U.S. Department
of Transportation
**National Highway
Traffic Safety
Administration**

400 Seventh St., S.W.
Washington, D.C. 20590

OCT 20 2003

Clarence M. Ditlow
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Dear Mr. Ditlow:

First let me apologize for the delay in getting this to you and I would like to address the issues that you raise in your letter dated May 30, 2003.

Permit me to provide a brief overview of how data is captured in the Fatality Analysis Reporting System (FARS). Information in the FARS database is recorded in a hierarchical structure. There is one Accident Level Record for each crash. The number of involved vehicles, drivers and persons dictates the appropriate number of Vehicle, Driver and Person Level Records included.

Since it's original 1975 design, the FARS database has included a Vehicle Level Record only for *Motor Vehicles In Transport* as defined in The Manual On Classification of Motor Vehicle Traffic Accidents (ANSI Standard D16.1). A Driver Level Record is included for each Vehicle Level Record.

For the purposes of uniformity, ANSI defines "In Transport" as the state or condition of a transport vehicle... within the portion of a transport way …". When this is applied to motor vehicles, "in transport" means in motion or on a roadway. This type of situation includes driverless motor vehicles in motion, motionless motor vehicles abandoned on a roadway, disabled motor vehicles on a roadway, and others. To further define this term, "roadways" are lanes used for travel during rush hours and parking during off-peak periods. By industry definition, and standard coding practices, motor vehicles "not in transport" are not counted as a "motor vehicle in transport" in the FARS database. Should the vehicle be occupied (as was the case in these cases you cite) the information is captured not at the Vehicle or Driver level, but at a non-motorist level.

A Person Level Record is included for every involved person in a crash, but persons inside devices other than Motor Vehicles in Transport are considered Non-Motorists as defined in ANSI D16.1. Section 2.2.36 defines a non-motorist as "any person other than a motorist". "Inclusions are:

- Pedestrians,
- Occupants of motor vehicles not in transport
- Occupants of transport vehicles other than motor vehicles.

Accordingly, there is no Vehicle and no Driver Level Record for these persons.

It is imperative that the FARS data system follows a clear and consistent, set of procedures and coding rules when capturing data related to fatal crashes. In doing so, all FARS Analysts can be trained to apply the industry standard rules (i.e., ANSI definitions) to each case coding scheme.

The 100 or so distinct FARS elements are distributed across the four separate coding levels (Accident, Vehicle, Driver and Person) of the hierarchy mentioned earlier. Any element recorded solely at the Vehicle Level will not be present for Non- Motorists because Non-Motorists do not have a Vehicle Level on which those elements are recorded.

For the past two years, a committee of experienced FARS Analysts, knowledgeable in FARS coding conventions, their state practices and PARs, ANSI D16.1, and the FARS microcomputer data entry system (MDE), has been discussing the various options for a redesign of the FARS coding scheme, MDE data entry system, online edit checking and training program in order to include information on "Parked" and other "Not-In Transport Vehicles" as well as their "drivers". Last year, the National Center for Statistics and Analysis' (NCSA's) Data Compatibility Team recommended that the ability to capture this kind of information in all of its data systems should be the goal of any improved data compatibility effort across all data collection systems.

Simultaneously, changes are proposed for the Seventh Edition of ANSI D16.1 (soon to be produced) that will provide a guide or framework for developing these changes in FARS and other data systems.

Needless to say, this is not a trivial change. Any additional included "vehicles" must be carefully accounted for in the crash scenario hierarchy and must be clearly distinguished from Motor Vehicle in Transport. We expect that crashes defined as two-vehicle or three-vehicle today, must retain the same definition in the future. We expect that persons in these new "vehicles" must be accounted for in the hierarchy, as "occupants" of these "vehicles", but remain "Non-Motorists" as in the past. The MDE data entry system, case structure, online edit checking, training, the number of records and the coding burden will all be affected. Nevertheless, we are committed to moving toward such a design.

Your question regarding "…does the agency deny that the cause of death for any of the eight individuals was due to fire?" is one that we here in NCSA, cannot address as "official agency" position. However, I do want to clarify a few points:

1. FARS data is collected and coded by State Analysts with the best information available at the time of case filing.
2. The FARS Analyst does not "attribute" a cause of death to the occupant in a fatal crash.
3. FARS does not use the death certificate to ascertain the cause of death nor do we have any elements that would suggest that.

"Causes of Death" are assigned by State appointed (or elected) officials who, with their expertise and training, assign an official "cause" to the death. The complexity of determining whether a fatality is the result of:

- Crash forces
- Pre-existing condition precipitated by events in the crash
- Thermal burns or smoke inhalation
- Suicide
- Etc.

is well-beyond the scope of the FARS program. The State office that reports the "official cause of death" would be your best source to obtain this information.

If you have any questions or need further information, please contact Mr. Kenneth Rutland, Chief, State Data Reporting Systems Division at (202) 493-0055.

Sincerely yours,

Joseph S. Carra, Ph.D.
Director, National Center
for Statistics and Analysis