

## **Comment from Oregon Dept of Transportation-Safety Office**

Please see our responses to questions 5, 11 and 12 under Reducing Disparities and Increasing Community Participation and Performance Measures:

Question 5. What varied data sources, in addition to crash-causation data, should States be required to consult as part of their Highway Safety Plan problem identification and planning processes to inform the degree to which traffic safety disparities exist on their roadways?

–Land use, demographic data, income and race (for fatalities).

Question 11. Performance management provides a framework to support improved investment decisions that guide States to focus on areas likely to have the most meaningful impacts on saving lives, preventing injuries, and reducing traffic-related healthcare and other economic costs. NHTSA and the Governors Highway Safety Association previously collaborated on a minimum set of performance measures to be used by States to develop and implement behavioral HSPs and programs. Should these measures be revised? If so, what changes are needed?

–Reconcile the definition of vulnerable road user so that it aligns with FHWA’s definition (which does not include motorcycles).

–For reporting consistency between the HSIP and the HSP, consider allowing the use of state crash databases for reporting fatalities instead of requiring the use of FARS in the HSP. FARS data includes fatalities that occur off the transportation system, during work related activities and those that involve self-harm (suicide) which are excluded from state crash databases.

–Reconcile the differing reporting periods between NHTSA (HSP) submissions and the FHWA Highway Safety Improvement Plan (HSIP) submission. For example:

oThe 2020 HSP report is submitted in 2019 using 2013-2017 crash data

oThe 2020 HSIP report is submitted in 2020 using 2015-2019 crash data

Question 12. Section 24102 of the Bipartisan Infrastructure Law requires performance targets “that demonstrate constant or improved performance.” What information should NHTSA consider in implementing this requirement?

–The approach to requiring states to set targets that demonstrate constant or improved performance using data driven methods conflicts. For most states, this will mean setting targets and goals that are more aspirational than achievable (no state wants to see fatal and serious injuries increase). In addition, if funding is tied to achieving the aspirational goals then there is a high potential that the states that need the funding most (those that support ped/bike accessibility and infrastructure) will lose it.