



June 3, 2022

Safe Kids Worldwide
Comment to the National Highway Traffic Safety Administration
Federal Register Notice No. 87 FR 19573
Fatality Analysis Reporting System (FARS) and Non-Traffic Surveillance (NTS)

Docket No. NHTSA-2022-0031

Introduction

Safe Kids Worldwide thanks the National Highway Traffic Safety Administration (NHTSA) for this opportunity to provide comment regarding the agency's critically important Fatality Analysis Reporting System (FARS) and Non-Traffic Surveillance (NTS) programs, upon which the safety community relies for data on crashes and non-crash road safety issues. This comment focuses on two points highlighted for public comment in the docket: the importance of the FARS/NTS programs to both NHTSA's mission and the broader safety community, as well as several modest suggestions NHTSA might consider in assessing ways to improve the quality, utility, and clarity of data available via FARS/NTS.

Importance of FARS/NTS to NHTSA's Mission and the Safety Community

The NHTSA FARS and NTS program is an incredibly robust and valuable system routinely used for research purposes by Safe Kids Worldwide to better understand roadway crash injuries. The collection and analysis of this data is critical to NHTSA's mission and is relied on by the broader Department of Transportation as well as Congress, state highway safety offices, and municipalities across the country to diagnose and respond to road safety issues. Safe Kids strongly supports this ongoing data collection as not only necessary but critically important.

Opportunities to Improve FARS/NTS

As discussed above, FARS/NTS as they exist today are incredibly valuable tools. However, our research team has identified two opportunities for improvement in terms of detail available through the associated Fatality and Injury Reporting System Tool (FIRST) online query tool. The first is the inclusion of more detailed non-motorist location categories, currently available only via a data request to NHTSA. For education and awareness-raising purposes, the level of detail for multiple locations within and not within an intersection are important, particularly related to whether the victim was in a marked or unmarked crosswalk when injured. Knowing what proportion of victims were located on a sidewalk or median would also be insightful for prevention education. Also, although users can obtain data on crashes involving alcohol and/or a drugged driver through written data request to NHTSA, those variables are not available in the FIRST tool.

Secondly, we respectfully suggest including identifiers for train-related injuries. Currently, the "Relation to Junction – Specific Location" variable includes a "Railway Grade Crossing" category, but to our knowledge users cannot query crashes in which a roadway user struck or was struck by a train. According to the FARS CRSS Coding Manual, trains are coded generally as "objects not fixed," which to

our knowledge could include trains or other objects. According to data from the Federal Railroad Administration (FRA), 229 children ages 0-19 years were fatally injured in collisions at railroad crossings between years 2011 and 2020. While FRA tracks injuries at railroad crossings and makes that data available to the public, the crash data is not as detailed as what is reported by FARS. Inclusion of a variable in FARS specifically indicating a collision with a train or railroad equipment would be beneficial, perhaps coded under “Crash Type > Special Circumstance,” where incidents involving buses, emergency vehicles, and mail carrier vehicles are flagged.

About Safe Kids Worldwide

Safe Kids Worldwide is a nonprofit organization working to help families and communities keep kids safe from unintentional injuries. Most people are surprised to learn preventable injuries are the leading cause of child death in the United States. Throughout the world, almost one million children die of an injury each year, and almost every one of these tragedies is preventable.

Safe Kids works with a network of more than 400 coalitions in the United States and with partners in more than 30 countries to reduce traffic injuries, drownings, falls, burns, poisonings and more.

Losing one child is one too many, and we do not want any parent to have to endure the loss of a child. We are calling on everyone to come together, to raise awareness and to get involved. Saving lives is a decision we can all make every day.