

INFORMATION COLLECTION SUPPORTING STATEMENT

NHTSA Survey of Law Enforcement Officers/Agencies Attitudes towards and Resources for Traffic Safety Enforcement

A. Justification

The National Highway Traffic Safety Administration (NHTSA) of the U.S. Department of Transportation (USDOT) is seeking approval from the Office of Management and Budget (OMB) to conduct a pilot study in order to identify methodological and statistical challenges to performing a future national survey of law enforcement officers, supervisors, and command-level staff. This pilot study will examine issues in collected data related to law enforcement personnel's attitudes towards, and allocation of resources associated with, traffic safety enforcement. The *Survey of Law Enforcement Officers/Agencies: Attitudes Towards and Resources for Traffic Safety Enforcement* is an in-depth study of a nature that has not been previously conducted.

This pilot study will collect critical information about law enforcement officers' and management's attitudes towards traffic safety enforcement, allowing NHTSA to assess key variables that have implications for intervention and outreach activities that ultimately impact how law enforcement saves lives on the roads. Due to economic challenges and resource constraints, a number of law enforcement agencies have changed the way they perform traffic enforcement in order to reduce costs. It is important to gain an understanding of how attitudes and resources have led to these changes and find new ways for NHTSA to enhance traffic safety in partnership with law enforcement.

The proposed data collection will involve recruitment of 40 law enforcement agencies from across the United States. A web-based survey will be offered to law enforcement line officers and supervisors with a goal of collecting 1,200 completed line officer and 80 supervisor questionnaires. In addition, telephone interviews will be conducted with one command level staff member at each agency for a total of 40 completed interviews. A crime analyst in each agency will also be asked to provide administrative traffic-related data for a specific time-frame. Data collection is planned for 2016.

A.1. Explain the circumstances that make the collection of information necessary. Identify any Legal or 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.

a. Circumstances making the collection necessary

NHTSA was established to reduce the number of deaths, injuries, and economic losses resulting from motor vehicle crashes on the Nation's highways. As part of this statutory mandate, NHTSA is authorized to conduct research as a foundation for the development of motor vehicle standards and traffic safety programs. This information collection supports this department's strategic goal of safety.

Previous research has demonstrated that increased traffic enforcement reduces driver behaviors associated with crash deaths and injuries. However, due to economic challenges and resource constraints, a number of law enforcement agencies have merged traffic enforcement with other enforcement divisions or otherwise reduced traffic enforcement in order to reduce costs. It is important to gain an understanding of how attitudes and resources have shifted in recent years in order to determine what NHTSA can do to enhance traffic safety through enforcement.

b. Statute authorizing the collection of information

Title 23, United States Code, Chapter 4, Section 402 and 403 (Attached as Appendix A) gives the Secretary authorization to use funds appropriated to carry out this section to conduct research and development activities, including demonstration projects and the collection and analysis of highway and motor vehicle safety data and related information needed to carry out this section, with respect to all aspects of highway and traffic safety systems and conditions relating to - vehicle, highway, driver, passenger, motorcyclist, bicyclist, and pedestrian characteristics; accident causation and investigations; and human behavioral factors and their effect on highway and traffic safety. NHTSA further has the responsibility for promoting and implementing effective educational, engineering and enforcement programs with the goal of ending preventable tragedies and reducing economic costs associated with vehicle use and highway travel. [See 23 U.S.C. 402(a)(2) (a)(vi), 23 U.S.C. 402 (b)(1)(b), 23 U.S.C. 402 (b)(1)(f), 23 U.S.C. 403(b)(1)(a)(i), 23 U.S.C. 403(b)(1)(a)(ii), 23 U.S.C. 403(b)(1)(b)(iii), 23 U.S.C. 403(b)(1)(c); 23 U.S.C. 403(b)(1)(e)].

A.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 purpose of the study is to provide critical information needed by NHTSA to determine the strengths and weaknesses associated with current traffic enforcement practices and how traffic enforcement is prioritized within law enforcement agencies.

The data collected will be used to assist NHTSA in its ongoing responsibilities for: (a) developing an accurate assessment of the traffic safety problem on a national scale; (b) providing information to NHTSA's partners involved in improving public safety; and (c) providing sound scientific reports on NHTSA's activities to other public safety researchers.

NHTSA will use the findings to help focus current programs and activities to achieve the greatest benefit and to provide informational support to states, localities, and law enforcement agencies that will aid them in their efforts towards enhancing traffic law enforcement.

A.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 information technology. Also describe any consideration of using information technology to reduce burden.

The line officer and supervisor data will be collected electronically through the use of web-based survey instruments. A web-based survey design allows project staff a number of advantages over other survey modes, including:

- Automatically executing skip patterns based on prior answers to questions (which decreases overall interview time and consequently the burden on respondents);
- Eliminating potential error caused by interviewers of face-to-face and telephone surveys and data entry/keying errors caused in mail survey;
- Providing random rotation of specified questions or response categories (to avoid bias);
- Ensuring that questions cannot be skipped; and
- Rejecting invalid responses or data entries.

Web-based surveys also include reporting features that routinely perform a number of critical assurance routines that are monitored by survey supervisors, including tracking average interview / question length, refusal rate, termination rate, and performing consistency checks for inappropriate combination of answers. It is anticipated that 96% of the data will be collected through the web-based survey instruments (line officer and supervisor). Another 2% will be collected through structured interviews with command staff conducted via telephone. The remaining 2% will be collected through electronic-transfer or administrative data.

A.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.

NHTSA researchers have reviewed recent studies on traffic safety enforcement. While a few surveys have been conducted measuring some aspects of traffic safety enforcement, none provide a comprehensive data set covering such a broad range of officer attitudes,

motivations, training, resources, and agency priorities related to traffic safety enforcement.

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

The collection of information may involve smaller law enforcement agencies. Since the data collection design and sampling selection methodology is based on the size of the agencies, the proportion of burden for smaller agencies is no greater than that of larger agencies.

A.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 the survey were not implemented, NHTSA would lack current data on law enforcement officers' attitudes, training, and prioritization of traffic safety enforcement. The end result would be that the agency would not have adequate information to determine how best to apply its resources within the current environment. There are no legal or technical obstacles to reducing burden.

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

No special circumstances require the collection to be conducted in a manner inconsistent with the guidelines in 5 CFR 1320.6.

A.8. Provide a copy of the FEDERAL REGISTER document 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.

60-DAY FEDERAL REGISTER NOTICE: A copy of the Federal Register Notice which notified the public of NHTSA's intent to conduct this information collection, and provided a 60-day comment period was published on April 29th, 2015 (Vol. 80, No. 82, Page 23849). It is attached as Appendix B. One comment was entered into the NHTSA docket in response to the 60-day Federal Register Notice. The comment from an individual noted that the research appeared to be mandatory on the part of LEAs and LEOs. It was recommended that clarification be provided to ensure that agencies and officers were fully aware that participation was voluntary. In response, we refer to the following attachments to this document in which language clearly noting the voluntary nature of participation in the research can be found: Attachments D1, D2, D3a, D3b, D4, F, G, H, and I, in addition to the text of the OMB burden statement that will be presented on all data collection instruments.

30-DAY FEDERAL REGISTER NOTICE: A copy of the Federal Register Notice, which notified the public that this information collection request will be forwarded to OMB and provided a 30-day comment period, was published on September 1st, 2015. It is attached as Appendix C.

EXPERT CONSULTATION: The data collection instruments were provided to expert reviewers from the Police Executive Research Forum (PERF). In addition, several structured group discussions were organized with several members of the law enforcement community across the United States to seek comment on the survey content and specific questions. The reviewers and group members did not voice any opposition to the collection and felt that it was a worthwhile endeavor.

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

No payment or gifts will be provided to respondents.

A.10. Describe any assurance of confidentiality provided to respondents

In the survey's introduction, respondents are informed that participation is voluntary, and their answers will be kept private and will be used only for statistical purposes. These surveys do not collect identifying information such as names, addresses, telephone numbers, or social security numbers. Study procedures call for the point-of-contact to provide the NHTSA contractor with a list of officers identified only by a link such as a roster line number. No names or demographic data will be provided. The contractor will not know the identity of the officers sampled for inclusion in the study. The contractor will provide the point-of-contact with sealed envelopes including log-in information (user name and password specific to each sampled respondent). The point-of-contact will distribute the envelopes to the sampled staff, thus preserving confidentiality.

A.11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior or attitudes, religious beliefs, and other matters that are commonly considered private.

The survey does not contain any questions related to matters that are commonly considered sensitive or private. However, while the survey questions are directed at experience and attitudes towards traffic safety enforcement, some will ask about their opinions regarding agency policies and practices that, if revealed to their supervisors or command staff, could be problematic for their position in the agency. While questions of this nature are important to the larger analysis and results, a number of measures are taken to ensure respondent confidentiality and privacy (see response to A10).

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

Data collection will involve, on average, 30 line officer respondents, 2 supervisor respondents, and a command-level staff interview at each of the 40 participating agencies. Each respondent will be administered the survey once. A point-of-contact (POC) in each agency will coordinate collection. Also a crime analyst in each agency will be asked to complete an administrative data abstraction form.

Data collection instruments are attached in Appendix D1, D2, D3b, and D4, with item justifications in Appendix E1, E2, E3 and E4. Informed consent is included on the first screen of each of the web-based instruments (see D1 and D2). Respondents will need to acknowledge consent before continuing with the survey. For the telephone interviews with the command-level respondents, the interviewer will read the consent form (Appendix D3a), which will require verbal consent by the respondent in order to continue with the interview.

NHTSA estimates that the line officer and supervisor surveys will average 15 minutes, a total of 8 hours, on average, for the 30 line officers and 2 supervisors per agency, or a total of 320 hours for the 1,280 combined line officer and supervisor respondents. The command-level staff telephone interview, including informed consent, is estimated to take 30 minutes per agency for a total of 20 hours. Agency administrative data collection by the crime analyst is estimated to take 30 minutes per agency for a total of 20 hours.

The total estimated burden is shown in **Table 1**.

**TABLE 1
ESTIMATED BURDEN HOURS**

	Line Officer	Supervisor	Command-level	Crime Analyst	Total
Respondents	1,200	80	40	40	1,360
Minutes	15	15	30	30	90
Burden Hours	300	20	20	20	360
NHTSA Form	1317	1327	1328/1329	1330	
Appendix	D1	D2	D3a/D3b	D4	

In sum, NHTSA proposes to survey up to 1,200 law enforcement line officers, 80 law enforcement supervisors, 40 command-level staff telephone interviews, and administrative data collection from each of the 40 participating agencies over the life of the project and estimates a burden of 360 total hours.

Since respondents will be contacted at their place of employment, the survey will likely incur an actual cost to the respondents (i.e., they will be participating during salaried hours). However, it is possible that some staff may complete the survey at a different

location and during non-working hours. This is particularly true of respondents whom may have concerns about confidentiality if completing the survey at their place of employment. At \$27.31¹ per hour for line officers, \$38.91 per hour for supervisors, \$50.07 for command-level staff, \$50.07 per hour for the agency point-of-contact, and \$25.62 per hour for the crime analyst conducting the administrative data abstraction, the total annual estimated cost associated with the burden hours is:

\$27.31 x 300 hours (line-officers) = \$8,193
\$38.91 x 20 hours (supervisors) = \$778
\$50.07 x 20 hours (command-level staff) = \$1,001
\$25.62 x 20 hours (crime analyst). = \$512

The total for this data collection is \$10,484 if all possible respondents in Table 1 are surveyed.

A.13. Provide an estimate of the total annual cost to the respondents or record keepers resulting from the collection of information.

Respondents would not incur any other reporting or record-keeping costs from the information collection.

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

Total estimated cost to the government for conducting the survey is as follows:

Number of completed surveys	1,280
Number of completed telephone interviews	40
Number of agencies participating in data abstraction	40
Total annualized cost of conducting this research	\$614,868

The total contract cost includes briefings, trainings, survey development, analyses, report writing, and other project planning and administrative costs.

A.15. Explain the reasons for any program changes or adjustments in Items 13 or 14 of the OMB 83-I.

This is a new information collection. As such, it requires a program change of adding 360 hours to NHTSA's overall burden hours.

¹¹ US Department of Labor, Bureau of Labor Statistics (2014). May 2014 National Occupational Employment and Wage Estimates – Mean Hourly Wage (All Occupations). http://www.bls.gov/oes/current/oes_nat.htm

A.16. For collection of information whose results will be published, outline plans for tabulation and publication.

Cross-tabular analyses of the survey data by population subgroups and key analytical variables will also be conducted. Findings will be disseminated through internal briefings to NHTSA managers who must make strategic planning decisions regarding program activities and resources, as well as through printed technical reports distributed to traffic safety officials and other interested persons at the national, State and local levels. Those reports will be available to the general public on the NHTSA website. The data will also be placed in the public domain, available through the NHTSA website.

A.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.

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

No exceptions to the certification are made.