Rollover Protective Structure (ROPS) Attribute Identification by Channel Intermediaries

Supporting Statement Part A

Request for Office of Management and Budget Review and Approval

for Federally Sponsored Data Collection

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A. Justification

1. Circumstance Making the Collection of Information Necessary

The National Institute for Occupational Safety and Health (NIOSH) is seeking a three year approval for a NEW Information Collection Request (ICR) for Rollover Protective Structure (ROPS) Attribute Identification by Channel Intermediaries. NIOSH is authorized to collect information that pertains to occupational health matters in the United States under authority of PL 91-596, commonly known as the OSHA Act (Appendix A).

Background

The mission of the National Institute for Occupational Safety and Health (NIOSH) is to promote safety and health at work for all people through research and prevention. The prevention of traumatic injury is within the purview of NIOSH, and elevated incidence and rates of traumatic injury are found in the farming community. In 2012, the most current year of record, 374 farmers and farm workers died of a work-related injury, for a fatality rate of 20,2 per 100,000 workers (NIOSH , 2014a), far in excess of the rate of fatal injury for all industries combined (BLS, 2012). Non-fatal injury to farmers and farm workers are additionally elevated, leading NIOSH to find that farmers “are at high risk for fatal and nonfatal injuries” (NIOSH, 2014b).

Tractor-rollovers are a leading cause of such fatal and nonfatal traumatic injury among agriculture workers, especially with the continued use of older farm tractor equipment that is unprotected by rollover protective structures (ROPS).Historically, international manufacturers of farm tractors, chiefly in the Scandinavian countries and beginning in the 1950’s, were faced with high rates and frequencies of fatal and nonfatal injury among the users of their products. In

response, legislatures of many European countries passed legislation requiring the use of rollover protective structures on all operational farm tractors. Subsequent legislation stipulated that older tractors could no longer be put in service for any employees of agricultural concerns. As a result of this mandatory change in the provision of ROPS, there was a corresponding decline in the rate and frequency of traumatic injury from tractor rollovers in those countries (Rautianinen, 2008; Thelin, 1998).

In this country, given what was learned from the European countries, voluntary manufacturing consensus standards were developed (ASAE S336.1 and ASAE S519) (ASABE, 1989). These have required ROPS on all newly manufactured farm tractors beginning in the mid-1980's, benefiting the users of such tractors. The subsequent national experience involved a significant reduction in rollover-related traumatic injury for all newly acquired farm tractors (CDC, 1993).

However, voluntary consensus manufacturing standards do not address the substantial continued use of unprotected farm tractors in this country. Existing farm tractors without ROPS have not been replaced as a function of age and obsolescence and lack of protection, and there is no clear indication of the lifespan of a tractor in the literature. In the period following the creation of the consensus standards, a substantial secondary market emerged for older, unprotected farm tractors, reflecting the price differential between new, more technologically advanced tractors, and older, less-sophisticated tractors, as well as the emerging perceived value of the older tractors as collectibles, as a valued item because of a posited link between current farming practices and past practices, because of perceived value as a function of alternative lifestyle arrangements in which farming no longer constituted a major constituent of remunerative activities, because of antiquarian value, and for other, related reasons. .

As a result, unprotected farm tractors are still to be found, frequently in operational status on American farms, and the leading cause of death for farm workers continues to be tractor overturns. As of 2006, the USDA found that only 59% of operational farm tractors were protected by ROPS (NASS, 2008). It should be noted that NASS only considers operational tractors that produce goods as within its purview, whereas the current project considers all tractors, whether used as productive, operational tractors or maintained for non-utilitarian purposes, such as for collectability purposes or display purposes, as within the purview of consideration. Operators of non-utilitarian tractors remain at risk of traumatic injury and tractor-parts dealers can offer protection against traumatic injury through the mechanism of ROPS provision.

NIOSH has found that the single most effective way of reducing deaths from tractor overturns is the use of a rollover protective structure (NIOSH, 2014a). The NIOSH research agenda has noted that many "older tractors can be retrofitted," with after-market ROPS (NIOSH 2009). However, to date, no effort has been made to incorporate the knowledge, belief and attitudes of a key intermediary in the aftermarket provisioning experience, the tractor parts dealers.

This group is key in the decision to provide retrofit ROPS to end users. Tractor parts dealers have intimate knowledge of the constraints that face both end users and manufacturers, in terms of pricing, use and appearance of the product by end users, information effects as to the availability of ROPS, and related factors. In addition, tractor parts dealers have intimate knowledge of the factors that affect distribution, availability, and utility.

This group has been largely disregarded in the literature, and information on the importance of the distribution channel is basically nonexistent. This is unfortunate, because

tractor parts dealers can serve as advocates, information sources, promoters, and providers, and this item of safety equipment is proven in effectiveness, highly necessary, and valued within the farm community.

To reduce the incidence of traumatic injury among farm workers, NIOSH will administer stated-preference questionnaires designed to assess ROPS stocking preferences among a group of tractor-parts dealers. These dealers operate in Pennsylvania, New York, New Hampshire and Vermont, and have membership in the Northeast Equipment Dealers' Association (NEDA), a trade group for tractor parts dealers that is active in 12 States in the U.S. Northeast and Mid-Atlantic States. This information will be used to assess the barriers and incentives for the sale and distribution of ROPS.

ROPS Attribute Identification by Channel Intermediaries is a study that includes a qualitative- information-review phase (administered over a 90-day period), a pilot-project phase (to be conducted over a period of 1 month), and a survey administration and data collection phase (which will be conducted over a 1-month period). The overall goal of this project is to identify the stated preference for attributes of the ROPS provisioning experience of the channel intermediaries, those persons in the distribution chain midway between the manufacturer and the end user, and to determine methods that will be used to successfully motivate those parts dealers to recommend, supply, and distribute this item of safety equipment. In addition, this information can be used to identify those impediments to distribution that call for intervention by parties that are external to the supply process, and whose actions address the public good. These are generally state and federal agencies that have mandated authority to reduce the societal impact of industrial injuries and fatalities. The data gathered in this study regarding parts dealers' specific impediments, motivational factors, and preferred information sources will be of significant

practical value when designing and implementing future interventions, especially those interventions that call for an integrated action between public and private agencies.

Literature review of qualitative interviews was conducted to determine the most significant issues for a group of tractor-parts dealers. Qualitative interviews were previously conducted by the New York Center for Agricultural Safety and Health (NYCAMH) in New York State, for general purposes of advocating ROPS use, and for purposes not connected to the ends of this project. The primary investigator (PI) reviewed this material, and also conducted literature review of national web-based forums of interest to the community of tractor dealers, users and other interested parties. Additionally, telephone contact was made a single time with 9 subject matter experts, with expertise in tractor parts supply, farm safety, tractor safety, ROPS and existing programs to advance farm safety. In response to the issues identified in this approach, and to the increasing maturity and adoption of the survey technology (maximum difference scaling), a survey was developed to establish a prioritized ranking of most important issues to tractor parts dealers, in their decision to provide ROPS to end users. The proposed survey application described here is instrumental in understanding the stated preference of that group of tractor-parts dealers. Phase 1 of this project (completed) included review of qualitative interview information and limited in-depth interviews with subject-matter experts, as a hypothesis-generating activity. This interview process was not subject to OMB review, in that total interview subjects did not engage the need for OMB review, as the total number of subjects was under the limit established for OMB involvement, and publication review did not involve human subjects and was of unpublished internal NYCAMH literature. This review as conducted in order to develop a questionnaire which addressed the leading concerns of this audience. Phase 2 of this project (completed) was to administer a trial questionnaire to a small group of test subjects, 9 in

number, who were members of NEDA and knowledgeable about tractor safety, to determine whether the survey as constituted was easily comprehended and whether it employed commonly accepted terminology. The primary goal of Phase 3 of this project (to be completed) is to gather ranking, or stated preference, information for the target audience, tractor parts dealers in New York, Pennsylvania and Vermont, through the mechanism of this survey.

The information gathered from this study will be informative in determining the role of various public agencies in advancing the adoption of safety equipment for farm tractor use by assisting in the provisioning of safety equipment This assistance can take various forms; there may be a need for a government-subsidized central repository for information related to ROPS availability for particular tractor models, or there may be a need for government support for advancing knowledge of existing repositories. There may be a need for government support of manufacturing processes, or informational outreach to manufacturers that address stated preference for aspects of customizability. There may also be a need for government to support programs that address the cost to consumers and price point of existing ROPS protection. Of course, there may additionally be other responses by public agencies as a function of stated preference by NEDA members for conditions requiring involvement of public agencies.

Several of these potential initiatives are conditionally dependent upon the response to this survey, encompassing the ranking of stated preferences of tractor-parts dealers. It should be noted that farm-safety initiatives commonly rely on subsidization by various governmental agencies to advance their societal goal of injury reduction related to farming. It may be that fine-tuning or further response of governmental agencies is needed to address the needs of a vital partner in promoting the use of ROPS.

All of this represents a legitimate use of government involvement, funding and intervention, in that much of the private investment in ROPS at present is fractionated and incomplete, is frequently regional or state-based in focus, and does not address commonalities related to the provisioning process, such as knowledge of a common source of information about ROPS availability, stable pricing, and concern that the price of indemnification against lawsuit is excessively high. It does not appear that private markets have the experience, incentive or overview to provide sufficient coverage, influence and the organizational ability to provide a comprehensive solution to a societal problem, traumatic injury to farm-tractor operators.

. Additionally, this study will help determine the appropriate communications messages for public agencies to develop and advance widespread adoption of retrofitting tractors with safety equipment.

This study addresses the NORA research priority area of Traumatic Injuries. In addition, it also involves the goals of the NIOSH industry sector, Agriculture, Forestry and Fishing. This project addresses Healthy People 2020 (http://www.healthypeople.gov/2020/topics-objectives/topic/occupational-safety-and-health) goals in the focus area of Occupational Safety and Health.

The PI has used the qualitative information from a review of the unpublished but recorded literature from New York Center for Agricultural Medicine and Health (NYCAMH) and from various subject-matter experts to develop the core questionnaire items. In addition, a small group of subject matter experts with expertise in tractor safety, tractor part distributorship, ROPS provisioning and related areas, were queried to determine their assessment of the leading issues for tractor parts dealers in their decision to stock and recommend ROPS.

The overall goal of this project is to improve the process of provisioning items of safety equipment, which have established efficacy [Reynolds, 2000] in reducing the incidence of traumatic injury in this population. Additionally, this project may result in the development of recommendations for overcoming barriers that have diminished the effectiveness of occupational health and safety programs. The ultimate purpose of this project is to better understand how to achieve a lower frequency and lower rate of occupational injury to farm tractor operators.

Overview of the Data Collection System – Data will be collected by electronic survey. This will be an establishment survey of the approximately 520 establishments in New York State, Pennsylvania, New Hampshire and Vermont that elect membership in NEDA. These establishments have provided contact information to NEDA, and this information will be used to contact representatives of each establishment. Because the information collection effort is oriented toward the collection of data from business establishments, and no personal identifiers are collected, the privacy impact of this data collection effort should be minimal. The purpose of data collection will be to identify attitudinal issues stated by the representatives of the establishment in terms of the ranking and importance of these issues related to the decision to provide ROPS to end users. While demographic information may be available from the Bureau of the Census and other public data-collection agencies, county-based information on ROPS use and distribution on older farm tractors does not exist at present, proprietary information from manufacturers may not be available, and a direct question to tractor-parts dealers may be of greatest utility.

Items of information to be collected – The data will be in the form of responses to questions in three general areas.

First, the survey will ask general questions about role, prior beliefs, knowledge and attitudes towards ROPS (Appendix C, C1). This section will be used to screen participants to determine whether they are appropriate candidates for participation in the survey, and to elicit general information on methods of improving adoption rates for ROPS.

Second, the survey will collect demographic information such as age group, full-time residency and full-time farming experience on the tractor parts dealer's customer base. This information will be used to give a general indication of the kind of clientele served by the tractor parts dealers. The purpose of this activity will not be to determine the demographic characteristics of the clientele, but to determine dealers' perceptions of the utility to that population to be derived from supplying ROPS to them. Preference for characteristics of the provisioning process on the part of tractor-parts dealers is assumed to be driven by the needs of the end users. It is assumed that upon analysis of dealers' responses, natural clusters or latent classes of end users will be found, and that the differing characteristics of these population clusters will affect dealers' willingness to provide ROPS to them. Latent classes or clusters of users will be developed by the PI upon analysis of stated preference responses, and the PI anticipates that stated preference responses will reflect demand for ROPS by various groups of consumers, which can be met by supply efforts, upon satisfaction of existing constraints. Tractor parts dealers will provide a single perception-based answer to general questions on the characteristics of their client base (tractor owners). The questions will attempt to determine, to the best of the dealer's understanding, the following information about the client base: residence (the farm or elsewhere), farm size (small or large), typical crops, tractor purpose, and general age bracket. While this information is perception-based and limited and may not be representative or accurate, it will give general information on the overall characteristics of the client base, and will

serve to determine whether clusters of respondents share similar preferences or concerns, or whether preferences are distributed broadly, without any clustering of characteristic and preference.

Finally, the survey will ask the tractor parts dealers' preferences for items reflecting attributes and levels of attributes of ROPS or the ROPS provisioning experience. This constitutes the main focus of the data collection effort, and will determine the priority given by tractor-parts dealers to attributes of the provisioning experience. Questions will be posed in six general areas: Attributes of

- price,
- appearance,
- location of and ease of access to information on ROPS availability,
- foldability of the ROPS design,
- insurance, and
- customizability

will be determined. It should be noted that these attributes are for administrative and analytic purpose only, and that they will not be presented to the respondent. Instead, the levels pertaining to the attributes will be presented to the respondents, to determine the importance of these levels to the audience. For example, the foldability of the ROPS is something that the respondent can decide is important to the end user, and therefore this attribute of the ROPS can be determined to represent either a foldable state or a rigid and unfoldable state. A tractor parts dealer who commonly sells ROPS to an orchard operator, for example, may feel that this attribute of the ROPS is of greater or lesser importance than that of a dairy farmer who makes use of the ROPS-equipped tractor for general utility purposes. If the respondent felt that ROPS should be foldable,

then he would rank this attribute level as more significant, rather than less significant, following the forced-choice selection criteria for each level. In either case, the tractor-parts dealer would select the level of the attribute, rather than choose the attribute itself. The levels of the attributes are the following:

- For price, the levels are the following:
    - The price is subsidized by the government at 20% of the tractor's value.
    - The ROPS manufacturer or fabricator sets the ROPS price.
    - The government will pay for part of the ROPS price so that the end user pays no more than $500 to purchase a ROPS.
- For appearance, the levels are the following:
    - ROPS look like safety equipment.
    - ROPS can easily be removed for parades or shows.
    - ROPS are constructed to match the general appearance of the tractor model.
- For location of and ease of access to information on ROPS availability, the levels are the following:
    - Farm safety agencies provide a list of ROPS that fit all tractors. It is available to anyone on the internet.
    - Tractor manufacturers and ROPS fabricators provide a list of all available ROPS.
- For foldability of the ROPS design, the levels are the following:
    - ROPS remain rigid and protect at all times.
    - The ROPS folds down to allow access to outbuildings.

- For insurance, the levels are the following:
    - The dealer is protected against lawsuit by private insurance.
    - The dealer is protected against lawsuit by group insurance.
    - The dealer is protected against lawsuit by government-subsidized insurance.
- For customizability, the levels are the following:
    - The ROPS comes with welded tabs and mounts to attach a sunshade and other equipment.
    - Mounting tabs for sunshades and other equipment must be attached by the user. Welding will not affect the integrity of the steel.

Prohibitions against conflicting levels of attributes appearing to the end user will be established, as part of the design of the instrument. It should be noted that the process for eliciting information via the stated preference methodology is well established, and follows the general psychographic principle of the Method of Paired Comparisons.

2. Purpose and Use of Information Collection

The purpose and use of information collection for this project is to advance occupational health and safety by identifying the most important factors in the decision to provide ROPS to end users by tractor-parts dealers. This information will be determined as a result of answers to a stated-preference questionnaire, which has been designed to elicit preference on which attributes of the ROPS equipment or the ROPS provisioning process is most important to tractor parts dealers, and will thus increase the dealers' willingness to stock, recommend and provide ROPS to end users, considering that each concern was successfully addressed by relevant agencies.

Each of the 520 member organizations of NEDA in New York, Pennsylvania, New Hampshire and Vermont will be asked to provide their stated preference response to questions about ROPS attribute levels, so that the utility or value assigned by each of these members can be accurately determined, summed and analyzed. As a result, tractor-parts dealers can indicate which attribute of ROPS, or the ROPS provisioning experience, is most important to them in their decision to stock ROPS. The result will be a ranking of attributes and levels, so that, for example, the attribute /level of “ROPS folds down to allow access to outbuildings,” are seen as more important to dealers than the attribute/level of “ROPS are constructed to match the general appearance of the tractor model.”

It may be that appearance of the ROPS as consistent with the overall appearance of the tractor will be most important to a group of persons, but this group can be identified by cluster or latent class analysis, and this attribute may not be regarded as important to overall dealer membership. However, the latent class may contain a significant population in itself, and the size and characteristics of this population may have implications for manufacturers or farm policy members.

However, if the most important and least important qualities of the ROPS or the ROPS provisioning experience for the overall population of tractor parts dealers can be determined, this information could be used to inform public policy on this aspect of farm safety . In this way a critical component of farm safety can be addressed, with the overall goal of reducing traumatic injury on American farms by maximizing the availability of a proven item of safety equipment, which has known efficacy in reducing the leading cause of agricultural fatal injury.

2.1 Privacy Impact Assessment Information

No Information in Identifiable Form (IIF) other than contact information from a mailing list is being collected. This information will be destroyed following the completion of the project.

3. Use of Improved Information Technology and Burden Reduction

The survey will be conducted electronically over a secure internet connection; the survey will be housed on Sawtooth Software/Rackspace computers and accessed in secure fashion, utilizing a token provided by the vendor (Sawtooth).

4. **Efforts to Identify Duplication and Use of Similar Information**

In the process of creating the current survey NIOSH researchers have conducted qualitative interviews, conducted literature searches, consulted experts in the field and attended professional conferences addressing relevant topics. To date no interview instrument revealing the stated preference of tractor-parts dealers on the barriers and motivators to the provision of ROPS has been found; stated preference research addressing the barriers and incentives to action on the part of tractor parts dealers cannot be identified. The interview instrument reflects these concerns, however no one has developed a qualitative or quantitative instrument to address this problem. The use of this interview instrument will provide NIOSH with information essential to the development of a survey to assess the occupational safety and health needs and motivators of tractor parts dealers.

5. Impact on Small Businesses or Other Small Entities

Small businesses will be directly involved in this data collection; the purpose of this study is to determine the critical issues for small businesses in their decision to provision safety equipment to end users. The questions have been held to the absolute minimum required for the

intended use of the data. However, the questionnaire does not have general application to business methods employed by business endeavors other than farms.

6. Consequences of Collecting the Information Less Frequently

This is a one time data collection.

7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

This request complies with the regulations set forth in 5 CFR 1320.5.

8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency

A. A 60-day Federal Register Notice was published in the Federal Register on July 24, 2013, vol. 78, No. 142, pp. 44567-44568. No comments from the public were received.

B. The following individual has been consulted regarding various aspects of interview questionnaire design and content in 2010 and 2011:

Paul Jenkins
Bassett Healthcare
1 Atwell Road
Cooperstown, NY 13326
Phone: 800.343.7527
Fax: 607.547.6087
paul.jenkins@bassett.org

9. Explanation of Any Payment of Gift to Respondents

No payment will be made to respondents.

10. Assurance of Confidentiality Provided to Respondents

10.1 Privacy Impact Assessment Information

This submission has been reviewed by ICRO, who has determined that the Privacy Act does not apply. No individually identifiable information will be collected. Notification of the survey will be provided to potential participants by advance notice letter (Appendix D). Approval of

this study by the Institutional Review Board of CDC was received March 3, 2011, and revised authority to collect information was granted by the IRB on 1/13/2014 (Appendix G). Individuals will be informed that providing information for the purposes of this study is voluntary and no adverse consequences will apply for failure to provide such information. No information in identifiable form will be collected from respondents, other than mailing list contact information, which will be destroyed following the completion of the project. Respondents will be asked to provide general demographic information on typical customers, such as age range, most common type of farming, and hours of tractor use at the beginning of the survey. The survey will be administered only once to each respondent and therefore there will be no need to collect contact information for follow-up. The survey will be administered by NIOSH researchers. All data will be recorded on standard forms and belongs exclusively to NIOSH. There is no distinction between the data collected and the data that NIOSH will retain.

11. Justification for Sensitive Questions

No sensitive questions will be asked. Social Security numbers will not be collected.

12. Estimates of Annualized Burden Hours and Costs

A. In this phase, a total of 520 representatives of respondent organizations will be solicited to participate in this study. Survey time requirements should be on the order of 5 minutes, as determined by the PI, and respondents will complete a single survey only. Representatives of this group, which represents the interests of farm tractor parts dealerships in New York, Pennsylvania, New Hampshire and Vermont, will be asked to complete a survey that provides respondent information on stated preference for significant issues related to the provisioning of ROPS. Contact will be in the form of a notification letter about the purpose of the survey and a request to participate, a

subsequent contact and instruction letter to notify respondents how to access and complete the survey, and a follow-up letter to ask respondents to complete the survey if they have not done so, and a statement of thanks.

Estimated Annualized Burden Hours

Type of Respondents	No. of Respondents	No. of Responses per Respondent	Average Burden per Response (in hours)	Total Burden Hours
Tractor parts dealers	520	1	5/60	43
Total				**43**

A. Respondents will be employed at tractor supply dealerships in some form of repair/maintenance or sales and leasing role. Contact with subject matter experts indicates that job assignments are not consistent across dealerships, and some joint task responsibilities for repair and leasing are routinely assigned. Therefore the average BLS hourly rate for two BLS categories that most closely match job tasks will be used: Farm equipment mechanics and service technicians ($17.16) (www.bls.gov/oes/current/oes493041.htm) and Parts salesperson ($15.54) (www.bls.gov/oes/current/oes412022.htm). Based on data from the Bureau of Labor Statistics website the mean hourly wage in May of 2012 for these two categories was $16.35. For the table below, it is assumed that participation will be at the 100% level, although it is unlikely that full participation levels will be reached. Given these assumptions, it should be assumed that the estimated burden represents an upper bound, and actual burden should be lower.

Estimated Annualized Burden Costs

Type of Respondents	No. of Respondents	No. Responses per Respondent	Avg. Burden per Response (in hours)	Total Burden Hours	Hourly Wage Rate	Total Respondent Costs
Tractor parts dealers	520	1	5/60	43	16.35	$703
Total						$703

13. Estimates of Other Total Annual Cost Burden to Respondents or Record Keepers

A. Cost of data storage is a function of response and completion rates. Sawtooth/Rackspace charges $.49 per completed survey per month. Because published literature indicates that over 96% of responses occur within two weeks, a month is considered to be adequate time for maintaining completed surveys. As a result, assuming a .9 response rate, a total of .9*520*.49=$229. Even at 100% completion rate, $250 should be adequate. This amount has been reserved for this project.

B. There is no cost to respondents for operation or maintenance in this project. Respondents are not asked or expected to purchase any services.

14. Annualized Cost to the Government

Researcher	Base And Benefits	Time on project	Cost for one year
Paul Keane	$94,720	50%	74,000 x .50 = $47,360
			Total Salary Cost = $47,360

Annualized salary and benefits (see above)	$47360
Travel to data collection sites	$1500
Total annualized cost to government	$48860

15. Explanation for Program Changes or Adjustments

This is a new data collection.

16. Plans for Tabulation and Publication and Project Time Schedule

A.16 - 1 Project Time Schedule	
Activity	Time Schedule
Recruitment materials provided to contractors	0-1 months after OMB approval
Complete Data collection	3 months after OMB approval
Analyses	6 - 18 months after OMB approval
Publication	18 - 24 months after OMB approval

Data will be analyzed to determine preference for items of interest related to the decision to provision tractor parts, and to determine whether unique sectors of respondents are to be found, with corresponding unique preferences.

17. Reason(s) Display of OMB Date is Inappropriate

The OMB approval number and expiration will be displayed on all materials given to the contractor.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

There are no exceptions to the certification.

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