

Supporting Statement for Paperwork Reduction Act: Part A

Generic Information Collection Submission for “Generic Clearance for the Collection of Qualitative Agency Program Evaluation”

OMB Control No. 2127-0682

National Highway Traffic Safety Administration (NHTSA)

Abstract¹

The National Highway Traffic Safety Administration (NHTSA) seeks the Office of Management and Budget's (OMB) approval for a reinstatement of a previously-approved information collection of a generic clearance for qualitative feedback on agency programs. This collection of information is necessary to enable the Agency to achieve its safety mission to the public by garnering customer and stakeholder feedback on vehicle safety program and tool development and assessment in an efficient and timely manner. The information will be collected from a wide range of NHTSA customers and stakeholders through voluntary means and per request. NHTSA's customers and stakeholders include the American traveling public and range from individuals, local communities, advocacy organizations, to State, local, territorial, and tribal governments. The results of the data collections may be used in reports published on NHTSA's website and presented at conferences. However, there will be no attribution to individuals in the analyzed data. This is a request for reinstatement of a previously-approved information collection. This information collection request is estimated to have the total burden of 1,795 hours annually. The estimated annual burden hours do not include a plan to substantively update current public-facing agency websites; therefore, there is a decrease in estimated annual burden hours from the previous submission.

A. Justification

1. Explain circumstances that make the collection of information necessary.

This is a request for reinstatement of a previously-approved information collection of a generic clearance for qualitative agency program evaluation. It would allow NHTSA program offices to collect qualitative feedback on vehicle safety programs and tools from program recipients and stakeholders from local communities in an efficient and timely manner.

NHTSA was established by the Highway Safety Act of 1970 and its mission is to save lives, prevent injuries, and reduce economic costs due to road traffic crashes through education, research, safety standards, and enforcement. To further this mission, 23 U.S.C. § 403 authorizes the Secretary of Transportation (NHTSA by delegation) to conduct research and develop motor vehicle safety programs,

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

to prevent or reduce motor vehicle-related crashes and the resulting deaths, injuries, property damage and associated costs.

NHTSA's offices are specifically focused on developing and evaluating programs and activities to prevent or reduce motor vehicle-related crashes and injuries, such as public education and information materials to prevent risky driving behaviors (impaired, reckless, and distracted driving, etc.) and protecting vulnerable populations (e.g., pedestrians, cyclists, and other road users). To do this, obtaining qualitative information from NHTSA's customers and stakeholders (i.e., individuals, local communities, advocacy organizations, to State, local, and territorial communities) in a timely manner is critical. Customer opinions and their experiences help identify and flush out program needs and shapes how an activity is developed and delivered. Customer feedback is also particularly necessary in learning about how an activity/program is then used and what shortcomings it might have. This allows NHTSA to address and redevelop program activities before they are fully launched and evaluated.

2. Indicate how, by whom, and for what purpose the information is to be used.

NHTSA program offices have evolving evaluation needs for understanding effectiveness of traffic safety communications materials with the public audience. A generic clearance would allow the office of Communications the flexibility to create tailored information collection (IC) based on current circumstances and receive approval for traffic safety messages that resonate with target audiences in a timely manner. This information collection would help ensure targeted NHTSA response and adjustment toward customizing and adapting traffic safety messages that resonate with the driving public. The objectives of the information collection include:

- Understanding of the driving public's mindset on traffic safety issues;
- Accurate and timely Insight into communication strategies and messaging that resonate with each traffic safety issue's target audience;
- Documentation of innovative communication strategies that support the agency's mission to decrease traffic crashes due to risky traffic behavior; and,
- Provision of support needed. For example, how best to increase or adjust messaging of existing communication materials that is currently available to reach target audiences.

Information will be collected from a sample of those affected or targeted by various aspects of motor vehicle safety programs or tools, such as individuals, local communities, advocacy organizations, to State, local, territorial, and tribal governments.

Information will be obtained through various methods including in-person and online focus groups, online bulletin/listening boards and small group discussion methods to gain useful and effective insight to inform communication materials. These qualitative research methods are vital to the creation of many activities and programs as they can offer opportunities for the customers who will most directly benefit from the activities to have input on them, to exchange ideas, and brainstorm. Focus groups also are important mechanisms to learn about the successes and challenges of activities already implemented. For some program activities, usability study methods will be utilized to identify potential problems in the products (toolkits, guides, etc.) by observing and discussing how they are used and identifying any potential barriers to their use.

Much of the data collected will also be used to develop and assess existing and forthcoming educational material and provide any necessary technical assistance. The Agency will only submit a collection for approval under this generic clearance if it meets the following conditions:

- The collection is voluntary.
- The collection is low-burden for respondents (based on considerations of total burden hours, total number of respondents, or burden-hours per respondent) and is low-cost for both the respondents and the Federal Government.
- The collection is non-controversial and does not raise issues of concern to other Federal agencies.
- The collection is targeted to the solicitation of opinions from respondents who have experience with the program or may have experience with the program in the near future.
- Information gathered will yield qualitative information; the collections will not be designed or expected to yield statistically reliable results or used as though the results are generalizable to the population of a study.
- Any Personally Identifiable Information (PII) will be collected only to the extent necessary and will not be retained.
- Information gathered will not be used for the purpose of substantially informing influential policy decisions.

If these conditions are not met, the Agency will submit an information collection request to OMB for approval through the normal PRA process.

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.

IC methods will vary. The specific information technology used will be described in each program-specific Generic IC.

When appropriate, program offices will use electronic methods or online collaboration tools to collect information to reduce burden. Electronic methods could include web pages, online data management systems, emails or online video conference platforms. Depending on the needs of the projects, in person/hard copy administered methods will be used on a case-by-case basis.

For example, the preferred mechanism for the collection of comment card information and satisfaction surveys is likely through emails or online survey links. However, training evaluation might be better collected via hard copies directly after the event while the participant is still available and engaged.

Discussion and focus groups may be best in person when in-depth information is needed, or when a group format is needed for brainstorming and/or encouraging discussion among participants. However, given technical advances, conducting these via video links may be more convenient, less expensive, and more inviting to participants. Should video discussion and/or focus groups be chosen, professional video conference tools will be used (TEAMS, ZOOM, etc.).

Usability studies may be carried out either in person or online. Factors of considerations could include whether the facilitator could easily assess whether or not a participant comprehends the intent of a product, can retrieve information from it, and what barriers they might have to using it.

4. Describe efforts to identify duplication.

There is no similar data gathered or maintained by NHTSA or are available from other sources known to the Agency. This is because expected respondents are NHTSA program recipients, target audiences, or stakeholders from local, States, and national communities.

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

Some small businesses and other small entities may be involved in these information collections, but NHTSA will minimize the burden by asking for only the minimum amount of information needed for the specific information collection by sampling, asking for readily available information, and using short, easy-to-complete information collection instruments.

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.

Currently, NHTSA's Program Offices have limited ways to engage the communities they serve to learn what their needs are and few ways to determine a program or a specific tool's usefulness after implementation. Timely and availability of information will help ensure NHTSA's program offices and the Office of Communications have all the information necessary to develop the most effective programs, fully ascertain if the activities and programs being developed have the potential to prevent injuries and fatalities on our nation's roads when implemented, and if they have been effective when used. The information collected will help improve the future direction and scope of NHTSA's work as well as achieving NHTSA's mission.

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

- requiring respondents to report information to the agency more often than quarterly;
- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- requiring respondents to submit more than an original and two copies of any document;
- requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;
- 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;
- requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
- 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
- requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

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

- 8. If applicable, provide a copy and identify the date and page number of publications 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.**

This section will be updated after 60-day and 30-day notices are published.

NHTSA published a 60-day notice on **June 26, 2025**, requesting comment on NHTSA's intention to submit this ICR to OMB for approval **90 FR 27375**. NHTSA received **X comments**.

[INSERT DISCUSSION OF COMMENTS]

NHTSA published a 30-day notice on **[INSERT DATE]** that stated NHTSA's intention to submit this ICR to OMB for approval **(XX FR XXXXX)**.

9. Explain any decision to provide any payment of gift to respondents.

Focus groups respondents participating in in-person and online focus groups may receive stipends of \$100. Each session will last between 75-90 minutes. Online discussion board respondents will receive stipends between \$50 and \$100 with the higher stipend being for hard-to-reach groups and sessions longer than 90 minutes.

10. Describe any assurance of confidentiality provided to respondents.

Individuals will be assured of confidentiality to the extent permitted by law.

Respondents will not be required to provide their name when completing any evaluation form (satisfaction surveys, comment cards, etc.) which provides for some confidentiality in their response.

For focus groups, discussions, and usability studies, names will be collected for contacting and scheduling purposes, but will be omitted in any reports. This assurance will be provided verbally and/or at the bottom of each information collection form (if applicable).

11. Provide additional justification for any questions of a sensitive nature.

Information collections under this generic clearance are not expected to include questions of a sensitive nature. Questions will only pertain to the evaluation of activities and programs themselves. Each program-specific IC will provide information about any potentially sensitive questions.

12. Hour Burden of Collection of Information on Respondents

A variety of instruments will be used to collect information from respondents including satisfaction surveys, focus groups, small group discussions, and usability studies. The estimated 1,795 annual burden hours are based on the number of anticipated collections over the requested period for this clearance. It is expected that the primary respondents for these collections are state and local workers. To calculate the opportunity cost associated with this submission, NHTSA estimated the total opportunity costs associated with these burden hours by looking at the average wage for state and local workers. The Bureau of Labor Statistics (BLS) estimates that the average hourly wage for state and local workers is \$37.09/hour.² The estimated annual opportunity cost is approximately \$43,764.15 and the total three-year opportunity cost is approximately \$131,292.45. Table 1 below outlines the expected collections and the corresponding estimated annual burden hours and opportunity costs.

Table 1 - Estimated Annual Burden Hours and Associated Opportunity Costs					
Type of Collection	No. of Respondents	Time per Response	Estimated Burden Hours	Opportunity Cost per Response	Estimated Opportunity Cost
Customer Satisfaction Surveys (Office of Communications)	16,400	3 min.	820	\$9.27	\$7,601.40
Focus Groups (Office of Communications)	240	75 min.	300	\$37.09	\$11,127.00
Small Group Discussions	625	1 hour	625	\$37.09	\$23,171.25
Usability Study	50	1 hour	50	\$37.09	\$1,854.50
TOTAL	17,315		1,795		\$43,764.15

13. Total Annual Cost Burden to Respondents

Participation in this collection is voluntary, and there are no costs to respondents beyond the time spent participating in the information collection.

14. Annualized Costs to the Federal Government

The anticipated cost to the Federal Government is approximately \$724,195 annually, which includes any stipends that may be offered for focus group participation (included in contractor and recipient costs). The table below shows a breakdown of estimated annual costs for each type of collection. These costs are comprised of estimated contractor costs that are necessary to collect the information under this generic clearance.

Type of Collections (Annual)	Estimated Contractor Costs (\$)
Satisfaction Surveys – Office of Communications) (16,400/year)	\$69,195
Focus Groups – Office of Communications (7/year)	\$550,000
Small Group Discussions (5/year)	\$75,000
Usability Studies (4/year)	\$30,000
Annual Total	\$724,195
TOTALS (annual x 3 years)	\$724,195 annually x 3 years = \$2,172,585

² Table 3. Average hourly earnings of state and local government workers, September 2023, (<https://www.bls.gov/news.release/eccec.t03.htm>) (Accessed Dec 20, 2023)

15. Explain reasons for any program changes or adjustments reported on the burden worksheet.

This is a request for a reinstatement of a previously-approved information collection of a generic clearance. This information collection request is estimated to have the total burden of 1,795 hours annually. The estimated annual burden hours do not include a plan to substantively update current public-facing agency websites; therefore, there is a decrease in estimated annual burden hours from the previous submission.

16. If results will be published, outline plans for tabulation and publication.

The results of the data collections may be used in reports published on NHTSA's website, papers in research journals and presented at conferences. However, there will be no attribution to individuals in the analyzed data. Any plans to publish results will be described further in individual ICs that would be submitted under this generic clearance.

17. If seeking approval to not display expiration date explain the reason.

All written and electronic material will display the expiration date of the OMB approval of the information collection.

18. Explain each exception to the topics of certification statement identified in "Certification for Paperwork Reduction Act Submissions." The required certifications can be found at 5 CFR 1320.9.³

There are no exceptions to the certifications statement.

³ 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.