

**Department of Transportation
National Highway Traffic Safety Administration
Information Collection Request Supporting Statements: Part A
National Survey of the Use of Booster Seats
OMB Control No. 2127-0644**

Abstract:

The National Survey of the Use of Booster Seats (NSUBS) is a voluntary, biennial survey that collects data on restraint use information for children under 13. Data collectors observe vehicles at locations such as fast-food restaurants, gas stations, daycare centers, and recreation centers, where child occupants are more likely to be present. When a vehicle with child passengers enters a selected location, the data collectors note the age, sex, and restraint use of all occupants. If the vehicle's driver voluntarily participates, they provide additional information, including the race/ethnicity of all occupants and the height and weight of the child passengers. No personal identifying information, such as names, addresses, or phone numbers, is collected during this process.

The contractor processes the collected data and supplies it electronically to the National Highway Traffic Safety Administration (NHTSA). The contractor also generates replicate weights, derives analytic variables, and integrates auxiliary information such as state laws. NHTSA uses the data to estimate restraint use among children under 13 and produces detailed breakouts by age, race/ethnicity, height, and weight. The data also helps assess how often children are prematurely transitioned to restraint types that are inappropriate for their age, height, or weight. In addition, NHTSA collects the age of adult drivers to analyze the relationship between driver age, driver seat belt use, and child restraint use. NHTSA utilizes this information to design programs that target caregivers of children who are either unrestrained or improperly restrained, with the goal of improving child safety in motor vehicles. The findings may also inform State legislatures considering updates to their child restraint laws.

The current collection, approved under the Office of Management and Budget (OMB) Control No. 2127-0644 (expiration date: 09/30/2025), reflects revisions including a transition from paper forms to electronic devices.

The average number of respondents has decreased from 5,300 to 4,600, reducing the estimated burden hours from 376 hours to 326 hours. The contractor obtains Institutional Review Board approval before any data collection begins. NHTSA estimates that the annual burden to respondents is approximately \$8,329.30.

A. Justification

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

The NHTSA began conducting NSUBS in response to the Transportation Recall Enhancement, Accountability, and Documentation (TREAD) Act of 2000 (Public Law 106-414). Section 14(i) of the TREAD Act mandated the Department of Transportation (DOT) to develop a five-year plan aimed at reducing by 25 percent the deaths and injuries among 4- to 8-year-olds caused by the failure to use a booster seat. In alignment with this requirement, NHTSA initiated the NSUBS in 2006.

The collection of the NSUBS data is critical because it provides NHTSA with essential information on the prevalence and proper use of booster seats among children. This data helps NHTSA and DOT to effectively target outreach programs, ensuring that children are adequately protected when traveling in vehicles. Without this information, it would be challenging to measure progress, identify gaps in child passenger safety, or develop strategies to address these issues.

While improvements have been made in the use of restraints for younger children--99.8 percent of infants (0 to 12 months) and 93.7 percent of children aged 1 to 3 years were restrained in 2021—progress for older children remains low.¹ Booster seat use among children aged 4 to 7 was only 31 percent nationwide in the 2021 NSUBS. In 2022, NHTSA's Fatality Analysis Reporting System recorded 195 fatalities among booster-aged children (aged 4 to 7), a decrease from 257 in 2021. However, of the 169 children aged 4-7 killed in 2022 for whom restraint use was known, 40 percent were unrestrained.

Further legislative support for child passenger safety came from Anton's Law of 2002 (Public Law 107-318), which directed NHTSA to undertake a range of initiatives aimed at enhancing the safety of older child passengers. These initiatives included rulemaking, compliance testing, and consumer education programs designed to improve booster seat usage.

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 NHTSA uses the information collected from the survey to design more effective outreach programs aimed at increasing the use of appropriate child restraints in motor vehicles. The data enables NHTSA to tailor its programs to better reach caretakers whose children are either unrestrained or not using the correct restraint for their size, ensuring maximum protection in the event of a crash.

Additionally, the findings from the NSUBS may be of interest to State legislatures considering updates to child restraint laws, such as enacting mandatory or enhanced booster seat use provisions. Currently, all 50 States, the District of Columbia, and Puerto Rico have child passenger safety laws, and the NSUBS data can help inform any legislative improvements aimed at protecting children in vehicles.²

¹ The 2021 NSUBS is available at: <https://crashstats.nhtsa.dot.gov/Api/Public/ViewPublication/813396>

- 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.**

For the 2025 NSUBS, NHTSA is transitioning from paper-based data collection instruments to the use of electronic devices. This marks the first survey in which all previously collected paper data will be captured electronically. The primary motivation behind this shift is to streamline the data collection process, allowing information to be sent almost instantly to the contractor for immediate quality control checks, reducing the time needed for manual processing and entry of paper forms. This transition helps minimize delays and potential errors associated with paper-based submissions, ultimately improving the efficiency and accuracy of data collection. This approach aligns with efforts to reduce administrative burdens by leveraging technology to simplify processes. Additionally, since real-time checks on entered data can be performed in the field, data collectors can confirm responses such as appropriate height and weight for children based off reported age.

- 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.**

There is no duplication of effort in conducting the NSUBS. No other existing survey or data source provides probability-based observational data on booster seat and child restraint use, combined with interview data on child age, height, and weight. The information gathered from NSUBS, specifically through direct observations and interviews with vehicle occupants, is critical for tailoring NHTSA's child restraint programs to ensure effectiveness.

Additionally, the NSUBS is the only source of scientifically-based data that includes restraint use by self-reported race/ethnicity categories. This unique combination of observational and demographic data cannot be replicated by any other available source, making the NSUBS essential for meeting NHTSA's programmatic and research needs.

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

The NSUBS involves collecting data at locations such as fast-food restaurants, gas stations, day care centers, and recreation centers. To minimize any potential burden on small businesses or other small entities, the contractor contacts potential sites in advance to request voluntary permission to conduct the survey on their premises.

² Governors Highway Safety Associate: Child Passenger Safety information is available at: <https://www.ghsa.org/state-laws/issues/child%20passenger%20safety>

Businesses are fully informed about the nature of the survey, including the activities involved and the time it will take. Participating businesses are not required to provide any additional services beyond allowing the survey to be conducted at their location. This approach ensures that the impact on small businesses remains minimal while allowing valuable data to be collected.

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 NHTSA does not collect this information, it would lack scientifically-based data on the use of booster seats and other child restraints by actual motorists. Without this data, NHTSA's outreach efforts would be less effective, potentially leading to higher rates of death or injury among children in motor vehicle crashes due to nonuse or misuse of child restraints. Accurate data allows NHTSA to better target its outreach programs to at-risk populations, helping reduce these preventable fatalities and injuries.

Up-to-date data is essential for the continued success of child passenger safety initiatives. Since the NSUBS was first conducted in 2006, it has provided key insights during 2006 – 2009 and biennially from 2011 through 2023. NHTSA plans to continue this schedule. Reducing the frequency of data collection would reduce the effectiveness of NHTSA's child safety programs, as outreach efforts rely on current information to address evolving trends and issues.

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

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

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

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

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

NHTSA plans to implement Statistical Policy Directive No. 15 (SPD-15) requirements in the 2029 survey. This implementation will not be affected by the current approval process but will be addressed in subsequent approval cycle. NHTSA will collaborate with stakeholders to determine the most effective approach for integrating SPD-15 and will coordinate with the contractor to explore options for including minimum or detailed race/ethnicity categories in the data collection application.

During the 2021 NSUBS, adults answered interview questions for 6,687 children. However, some race/ethnicity combinations, such as Hispanic and American Indian or Alaska Native, Hispanic and Asian, Hispanic and Native Hawaiian or Other Pacific Islander, and Non-Hispanic Native Hawaiian or Other Pacific Islander, had fewer than 30 respondents. These small sample sizes pose challenges for analyzing data within the detailed race/ethnicity categories. Additionally, privacy considerations would require much of the detailed information to be suppressed in the final dataset before it can be share.

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

NHTSA published a 60-Day Notice on April 2, 2025, requesting comment on NHTSA's intention to submit this ICR to OMB for approval (90 FR 14515). NHTSA received one comment. The comment received from an individual appears to not be related to NSUBS since they talk about Elections Commission Advisor, we believe this comment was posted on the incorrect notice. The comment does not necessitate a revision to the scope of the information collection or the estimates of the annual cost or burden hours.

NHTSA published a 30-Day Notice on July 22, 2025, that stated NHTSA's intention to submit this ICR to OMB for approval (90 FR 34575).

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

The NHTSA does not offer any payments or gifts to respondents. However, as part of the survey process, NHTSA provides drivers with educational brochures about child passenger safety. Additionally, children who are part of the sample receive stickers as a small token.

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 or privacy impact assessment, those should be cited and described here.

Data collectors at survey sites will inform each respondent that no personally identifying information will be collected. NHTSA ensures the confidentiality of all respondents by adhering to this practice. Additionally, the results and the electronic file of the data will be released by NHTSA, ensuring no individual can be personally identified from the data.

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 survey does not collect any information of a sensitive nature, such as sexual behavior, attitudes, religious beliefs, or other matters that are commonly considered private. As such, there is no need for additional justification, as these types of questions are not included in the data collection process.

Data collectors can select “DK” (don’t know) under sex. This is intended to be used for when the data collector can observe that there is a person in a vehicle, but they cannot see the person well enough to determine sex due potential issues like dark window tinting or sun glare. The final dataset only includes “male” and “female” responses because all DK’s responses are imputed to either male or female.

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.

The NHTSA estimates that each respondent will spend approximately 4.25 minutes providing the required information based on experience with past surveys. A respondent is defined as an adult motorist providing information about the children in their vehicle. Based on this, NHTSA estimates the total burden for roughly 4,600 respondents based on historic trends to be approximately 326 hours. The calculation is as follows:

$(4.25 \text{ minutes} \times 4,600 \text{ respondents}) \div 60 \text{ minutes/hour} = 325.8 \text{ hours}$

Since NSUBS data collection occurs biennially, dividing the total burden hours by two results in an annual burden of 163 hours.

Table 1: Burden Estimates

Responses per Survey	Estimated Burden Per Response	Total Burden Hours Per Survey	Total Annual Responses	Total Annual Burden Hours
4,600	4.25 minutes	326 hours	2,300	163 hours

To estimate the value of the respondents' time, NHTSA uses the average hourly wage in the United States, which is estimated to be \$31.48.³ Since wages represent only 61.6 percent of total compensation (according to Bureau of Labor Statistics (BLS) data), the fully loaded hourly compensation cost is \$51.10. Using this figure, NHTSA calculates the total opportunity cost to respondents for each survey to be \$16,658.60 (= 326 hours \times \$51.10) or \$8,329.30 annually.

Table 2: Opportunity Costs Estimates

Responses per Survey	Estimated Burden Per Response	Average Hourly Opportunity Cost	Opportunity Cost Per Response	Total Burden Hours per Survey	Total Opportunity Cost per Survey	Total Annual Opportunity Cost
4,600	4.25 minutes	\$51.10	\$3.62	326 hours	\$16,658.60	\$8,329.30

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.

Participation in this study is entirely voluntary, and respondents will not incur any costs beyond the time they spend taking part in the survey. There are no additional capital or start-up costs, nor are there any operational, maintenance, or record-keeping expenses associated with this information collection. Additionally, there are no costs to record keepers for this survey.

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

³ U.S. Dept. of Labor, BLS, April 3 2024, from https://www.bls.gov/oes/current/oes_nat.htm#00-0000 for May 2023

The total annual cost to the Federal Government for conducting this survey is estimated to be **\$739,962.90**.

This total consists of two primary components:

1. **Contractor Costs**: The contractor responsible for conducting the survey, including design, data collection, and analysis has an estimated total survey cost of \$1,463,400. When annualized, this results in **\$731,700**.
2. **NHTSA Staff Costs**: NHTSA staff, specifically the Contracting Officer's Representative, will spend approximately 180 hours across various tasks, such as preparing procurement requests, reviewing technical and cost proposals, attending meetings, and verifying deliverables. Annualized, this equates to 90 hours. Using the weighted hourly rate of \$56.56 for a GS 13-4 in Virginia Beach, Virginia, the total wage cost is \$5,090.40.⁴ Since wages represent only 61.6 percent of total compensation (according to BLS data), the fully loaded hourly compensation cost is \$91.81, bringing the total annualized NHTSA cost to **\$8,262.90**.

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

Since the last time NHTSA sought approval, the only adjustment to the information collection has been a decrease in the estimated number of respondents, from 5,300 to 4,600, leading to a reduction in burden hours. The original estimate of 376 hours has been reduced to 326 burden hours, reflecting a decrease of 50 hours.

The previous estimate of 5,300 respondents was based on an earlier assessment. However, due to the nature of this survey, the number of respondents can vary from year to year. Over the last three surveys, the average number of drivers interviewed has been 4,600 respondents, necessitating this adjustment.

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

The NHTSA will tabulate the survey data, analyze the results, and publish the findings in a technical report. Data collection for the NSUBS typically occurs biennially in July. After collection, the results will be analyzed, and reports are generally published the following year.

⁴ <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2025/VB.pdf>

These publications, which include a detailed analysis of the data, will be made available to the public at: <https://crashstats.nhtsa.dot.gov>. In addition, NHTSA plans on releasing an electronic file of the data collected and processed data for public access which it has never done before. We are not sure what they schedule will look like at this time.

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.

The data collectors will display the OMB approval number and its expiration date, along with the Paperwork Reduction Act (PRA) Burden Statement, on the electronic interview forms used during the data collection process. Therefore, there is no need to seek approval for not displaying the expiration date, as it is already appropriately included.

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 1320.9.⁵

The NHTSA is not making any exceptions to the topics of the certification statement identified in 5 CFR 1320.9. The agency fully complies with all certification requirements related to the PRA submission.

Attachments

- Attachment A: Section 14(i) of the Transportation Recall Enhancement, Accountability, and Documentation (TREAD) Act of 2000 (Pub. Law 106-414)
- Attachment B: Anton's Law (Pub. Law 107-318)
- Attachment C: Example screenshots of interview questions⁶

⁵ 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.

⁶ The race and ethnicity questions in the interview will only be used for NSUBS 2027. The combined race and ethnicity question conforming to SPD15 will be used after NSUBS 2027.