

Comment from Kathleen Hancock

Posted by the **National Highway Traffic Safety Administration** on May 24, 2022

I have two primary comments in response to the NHTSA RFC on NHTSA-2022-0036.

1) Established practice is for proposals for funding for annual formula grants use fatal crash numbers (with the source often being FARS). This results in programs for the coming year being based on data from two years prior. As is painfully reflected in 2021 crash rates, 2019 was clearly not the appropriate data for use in allocating grant funding for 2021. As the US embraces the Safe System approach, this latency in data for data-driven decisions is unacceptable. To compound the problem, when serious injuries are added to the performance measures, FARS can no longer be a primary source for crash data. Even using state data that is often more current, the basis for allocating funds would be based on year-old data – ie grants for 2023 are generated in early 2022 based on 2021-2022 data. If we, as a safety community, are to be truly data-driven with the ability to generate appropriate performance goals and evaluate them with timely measures, we need to account for near-real-time conditions by adding flexibility to deploy countermeasures based on near-real-time data. Current grant procedures and formulas need to be updated to take advantage of current technologies and provide for flexibility to adjust resources and countermeasure approaches based on current risks and conditions, not historical trends.

2) The Safe System approach emphasizes that responsibility is shared, safety is proactive and redundancy is crucial. The current grant approach, particularly for selective enforcement, is a siloed approach that focuses on crash numbers by category (alcohol/speed/OP/etc) and requires the grantee to allocate the specified resources according to a plan that is based on known (historic) conditions. This does not allow for proactively coordinating resources based on changing conditions and ensuring redundancy for a newly emerging safety hazard or for infrastructure modifications which have different time scales than enforcement and education initiatives. I know that government agencies are constrained by federal/state finance restrictions but, if possible, consideration should be given to developing creative resource allocation options for grantees to adjust enforcement and education/communication to more directly link to engineering countermeasure implementation and/or to consequences of human mistakes in a timely manner (ie in response to a fatal or serious injury crash shortly after it occurs).