

# Comment from Heather Guillen

Posted by the **National Highway Traffic Safety Administration** on Jun 7, 2023

Dear National Highway Traffic Safety Administration,

As you know, America is No. 42 of 51 high-income countries for per capita traffic fatalities.

Insufficient and inconsistent crash data has hindered efforts to identify risk factors and protective factors, which thwarts development and adoption of strategies to prevent these unnatural and violent deaths and injuries.

The proposed revision to the Model Minimum Uniform Crash Criteria (MMUCC) does not fully address insufficient and inconsistent crash data because it fails to align with USDOT's recent adoption of the Safe System Approach, which is a public health approach to prevent crashes from happening and minimize the harm caused when crashes do occur.

As with public health efforts, the Safe System Approach emphasizes prevention. The focus is on systemic change to create a built environment where simple mistakes do not result in serious injuries or deaths. The Safe System Approach seeks to analyze and subsequently reduce risk factors and improve protective factors to prevent crashes and minimize their consequences.

To align MMUCC with a Safe System Approach, MMUCC could categorize variables, also known as data elements, into chapters that align with the five objectives of a Safe System Approach – safer people, safer roads, safer vehicles, safer speeds, and post-crash care.

Currently, MMUCC data elements are detailed in the following six chapters: system populated data elements, crash data elements, vehicle data elements, driver data elements, person data elements, and non-motorist data elements.

Vehicle data elements and driver, person, and non-motorist data elements already align with two objectives of a Safe System Approach (safer vehicles and safer people), but there is no explicit alignment with safer roadways or safer speeds. In fact, the MMUCC revision removed the roadway data elements chapter and most roadway data elements; instead, MMUCC encourages states to rely on separate voluntary guidance to conduct supplemental data collection beyond the data collected in the police crash report. This is a problem because it shifts the priority of crash data collection off local law enforcement officers and onto states, expecting them to take additional, voluntary, steps beyond basic crash data reporting.

Thus, I propose you consider adding back the roadway data elements chapter to the MMUCC. The rationale is that these elements are important for evaluating infrastructure and the effectiveness of countermeasures that prevent or reduce the frequency and severity of crashes.

To align MMUCC with a Safe System Approach, in addition to three chapters for system populated data elements, crash data elements, and vehicle data elements, I propose adding the following chapters and additional data elements:

- Edit the vehicle data elements chapter to be specific to vehicle-related data, rather than include crash data and roadway data, and include vehicle height and vehicle weight (<https://salud.to/megacars>).

- Combine driver data elements, person data elements, and non-motorist data elements into one chapter on people data elements and include person height and person weight.

- Add back the chapter for roadway data elements, particularly the following roadway elements: roadway functional class, annual average daily traffic, presence of bicycle facility, mainline number of lanes at intersection.

- Add a chapter for speed data elements and include 85th percentile speed (<https://salud.to/trafficsafety>).

As a proponent of a public health approach to traffic safety, I am concerned that the changes to the MMUCC have weakened rather than strengthened the guidance and will result in even more inconsistent and insufficient crash data.

I hope you will further align the MMUCC with a Safe System Approach.