

Public Comment on FARS Data Collection Improvement

In order to improve the consistency of the Fatality Analysis Reporting System (FARS), we are recommending that the process for fatal crash data entry *begin* with input into the FARS database rather than into the state crash databases.

In order to enhance quality, utility, and clarity of information to be collected, NHTSA should develop a standardized, comprehensive crash report form, which would provide every data element required to thoroughly identify and analyze all fatal crash factors. This will enable every state to input standardized, uniform crash data into the FARS database -- to the benefit of not only individual states but the citizens of the country.

Furthermore, the existence of a standardized crash report form allows NHTSA to conduct standardized, [uniform digital training](#) for both law enforcement and data analysts. This will reduce the burden on the states and provide quality information so important for data-driven decision-makers at all levels. And, in order to make the NHTSA data query tool more useful to the end-user researchers and analysts, all FARS data elements should be accessible (except for protected personal information).

As an example of the need for uniform crash information, truck underride has been documented to be vastly undercounted in the FARS data. Part of the reason for this is that there is inconsistency in state crash report form data elements regarding underride. In order to overcome that inadequacy, NHTSA should expand the FARS data requirements on underride in their standardized crash report form. This would include the following data elements and photos from the crash scene as appropriate for documentation of underride as listed in this [Truck Crash Investigation Underride Evaluation Checklist](#):

- Any damage sustained by the passenger vehicle which indicates that underride occurred -- even if the passenger vehicle is not under the truck at the end of the crash scenario.
- What was the condition of the car, i.e., were the windshield, doors, or roof caved-in or sheared off?
- Did airbags deploy and seat belt pre-tensioners activate/function as intended?
- Did the car's crumple zone function as intended?
- Did the truck enter any part of the passenger occupant survival space, i.e., passenger compartment intrusion (PCI) -- location and extent?
- Were the occupants trapped?
- Did they have to be extricated?
- What part of the car was involved in a collision with the truck?
- With what part of the truck did the car initially collide?
- Did it happen at the side of the truck?
- Did it happen at the front of the truck?
- Did it happen at the rear of the truck?
- If so, at what point on the rear guard did it make contact?
- What was the condition of the rear underride guard post-crash?

- What appeared to be the [condition of the rear underride guard](#)? Did it look like it had been properly maintained? Was it rusty, corroded, bent, have cracks, etc.? (See the [FMCSA Federal Motor Carrier Safety Regulations Pocketbook, Appendix G](#))
- Did the underride prevention equipment have any record of maintenance?
- Was it a tractor trailer or a single unit truck (box truck, straight truck)?
- Who was the truck manufacturer?
- What make, model, and year was the truck-tractor or Single Unit Truck?
- Who was the trailer manufacturer?
- What make, model, and year was the trailer (ask for VIN)?
- Were there any serious injuries?
- If so, where was the person sitting in the passenger vehicle?
- Were there any fatalities?
- If so, what was listed as the causes of death?
- If a person was taken to the hospital with injuries, follow-up later to see if they died or had long-term debilitating injuries.

By expanding and standardizing the FARS data requirements, NHTSA can ensure that state input into the FARS will yield more accurate and complete fatal crash data.

An additional issue that should be addressed is the fact that crash victims are often injured and transported to a medical facility where they later die. There are instances where these victims are not consistently reported in the FARS data. [As an example](#), in our truck underride crash on May 4, 2013, our daughter, AnnaLeah, died at the scene. The Georgia crash report form said she had a “Fatal Injury.” Our daughter, Mary, on the other hand, was transported to a hospital with life-threatening injuries. The Georgia crash report form said she had a “Non-Fatal Injury.” She died in the hospital on May 8, 2013 due to her crash injuries. My son and I had non life-threatening injuries. The Georgia Significant Crash Report (SCR) listed 1 fatality and 3 injured. The FARS report for rear underrides in Georgia in 2013 listed 1 death. This is not an accurate reflection of the underride problem.

How many times does this oversight occur -- not just in truck underride crashes but in any type of auto-related fatality? NHTSA should require states to follow-up on all injured crash victims in order to identify additional post-crash fatalities.

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