A Petition under the Administrative Procedure Act to Improve NHTSA's FARS Underride Data

← RESEARCH & DATA

Fatality Analysis Reporting System (FARS)

- Operational in 1975
- Data collected from fatal vehicle crashes within the 50 States
- Funded by NHTSA under cooperative agreements
- User's Manuals are updated annually

Since the 1990s, many researchers and organizations, including NHTSA, have documented the underreporting of underride crashes and fatalities in FARS

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PETITION under the Administrative Procedure Act

Dear Secretary Buttigieg:

In accordance with Administrative Procedure Act (APA), I hereby petition the U.S. Department of Transportation (USDOT) and the National Highway Traffic Safety Administration (NHTSA) to promptly issue, amend, modify, or repeal the relevant regulations or guidance documents (49 CFR 5.3; 5 U.S.C. §553(e)) in order to:

Petitioned Action 1

Update FARS User's and Coding Manuals, the Model Minimum Uniform Crash Criteria, and other guidance documents to provide a standardized definition of underride and override crashes

Petitioned Action 2

Modify the existing FARS underride/override data element to differentiate and collect data on rear underride, side underride, and front override crashes

Petitioned Action 3

Require an Underride/Override "Checkbox" on State Police Crash Report Forms when States upgrade and standardize their electronically reported State crash data systems

Petitioned Action 4

Provide annual training and information to State FARS analysts and State and local police departments on how to identify and record underride/override crashes

Vehicle Underride/Override   **V31**

V31 – *Vehicle* Underride/Override

FORMAT: *1 numeric*
SAS NAME: *Vehicle.UNDEROVERRIDE, Parkwork.PUNDEROVERRIDE*
ELEMENT VALUES:

Codes	Attributes
0	*No Underride or Override Noted*
1	*Rear Underride a Motor Vehicle In-Transport (Compartment Intrusion)*
2	*Rear Underride a Motor Vehicle In-Transport (No Compartment Intrusion)*
3	*Rear Underride a Motor Vehicle In-Transport (Compartment Intrusion Unknown)*
4	*Side Underride a Motor Vehicle In-Transport (Compartment Intrusion)*
5	*Side Underride a Motor Vehicle In-Transport (No Compartment Intrusion)*
6	*Side Underride a Motor Vehicle In-Transport (Compartment Intrusion Unknown)*
7	*Front Override*

Recommendation:

The ACUP's report should strongly recommend that NHTSA grant the petition and commit to improving FARS data quality by addressing the well-known underreporting of underride/override crashes and fatalities during the 2025 annual update of the FARS coding and user's manuals