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**Safety Effectiveness Evaluation of the
National Accident Sampling System
Part II**

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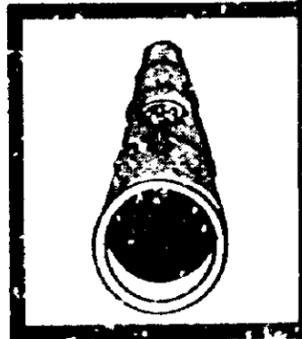
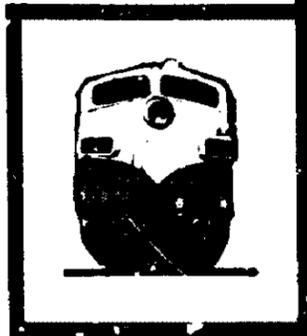
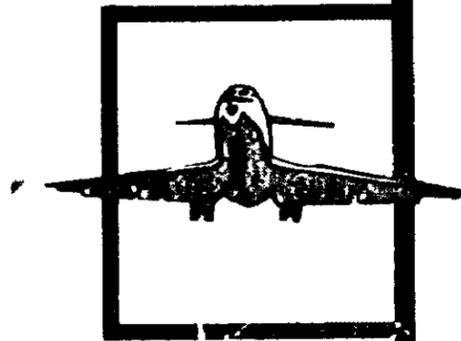
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NATIONAL TRANSPORTATION SAFETY BOARD

WASHINGTON, D.C. 20594

SAFETY EFFECTIVENESS EVALUATION OF THE NATIONAL ACCIDENT SAMPLING SYSTEM (PART II)



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16. Abstract The report evaluates the National Accident Sampling System (NASS) being administered by the National Highway Traffic Safety Administration. NASS is a nationwide system of investigative teams whose goal is to collect nationally representative highway accident data. The report supplements the Safety Board's original evaluation of NASS (Report No. NTSB-SEE-78-1 adopted March 2, 1978), which included recommendations to the National Highway Traffic Safety Administration (NHTSA) and the Federal Highway Administration (FHWA). The major findings of this evaluation are: <ol style="list-style-type: none"> (1) The Safety Board is encouraged by the progress made by the NHTSA since its original evaluation. (2) The NHTSA and the FHWA are working together so that NASS can support the data needs of both agencies. (3) The planning for NASS has substantially improved. (4) Of the seven Safety Board recommendations contained in the original NASS evaluation, one has been "closed, with acceptable action," while six remain "open, with acceptable action." (5) Although certain concerns still exist, the Safety Board is not aware of any major reasons why NASS should not be expanded to 20 sites. The advantages of expansion outweigh any disadvantages. 			
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**SAFETY EFFECTIVENESS EVALUATION OF THE
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NATIONAL ACCIDENT SAMPLING SYSTEM

Adopted: March 8, 1979

Background

On March 3, 1977, the Subcommittee on Transportation and Related Agencies of the Senate Appropriations Committee asked the National Transportation Safety Board to study the National Accident Sampling System (NASS), which was being developed by the National Highway Traffic Safety Administration (NHTSA). Specifically, they urged the Safety Board to evaluate NASS to determine if a sufficient amount of reliable data will be collected in order to accurately determine accident trends and to assess the impact of vehicle safety standards.

Under the authority of the Independent Safety Board Act of 1974, the Safety Board initiated a safety effectiveness evaluation of NASS in October 1977, which coincided with the formal implementation of the NASS pilot program. The report "Safety Effectiveness Evaluation of the NASS" (Report No. NTSB-SEE-78-1) was adopted by the Safety Board on March 2, 1978.

Its major findings were as follows:

- "1. Nationally representative highway accident data are needed.
- "2. If attained, NASS' publicly stated objectives will provide valuable information to the nation's highway safety program.
- "3. The NASS plan for the near future emphasizes motor vehicle crashworthiness and primarily supports NHTSA's mission.
- "4. The NASS program alone will provide limited capability for evaluating many countermeasures.
- "5. The implementation of NASS has proceeded beyond the level of planning.
- "6. Through improved planning and broader perspective NASS could become an important part of the national highway safety program."

In addition, six safety recommendations were made to the NHTSA and one to the Federal Highway Administration (FHWA) which were deemed necessary to improve the utility of the NASS effort. Since that time the Safety Board has been closely monitoring the development of NASS and the actions taken in response to the Board's recommendations.

The Senate Appropriations Committee in NTSB's fiscal 1979 Appropriations Bill (Report No. 95-938) directed the Safety Board to "continue its review of the NASS program." The findings included in this report are based on the NASS program as of January 31, 1979. Furthermore, this report is designed to supplement the original Safety Board report on NASS. Readers unfamiliar with that earlier report should read it before analyzing this report.

During this evaluation, the Safety Board performed a variety of activities including:

- o Factfinding visits to 8 of the 10 operational NASS accident investigation teams and both of the NASS zone centers that oversee team operations under contract to the NHTSA.
- o Technical review of the NHTSA and FHWA official responses to the associated recommendations.
- o Numerous discussions and interviews with key NHTSA and FHWA staff and NASS-related contractors.
- o Visits with three contractors involved with the National Crash Severity Study.
- o Staff participation in the 1978 Public Meeting to Review NASS, sponsored by the NHTSA on October 16 and 17, 1978.

Status of NASS-Related Safety Recommendations

Based on the original "Safety Effectiveness Evaluation of the NASS" the Safety Board recommended that the NHTSA:

1. "Establish a NASS Advisory Committee to provide NHTSA with a broader perspective of types of data that should be collected and methods of data storage and retrieval. The committee membership should be balanced and include persons from automobile manufacturers, highway user groups, the insurance industry, governors' highway safety representatives, highway engineering agencies, medical and legal professions, statistical and economic professions, and the private and government highway safety research community. (H-78-21)
2. "Study the practical problems associated with collecting key data, such as injury data, to determine the magnitude of any problems and to assess the impact on the effectiveness of the NASS program before selecting the number and location of future NASS investigation sites. (H-78-22)
3. "Study the potential effects from liability litigation between parties to individual motor accidents which could involve testimony from NASS

investigators on the cost and quality of data collection. The study should consider the need, advisability, and obtainability of a limited shield for NASS investigators. (H-78-23)

4. "Assure that the number of NASS accident investigation sites will not be expanded beyond the original 10 until after experience with field data collection and processing is evaluated; the exposure data system design, sample design, accident causation methodology, and other NASS studies are completed; and a comprehensive plan for further implementation of NASS is developed and made public. (H-78-24)
5. "Ensure that copies of the sanitized accident reports and case files including photographs completed by each team are retained and systematically filed at a central location for easy retrieval for future use by persons interested in further in-depth research. (H-78-25)
6. "Revise the currently proposed data collection forms to include substantially increased emphasis on the highway environment. The recommendations and counsel of the Federal Highway Administration should be sought and utilized. (H-78-26)"

Similarly, the National Transportation Safety Board recommended that the FHWA:

1. "Conduct a comprehensive study to identify highway safety accident problem factors for which data must be collected to identify the problem magnitude, and support research and countermeasure formulation. Such problem factors should include elements such as geometric design factors, roadway surface skid resistance qualities, traffic control devices, traffic barrier systems, roadside hazards, and other factors related to highway operational safety. This study should be designed to support both the NHTSA NASS program as well as the activities of FHWA and State and local agencies involved in highway safety. (H-78-27)"

The following represents the current status of each of those recommendations:

H-78-21 - Establish a NASS Advisory Committee. -- In response to this recommendation the NHTSA sponsored a Public Meeting to Review the NASS on October 16 and 17, 1978. Twenty-three highway safety professionals were invited to the meeting representing all of the constituent groups recommended by the Safety Board.

The 2 days of discussion were generally quite productive. The NHTSA made public its current plans for the program and received input from individuals with a variety of professional interests and perspectives. In addition, the invited participants subsequently developed 22 recommendations to "further the timely development and future success of NASS." ^{1/}

^{1/} "A Report of the Invited Participants, 1978 Public Meeting to Review The National Accident Sampling System," December 19, 1978.

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The effectiveness of the public meeting was somewhat hampered because many of the participants arrived unprepared for the meeting and were not familiar with the NASS program. Consequently, there was a tendency to draw conclusions on initial reactions rather than in-depth analysis.

The NHTSA has indicated that it is attempting to establish a more permanent advisory committee. The Safety Board endorses this plan since it believes it will be most beneficial to have dialogue between the NHTSA and an independent group at key points in NASS' development.

The Safety Board considers this recommendation "closed, with acceptable action." The Board will monitor future advisory committee effectiveness.

H-78-22 - Study the problems with collecting key data. -- The NHTSA responded to this recommendation after only 12 weeks of NASS data collection, based on its experience with the Restraint Systems Evaluation Program, which was concluded in 1976, and the National Crash Severity Study, which is ongoing.

A brief report, "Key Data Element Reporting in the NASS," was included in the NHTSA response. The report concluded that "the control of error involves numerous considerations of sample design and field data collection procedures." Most importantly, it indicated that the NHTSA was engaged in a continuing study of the key data to be used in national estimates. In that regard, the Safety Board is aware that extensive NHTSA evaluations are currently underway. The zone centers are completing quantitative and qualitative assessments of team operations. Similarly WESTAT RESEARCH, Inc. is analyzing the data from the pilot program as an integral element of the second stage sample design contract.

The results of these NHTSA evaluations, along with most of pilot test data were not available for the Safety Board to consider in this evaluation. Nevertheless, numerous discussions with the NHTSA staff indicate that it is well aware of many potential problems, is sincerely committed to continuing its evaluation efforts, and is prepared, if necessary, to take remedial actions. For example, after the first half of the pilot program the following data completion rates were recorded:

<u>Category</u>	<u>Data Completion Rates</u>		
	<u>Best Team Percent</u>	<u>Worst Team Percent</u>	<u>Average Percent</u>
Scene Inspections	100	86	98
Vehicle Inspections ^{1/}	92	46	73
Operator Interviews	96	56	74
Medical Records	100	22	74

^{1/} Did not include nontowaway or noninjury cases.

The NHTSA subsequently rated the "overall level of performance" as depicted in the above table as "unsatisfactory," and intensified efforts to improve the

situation. The following goals for the overall data base were established as being minimally acceptable:

	<u>Percent</u>
Scene Inspections	95
Vehicle Inspections	85
Operator Interviews	80
Medical Records	90

Their efforts have apparently paid off as seen in the data from the second half of the pilot program.

<u>Category</u>	<u>Data Completion Rates</u>		
	<u>Best Team</u> <u>Percent</u>	<u>Worst Team</u> <u>Percent</u>	<u>Average</u> <u>Percent</u>
Scene Inspections	100	100	100
Vehicle Inspections ^{1/}	97	45	82
Operator Interviews	95	56	81
Medical Records	100	74	92

^{2/} Did not include nontowaway or noninjury cases

Although the rate for vehicle inspections is still slightly below its goal, much improvement has been made. The low average rates are also primarily the result of special problems which exist at two of the sites.

The worst vehicle inspection rate was at the Chicago site where many accident victims are difficult to trace down. Often the police are given false addresses or only post office box numbers. Once found victims are also reluctant to allow their vehicles to be inspected or to agree to an interview (only 56 percent of the operators were interviewed).

The worst site for obtaining medical records was Fort Lauderdale, Florida, where 8 out of the 14 hospitals require a patient-release form before medical records can be obtained. This problem is compounded by the fact that many of the accident victims are tourists traveling through the area.

Both of these sites will require attention, which the NHTSA recognizes. They are also good examples of the kind of special problems which could develop as NASS expands.

In general the Safety Board's review of the team operations found that the pilot program has been successful. The team members were well trained and competently fulfilling their contractual responsibilities. Most importantly, cooperation with local organizations, such as hospitals, police, and tow yards, has been established and maintained. The effective operation of a NASS team demands continual effort to adjust and react to changes in the system. The NHTSA has appropriately recognized this demand and appears committed to apply the necessary resources to handle the problem.

On the the other hand, the Safety Board is not convinced that the pilot program experience is representative of future NASS operations. This is based on several factors.

- o The type of individuals hired as NASS investigators generally has more education and training than a typically trained technician would be expected to have in the continuing program.
- o The number of State confidentiality laws and associated efforts to protect individuals privacy could increase.
- o The trend toward more highway accident litigation cases will continue.
- o The problems of obtaining and retaining qualified contractor teams will increase as the number of NASS sites grows.
- o Increased demands will be placed on the NASS teams as special studies are added to their responsibilities.

In summary, the Safety Board is pleased with the progress the NHTSA has made, and it is particularly encouraged with the NHTSA's commitment for continual review and evaluation. Nevertheless, Recommendation H-78-22 will remain "open, with acceptable action" pending further review.

H-78-23 - Study the potential effects of liability litigation. --The Safety Board made this recommendation because we were concerned with the potential effects of litigation on the collection of data and we were not convinced that the NHTSA had studied this potential adequately. In its formal response the NHTSA provided a study entitled "The Effects of Liability Litigation on the NASS," based on a survey of 8 NHTSA contractors and their experiences in collecting data on some 19,000 investigations. The results indicated that in over 2,000 investigations, or 11 percent of the cases, some information was lost because of an uncooperative interview or refusal to allow vehicle inspection. Likewise, some 180 subpoenas were issued or considered and in 47 instances, deposition or testimony was given. These tasks accounted for 1.5 percent of the time devoted to field data collection. The study concludes that "there is little need for a shield to aid investigators."

The NASS pilot program results appear to confirm these results. There were 1,934 drivers involved in the accidents investigated. Of these only 29 drivers, or 1.5 percent, refused to be interviewed because of fear of litigation. Of the 1,285 vehicles involved, 15 vehicles, or 1.2 percent, could not be inspected for legal reasons. No subpoenas or deposition requests have been received. The Safety Board agrees that results of this type do not justify a limited shield.

Nevertheless, the Safety Board believes that continued study is warranted, and remains deeply concerned over the potential adverse impact of even a few litigations. For example:

An accident investigated by a NASS team develops into litigation where a hospital, or State, or local government is sued. Data from the NASS effort is in some way utilized in the case or perhaps the investigators testify in the case. This could easily lead to the situation where the local cooperation from police, highway officials, or the medical profession would be eliminated. If so, the adverse impact on NASS could be devastating, not only to the site involved, but also to other sites.

The NHTSA staff recognizes this problem, has indicated that another study of the problem will be completed in 1979, and will seek a limited shield if it believes it desirable. The Safety Board encourages the NHTSA to give special attention to the potential problem described above. Therefore, H-78-23 will remain "open with acceptable action" pending completion of the 1979 study.

H-78-24 - Assure the number of NASS sites will not be expanded until certain activities are completed. -- The implementation of the NASS is based on concurrent development of many tasks. Some tasks are sequential, that is, preceding tasks must be completed before the next can begin; still others can proceed simultaneously.

In response to this recommendation, the NHTSA stated that it shared the concern of the Safety Board that NASS proceed to full implementation only after adequate planning and successful field experience have been demonstrated. Nevertheless, the NHTSA believed that the next expansion should not be delayed just because the accident causation methodology and exposure data system design were not completed.

To date, 10 NASS teams and 2 zone centers have been established, personnel have been trained, and the teams made operational. The NHTSA's current plans for expansion call for 2 new zone centers to be selected in November 1979 and 10 new teams in March 1980. Subsequently, 15 additional teams would be added in February 1981 and November 1981. However, the total number and locations of future sites will not be determined until after the sample design is completed, which is scheduled for September 1979.

Although the NHTSA points out that it will complete 20 months of field experience with the initial 10 teams before the next expansion, this experience is limited to the continuous sample subsystem. Special studies, for example, will not begin until at least April 1979. Likewise, the NHTSA is just beginning to

implement its plans for "remote data entry" using computer terminals. Both of these activities will impact team operations by increasing their workload.

In its original evaluation report, the Safety Board discussed its concern over three methodology studies which could affect the expansion of NASS.

The first study, "National Accident Sampling System - Non-Reported Accident Study," is about to be awarded. This should provide estimates of how significant the unreported accidents are, and what priority the NHTSA should assign to them. Generally, unreported accidents are assumed to be minor in terms of injuries and thus relatively insignificant. Originally it appeared as if the NHTSA wanted to collect this type of data as part of the normal team operations. Recently however, it has decided to address it through separate surveys. Therefore, even though the unreported accident study will not be completed until January 1980, it should not affect the NASS expansion plans.

The second study will design a "National Exposure Data System" and is being completed by the Highway Safety Research Institute at Ann Arbor, Michigan. Currently, a number of potential exposure data elements and alternative methods for collection are being considered. Unfortunately, the NHTSA has reported that it is disappointed with this effort and believes much more work will be necessary.

The NHTSA helped sponsor the recent National Personal Transportation Survey. This survey was conducted by the Bureau of the Census and involved personal interviews with about 20,000 American households. The data collected included statistics, such as the number of trips and vehicle miles by type of vehicle used. It is likely that similar efforts will continue so that additional exposure data can be gathered.

Similarly, the NHTSA is studying the possibility of roadside observation surveys to collect selected highway- and vehicle-oriented exposure data. Such surveys, they believe, should not involve stopping traffic or any actions to inconvenience motorists. The Safety Board is aware that the NHTSA and FHWA are discussing the possibility of using the existing FHWA "Mileage Facilities Reporting System," to provide the majority of NASS exposure data. This system contains exposure, inventory, and accident data by road segments collected by State and local highway departments.

The Safety Board believes that valid exposure data must be an integral component of NASS, because without it problem identification and countermeasure design and evaluation will be limited. The Board is also extremely pleased to see the NHTSA-FHWA dialogue over joint exposure data collection plans, especially since duplicate data collections would tap State and local resources already heavily involved in exposure data collection. Such cooperation can only help enhance highway safety.

The NHTSA has also recently decided that exposure data would not be collected by the NASS team members. Thus, the agency's plans for expanding NASS will not be affected by the design of an exposure data system.

The third study involves the problem of how can valid accident-causation data be collected. The study is proving to be a formidable undertaking, because of the complexity of the accident phenomenon and corresponding difficulty in describing it in an objective, consistent manner, which of course is essential if NASS investigators are involved.

The current NHTSA plan projects that the causation methodology will be completed in time to actually start collecting real world data in July 1980. Even this date may be optimistic. Although this one objective of the NASS program will be delayed, the Safety Board believes that the next expansion of NASS need not wait until the causation study is completed.

In response to Recommendation H-78-24, the NHTSA is developing a four-volume NASS plan. One volume has been published, and drafts of the other volumes have been prepared and distributed at the 1978 Public Meeting to Review NASS. The Safety Board understands that the entire plan will be made public and widely distributed. It expects this plan to provide more realistic expectations of what the program can achieve.

As stated in its original NASS evaluation report, the Safety Board believes that the lack of definitive, reliable nationally representative highway accident data is one of today's most critical problems. NASS has potential for providing data that will permit improvement in many safety areas. For example, the passive restraint standard will become mandatory for certain new cars beginning in September 1981. That standard is expected to have an enormous impact, both in terms of benefits and increased costs. NASS is capable of providing invaluable data to support the evaluation of the standard's effectiveness. Therefore, the Safety Board has been and still is interested in the timely development of NASS.

The Safety Board has conducted a thorough review of the NASS program and is not aware of any reason why the expansion of NASS to 20 sites should be delayed. The benefits of expanding outweigh the disadvantages. However, continued review and evaluation is important, especially during the next year. Therefore, the status of Recommendation H-78-24 will remain "open, with acceptable action."

H-78-15 - Establish a central filing system for the NASS data. --The NHTSA intends to establish and maintain a permanent NASS data file. The data will be retained and made accessible for at least 5 years and perhaps longer, depending on demand from the highway safety research community.

NASS data collected in 1978 will not be maintained since it was part of the pilot test. Likewise, it will not be analyzed to infer any safety conclusions, although it will be analyzed as part of the management evaluation of team operations.

The Safety Board reviewed NASS data files maintained by each of the zone centers during the pilot program. Each case file contained a number of photographic slides, was readable, and often contained additional information beyond that coded for computer storage. These files should prove extremely useful for future analyses.

Recommendation H-78-25 will remain "open, with acceptable action" until the permanent files are actually established. It is not clear, for instance, whether the files will be maintained directly by the NHTSA or by a NHTSA contractor. Likewise, the procedures for data access and release have not been established.

H-78-26 - Revise the NASS data collection forms to include more highway data. -- Progress toward fulfilling this recommendation has been promising. The NHTSA appears totally committed to working with the FHWA and revising the NASS data collection forms to place "substantially increased emphasis on the highway environment."

The FHWA provided the NHTSA with a "listing of their data needs" on May 12, 1978. However, this list must be considered tentative since the FHWA is still working on a "Study of FHWA's Safety Related Information Needs." Since August a joint NHTSA-FHWA working group has been attempting to resolve issues related to definitions, priorities, and field protocol. Interagency agreement may be reached and the NASS form modified substantially. The NHTSA believes that actual data collection using the new forms should begin in 1980.

One of the most promising developments to result from Recommendation H-78-26 was the formation of an Executive Coordination Group, composed of top executives from the NHTSA and FHWA. This group will provide policy guidance with respect to joint data collection efforts and resolve controversial issues which arise at the working level. The Executive Coordination Group is also considering areas outside of NASS, such as 55 mph enforcement. This type of interagency dialogue is vital and the Safety Board strongly encourages its continuance.

Recommendation H-78-26 will remain "open, with acceptable action" until data needs are identified by the FHWA and the NASS data forms revised.

H-78-27 - Conduct a comprehensive study to identify highway safety problem factors. -- in response to this recommendation, the FHWA pointed out that it currently collects and uses a wide variety of safety-related information. Nevertheless, it recognized that the information "does not sufficiently meet the needs implicit in the FHWA policy that safety considerations must be accounted for throughout each stage in the transportation development process." Consequently, the FHWA has established an in-house task force to identify the agency needs for safety-related information and sources for obtaining it. The FHWA expects a task force report entitled "A Study of FHWA's Safety Related Information Needs" to be completed within 3 or 4 months. Therefore, Recommendation H-78-27 will remain "open, with acceptable action" pending completion of the study.

Overview

NASS Organization/Management Structure. -- The NASS organizational structure includes the individual teams, zone centers, and the NHTSA staff. Each of the current teams and zone centers is an independent contractor. The NHTSA staff has overall management responsibility for the NASS operations. The staff

oversees both the zone centers and the teams and provides overall policy direction through the zone centers. The zone centers provide the day-to-day technical guidance, oversight, supervision, and quality control over the team operations.

Each team has a team manager and a team leader. The team manager, who usually works part-time on NASS and is often not collocated with the NASS team, handles the general administration of team operations. On the other hand, the team leader is one of the NASS investigators and handles the day-to-day supervision.

The zone center communicates directly with the team leaders on all technical matters, bypassing the team manager. This creates an awkward situation since the zone center is charged with directing team operations but has no contractual control over the teams. In addition this means that in one sense the team members have two bosses, the team manager and the zone center.

In general, this structure appears to be working. Its biggest advantage is that it helps insure standardized methods of data collection so essential to NASS. Basically, it reduces the likelihood of each team's establishing its own unique data collection policies. This is the reason the number of zone centers should be limited. The NHTSA now plans four zone centers at full implementation, which appears to be enough.

In addition, under any structure it is essential that the NHTSA exercises independent oversight over all teams and zone centers. The ultimate responsibility for quality control must rest with the NHTSA NASS staff.

How NASS Will Support NHTSA's Data Needs. -- In its original NASS evaluation report, the Safety Board pointed out that for the most part the NHTSA had designed NASS to serve its own data needs. Consequently, the Safety Board made recommendations to the NHTSA and the FHWA so that as NASS developed it would serve a much wider spectrum of users.

Since our original evaluation, the NHTSA has published a 5-year rulemaking plan based on the agency's priorities. Consequently, the Safety Board believed it was important to reexamine how NASS specifically supported the NHTSA's needs. On October 23, 1978, the Safety Board asked the NHTSA to describe how the specific NASS continuous sample data elements support planned NHTSA rulemaking or safety program initiatives. It asked why were the data being collected and what questions would they answer?

In the NHTSA's response it provided a list of 60 questions which the continuous sampling subsystem (CSS) would answer, along with the items of data actually being collected to answer the questions. This list was based on work the Highway Safety Research Institute at Ann Arbor, Michigan, had completed as part of the original NASS design and on the work of the NASS Internal User's Committee. Both of these sources had independently compiled what various segments of the FHWA and the NHTSA perceived to be "their data needs."

The NHTSA's rationale for which questions to address was based on the

following criteria:

- o The data had to be of national interest and desired for continuous or recurring statistics.
- o The data had to be classifiable for at least 70 percent of the cases.
- o The data had to reflect objective observation or measurement and not subjective opinion.
- o The data had to be available from normal NASS data sources.
- o The data had to be such that it could be encoded into a computer file.
- o The data had to support the NASS objectives, except that data for countermeasure design and evaluation were limited to high priority standards.

One area for which the NHTSA has clearly identified a need for NASS data is the evaluation of the passive restraint standard. The NHTSA is currently developing evaluation plans for the period of 1979 through September 1981, when the passive restraint standard will become mandatory. The NHTSA has also indicated that subsequent evaluations will be supported by NASS, probably using special studies. The existing NASS data collection form is oriented toward crashworthiness data, which would support the evaluation of passive restraints. Since the evaluation plans are not yet developed, it is impossible to effectively determine whether NASS will provide all of the necessary data.

With respect to the agency's rulemaking plans, there is evidence that the NHTSA considered how NASS will support the various goals. In an internal memorandum of March 22, 1978, the Director, National Center for Statistics and Analysis, provided the Director, Office of Vehicle Safety Standards, with a discussion of how the Center's data collection programs, including NASS, would support the rulemaking goals. For the most part the discussion is general and only indicates the extent to which NASS would support a rulemaking goal. In addition, items described as "lower priority" or "with no apparent accident data requirement" were omitted. Highest priority was assigned to areas where rulemaking dates had been set. It isn't clear how "no apparent accident data requirement" had been defined. For instance, a low-tire-pressure warning standard was listed as requiring no additional accident data, because it was "very difficult to measure and even more difficult to associate with accident causation."

Another NHTSA document entitled "NASS Continuous Sampling System Support for Planned NHTSA Rulemaking and Safety Program Initiatives" was provided on January 10, 1979. This document lists four rulemaking categories and four traffic safety programs described as "the more obvious high priority examples." For each area the relevant CSS data elements are identified. In the document the NHTSA states that "the priority initiatives" contained in the "NHTSA Five-Year Plan for Motor Vehicle Safety and Fuel Economy Rulemaking, March 10, 1978," and the "Report on Traffic Safety Research and Demonstration Priorities,

March 1978," were considered when the final data elements were selected for NASS. The Safety Board is not sure however to what extent these priorities were addressed. The NHTSA adds that "the fact that the CSS is not uniquely and specifically tied to current rulemaking and safety program initiatives, does not mean the system is unresponsive to these needs.... To the extent that the CSS does not adequately support planned initiatives of high priority, special studies can likely be designed to accomplish this support...."

The Safety Board recognizes that since the CSS is continuous its design cannot be "uniquely devoted to specific or currently planned initiatives," and that much of the emphasis has correctly been placed on problem identification. It also recognizes the flexibility which the NHTSA has in periodically revising the CSS data collection forms or designing special studies. In fact, the current NHTSA definition of special study really doesn't preclude any type of data collection effort.

The Safety Board is pleased to see progress in the NHTSA's program in identifying agency initiatives and attempting to place priorities on them. The NHTSA should continue its efforts by expediting the task to "formalize a traffic safety program plan." Similarly, dialogue within the NHTSA and between the NHTSA and other highway safety organizations should be initiated on highway safety priorities. Such dialogue should consider both rulemaking and traffic safety programs as well as their relative priorities.

As the highway safety priorities become finalized, the Safety Board believes that additional effort should be expended to more closely integrate the agency plans with the agency data collection. For example, the Safety Board believes the NHTSA should be able to clearly document how NASS will explicitly support the agency plans.

Conclusions

- (1) The Safety Board is encouraged by the progress made by the NHTSA since its original evaluation.
- (2) The NHTSA and the FHWA are working together so that NASS can support the data needs of both agencies.
- (3) The planning for NASS has substantially improved.
- (4) Of the seven Safety Board recommendations contained in the original NASS evaluation, one has been "closed, with acceptable action," while six remain "open, with acceptable action."

- (5) Although certain concerns still exist, the Safety Board is not aware of any major reasons why NASS should not be expanded to 20 sites. The advantages of expansion outweigh any disadvantages.

BY THE NATIONAL TRANSPORTATION SAFETY BOARD

/s/ JAMES B. KING
Chairman

/s/ ELWOOD T. DRIVER
Vice Chairman

/s/ FRANCIS H. McADAMS
Member

/s/ PHILIP A. HOGUE
Member

March 8, 1979

END
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