Anonymous - Comments

To address the different parts of requested comments:

Whether the proposed collection of information is necessary for the proper performance of the functions of the Department, including whether the information will have practical utility
•Although much of the information collected is good to know, some of the information does not make sense and does not seem to contribute to furthering traffic safety, such as evaluation of the performance targets using data from different years (like comparing apples to oranges to bananas). The administrative burden from all of this paperwork and the assessments sometimes prevents us from doing the real work of trying to save lives and reduce injuries on the roadways. This paperwork burden affects our traffic safety partners, too, who must handle administrative duties and paperwork rather than focusing on traffic safety; implementing strategies and action plans from the Strategic Highway Safety Plan and other plans; coming up with innovative solutions; etc.

The accuracy of the Department's estimate of the burden of the proposed information collection
•Traffic Records Assessment – Underestimated because the estimate doesn't appear to take into account all the respondents to the Traffic Records Assessments within the state (law enforcement, SHSO, Judiciary, Department of Health, DMV, etc.)
•Annual report – Grossly underestimated because the state processes are sometimes cumbersome and time consuming. Not only collecting the information, but also drafting the copy for the annual report, developing the performance report, close out in GTS, etc. It definitely takes more than 40 hours for annual reports, and we have multiple people working on it.
•Grant applications – Underestimated, especially with Traffic Records grants because of all the requirements (measurable progress, descriptions of strategic plan, assessment recommendations and report on addressing/not addressing recommendations and explanations why/why not, etc.)
•Highway Safety Plan – Development of the HSP is a long process that is now required to be a collaborative effort that includes multiple traffic safety partners. Are the partners' times included in all of these estimations?

Ways to enhance the quality, utility and clarity of the information to be collected
•Not sure, except to eliminate unnecessary paperwork that serves no real purpose or can be streamlined

Ways to minimize the burden of the collection of information on respondents, including the use of automated collection techniques or other forms of information technology
•Automating the collection of information, such as for the annual report.