Information Collection Request Supporting Statements: Part A
Crash Report Sampling System (CRSS), Non-Traffic Surveillance (NTS), and Special Studies Data Collection
OMB Control No. 2127-0714

Abstract:[1]

The National Highway Traffic Safety Administration (NHTSA) is seeking approval from OMB of this information collection request (ICR) for an extension with modification of its currently approved information collection for the Crash Report Sampling System (CRSS) information collection and related special studies. NHTSA is seeking approval to modify the collection to include the collection of the portion of NHTSA's Non-Traffic Surveillance (NTS) data that is submitted through the CRSS data collection effort and add two special studies. NHTSA is authorized by 49 U.S.C. 30182 and 23 U.S.C. 403 to collect data on motor vehicle traffic crashes to aid in the identification of issues and the development, implementation, and evaluation of motor vehicle and highway safety countermeasures to support efforts to reduce injuries and fatalities caused by motor vehicle crashes. CRSS is a voluntary collection of data from police-reported crashes involving all types of motor vehicles, pedestrians, and cyclists; this includes property damage only crashes as well as those resulting in injuries and fatalities. The Non-Traffic Surveillance (NTS) is a virtual data collection effort for collecting information about non-traffic crashes and non-crash incidents. Non-traffic crashes occur on private roads, parking lots or driveways, such as a back over in a driveway. Non-crash incidents, on the other hand, are incidents that involve motor vehicles that result in injuries and fatalities to persons, such as carbon monoxide poisoning and hypo/hyperthermia. The NTS data provide counts and details regarding fatalities and injuries that occur in non-traffic crashes and in non-crash incidents. Additionally, two special studies are included: the non-Sample count study and the PJ frame evaluation which will assess the quality of the CRSS sampling frame and assist with determining the weights and measure of size for the CRSS Police Jurisdictions (PJs). This is a modification to the previously approved as OMB Control No. 2127-0714 (current expiration Date: 12/31/2022). This ICR increases burden by 7,000 hours (from 35,680 hours to 42,680 hours).

A. Justification

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

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

NHTSA is authorized by 49 U.S.C. § 30182 and 23 U.S.C. § 403 to collect data on motor vehicle traffic crashes to aid in the identification of issues and the development, implementation, and evaluation of motor vehicle and highway safety countermeasures to reduce fatalities and the property damage associated with motor vehicle crashes. Using this authority, NHTSA established the Crash Report Sampling System (CRSS), Non-Traffic Surveillance (NTS) and targeted Special Studies to collect data on motor vehicle crashes. These data collection effort support the Department of Transportation's strategic goal for safety by working toward the elimination of transportation related deaths, injuries, and property damage.

The Crash Report Sampling System (CRSS) is a voluntary collection of data from police-reported crashes involving all types of motor vehicles, pedestrians, and cyclists; this includes property damage only crashes as well as those resulting in injuries and fatalities. CRSS obtains its data from a nationally representative probability sample selected from the estimated six million police-reported crashes that occur annually in the United States. By focusing attention on police-reported crashes, CRSS concentrates on the crashes of greatest concern to the highway safety community and the public.

CRSS depends on the voluntary participation and cooperation of State and law enforcement agencies. This allows NHTSA and its contractors to access the crash reports to review, list, and categorize the crashes. CRSS data is solely based on crash reports. The crash reports provide essential data: detailed information regarding the location of the crash, the vehicles, and the people involved. The crash reports are official local and State government forms that include the location of the crash and the pre-crash environment, explains the number and types of vehicles involved as well as describing the persons, injuries and other variables to express how the person was involved in the crash. No personally identifiable information is collected or released via the CRSS data. Selected crashes are released to the public in the annual CRSS file following quality control processes conducted by NHTSA. These data files are used by NHTSA and the public for highway safety research purposes.

In addition, data regarding fatalities and injuries that occur in nontraffic crashes and in non-crash incidents had not routinely been collected by NHTSA. U.S. Congress required NHTSA to collect and maintain information about fatalities and injuries in nontraffic and non-crash incidents in Public Law Number 109-59, Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU) and in Public Law Number 110-189, Cameron Gulbransen Kids Transportation Safety Act of 2007 (K.T. Safety Act). NHTSA designed and implemented the Non-Traffic Surveillance (NTS) study to fulfill the requirements of SAFETEA-LU and the K.T. Safety Act.

The Non-Traffic Surveillance (NTS) is a virtual data collection effort collecting information about non-traffic crashes and non-crash incidents. The NTS data provide counts and details regarding fatalities and injuries that occur in non-traffic crashes and in non-crash incidents. The NTS non-traffic crash data are obtained through NHTSA's data collection efforts for the Crash Report Sampling System (CRSS),[2] the Crash Investigation Sampling System (CISS), [3]

[2] The CRSS information collection is assigned OMB Control No. 2127-0714.
[3] The CISS information collection is assigned OMB Control No. 2127-0706.

and the Fatality Analysis Reporting System (FARS)[4]. NTS also includes data outside of NHTSA's own data collections. NTS' non-crash injury data is based upon emergency department records from a special study conducted by the Consumer Product Safety Commission's National Electronic Injury Surveillance System (NEISS) All Injury Program. NTS non-crash fatality data is derived from death certificate information from the Centers for Disease Control's National Vital Statistics System.

This ICR only seeks approval for the collection of data for NTS non-traffic crash data collection from the CRSS data collection effort. The burden for NTS is included across three information collections because the data is collected differently under each of NHTSA's three data collection efforts that feed into NTS. The CRSS and CISS data collection efforts obtain NTS applicable reports received from the sample sites during their normal data collection efforts for CRSS and CISS. The FARS data collection effort uncovers NTS applicable reports received from the State during their normal data collection activities for FARS. Therefore, portions of the burden for NTS is included in the ICRs for all three data collection efforts.

This ICR is also requesting approval for two special studies to be conducted using the CRSS collection methodologies. The burden has been divided by three, to note the Non-Sample count and PJ Frame Evaluation special studies will only be conducted once during this ICR.

In addition to the CRSS data collection, NHTSA may require a special study to collect crash counts from the non-sampled CRSS jurisdictions. The data to be collected from the non-sampled Police Jurisdictions (PJs) includes the crash counts by the crash report Strata - within in scope for CRSS, NTS applicable, or out of scope. Non-sampled PJs are defined as PJs that investigate motor vehicle crashes within the CRSS PSU boundaries but are not selected for the CRSS data collection.

The majority of the CRSS estimates are sub-population totals and percentages. To make these estimates efficient, both CRSS PSU and PJ samples were selected using probability proportional to size sampling method. Here the PSU and PJ crash counts were used as the measure of size (MOS). On the other hand, CRSS PSU and PJ samples are panel samples – once selected they are used for many years' data collection. A drawback of using panel sample is the MOS may become outdated over time so that the estimates become less efficient. To mitigate this inadvertent effect, it is necessary to collect the crash counts of the non-sampled PJs every 2-3 years if budget allows and use them together with the sampled PJ's crash counts to calibrate the PJ weights. The completion of the non-sample count special study supplements the CRSS data collection effort to reduce PJ frame coverage errors, sampling variance and potential PJ non-response bias. Additionally, non-sample counts are also used to update the PJ frame for future PJ sample re-selection

There are various tasks associated with the non-sampled PJ crash counts, including working with the non-sample police jurisdictions to gain access to crash reports. Then, for an entire data collection year, the collection of the non-sampled PJ crash counts would include the review of crash reports from the non-sampled PJs that are to be stratified and tallied.

[4] The FARS information collection is assigned OBM Control No. 2127-0006.

NHTSA anticipates approximately 247,100 crashes from the non-sample PJs for the data collection year. This estimate is based on population counts of all police reported motor vehicle crashes on a trafficway identified during the development of the CRSS PJ frame. The completion of the non-sample count special study supplements the CRSS data collection effort to reduce PJ frame coverage errors, sampling variance and potential PJ non-response bias. Additionally, non-sample counts are also used to update the PJ frame for future PJ sample re-selection.

Another special study NHTSA may require is the CRSS PJ frame evaluation. The current CRSS PJ sample was selected from a PJ frame created in 2016. However, the PJ frame is constantly changing: new PJs start operating, existing PJs are closed, multiple PJs are merged into one PJ, or one PJ splits into multiple PJs. The current CRSS PJ sample was selected from the 2016 PJ frame and the PJ weights were calculated accordingly. If the PJ frame has changed dramatically from the 2016 PJ frame, the CRSS PJ weights are no longer correct and the CRSS estimates may be biased. To prevent this, NHTSA needs to evaluate the current PJ frame. Specifically, this includes the following:

1. Identify all PJs that currently generate PCRs for the sampled non-EDT PSUs regardless of where the PJs are located.
2. For all identified PJs in the PJ frame, collect 6 crash counts (total crashes, fatal crashes, injury crashes, pedestrian crashes, motorcycle crashes, and commercial motor vehicle crashes). These crash counts will be used as PJ measurement of size for PJ sample selection or PJ weight adjustment if needed.

Absent the data collected and disseminated via the CRSS, NTS and the two special studies, US DOT, State Highway Safety Offices, and other traffic safety analysts would not have information data crucial to problem identification and countermeasure development for motor vehicle crashes and non-traffic crashes, respectively.

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 Crash Report Sampling System (CRSS) data are used to estimate the overall crash picture, identify highway safety problem areas, measure trends, drive consumer information initiatives, and form the basis for cost and benefit analyses of highway safety initiatives and regulations. CRSS data estimates fatal, serious injury, and property-damage-only (PDO) crashes nationwide. It gives motor vehicle researchers an opportunity to assess the overall state of highway safety and identify existing and emerging highway safety trends as well as assess the effectiveness of motor vehicle safety standards and highway safety programs.

NHTSA designed and implemented the Non-Traffic Surveillance (NTS) study to fulfill the requirements of SAFETEA-LU and the K.T. Safety Act to collect and maintain information about fatalities and injuries in non-traffic crashes and non-crash incidents. Non-traffic crashes involve injuries and fatalities to persons involved in motor vehicles with unstabilized situations and harmful events outside of the trafficway. Non-traffic crashes occur on private

roads, parking lots or driveways, such as a back over in a driveway. Non-crash incidents, on the other hand, are incidents that involve motor vehicles that result in injuries and fatalities to persons, such as carbon monoxide poisoning and hypo/hyperthermia. The CRSS, CISS and FARS studies with their partnership with local and state police agencies, access non-traffic crashes and submit the reports for NTS coding throughout the data collection year using the same processes to acquire their studies cases, respectively.

The non-sampled PJ Crash Count Special Study and the PJ Frame Evaluation Special Study are critical to assessing the quality of the PJ frame of the CRSS PSUs to determine PJ weights and measure of size for the CRSS PJ sample selection. Without the special studies, NHTSA may fail to accurately assess the national crash picture by missing pertinent crash data. Thus, the importance of including the special studies and the estimated additional burden for the CRSS.

Data users include virtually every program area in NHTSA, other federal agencies such as the Federal Highway Administration, Federal Motor Carrier Safety Administration, state and local governments, domestic and foreign motor vehicle manufacturers, insurance and consumer organizations, safety research organizations, universities, foreign government agencies, and individual citizens.

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.**

Many police agencies have shifted from paper-based crash data collection to utilizing automated technology to report crash information. When possible, the CRSS, NTS and the Special Studies leverage this technology to electronically transfer data to NHTSA's Crash Data Acquisition Network (CDAN) to minimize any burden on law enforcement.

The CDAN is an integrated, web-based information technology system that provides a single, central IT platform that maintains the data NHTSA collects from its FARS, CRSS, and NTS studies. These crash data collections are centered on the crash report, the form which law enforcement agencies use to document a motor vehicle crash. NHTSA collects crash reports from cooperating police jurisdictions and custodial agencies in each State. In addition to data derived from the crash report, NHTSA may obtain additional information to further the understanding of a crash, its causal factors, or outcomes. This additional information is also stored and maintained in CDAN.

CDAN is Privacy Impact Assessment (PIA) approved system. The approval can be viewed at: https://www.transportation.gov/individuals/privacy/crash-data-acquisition-network-cdan-pia.

As States crash data collection systems have been increasingly electronic, the access to crash reports have become centralized. Improved technology is constantly being sought and evaluated to reduce the burden of the data collection and reporting effort.

The CRSS States have a combination of crash report access methods, which include but are not limited to the Electronic Data Transfer (EDT), access to State websites and web service transfer. The Electronic Data Transfer is a routine automated transfer of State crash data from a State agency to NHTSA to support crash data collection efforts for various crash report data collection systems. EDT reduces the level of effort need to share crash data to support NHTSA record based and crash investigation studies.

Additionally, States provide CRSS Samplers access to the crash data collection databases to retrieve crash report data, thereby, eliminating the physical visits to individual police jurisdictions and their respective records managers.

States also provide data through secure web service portals to NHTSA on a routine basis. The State transfers the data and NHTSA will retrieve the data.

The NTS data collection effort is essentially a virtual data collection system, comprised of multiple databases to obtain the non-traffic crash and non-crash injuries and fatalities. The non-traffic crashes are a combination of all the various crash report access methods.

Once NHTSA accesses the crash report data, it's made available through the Police Accident Report Sampling Engine (PARSE). The PARSE application is a centralized, web-based repository in which CRSS, and NTS applicable crash reports are listed, categorized, and selected for further coding.

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.**

   No similar crash data collection studies exist.

   CRSS nor its related special studies do not duplicate efforts with any other Federal crash data collection. No existing survey or other source provides the data required to support highway safety research needs, particularly for serious injury and PDO crashes. NTS does not duplicate an effort with any other Federal crash data collection. No existing survey or data source provides the data to support injuries and fatalities that occur in non-traffic crashes and non-crash incidents.

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

   CRSS, NTS and the special studies collections do not involve small business or small entities. The information for CRSS and NTS is collected from law enforcement organizations and state agencies.

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

If this collection is not done for CRSS, the Agency would lose its ability to obtain nationally representative police-reported motor vehicle traffic crash data. This information will identify highway safety problem areas and provide general data trends.

If this collection is not done for NTS, the Agency would be unable to meet the requirement outlined in Cameron Gulbransen Kids Transportation Safety Act of 2007, Public Law 110–189.

The special studies are critical to assessing the quality of the PJ frame of the CRSS PSUs to determine PJ weights and measure of size for the CRSS PJ sample selection. Without the special studies, NHTSA may fail to accurately assess the national crash picture by missing pertinent crash data. Thus, the importance of including the special studies and the estimated additional burden for the CRSS.

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.

The procedures specified CRSS, NTS, and the special studies are consistent with the guidelines set forth in 5 CFR 1320.6 except for the fact that the information will be collected more often than quarterly. When respondent entities agree to grant access to their crash reports, the frequency of sharing data is based on their internal processes and the volume of crash reports collected. For respondents that submit using Electronic Data Transfer (EDT) and States who provide access to their websites, the collection will occur daily. For respondents that provide physical access to the police jurisdiction, crash reports are typically accessed weekly or bi-weekly. For respondents that provide crash reports via mail courier or other electronic means such as secure email, the crash reports are accessed monthly. Typically, the schedule is determined based on the police

agencies' internal processes for sharing crash reports with the State-level agency responsible for the State crash file. For instance, a police jurisdiction will transmit its crash reports to the States monthly and at the same time a copy is provided to the CRSS study via one of the methods noted above.

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

   NHTSA published a 60-day notice on September 28, 2022, requesting comment on NHTSA's intention to submit this ICR to OMB for approval (87 FR 58905). NHTSA received one supporting comment from the National Association of Mutual Insurance Companies (NAMIC), emphasizing the proposed data collection is critical for the proper performance of the functions of NHTSA and the proposed collection will have great practical utility. Furthermore, NAMIC asserts NHTSA should propose more widespread, extensive, and granular auto safety and crash data recording and reporting. NAMIC also offers assistance with providing specific metrics, key performance indicators (KPIs), and measures of success.

   NHTSA published a 30-day notice on December 20, 2022 requesting comment on NHTSA's intention to submit this ICR to OMB for approval (87 FR 77948, Pages 77948-77952).

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

   No payment or gift will be provided to any respondent.

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**.

    The CDAN is an integrated, web-based information technology system that provides a single, central IT platform that maintains the data NHTSA collects from its FARS, CRSS, NTS studies. These crash data collections are centered on the crash reports, the form in which law enforcement agencies use to document a motor vehicle crash. NHTSA collects a crash report from cooperating police jurisdictions and custodial agencies in each State.

NHTSA has conducted a Privacy Impact Assessment (PIA) for the CDAN system and has made that assessment publicly available.[5]

The CRSS and NTS are not a system of records that are subject to the Privacy Act. No names of individuals are entered into automated case files. The data acquired for CRSS and NTS are taken from State public record files. Personal identifiers are not required, requested or recorded on analytical files released to the public. NHTSA makes CRSS and NTS data available to the public.

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.

The CRSS, NTS and special studies do not obtain information that is of a sensitive nature.

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.

Within the 30 States or 60 CRSS Primary Sampling Units (PSUs) there are Police Jurisdictions (PJs), from which a CRSS sampler must obtain crash reports for listing, categorization, and sampling. Currently, 50 PSUs provide NHTSA data electronically—through EDT, State website access, or web service portal. For one State, the crash reports are obtained through EDT and manually since not all crashes are reported through EDT. A total of 10 PSUs, or 21 local PJs, where crash reports collection is conducted in the field using a combination of electronic and manual methods as dictated by the sample PJ's crash report collection methods. These PJs required field samplers which incur an increased burden due to the labor-intensive administrative practices and privacy protections associated with manually accessing the crash reports.

The annual burden estimate detailed in Table 1 is produced by identifying the crash report access method for each PSU and PJ and assigning the appropriate burden hours for that method as outlined below.

- EDT Maintenance – For PSUs providing crash report through EDT, the burden is estimated at 5 hours annually. This accounts for yearly updates to programming needed to successfully transmit data, such as updating data structures if new data elements are added or any changes to the state made to their crash report and/or databases.
- State Website – User Access Only: For PSUs providing crash reports via a state repository/website or database, the burden is estimated at 10 hours annually. This

[5] https://www.transportation.gov/individuals/privacy/crash-data-acquisition-network-cdan-pia

represents time to process user account requests, establish credentials, and routine maintenance of the State's data repositories.

- State Website – User Access and Additional Administrative Functions: For PSUs providing crash reports directly to NHTSA via web service or where the State employees provide user access accounts in addition to regularly searches for crash reports, compiles the lists of crashes to send to NHTSA monthly, the burden is estimated at 60 hours annually. This represents implementation, data transfer monitoring, and communications with NHTSA and its contractors.
- For PSUs providing crash reports to NHTSA via manual crash report access methods (i.e., weekly physical visits to a PJ, copying crash reports and mailing them, and searching for recently completed crash reports and uploading crash reports to secure email links), the burden is estimated at 470 hours annually. This represents—but is not limited to—maintaining a law enforcement presence while the crash reports are being reviewed, and/or providing resources to the CRSS sampler in order to access the crash reports. This is the most labor extensive access type due to the administrative burden and the additional processes required to protect PII. Other local police jurisdictions may photocopy crash reports and FedEx to the contractors or download electronic crash reports to submit electronically via secure email or thumb drive monthly. This total also accounts for States that have monthly manual processes to identify crash reports in their state databases, compile crash reports and share with NHTSA.

The hourly burden was calculated using the Bureau of Labor Statistics' mean hourly wage estimate for Court, Municipal, and License Clerks (Standard Occupational Classification #43-4031)[6] from May 2021 of $21.57. Therefore, NHTSA estimates the hourly wage associated with the estimated 21,040 burden hours (see Table 1) to be $453,832.80 (21,040 hours × $21.57 per hour). The Bureau of Labor Statistics estimates that for State and local government workers, wages represent 54.96% of total compensation.[7] Therefore, the total cost of burden associated with this collection is estimated to be $825,751.09 ($453,832.80/.5496).

Table 1: CRSS Data Collection Burden Hours

Access Method	Hours per Jurisdiction	Number of Respondents Jurisdiction (PJ) or States	Total Hours
EDT (Maintenance)	5	14 States	70

[6] *See* May 2021 National Industry-Specific Occupational Employment and Wage Estimates, 43-4031 – Court, Municipal, and License Clerks, available at https://www.bls.gov/oes/current/oes434031.htm (accessed May 18, 2022).

[7] *See* Table 1. Employer Costs for Employee Compensation by ownership (Dec. 2021), available at https://www.bls.gov/news.release/ecec.t01.htm (accessed May 18, 2022).

State Website (user access only)	10	11 States	110
State Website (user access and additional administrative functions)	60	2 States	120
Web Service (user access and States query and compile info)	60	1 State	60
Mixed Manual	470	44 PJs	20,680
Grand Total		**72 Respondents**	**21,040**

Annually, there is the potential to reselect police jurisdictions, which is dependent on maintenance of cooperation and access to crash reports. If cooperation is lost, replacement jurisdictions are sought. Regardless, the PJ frame is updated, and the PJ sample is reselected every year. However, the changes in the sampled PJs are minimal because Pareto sampling method is used for PJ sample selection. Any changes to the PJ frame could impact the reported burden rates. For more details, please refer to Pages 29-32 of the Technical Report: https://crashstats.nhtsa.dot.gov/Api/Public/ViewPublication/812706.

The CRSS special studies are important to evaluate the PJ frame of the CRSS PSUs, determine PJ weights and measure of size for the CRSS PJ sample selection. For NHTSA to accomplish its mission, motor vehicle crash data must be of the highest quality which includes sampling from an accurate PJ frame to select a nationally representative sample of crashes.

The burden calculation for the non-sample count special study is difficult to determine. Each burden calculation is associated with the agreed upon crash report access method for sample sites. For non-sample PJs we have no established relationship nor is it known which type of access to crash report is feasible. Most importantly, non-sample count special studies are conducted on an ad-hoc basis and not implemented every year. We estimate that the non-sample special study will at most be conducted once in the next three-year cycle. Table 2 illustrates non-sample counts by access method in the state for sample sites.

EDT has been removed from the table because CRSS samples from the entire county for EDT States, therefore there is no distinction between the non-sample and sample PJs. This is an added benefit to EDT implementation as we get an accurate assessment of the PSU frame by CRSS strata. State websites with user access have non-sample PJs however, there is no added burden because the initial access granted is at the state level. State website with user access and additional administrative functions provide NHTSA data at the county level, which includes both sample and non-sample PJs, thus there is no additional burden to the state. Webservice agreements also provide data at the county level, thus there is no additional burden to the state to provide non-sample crash reports. States noted as having manual methods only account for the

sample PJs. Without established cooperation, NHTSA can't forecast individual PJs access methods for the purposes of the burden calculation. Therefore, NHTSA assumes that all the non-sampled PJs in the PSUs using the mixed manual method will also be mixed manual. Thus, NHTSA estimates 136 PJs will participate in the non-sample special study using the mixed manual method. The maximum burden for the non-sample count special study's estimated burden is 63,920 (see Table 2) with the possibility of reduction with cooperative agreements finalized. Since the non-sampled special study will be collected once in the next three year, dividing the 63,920 total burden hours by three yields an annual burden of 21,307 hours.

Table 2: Non-Sample Count Special Study Burden Hours

Access Method	Hours per Jurisdiction	Number of Respondents Jurisdiction (PJ) or States	Annual Total Hours
Manual	470	136	21,307 (470*136/3)
Grand Total		**136**	**21,307**

The total cost of burden associated with non-sampled special study is $836,229.97 (21,307 hours x $21.57 per hour / .5496 compensation) using the same mean hourly wage estimate for Court, Municipal and license clerks and estimates that for State and local government workers, wages represent 54.96% of total compensation.[8]

The activities associated with PJ frame evaluation special study include identifying the in-scope PJs and contacting the in-scope PJs for the 6 crash counts. NHTSA estimates there are total 40 non-EDT PSUs and about 1,248 PJs in those non-EDT PSUs. NHTSA estimates it would take about 1 minute per PJ to confirm if there are any changes to the PJ since the 2016. NHTSA anticipates approximately 15 minutes (0.25 hours) for each PJ to prepare the 6 crash counts. NHTSA estimates the total number of hours of response burden is about 333 hours.

Table 3: PJ Frame Evaluation Special Study Burden Hours

[8] *See* Table 1. Employer Costs for Employee Compensation by ownership (Dec. 2021), available at https://www.bls.gov/news.release/ecec.t01.htm (accessed May 18, 2022).

PJ Frame Evaluation	Hours per Jurisdiction	Number of Respondents Jurisdiction (PJ)	Annual Total Hours
Manual	16 Minutes	1,248	333 (16/60*1,248)
Grand Total		**1,248**	**333**

The total cost of burden associated with PJ frame evaluation special study is $13,069.16 (333 hours x $21.57 per hour / .5496 compensation) using the same mean hourly wage estimate for Court, Municipal and license clerks and estimates that for State and local government workers, wages represent 54.96% of total compensation.[9]

The total annual burden hours for the CRSS, NTS and Special Studies is estimated at 42,680 hours (21,040 + 21,307 + 333) for a data collection year when all studies are implemented. Furthermore, the CRSS, NTS and Special Studies have 1,456 total respondents.

The total cost of burden associated with this collection is estimated to be $1,675,050.22 ($825,751.09+ $836,229.97 + $13,069.16).

Table 4: Summary of Additional Burden

Information Collections	**Previous Burden Hours**	**New Burden Hours**	**Difference**	**Reasoning**
CRSS	35,680	21,040	-14,642	Increased efficiencies with more States participating in EDT has decreased the CRSS burden hours
NTS	0	0	0	Included with CRSS burden
Non-Sampled Special Study	0	21,307	+21,307	New IC
PJ Frame Evaluation Special Study	0	333	+ 333	New IC
Total	35,680	42,680	+ 7,000	

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 additional costs to respondents participating.

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

[9] *See* Table 1. Employer Costs for Employee Compensation by ownership (Dec. 2021), available at https://www.bls.gov/news.release/ecec.t01.htm (accessed May 18, 2022).

any other expense that would not have been incurred without this collection of information.

The cost to the Federal Government for CRSS, NTS and Special Studies is estimated to be $7,292,910.55.

Data collection operations for CRSS and NTS is estimated at $3,075,071.72 annually to operate the sampling and coding contracts across the United States, based on its recent awarded contracts to Laansu Inc.

To calculate the costs for Special Studies, the proportion of non-sample crashes to total estimated crashes was used. Non-sample crashes is estimated at approximately 37% of sampled crashes, thus 37% of the operational costs of the current sampling contract, which is $4,857,059.88, was used to estimate the costs of the special studies. Data collection for special studies is estimated at $1,797,112.16. This cost is associated with the operation of special study data collection sites across the United States.

The annual administrative costs for salaries is $724,217.55. It takes four federal staff approximately 98% of their time. This includes but is not limited to contract management, assess the productivity of the data collection effort, review and remediation of quality control findings and participate in year sampling and coding updates for the upcoming data collection year. The estimated costs for staff was based on two GS-13, Step 1; 1 GS-13, Step 8; GS-14, Step 6 using the 2022 GS scale and the Washington, D.C. Locality Schedule. This equates to ($106,823+$106,823+$131,747+$147,272) *.98= $482,811.70. Since fringe benefits and overhead for federal staff is 50%, we estimate that total annual cost for these federal staff include fringe benefits and overhead is $482,811.70 * 1.50 = $724,217.55 annually.

The annual statistical support cost is $73.067.31. This is the federal staff time to create the initial sampling parameters to select the crashes, monitor the sample selection throughout data collection, adjust the sampling parameter if needed, and produce the weight for the annual file. The estimated cost for staff was based on nineteen percent of a GS-14, Step 4 time; five percent each of GS-15, Step 7, GS-14, Step 9, and GS13, Step 2 time using the 2022 GS scale and the Washington, DC Locality Schedule. This equates to ($138,856*19%) = 26,382.64 and ($176,300+$159,894+$110,384) *.05= $22,328.90. Thus, the total annual estimate for statistical support is $26,382.64+$22,328.90=$48,711.54. This increases to $48,711.54 *1.50 = $73,067.31 annual when fringe benefits and overhead are added.

The annual IT support cost is $1,623,441.81. The cost covers IT operations and maintenance support which include software applications, reporting tools, coding application, edit check implementation, EDT and Consolidated State Caseviewer, data warehousing, support servers, quality control and compiling annual data files. The IT operations and maintenance support for CRSS is estimated at $1,344,493.85 and $232,241.86 for NTS. The costs for staff was based on 30% of federal staff of one GS-14, Step 8 ($155,687*.30 = $46,706.10) using the 2022 GS Scale and the Washington, DC Locality Schedule. Thus, the total annual estimate for IT support is $1,344,493.85+ $232,241.86 + $46,706.10 = $1,623,441.81.

The total estimated annualized cost to the government is $7,027,148.93.

Expense	Annualized Cost
Sampling and Coding Contracts	$3,075,071.72
Special Studies	$1,797,112.16
Administrative Costs	$724,217.55
Statistical Support	$73,067.31
IT Services	$1,623,441.81
Grand Total	**$7,292,910.55**

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

After adjusting for the previous calculated burden, integrating the increased efficiencies and automation with more States participating in the EDT, NHTSA estimates 21,040 burden hours.

The previous request for this information collection (OMB No. 2127-0714) estimated the annual burden to be 35,680 burden hours. This request increases the burden to 42,680. This ICR is adjusted due to a) reducing burden hour estimates for CRSS information collection to be more accurate and reflect current efficiencies, b) add the non-sampled Special Study and c) add the PJ Frame Evaluation Special Study into this package. The combined impact is an increase of 7,000 burden hours to NHTSA's overall total.

From the implementation of CRSS until now, the understanding of the processes of law enforcement and state agencies has improved, and NHTSA has determined the original estimate of 35,680 hours was too high. For example, previously the largest PSUs which included several counties with mixed access methods, each county was counted for a burden of hours. However, with a central crash report database for the state, CRSS should have counted the burden only once and not for each individual county it encompassed.

Additionally, we have routinely sought efficiencies in the data collection efforts and implemented automation of receiving crash reports where possible. As states have converted to more electronic means to store crash reports, CRSS has sought to access the crash reports remotely thus reducing the level of effort needed from the law enforcement and state agencies.

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.

There is one CRSS file made available to the public each year after completion of quality control. The file is an analytical file. CRSS data file and accompanying documentation will be released annually which is available on the Internet, https://www.nhtsa.gov/file-downloads?p=nhtsa/downloads/CRSS/, in the fall for the previous calendar year. For example, data collection during calendar year 2022 will be available for public release in the fall of 2023. Copies of the data base have been acquired by motor vehicle manufacturers, highway safety research organizations, and insurance and consumer groups, who use the data for their own analyses.

The NTS non-traffic crash data files are produced annually and are available on the Internet: NHTSA File Downloads | NHTSA.

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

NHTSA will display the expiration date for OMB approval and the PRA burden statement on the CRSS website.

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.[10]

Paperwork Reduction Act Statement: 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 2127-0714. The information collected on this form is necessary to import a motor vehicle or motor vehicle equipment into the United States. We estimate on average that it will take approximately 10 – 20 minutes to complete the form. The information collected is mandatory under 49 CFR 591.5. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to: Information Collection Clearance Officer, National Highway Traffic Safety Administration, 1200 New Jersey Ave, S.E., Room W45-205, Washington, DC, 20590.

[10] 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.