Information Collection Request Supporting Statements: Part A
State Data Transfer
OMB Control No. 2127-0753

Abstract:[1]

The National Highway Traffic Safety Administration (NHTSA) is submitting this information collection request (ICR) to request an extension with modification of NHTSA's currently approved information collection for its State Data Transfer (SDT) program. The SDT program is a voluntary collection of motor vehicle crash data. State agencies collect information about motor vehicle crashes on Police Accident Reports (PARs)[2] for their own needs. In general, a PAR includes information about the vehicles and individuals involved in a crash, injuries or fatalities resulting from a crash, roadway information, environmental information, and information to reconstruct the crash scenes, etc. The SDT is a process through which participating States transfer their PAR data to the National Highway Traffic Safety Administration (NHTSA). SDT has two components that NHTSA's National Center for Statistics and Analysis (NCSA) calls protocols:

1. The <u>State Data System (SDS)</u> protocol obtains PAR crash data from States that submit data on an annual basis to NCSA. The data is submitted via electronic media, such as encrypted CD-ROM/DVD, or through secured mail or a secure file transfer protocol (SFTP). Files submitted through the SDS protocol are referred to as "annual crash files."

2. The <u>Electronic Data Transfer (EDT)</u> protocol obtains PAR crash data, crash reports, and crash images from participating State crash systems through an electronic data transfer. Generally, this transfer occurs on a nightly basis following State data quality control checks and acceptance by each State's centralized statewide crash data repository. The information is transmitted using Extensible Markup Language (XML) or JavaScript Object Notation (JSON) files through a web service using the Hypertext Transfer Protocol Secure (HTTPS) protocol between a State's crash data system and NHTSA. NHTSA started using this EDT protocol in 2015. The data that NHTSA receives is in the States' format, which is not standardized. NHTSA does not currently provide regular funding to the States to participate in EDT.

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[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.

[2] Police Accident Reports are also known as Police Crash Reports (PCRs) in some jurisdictions.

On November 15, 2021, President Biden signed the Infrastructure Investment and Jobs Act (IIJA or the Bipartisan Infrastructure Law), Public Law 117-58. Section. 24108 (d) authorizes the Secretary of Transportation to establish the State Electronic Data Collection (SEDC) program to provide grants to States to establish, upgrade, and standardize their centralized statewide crash data repositories to enable electronic data collection, intrastate data sharing, and electronic data transfer to NHTSA. The objective is to increase the accuracy, timeliness, and accessibility of the data, including data related to fatalities involving vulnerable road users. Through the SEDC program, NHTSA will award grants to States to modernize or establish their centralized statewide crash data repositories to enable full electronic data transfer to NHTSA, increase their alignment to the Model Minimum Uniform Crash Criteria (MMUCC) Sixth Edition data, and transmit the data in a standardized format to NHTSA. This information collection request is to modify NHTSA's existing information collection for SDT to account for changes resulting from the new grant program. The new grant program will not only increase the number of States using the EDT protocol, but it will also request data standardization and increased alignment with the MMUCC States awarded the SEDC grant to collect and transmit data to NHTSA will be referred to as SEDC States; States that continue to transmit data through the existing EDT protocol, *not* developed and/or updated with SEDC grant funds (i.e., current EDT States) will be referred to as non-SEDC States.

The SDT process allows States to submit all their PAR data to NHTSA. NCSA uses this data to develop a census of the participating State's crashes. This dataset helps NCSA identify existing and emerging highway safety trends and assess the effectiveness of motor vehicle safety standards and new and emerging technologies. NHTSA also uses the dataset to support NHTSA's Corporate Average Fuel Economy (CAFE) program. Specifically, NHTSA uses the data to complete the cost-benefit analyses for CAFE rulemakings, including using the data to evaluate the effects vehicle mass has on fatalities.

NHTSA also uses the information collected to support NHTSA's Fatality Analysis Reporting System (FARS), Crash Report Sampling System (CRSS), Crash Investigation Sampling System (CISS), Special Crash Investigation (SCI), Non-Traffic Surveillance (NTS), Crash Injury Research and Engineering Network (CIREN), and other data collection programs by pre-populating data where possible and leveraging the data for sample selection, etc. NHTSA also shares the data with other Department of Transportation (DOT) agencies that analyze crash data for motor vehicle and traffic safety trends. In the future, the data received through the SEDC program will be made available to the public as prescribed by the BIL.

The annual burden for this collection is 312,663 hours and $25,000,000. This is an increase of 311,980 hours and $25,000,000 from when the information collection was last approved (from 683 hours and $0). The adjustment in burden hours is due to the new SEDC grant program. SEDC grants increase the number of states participating and will increase the burden on the states because the SEDC States will be required to increase their alignment to MMUCC and

transmit standardized data. However, NHTSA can provide 80 percent of the funds for the SEDC grant program, so the State respondent must provide at least 20 percent or about $5,000,000 annually.

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.**

   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. The information collected serves to identify and develop safety countermeasures that will reduce deaths, injuries, and economic losses resulting from motor vehicle crashes.

   The SDT data are used to generate a census of police reported crashes occurring within the participating States. The State agencies already collect the information on PARs for their own needs. The data are collected in various formats and timelines according to each State's collection programs and systems. SDT enables NHTSA to develop a census of participating States' injury and property-damage-only crashes not available through any other NHTSA data collection program.

   NHTSA also collects the PAR information via SDT for additional uses in several existing data collection programs and special studies. The following are brief descriptions of these data collection programs:

   - FARS (OMB Control No. 2127-0006) is a nationwide census of fatalities caused by motor vehicle traffic crashes. In addition to PAR data, FARS includes detailed information regarding the location of the crash, the vehicles, and the people involved. FARS cases can also include toxicology report data, medical records, medical examiner reports, etc.[3]

   - CRSS (OMB Control No. 2127-0714) is a nationally representative sample of police-reported crashes involving all types of motor vehicles, pedestrians, and cyclists, ranging from property-damage-only crashes to those that result in fatalities. CRSS data elements are a subset of the data elements on each State's PAR.[4]

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[3] Additional details about FARS and how the agency collects this information are available in the supporting statements for the ICR with OMB Control No. 2127-0006.
[4] Additional details about CRSS and how the agency collects this information are available in the supporting statements for the ICR with OMB Control No. 2127-0714.

- Investigation-based Crash Data Studies (OMB Control Number 2127-0706) includes CISS, SCI and Special Studies. CISS is a nationally representative sample of minor, serious, and fatal crashes involving at least one passenger vehicle—cars, light trucks, sport utility vehicles, and vans—towed from the scene. CISS collects data at both the crash level through scene analysis and the vehicle level through vehicle damage assessment together with injury coding. Data collected through CISS expands upon the information that is collected in a PAR.[5]

  The SCI Program provides NHTSA with the most in-depth crash data collected by the agency. The data collected ranges from basic information contained in routine police and insurance crash reports, to comprehensive data from special reports produced by professional crash investigation teams. Hundreds of data elements relevant to the vehicle, occupants, injury mechanisms, roadway, and safety systems are collected for each of the over 100 crashes designated for study annually.

- The Non-Traffic Surveillance (NTS) is a data collection effort for 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), the Crash Investigation Sampling System (CISS), and the Fatality Analysis Reporting System (FARS). 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.

- CIREN combines crash data collection with professional multidisciplinary analysis of medical and engineering evidence to determine injury causation in every crash investigation conducted. The mission of the CIREN is to improve the prevention, treatment, and rehabilitation of motor vehicle crash injuries to reduce deaths, disabilities, and human and economic costs.

Before EDT, the transfer of motor vehicle crash data from a State's crash data system to NHTSA's FARS, CRSS, and CISS required individuals to manually enter all State crash data into each of these systems. The SDT program's EDT protocol enabled NHTSA to automate the transfer of participating States' motor vehicle crash data to NHTSA's data collection systems and automate some of the data coding processes in FARS, CRSS and CISS. On November 15, 2021, President Biden signed the Infrastructure Investment and

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[5] Additional details about CISS and how the agency collects this information are available in the supporting statements for the ICR with OMB Control No. 2127-0706.

Jobs Act (IIJA or the Bipartisan Infrastructure Law), Public Law 117-58. Section 24108 (d) authorizes the Secretary of Transportation to establish the State Electronic Data Collection (SEDC) program to provide grants to States to establish, upgrade, and standardize their centralized statewide crash data repositories to enable electronic data collection, intrastate data sharing, and electronic data transfer to NHTSA. Through the SEDC program, participating States will build and modernize their centralized statewide crash data repositories and increase their alignment to the MMUCC Sixth Edition; NHTSA will receive more standardized and timely data and increase the usability of the data.

NHTSA's SDT program will reduce the burden of manual data entry and result in more accurate and timely data to help save lives, prevent injuries, and reduce economic costs due to motor vehicle crashes.

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.**

NHTSA utilizes the SDT data to identify existing and emerging highway safety trends, assess the effectiveness of motor vehicle safety standards, and study the impact of new and emerging technologies on vehicle and highway safety programs. For example, NHTSA combines data from SDT with information about the type of advanced driver assistance systems (ADAS) on crash-involved vehicles to estimate the effectiveness of vehicles equipped with ADAS technologies such as lane keeping support, automatic emergency braking, blind spot detection, etc.

NHTSA also uses the SDT to support the cost-benefit analysis for the Corporate Average Fuel Economy (CAFE) rulemaking. NHTSA uses the SDT data to estimate what effect vehicle mass has on fatalities. Without the volume of data from the States in the SDT dataset, it would not be feasible to estimate meaningful fatality rates or their relationship with vehicle mass.

NHTSA also uses the motor vehicle crash data it collects from States through SDT to pre-populate several studies that support NHTSA's mission: FARS, CRSS, CISS, SCI, NTS, CIREN and other application special studies.

In addition, the SDT data are made available to other DOT agencies, such as the Federal Highway Administration and the Federal Motor Carrier Safety Administration, to support their mission to save lives on our national roadways. The SDT data received through SEDC grant will be made available to public as required in BIL.

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.

SDT currently consists of two data transfer protocols. The SDS protocol relies on electronic data received through submitted electronic media, or electronic file transfer protocol on an annual basis. The SDS protocol is being phased out as States continue to establish centralized statewide crash data repositories and are able to support automated transfer processes.

The EDT protocol is an automated electronic information process that reduces the burden on State respondents by limiting manual and redundant data entry for NHTSA's data collection program. EDT data is used to structure crash cases, pre-populate some of the information multiple data collection programs, and reduces the State resources required to provide the data to NHTSA.

NHTSA works with States that choose to participate in EDT to establish automatic data feeds. The data are then populated into NHTSA's data collection systems, wherever possible, to reduce the burden on States. In addition, NHTSA will use the data to populate a separate, uniform census data repository of all crash data received from the participating States. During the implementation phase, the non-SEDC States, will have minimum burden to contend with since NHTSA and its IT contractor have carried out most of the development work associated with the EDT protocol; future SEDC States will have an increased burden due to the BIL requirements that specify a need to increase alignment to a specific data standardization (MMUCC Sixth Edition) set by NHTSA. SEDC States will use the new discretionary grant funds to help with its data standardization efforts. Following implementation, NHTSA and the State will review the data transfer process annually to determine if there are any required updates to the data feed from either NHTSA or the State, including adding or removing fields, data schema changes, data attribute changes, etc. Eventually, NHTSA hopes that EDT will fully replace SDS and other legacy collection methods.

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.**

Although information collected via SDT overlaps with data collected through FARS, CRSS, CISS, SCI, NTS, and CIREN, there is no duplication. Instead, SDT's EDT protocol enables NHTSA to reduce the burden of several of NHTSA's existing motor vehicle crash data collections from the States. The EDT protocol does this by pre-populating data into NHTSA's FARS, CRSS, and CISS databases, thus reducing existing

redundancy. This reduces the burden of manually entering data. States that have elected to participate in the EDT protocol have seen improved efficiencies and improved accuracy of data in the areas of FARS and CRSS data collection. SDT will continue to be voluntary, with participation based on States' interest and capabilities.

Broader SDT adoption by more States will support further efficiencies in FARS, CRSS, CISS, SCI, NTS, CIREN and safety analysis throughout DOT. This is a goal typically shared by both the States and the Federal offices responsible for management of the data. As a result, DOT will advocate for SDT adoption in the States as a best practice to improve the data management between State and Federal entities specific to crash and associated safety data.

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

Respondents to this information collection effort only include States, the District of Columbia, U. S. Territory governments, or the Secretary of the Interior acting on behalf of an Indian Tribe. These respondents are not considered 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 burden.**

SDT provides the most comprehensive PAR information for participating State injury and property-damage-only crashes in one consolidated data feed. This information is not available through any other NHTSA data collection program. SDT data is used to identify, evaluate, and respond to changes in safety on our Nation's roadways. Studies in safety include vehicle; vehicle technology use; roadway; passenger safety, other road users and underserved populations. Absent the SDT program and the data it collects, NHTSA will not be able to identify existing and emerging highway safety trends, assess the effectiveness of motor vehicle safety standards, and study the impact of new and emerging technologies as effectively.

For example, NHTSA utilizes the SDT data to identify crash-involved vehicles with advanced driver assistance technologies and evaluate effectiveness of the systems. Without SDT data, NHTSA would be not as able to estimate the effectiveness of vehicles equipped with advanced driver assistance technologies. Advanced driver assistance technologies are relatively new and are only offered in new vehicles, which represent a small proportion of all vehicles—and an even smaller proportion of vehicles involved in crashes. SDT is the most effective way to collect data on vehicles with these new technologies. The SDT data collection provides NHTSA with the large dataset and enhance NHTSA's ability to estimate effectiveness of these new technologies.

NHTSA also uses the SDT to support the cost-benefit analysis for its Corporate Average Fuel Economy (CAFE) rulemaking. NHTSA uses the SDT data to estimate the effects of reducing vehicle mass (to help meet fuel economy targets) on fatalities. Without the volume of data from the States in the sample, it would not be feasible to estimate meaningful fatality rates or their relationship with vehicle mass.

Furthermore, the SDT program allows NHTSA to decrease the burden on States associated with NHTSA's existing motor vehicle crash data collections as described above. Absent implementation of the SDT program, States will continue to provide the data separately for each motor vehicle crash data collection, which frequently requires manual data entry. By establishing one electronic transfer of State motor vehicle crash data under SDT, the burden on the participating States is reduced and the data timeliness and accuracy increased. The electronic nature of the SDT program provides higher frequency data transfer with lower effort.

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.**

This collection involves respondents providing information more often than quarterly. The information is submitted electronically using secure protocols and at a frequency agreed upon by both State and Federal offices. With the States participating in the EDT protocol, the data submission is automated and happens each night electronically. The electronic-only submittal is intended to decrease the data management and

communication burden on all involved parties. When adopted, the EDT protocol replaces costly and time-consuming manual or paper-based processes.

This collection does not require respondents to submit more than an original and two copies of any document, though respondents may send several copies of one PAR if there are updates to a crash. The process is automated and happens without human intervention. If there are any updates for a crash after the information has been sent to NHTSA, the States' electronic systems send updates automatically and NHTSA's EDT process receives the information and updates its records automatically.

Other than above description about the automatic information collection frequency and updates, there are no other 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.**

   NHTSA first published a notice in the Federal Register with a 60-day public comment period to announce the proposed EDT protocol part of SDT information collection on May 3, 2023 (87 FR 27949).

   NHTSA received one comment in support of the data collection from the National Association of Mutual Insurance Companies (NAMIC). NAMIC emphasized the information collection is not only necessary but "critical for the proper performance of the functions of NHTSA and there is every reason to believe that the results of the study will have great practical utility." Furthermore, NAMIC is interested in working with NHTSA on areas of studies and analysis. NAMIC is supportive of the Notice and strongly urges NHTSA to propose more wide and extensive auto safety data recording and reporting.

   NHTSA published a 30-day notice on September 5, 2023, requesting comment on NHTSA's intention to submit this ICR to OMB for approval (88 FR 60736, Pages 60736-60741).

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

No payments or gifts are provided to respondents in connection with this discretionary grant program other than the remuneration of contractors or grantees. As stated in BIL, NHTSA shall provide grants to States to upgrade and standardize State crash data collection systems to enable electronic data collection, intrastate data sharing, and electronic data transfers to the National Highway Traffic Safety Administration to increase the accuracy, timeliness, and accessibility of the data, including data relating to fatalities involving vulnerable road users. NHTSA can provide up to eighty (80) percent of the funding for the SEDC grants. The State is responsible for at least twenty (20) percent of the funding, but the State can provide more than the twenty (20) percent.

Eligible activities or equipment for grant funding include the following three costs:

  (i)   equipment to upgrade a statewide crash data repository;
  (ii)   adoption of electronic crash reporting by law enforcement agencies; and
  (iii)   increasing alignment of State crash data with the latest Model Minimum Uniform Crash Criteria.

The 20 percent funding that the States provide can be labor hours for state employee, contractor costs or equipment.

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

All data collected via the SDT program is handled in accordance with either established Memoranda of Understanding with participating States or grant award. In addition, all applicable Federal statutes, including but not limited to the Privacy Act, HIPAA Privacy Rights, FISMA, and OMB and DOT data protection mandates and policies are being followed.

SDT is part of NHTSA's Crash Data Acquisition Network (CDAN). CDAN's PIA is published at https://www.transportation.gov/individuals/privacy/crash-data-acquisition-network-cdan-pia.

The SDT program collects information from States' crash databases. The information comes from PARs and may contain personally identifiable information (PII). Whether a State submits PII to NHTSA via SDT is determined by each participating State. As discussed above, NHTSA will not publicly disclose PII in State crash data.

The types of PII found in a crash report includes: name, address, contact information for drivers, passengers, pedestrians, witnesses, and vehicle owners involved in automotive crashes resulting in death and/or injury. Specifically, SDT may obtain crash date, crash

time, crash location, driver license number, driver license State, name, address, gender, date of birth (to calculate age), vehicle license plate number, 4-digit GSA city code, 2-digit State number, Vehicle Identification Number (VIN), and the diagram and narrative of the police report. This data is used by NHTSA for crash analysis to identify national trends in road safety and influence the development, deployment, and evaluation of lifesaving safety countermeasures.

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 SDT program does not collect answers to questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, or other matters that are commonly considered private.

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

   SDT receives the crash data from States in two different ways: the SDS protocol and EDT protocol. There are currently 39 States participating in the SDT: 31 States participating using the SDS protocol and 20 States participating using the EDT protocol. There are currently 15 States providing data using both protocols, but for some of these States, we do not get the same information with both protocols. For example, for some States we receive all crashes through EDT, but we only get crashes that meet the State's specific threshold for reportable crashes through SDS.

   As mentioned above, this information collection request is being modified to account for changes resulting from the new SEDC program under the EDT protocol. NHTSA expects that in the next three (3) years, the current thirty-nine (39) States will continue to submit their data using either SDS or EDT protocol. NHTSA also expects that, in the next three years, ten (10) out of the twenty (20) current EDT States will apply for and be awarded SEDC grants and start sending more MMUCC-aligned data to NHTSA; three (3) SDS States, that are not EDT States, will apply and be awarded SEDC grants and begin sending MMUCC-aligned data to NHTSA; and two (2) new States, neither SDS nor EDT participating States, will apply and be awarded SEDC grants and begin collecting and transmitting standardized data to NHTSA. Therefore, NHTSA estimates the total number of States participating in the SDT will increase by four (4), to a total of forty-three (43), which is the existing thirty-nine (39) SDT States plus the four (4) new SEDC States in the next three (3) years. At the end of the three years, NHTSA estimates that there will be 25 SDS States, 10 EDT non-SEDC States, 20 SEDC EDT States with potentially 15 States

submitting information using both protocols. Due to the different requirements for SDS States, EDT non-SEDC States and EDT SEDC States, the annual burden for these three types of data transmissions will be described separately below.

States using SDS Protocol

SDS information is obtained annually from States and is submitted in a more traditional method via electronic media through secured mail or a Secure File Transfer Protocol (SFTP). NHTSA assumes a participating State already has a centralized statewide crash data repository. Currently, thirty-one (31) States are voluntarily submitting their annual crash database to NHTSA, with five (5) States sending electronic media and twenty-six (26) states uploading the database to an SFTP site. Since NHTSA accepts the States' centralized statewide crash data repository without changes, NHTSA estimates that it will require eight (8) hours for a State Database Administrator to save a copy of the State's annual crash database onto a SFTP site or electronic media. We estimate an additional four (4) hours will be required for an administrative assistant to package and send the electronic media to NHTSA. Therefore, the burden hours for thirty-one (31) SDS States to save a copy of the State's annual crash database onto a SFTP site or electronic media is 248 hours (8 hours x 31 States). An additional burden for the five (5) SDS States to package and send the electronic media to NHTSA is 20 hours (4 hours x 5 States).

To estimate the labor cost associated with submitting the SDS information, NHTSA looked at wage estimates for the type of personnel involved with copying, packaging, and sending the database. NHTSA estimates the total labor costs associated with copying the database by looking at the average wage for Database and Network Administrator and Architects. The Bureau of Labor Statistics (BLS) estimates that the average hourly wage for Database and Network Administrator and Architects (Standard Occupational Classification #15-1240, May 2021) is $49.25.[6] The Bureau of Labor Statistics estimates that State and local government workers' wages represent 61.9% of total labor compensation costs.[7] Therefore, NHTSA estimates the hourly labor costs for copying the database to be $79.56 ($49.25 ÷ 61.9%) for Database and Network Administrator and Architects. The cost associated with the eight (8) hours of Database and Network Administrator labor is estimated to be $636.48 ($79.56 × 8 hours) per respondent.

For the 5 States sending electronic media, NHTSA estimates the total labor costs for packing and sending the database by looking at the average wage for Secretaries and Administrative Assistants. The BLS estimates that the average hourly wage for Secretaries and Administrator Assistants (Standard Occupational Classification #43-

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[6] *See* May 2021 National Occupational Employment and Wage Estimates
United States, available at https://www.bls.gov/oes/current/oes_nat.htm (accessed March 13, 2023).
[7] *See* Table 1. Employer Costs for Employee Compensation by ownership (Sept. 2022), available at https://www.bls.gov/news.release/ecec.t01.htm (accessed March 13, 2023).

6014, May 2021) is $21.76.[8] By using the same estimate that wages represent 61.9% of the total compensation cost of labor, NHTSA estimates the total labor hour cost for packing and sending the database on electronic media to be $35.15($21.76 ÷ 61.9%). Therefore, the cost associated with the four (4) hours to send the electronic media is estimated to be $140.60 ($35.15 × 4 hours) per respondent.

Combining these copying, packing, and sending burden estimates for SDS, NHTSA estimates that the total burden hours associated with this collection will be 268 (248 + 20) hours and total labor cost associated with the collection will be $19,731 ($636.48 × 31 States) for copying and $703 ($140.60 × 5 States) for packing and sending, for a total of $20,434 ($19,731 + $703) for the SDS protocol.

SDS Burden Estimate Summary							
Burden Type	Respondents	Total Annual Responses	Burden Hours Per Respondent	Total Burden Hours	Labor Cost Per Burden Hour	Labor Cost Per Respondent	Total Labor Cost
SDS Copying	31	31	8	248	$79.56	$636.48	**$19,731**
SDS Packing and sending	5		4	20	$35.15	$140.60	**$703**
Total		**31**		**268**			**$20,434**

States using the EDT Protocol

Due to the different requirements including data standardization and alignment to MMUCC for SEDC and non-SEDC State, the cost estimates for these two groups under EDT protocol will be different as described below.

Non-SEDC States using EDT Protocol

The non-SEDC States using the EDT protocol burden hour estimate is based on the level of effort reported by the States that have fully implemented EDT. NHTSA estimates that in the next three years, there will not be any new States joining the twenty (20) States already participating in the SDT program using the EDT protocol. Instead, NHTSA believes new States will participate in EDT through the SEDC grant program. In addition, NHTSA estimates that over the next three years, starting in year two, there will

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[8] *See* May 2021 National Occupational Employment and Wage Estimates
United States available at https://www.bls.gov/oes/current/oes_nat.htm (accessed March 13, 2023).

be ten (10) existing EDT that will begin participating in the new SEDC grant program and will start sending data aligned to MMUCC. NHTSA estimates that, in year one, year two and year three, the number of non-SEDC EDT states will be 20, 15 and 10, respectively. Therefore, NHTSA estimates that there will be, on average, fifteen (15) non-SEDC EDT protocol States in each of the next three years. Since these fifteen (15) non-SEDC States are already using the EDT protocol, the cost and burden estimates for these States only account for annual maintenance effort. The estimates assume a participating State already has a centralized statewide crash data repository. The hourly burden for maintenance on States associated with non-SEDC EDT is estimated at five (5) hours per year, based upon currently participating States' experiences. This time is generally used to troubleshoot any connection issues or refine mapping protocols for any data elements that have changed.

NHTSA estimates the cost for IT personnel burden hours using the Bureau of Labor Statistics' mean wage estimate for Software and Web Developers, Programmers, and Testers (Standard Occupational Classification #15-1250, May 2021) of $54.68.[9] The Bureau of Labor Statistics estimates that for State and local government workers, wages represent 61.9% of total compensation.[10] Therefore, the total hourly cost associated with the IT burden hours is estimated to be $88.34 ($54.68 ÷ 61.9%) per hour.

Per the loaded labor rates for State IT staff outlined above, five (5) hours of work translates to an estimated total annual maintenance burden of $441.70 ($88.34 × 5 hours) per State respondent maintaining participation in the EDT program. NHTSA estimates that there will be, on average, 15 States participating in non-SEDC EDT program in each of the next three years. The total annual responses are 5,475 (15 EDT States × 365 nightly responses). Therefore, the annual maintenance cost for the States is a total of $6,626 ($441.70 × 15 States) per year. The number of total burden hours for the 15 States is 75 hours (5 × 15 States).

SEDC States using EDT Protocol

NHTSA published a Request for Information (RFI)[11] from May 2, 2022, to July 15, 2022, to assist the agency with the development and implementation of a new discretionary grant program to increase the number of States, U.S. territories, and Indian tribes electronically transferring their motor vehicle crash data to the NHTSA. Sixteen (16) States and Territories responded to the RFI with cost information for updating their

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[9] May 2021 National Occupational Employment and Wage Estimates United States, Occupational Employment Statistics, Bureau of Labor Statistics, U.S. Department of Labor, https://www.bls.gov/oes/current/oes_nat.htm#15-0000, last accessed March 13, 2023).

[10] Employer Costs for Employee Compensation by ownership (Sept. 2022), available at https://www.bls.gov/news.release/ecec.t01.htm (accessed March 13, 2023).

[11] Please see detailed information at this website: https://www.regulations.gov/docket/NHTSA-2022-0030

centralized statewide crash data repositories and aligning to previous versions of MMUCC. NHTSA used that information to inform NHTSA's burden estimates and estimates the burden as follows.

The cost and burden estimates for the EDT protocol are divided into two efforts: a one-time implementation effort, and an annual maintenance effort. To increase their alignment with the new MMUCC, the States will need to either develop a new electronic Police Accident Report (PAR) and build a centralized statewide crash data repository if they don't already have one or update the existing PAR and centralized statewide crash data repository to increase their alignment to the new MMUCC. In addition, States will need to electronically transfer their data in a standardized format to NHTSA. NHTSA predicts the States will need to take the following specific actions:

- Manually entering PAR data if there are legacy paper PARs to be input into the new and/or updated centralized statewide crash data repository.
- Developing a new PAR to increase alignment with the updated MMUCC.
- Adopting the new State PAR by law enforcement agencies.
- Setting up information technology infrastructure for the electronic centralized statewide crash data repository.
- Identifying and implementing the system changes to align with the updated MMUCC.
- Developing a user guide, data dictionary and training materials for the new and/or updated data collection system.
- Developing and implementing database and data warehouse for the data collection.
- Developing and implementing data transfer protocols for collecting data from law enforcement agencies to centralized statewide crash data repository.
- Developing and implementing edit and validation rules for quality assurance for the data collection.
- Developing and implementing data transfer protocols for sharing data among States and sending data to NHTSA.
- Integrating the reporting from other vendors if some law enforcement agencies within a state use other vendor's software.
- Creating data analytics and dashboard for data monitoring and reporting.

NHTSA estimates the labor categories in the rows of Error: Reference source not found are required for the implementation of tasks above. Based on the information received from the RFI, NHTSA estimates the labor hours for implementation and maintenance for each labor category as in the column "Implementation Total Hours" and "Maintenance Total Hours" in Error: Reference source not found. Labor category "Data Entry and Information Processing Workers" is needed when the States transition from a manual/paper system to an electronic system. Once the transition is complete, this labor

category is no longer necessary and therefore is not included in the maintenance burden estimates.

NHTSA uses the Bureau of Labor Statistics' mean hourly wage estimate for each Labor Category in the column labeled "'Labor Rate w/o Fringe and Benefit"[12] in Error: Reference source not found. The Bureau of Labor Statistics estimates that for State and local government workers, wages represent 61.9% of total compensation.[13] Therefore, the total hourly rate with fringe and benefit associated with the burden hours is calculated as below as shown in column "Labor Rate with Fringe Benefit" in Error: Reference source not found.

Labor Rate with Fringe Benefit = Labor Rate w/o Fringe Benefit ÷ Fringe Benefit Rate

The total cost for implementation and maintenance in Error: Reference source not found are calculated as follows:

Implementation Total Cost = Implementation Total Hours × Labor Rate with Fringe Benefit

Maintenance Total Cost = Maintenance Total Hours × Labor Rate with Fringe Benefit

Table 1. Burden Estimates for SEDC States using EDT protocol

Labor Category	Labor Series	Implementation Total Hours (hrs.)	Maintenance Total Hours (hrs.)	Labor Rate w/o Fringe Benefit ($/hr.)	Fringe Benefit Rate (%)	Labor Rate with Fringe Benefit ($/hr.)	Implementation Total Labor Cost (Per State) ($)	Maintenance Total Labor Cost (Per State) ($)
Program Manager	11-3021	**1,888**	**832**	$78.33	61.90%	$126.54	$ 238,908	$ 105,281
Computer System Analyst	15-1211	**5,080**	**160**	$49.14	61.90%	$79.39	$ 403,301	$ 12,702

[12] *See* May 2021 National Occupational Employment and Wage Estimates United States, available at https://www.bls.gov/oes/current/oes_nat.htm#00-0000 (accessed March. 13, 2023).
[13] *See* Table 1. Employer Costs for Employee Compensation by ownership (Sept. 2022), available at https://www.bls.gov/news.release/ecec.t01.htm (accessed March 13, 2023).

Web and Digital Interface Designer	15-1255	**1,760**	**416**	$49.50	61.90%	$79.97	$ 140,747	$ 33,268
Software Developer	15-1252	**10,240**	**1,280**	$58.17	61.90%	$93.97	$962,253	$ 120,282
Web Developers	15-1254	**5,920**	**1,280**	$39.09	61.90%	$63.15	$ 373,848	$ 80,832
Software Quality Assurance Analysts and Testers	15-1252	**7,040**	**1,280**	$46.97	61.90%	$75.88	$ 534,195	$ 97,126
Database Architects	15-1243	**3,520**	**960**	$58.58	61.90%	$94.64	$ 333,133	$ 90,854
Information Security Analysts	15-1212	**1,384**	**80**	$54.46	61.90%	$87.98	$ 121,764	$ 7,038
Data Entry and Information Processing Workers	43-9020	**4,192**	**0**	$18.70	61.90%	$30.21	$ 126,640	$0
Total		**41,024**	**6,288**				**$ 3,234,789**	**$ 547,384**

Thus, total labor cost for SEDC EDT implementation cost per State is estimated to be $3,234,789 with burden hours as 41,024. The total annual maintenance burden cost per year per State is estimated to be $547,384 with burden hours as 6,288.

NHTSA anticipates that during the first year of the grant, States will be in the development and implementation phase, where data transmission is not expected. Beginning with year two (2), and into year three (3), it is estimated that approximately ten (10) States per year will start transmitting data to NHTSA using the EDT protocol. Therefore, the average of number of State to transmit data to NHTSA for the three (3) years is 7 ((10 +10) ÷ 3 = 6.77, then round 6.77 up to the nearest integer which is 7). In this case during year three (3), there will be ten (10) states in maintenance phase. These are the ten (10) state which start transmission data to NHTSA during year two (2). The average number of states in maintenance phase is 4 (10 ÷ 3 = 3.33, then round 3.33 up to the nearest integer which is 4).

As NHTSA estimated that there will be average 7 new SEDC EDT States each year, the total implementation cost per year will be $22,643,526 (7 x $ 3,234,789) with burden hours as 287,168 hours (7 x 41,024 hours); the average annual maintenance cost will be $2,189,536 (4 x $547,384) with burden hours as 25,152 hours (4 x 6,288 hours). The total SEDC EDT labor costs are $24,833,062 ($22,643,526 for implementation and $2,189,536 for annual maintenance). This estimate includes total labor costs to the State respondents, but States may choose to have contractors incur some or all of these labor cost. The total annual responses for SEDC EDT States are 4,015 (11 EDT States × 365 nightly responses).

Summary for SDT Burden Estimates

The total estimated burden for SDT is 312,663 hours (268 hours for SDS + 75 hours for non-SEDC EDT + (287,168 hours + 25,152 hours) for SEDC EDT) and total estimated labor cost is $24,860,121 ($20,434 for SDS + $6,626 for non-SEDC EDT + ($22,643,526 + $2,189,536) for SEDC EDT).

A summary of the burden estimates for SDT is provided in Table 2.

Table 2. Summary for Estimated SDT Burden

	Number of States	Total Annual Responses	Burden Hours per Respondent	Total Burden Hours	Labor Cost per Respondent	Labor Cost ($)
SDS Copying	31	31	8	248	$617.76	$19,151
SDS Packing and Sending	5		4	20	$125.56	$628
EDT Implementation:	7		41,024	287,168	$3,234,789	$22,643,526

SEDC EDT						
EDT Maintenance: Non-SEDC EDT	15	5475		75	$441.70	$6,626
EDT Maintenance: SEDC EDT	4	1460		25152	$547,384	$2,189,536
Total				**312,663**		**$24,860,122**

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.**

The SEDC grant, in compliance with BIL, requires a twenty (20) percent match from participating State respondents. NHTSA estimates about half of the program cost for the SEDC grants will be labor costs. NHTSA estimates the total annual burden cost for the SEDC program (beyond the labor costs discussed in question 12) will be about $25,000,000 to respondents. Since the Grant respondents only have to provide at least 20 percent of the total cost, the respondents will have to fund about $5,000,000 annually.

NHTSA does not expect respondents to incur any additional costs for the SDS or non-SEDC States using EDT Protocol (beyond labor costs as discussed in question 12) as a result of this information collection.

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 annualized cost to the Federal government associated with this Information Collection Request (ICR) is $4,473,125.

States using SDS Protocol

The total annual costs for SDS to the Federal government are estimated to be $1,519,920 per year. Approximately, 80 percent of the time of one employee is devoted to managing the SDS part of SDT. Eighty percent of 2,087 work hours a year is about 1,670 hours. NHTSA estimates the cost of this time using the salary of a GS 14 step 5 employee in the Washington, DC, area, which is $71.88 per hour.[14] The Bureau of Labor Statistics estimates that wages represent 61.9 percent of total compensation for State and local

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[14] https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2023/DCB_h.pdf.

government workers, on average.[15] Using this estimate to calculate a loaded wage, NHTSA estimates the total hourly compensation cost to be $116.12 ($71.88 ÷ 61.9%). Therefore, NHTSA estimates the total annual cost for federal staff needed to manage the SDS to be $193,920 ($116.12 × 1,670 hours). Since the States supply the data in various layouts and formats, the federal contracting support needed to process this data into a useable common form is $1,326,000 per year for the estimated 31 participating States. Accordingly, NHTSA estimates the total annual cost to the Federal government for SDS to be $1,519,920 ($193,920 + $1,326,000).

Non-SEDC States using EDT Protocol

The total annual costs for non-SEDC States using EDT to the Federal government are estimated to be $210,971 per year. Approximately, 10 percent of one employee's time is devoted to managing the EDT non-SEDC States as part of SDT. Ten percent of 2,087 work hours a year is about 209 hours. NHTSA estimates the cost of this time using the salary of a GS 14 step 8 employee in the Washington, DC, area, which is $78.22 per hour.[16] The Bureau of Labor Statistics estimates that wages represent 61.9 percent of total compensation for State and local government workers, on average.[17] Using this estimate to calculate a loaded wage, NHTSA estimates the total hourly compensation cost to be $126.37 ($78.22 ÷ 61.9%). Therefore, NHTSA estimates the total cost for federal staff needed to manage the EDT will be $26,411 ($126.37 × 209 hours). Additionally, federal contracting support is needed to implement and maintain the electronic data transfer process for EDT to ensure NHTSA receives the data securely and accurately. The implementation cost per State is estimated to be $52,996 and the annual maintenance cost per State is estimated to be $12,304 based on NHTSA's IT contract. Currently there are twenty (20) non-SEDC EDT States. As discussed under Item 12, NHTSA estimates that in the next few years, there won't be any new States through non-SEDC EDT protocol and there will be five (5) non-SEDC States transitioning to SEDC EDT protocol each year. Therefore, there will be an average of 15 States to continue using the non-SEDC EDT protocol. Therefore, the total contract cost for the federal government is estimated to be about $184,560 ($12,304 x 15) per year for the 15 States. Accordingly, NHTSA estimates the total annual cost to the Federal government for EDT to be $210,971 ($26,411 + $184,560).

SEDC States using EDT Protocol:

The total annual costs to the Federal government for SEDC States using the EDT protocol are estimated to be $2,742,234 per year. To manage the SEDC grant, there will

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[15] Employer Costs for Employee Compensation-September 2022, Accessed 3/15/2023. https://www.bls.gov/news.release/archives/ecec_12152022.pdf Accessed 3/15/2023.
[16] https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2023/DCB_h.pdf.
[17] Employer Costs for Employee Compensation-September 2022, Accessed 3/15/2023. https://www.bls.gov/news.release/archives/ecec_06182020.pdf. Accessed 3/15/2023.

be a COR and an ACOR who will dedicate one hundred (100) percent of their time to the SEDC program. Additionally, there will be two IT program managers, one will spend one hundred percent (100) and one will spend seventy-five (75) percent of their time to manage the EDT process for data received through the SEDC grant program. The cost for Federal employees working on the SEDC is as follows:

Federal Employee	Hourly Rate ($/hr.)	Fringe Benefit Rate (%)	Hourly Rate with Fringe Benefit ($/hr.)	Yearly Hours (hrs.)	Percent Time	Number of Person	Total Cost ($)
COR	$ 82.45	61.90%	$ 133.20	2087	100%	1	$ 277,988
ACOR	$ 82.45	61.90%	$ 133.20	2087	100%	1	$ 277,988
IT PM 1	$ 82.45	61.90%	$ 133.20	2087	100%	1	$ 277,988
IT PM 2	$ 82.45	61.90%	$ 133.20	2087	75%	1	$ 208,491
Total							$ 1,042,457

Therefore, NHTSA estimates the total cost for federal staff needed to manage the SEDC portion of EDT will be $1,042,457.

Furthermore, Federal contracting support will be needed to implement and maintain the electronic data transfer process for EDT to ensure NHTSA receives the data securely and accurately. The initial setup cost for the overall system is estimated as $1,082,160. The cost of implementation for each State is estimated to be $74,815 and the annual maintenance cost for each State is estimated to be $23,477 based on NHTSA's IT contract cost estimates. NHTSA estimates that each year there will be seven (7) States to implement EDT under SEDC and an average of four (4) States each year for the next three (3) years under maintenance. Therefore, in addition to initial setup costs of $1,082,160, the annual total contract cost for the Federal government to implement and maintain SEDC EDT is estimated to be $617,617 ((7 × $74,815) + (4 × $23,477)). Accordingly, NHTSA estimates the total annual contracting cost to the Federal government for SEDC EDT to be $1,699,777 ($1,082,160 + $617,617). The total cost for Federal government including federal employee and IT contract is $2,742,234 ($1,042,457 + $1,699,777).

The total annual Federal cost for both SDS and EDT is estimated to be $4,473,125. ($1,519,920 for SDS + $210,971 for non-SEDC + $2,742,234 for SEDC).

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.**

The annual burden for this collection is 312,663 hours and $24,860,121. This is an increase of 311,980 hours and $24,804,901 from when the information collection was last approved (from 683 hours and $0). The adjustment in burden hours is due to the new SEDC grant program. SEDC grants increase the number of states participating and will increase the burden on the states for the implementation and maintenance of the EDT protocol because the SEDC States will be required to increase their alignment to MMUCC and transmit standardized data.

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.**

SDT data received through SDS and non-SEDC States using EDT protocol is not directly published or made available to analysts outside of DOT because of current Memorandum of Understanding. However, the data collected via the SDT EDT protocol for non-SEDC States is used to pre-populate NHTSA's FARS, CRSS, and CISS programs, in addition, a sanitized (i.e., PII removed), SDT dataset is used by NHTSA and DOT modal partners for analytical purposes. The quality-controlled datasets produced by the FARS, CRSS, and CISS programs are publicly released for analytical use to the broader highway safety community annually for the previous calendar year. The FARS, CRSS, and CISS datasets provide the basis for numerous NHTSA and other DOT operating administrations' publications; behavioral and vehicle safety research; rulemaking; focused analyses; defects investigations; annual departmental and modal target setting; lives saved; regulatory analysis and research; and various data tools like the Fatality and Injury Reporting System Tool (FIRST), the FARS Encyclopedia, the Annual Report portal, the State Traffic Safety Information (STSI) website, the Crash Viewer tool, and others. The sanitized SDT dataset will be used for ad hoc analyses and to support novel programs at the agency and Departmental levels. The SDT aggregated data may also be published in reports where the SDT data was analyzed.

As required by BIL, SDT data received from SEDC States using EDT protocol will be published after the PII information is removed.

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.

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.**[18]

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[18]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

There are no exceptions. The expiration date for the OMB approval for the SDT information collection will be displayed on the Memoranda of Understanding (agreement with participating States), SEDC grant award document or emails sent to the State's point of contact for the SDT data. As an example, the following statement will be provided on the Memoranda of Understanding for non-SEDC EDT States and SDS States:

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 2127-0753. This information is being collected to identify existing and emerging highway safety trends and assess the effectiveness of motor vehicle safety standards and new and emerging technologies. We estimate that participation in the State Data Transfer (SDT) will involve approximately 9-33 hours per year. However, your burden is dependent on your level of voluntary participation and how frequently you choose to submit information. 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.

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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.