

Part A: Justification

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

Attach a copy of the appropriate statute or regulation mandating or authorizing the collection of information.

The National Survey of the Use of Booster Seats (NSUBS) is being conducted to respond to Section 14(i) of the Transportation Recall Enhancement, Accountability, and Documentation (TREAD) Act of 2000. The act directs the Department of Transportation to reduce the deaths and injuries, among children in the 4 to 8 year old age group that are caused by failure to use a booster seat, by 25%. Conducting the National Survey of the Use of Booster Seats provides the Department with invaluable information on who is and is not using booster seats and using them appropriately, helping the Department better direct its outreach programs to ensure that children are protected to the greatest degree possible when they ride in motor vehicles.

Great strides have been made in recent years in protecting child passengers. Among infants and toddlers, restraint use is at the highest levels ever recorded (98 percent for infants and 95 percent for toddlers¹), and crash-related child fatalities have dropped steadily to the lowest number since record keeping began in 1975.

Unfortunately, similar progress has not been achieved where older child passengers are concerned. Booster seat use -- estimated at only 46 percent nationwide -- remains unacceptably low. According to NHTSA's Fatality Analysis Reporting System (FARS), in 2013 there were 199 fatalities among booster-aged child passengers -- ages 4-7 (down from 329 in 2009). For those children ages 4-7 killed, and for whom restraint use is known, 54 percent were unrestrained. In the rear seat, 90 percent of children ages 4-7 were restrained in 2013, according to NHTSA's National Occupant Protection Use Survey.

¹National Survey of the Use of Booster Seats, 2013.

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In the TREAD Act and Anton's Law, NHTSA was directed to conduct a range of initiatives, including rulemaking, compliance testing, and consumer education programs, to enhance the safety of older child passengers.

2. Indicate how, by whom, and for what purpose the information is to be used. Indicate actual use of information received from the current collection.

NHTSA staff will use the information collected by the survey to better design Agency outreach programs to help ensure that more of the nation's children are using restraints that will protect them in motor vehicles crashes. The survey data will allow programs to be better tailored to reach the caretakers whose children are unrestrained or not using the best restraint choice for their children's sizes. The findings will also support ongoing efforts by state legislatures to strengthen their child restraint laws by enacting mandatory booster seat use provisions. As of July 2015, 48 states, the District of Columbia and Puerto Rico had enacted such requirements.

3. Describe whether the collection of information involves the use of technological collection techniques or other forms of information technology.

This collection of information does not involve the use of such techniques or of other forms of information technology. NHTSA feels for this bi-annual study the use of simple paper and pencil forms is cost effective (you don't have to purchase the design software or equipment to collect the data in the field), and provides a less formal and more comfortable environment for the interviewed motorists. However, once all the data are collected NHTSA will receive an electronic file containing all the results of the survey. No electronic devices are used by the data gatherers, but NHTSA will receive 100 percent of the results in an electronic file.

4. Describe efforts to identify duplication. Show specifically why similar information cannot be used.

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There is no duplication of effort in conducting the National Survey of the Use of Booster Seats. No existing survey or other data source provides probability-based observational data on booster seat use accompanied by interview data on child age and size. Such information (i.e. scientifically-based data obtained from observations/interviews of actual children in vehicles) is needed to tailor Agency booster seat programs effectively.

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

The survey involves collecting data at fast food restaurants, gas stations, day care centers, and recreation centers. Potential survey sites will be contacted in advance to see if they would be willing to voluntarily grant permission to have the survey conducted at their establishments. Businesses will be fully informed as to the nature of the survey operations and the amount of time taken for the survey to be conducted at their establishments.

6. Describe the consequences to Federal program or policy activities if the information is not collected or collected less frequently.

If NHTSA does not collect this information, it will not have scientifically-based information from actual motorists on the appropriate use of booster seats and other child restraints with which to better target Agency outreach efforts. Outreach programs would be less effective, resulting in more children suffering death or injury in crashes than might have suffered this fate had outreach programs been more effective at reaching this at risk population.

NSUBS has been conducted seven times since 2006. It is anticipated that it will be conducted bi-annually in the future.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with the guidelines in 5 CFR 1320.6.

There are no circumstances requiring information to be collected in a manner inconsistent with the guidelines in 5 CFR 1320.6.

8. Provide a copy of the FEDERAL REGISTER notice soliciting comments on extending the collection of information, a summary of all public comments responding to the notice, and a description of the agency's actions in response to the comments. Describe efforts to consult with persons outside the agency to obtain their views.

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Docket number DOT-NHTSA-2015-0071 was established as a repository for comments received in response to the Federal Register 60 Day Notice and Request for Comments (attached as part of this package in pdf) published on (July 30, 2015) at Volume 80, Number 146, Page 45585. NHTSA received no comments based on the 60 Day Notice and request for comments.

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. However, brochures providing information about child passenger safety are provided to drivers, and stickers are provided to all children sampled in this study.

10. Describe any assurances of confidentiality provided to respondents.

Data collectors will recite the following statement, found on the attached data collection form, to each motorist they approach: “Hi, My name is _____ from Westat, a national research organization. We are conducting a child travel survey for the National Highway Traffic Safety Administration. We would like to ask a few simple questions. No personal identifying information will be collected and only project staff will be able to see your responses”.

11. Provide additional justification for any questions on matters that are commonly considered private.

The survey will not collect such information.

12. Provide estimates of the hour burden of the collection of information on the respondents.

NHTSA estimates that the data collection will take approximately 4 minutes of the respondent’s time. (The respondent in this case is an adult motorist providing information on children in his/her vehicle.) Multiplying the 4 minutes of burden per respondent by the estimated 4,800 respondents yields 320 total burden hours for all respondents collectively.

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The hourly value of time used here is the value of personal time as provided in the USDOT's *Departmental Guidance for the Valuation of Travel Time in Economic Analysis*, adjusted for 2015 dollars. This value is being used because the opportunity cost of time spent on personal travel is some non-employment related activity (i.e. leisure activity), as is the opportunity cost for time spent participating in this study. The 2015 adjusted hourly value is \$8.93 [2006 value is \$11.90]. Thus the total respondent burden is estimated to be \$2,858 based upon 320 hours @ \$8.93 each.

13. Provide estimates of the total annual cost to the respondents or record keepers.

It costs the respondents nothing to participate in the survey. There are no record keepers for this survey.

14. Provide estimates of the annualized cost to the Federal Government.

This survey is estimated to cost \$865,000 (per contract). This estimate reflects the total survey cost, including the costs to design the survey, conduct the survey, and analyze the results.

15. Explain the reasons for any changes or adjustments reported in Item 13 or 14 of the OMB Form 83-1.

There are no changes or adjustments to report to items 13 or 14

16. For collections of information whose results are planned to be published, outline plans for tabulation, and publication.

NHTSA will tabulate the survey data, analyze the results, and publish the data in a series of annual technical reports. The NSUBS data are to be collected bi-annually in July. The results will be analyzed and presented via publications released in approximately January of the following year. These publications can be obtained by anyone at the following location:

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<http://www-nrd.nhtsa.dot.gov/Cats/index.aspx>

- 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 intends to display the expiration date for OMB approval and the PRA burden statement.

- 18. Explain each exception to the certification statement identified in item 19, “Certification for Paperwork Reduction Act Submissions,” of OMB Form 83-1.**

No exception is made to any of the items in the certification statement.