Based on guidance from NORC's Director of Business Development obtained during feasibility discussions.

¹⁰ From Bureau of Labor and Statistics' Economic News Release - Table B-3: Average hourly and weekly earnings of all employees (April 2023). See <https://www.bls.gov/news.release/empsit.t19.htm>.

Table 1: Burden Estimates

Research Phase	Annual Respondents	Annual Responses	Estimated Burden Per Response	Average Hourly Labor Cost	Labor Cost Per Submission	Total Burden Hours	Total Labor Costs
Qual Screening and Recruiting ⁸	140	140	5 min	\$33.36	\$2.78	11.67	\$389.31
Qual Cognitive Testing	18	18	60 min	\$33.36	\$33.36	18	\$600.48
Quant Screening ⁸	20,930	20,930	5 min	\$33.36	\$2.78	1745	\$58,213.20
Quant Fielding	5,400	5,400	23 min	\$33.36	\$12.79	2070	\$69,055.20
TOTAL					\$51.71	3844.67	\$128,258.19

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

There are no record-keeping or reporting costs to respondents. Respondents who are members of an online panel of US consumers or will be sourced through purchasing supplemental lists or additional outreach will be contacted and asked to participate in the study. Each respondent participates only once in the data collection and there is no preparation of data required or expected of respondents. Respondents do not incur: (a) capital and startup costs or (b) operation, maintenance, and purchase costs as a result of participating in the cognitive test or quantitative survey.

14. Provide estimates of annualized costs to the Federal government. Provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

The total estimated cost to the government for planning and designing the study, conducting the data collection, completing the segmentation analysis and reporting the findings is \$700,426.93. This estimated cost is comprised of prime contractor professional time with an estimated direct labor cost of \$124,188.60 and subcontractor time and expenses for the survey panel, incentives and related services, for a total direct cost of \$576,238.33.

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

This is a new information collection request, resulting in a program change of an additional 3,574 burden hours and \$0 to NHTSA's overall total.

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

The goal of the study is to identify and describe at-risk drivers and motorcycle riders ages 21-54. To identify and describe this group of at-risk drivers and motorcycle riders, the research team will utilize advanced multivariate analytics, including but not limited to factor analysis, cluster analysis, including latent class, and other descriptive statistics among the 5,400 cases collected in the quantitative survey. A more detailed description of how the data will be analyzed is included in the Supporting Statements: Part B.

A comparative analysis across segments will be conducted to look for key differences that NHTSA may leverage in strategy moving forward. As appropriate, descriptive statistics for specific points of data and findings will be referenced. In the event the detailed data might be useful in the future, the addenda will include data tables of all findings representing all questions in the survey. Once the analysis is complete, a final written report containing detailed findings will be published. The following is NHTSA's project timeline from the date NHTSA receives OMB approval:

Task	Estimated timing
Survey programming and testing begins	Week 1
Cognitive testing recruiting begins	Week 3
Survey programming and testing complete	Week 5
Cognitive testing	Week 6
Summary of recommended changes	Week 8
Updates to the survey program	Week 9
Quantitative fielding begins	Week 10
Quantitative fielding ends	Week 14
Data processing and analysis begins	Week 15
Segmentation solution workshop	Week 20
Additional analyses	Week 21
Report development	Week 22
Final report	Week 23

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

We do not seek approval to not display the expiration date for OMB approval for this information collection.

18. Explain each exception to the topics of the certification statement identified in “Certification for Paperwork Reduction Act Submissions.” The required certifications can be found at 5 CFR 1320.9.¹¹

There are no exceptions to the certifications statement.

¹¹ Specifically explain how the agency display the OMB control number and expiration date and will inform potential respondents of the information required under 5 CFR 1320.8(b)(3); the reasons the information is planned to be and/or has been collected; the way such information is planned to be and/or has been used to further the proper performance of the functions of the agency; an estimate, to the extent practicable, of the average burden of the collection (together with a request that the public direct to the agency any comments concerning the accuracy of this burden estimate and any suggestions for reducing this burden); whether responses to the collection of information are voluntary, required to obtain or retain a benefit (citing authority), or mandatory (citing authority); the nature and extent of confidentiality to be provided, if any (citing authority); and the fact that an agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.