U.S. Department of Transportation

National Highway Traffic Safety Administration (NHTSA)

Crash Data Acquisition Network (CDAN)

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Executive Summary

The National Highway Traffic Safety Administration (NHTSA) is authorized by 49 U.S.C. § 30182 and 23 U.S.C. § 403 to collect data on motor vehicle traffic crashes to aid in the identification of issues and the development, implementation, and evaluation of motor vehicle and highway safety countermeasures. The information collected serves to identify and develop safety countermeasures that will reduce deaths, injuries, and economic losses resulting from motor vehicle crashes.

NHTSA's National Center for Statistics and Analysis (NCSA) provides in-depth analytical, investigative, and statistical analysis of data it collects to support the agency's safety mission. NCSA's analyses are used by NHTSA, other operating administrations in the U.S. Department of Transportation (e.g. Federal Highway Administration), and the public, including the motor vehicle safety community. As discussed in further detail below, although NCSA studies collects personally identifiable information (PII), it does not publish or make available PII to the public.

The Crash Data Acquisition Network (CDAN) is an integrated, web-based information technology system that provides a single, central IT platform that maintains the data NCSA requires to analyze vehicle crash data and identify outcomes, causal factors, and vehicle and component performance. NCSA obtains data through a number of information collections, also called studies, and additional manufacturer information pursuant to NHTSA regulatory requirements. The data collected by NCSA are stored and maintained in CDAN.

These crash data collections are centered on the Police Accident Report (PAR), the forms law enforcement agencies use to document a motor vehicle crash. NCSA collects a PAR from cooperating police jurisdictions and custodial agencies in each State. In addition to data derived from the PAR, NCSA may obtain additional information to further the understanding of a crash, its causal factors, or outcomes. This information may be obtained from medical records, on-site crash investigations, toxicology reports, etc. This additional information is also stored and maintained in CDAN.

What is a Privacy Impact Assessment?

The Privacy Act of 1974 articulates concepts for how the Federal government should treat individuals and their information and imposes duties upon Federal agencies regarding the collection, use, dissemination, and maintenance of personally identifiable information (PII). The E-Government Act of 2002, Section 208, establishes the requirement for agencies to conduct privacy impact assessments (PIAs) for electronic information systems and collections. The assessment is a practical method for evaluating privacy in information systems and collections, and documented assurance that privacy issues have been identified and adequately addressed. The PIA is an analysis of how information is handled to—i) ensure handling conforms to applicable legal, regulatory, and policy requirements regarding privacy; ii) determine the risks and effects of collecting, maintaining and

disseminating information in identifiable form in an electronic information system; and iii) examine and evaluate protections and alternative processes for handling information to mitigate potential privacy risks.[1]

Conducting a PIA ensures compliance with laws and regulations governing privacy and demonstrates the DOT's commitment to protect the privacy of any personal information we collect, store, retrieve, use and share. It is a comprehensive analysis of how the DOT's electronic information systems and collections handle personally identifiable information (PII). The goals accomplished in completing a PIA include:

- *Making informed policy and system design or procurement decisions. These decisions must be based on an understanding of privacy risk, and of options available for mitigating that risk;*
- *Accountability for privacy issues;*
- *Analyzing both technical and legal compliance with applicable privacy law and regulations, as well as accepted privacy policy; and*
- *Providing documentation on the flow of personal information and information requirements within DOT systems.*

Upon reviewing the PIA, you should have a broad understanding of the risks and potential effects associated with the Department activities, processes, and systems described and approaches taken to mitigate any potential privacy risks.

Introduction & System Overview

The mission of NCSA is to collect and analyze motor vehicle crash data to identify traffic safety issues and provide the data that supports agency decision-making. NCSA collects data from a motor vehicle crash to help analyze the incident to identify outcomes, causal factors, vehicle and component performance, etc. This data includes information about the crash incident (time of day, weather conditions, etc.); vehicles; drivers and passengers; other road users; the roadway; and Emergency Medical Services (EMS) mobilizations, medical treatments, and health outcomes.

NCSA's crash data sources are PARs, on-site crash investigations, and supplemental data such as medical records (EMS records, emergency room records, hospital records, autopsy reports) and toxicology data from State labs that may be collected to further the understanding of the causes and health outcomes associated with a crash. Data collected through NCSA studies is maintained within CDAN's centralized repository, but the data collected under each study remains separate from the other studies. NCSA study data is not comingled in one large database. The CDAN maintains records for six studies that analyze crash data to understand the nature, causes, and injury outcomes of crashes, and to develop strategies and interventions that will reduce the occurrence of crashes or injuries, with one

[1] Office of Management and Budget's (OMB) definition of the PIA taken from guidance on implementing the privacy provisions of the E-Government Act of 2002 (see OMB memo of M-03-22 dated September 26, 2003).

study that collects testing data related to automated vehicles. Each study has a specific traffic safety focus area. The studies are:

1. Crash Report Sampling System (CRSS);
2. Fatality Analysis Reporting System (FARS);
3. Non-Traffic Surveillance (NTS) System;
4. Crash Investigation Sampling System (CISS);
5. Crash Injury Research Engineering Network (CIREN);
6. Special Crash Investigations (SCI); and
7. Automated Vehicle Transparency and Engagement for Safe Testing (AV TEST).

Six of these studies: CRSS, FARS, NTS, CISS, CIREN, and SCI collect and maintain PII through PARs, on-site crash investigations, and supplemental data, such as medical records (emergency room records, hospital records or autopsy reports) and toxicology reports. Those six studies are explained in more detail below.

CDAN also includes a study that collects data for awareness of automated vehicle testing (Automated Vehicle Transparency and Engagement for Safe Testing Initiative (AV TEST)), which does not include PII. This program has both a public and internal interface, but all information submitted to NHTSA through this collection is publicly available (https://avtest.nhtsa.dot.gov). Under AV Test, NHTSA collects information from participating organizations (states; industry; associations; and AV testing operators) concerning AV tests performed by the organizations. The AV Test study is described in Appendix A.

CDAN also hosts the NHTSA Vehicle Product Information Catalog and Listing (vPIC-List) portal that is a publicly-available web interface (https://vpic.nhtsa.dot.gov/). The portal collects and publishes data NHTSA receives from manufacturers pursuant to certain NHTSA regulatory requirements,[2] such as manufacturer registration data, vehicle and vehicle part identifiers, and agents for service of process.

NCSA also uses the crash data collected under the studies identified above to conduct studies targeted towards understanding specific vehicle safety related topics. These targeted studies are driven by Congressional mandates or Departmental priorities and focus on the effectiveness of specific vehicle-based technologies, behavioral factors, or countermeasures—such as airbags, child restraints, impaired driving, speeding, etc. These studies are conducted over a limited time frame. If NHTSA conducts a special study that

[2] vPIC hosts and makes available information from vehicle and equipment manufactures that are submitted pursuant to certain regulations. These regulations are: 49 CFR Part 551, Subpart D (Foreign manufacturers and importers – designation of an agent for service of process), 49 CFR Part 565 (Vehicle Identification Number Guidance), 49 CFR Part 566 (Manufacturer Identification – Reporting Requirements), 49 CFR Part 574 (Tire Identification Number (TIN) Guidance), 49 CFR Part 571.106 (Brake Hose Manufacturer Identification), 49 CFR Part 571.205 (Glazing Material Manufacturer Identification), and 49 CFR Part 595.6 (Identification for Vehicle Modifier to Enable a Person with Disability to Operate or Ride as a Passenger).

uses PII from the crash data obtained through its other studies, and uses the PII that is inconsistent with the manner in which the use of PII is described in this document, it will amend this PIA to address such use.

PII Data Collection

A PAR is the basic data source for NCSA vehicle crash data studies and is the key document to initiate further NCSA study because it is used to collect additional information about a crash and the individuals involved in it. In general, a PAR includes information about the vehicles and individuals involved in a crash, injuries or fatalities resulting from a crash, roadway information, environmental information, information to reconstruct the crash scenes, etc. The PII in the PAR permits NCSA to obtain the supplemental information necessary to analyze crash causation, crash injury, crash severity and crash outcomes.

NCSA collects information through two automated and two manual entry sources. The two automated sources are part of the State Data Transfer (SDT) process to collect and normalize PAR data. SDT has two components that NCSA terms protocols:

1. The State Data System (SDS) protocol obtains PAR crash data from States that submit data on an annual basis to NCSA. The data is submitted in a file called the annual crash file, which is submitted via electronic media, such as encrypted CD-ROM/DVD, or through secured mail or a secure ftp.
2. The Electronic Data Transfer (EDT) protocol obtains PAR crash data, crash reports or crash images from participating State crash systems through an electronic data transfer. Generally, this transfer occurs on a nightly basis following State data quality control checks and acceptance from each State's centralized database. The information is transmitted using XML or JSON files through a web service using HTTPS protocol between a State's crash data system and the CDAN system.

The SDT process obtains all of a participating state's PAR to develop a national census of crashes that NCSA may use to populate its studies and perform additional crash research to support NHTSA's vehicle safety and traffic safety efforts.

The manual entry process is associated with each NCSA study. The data collection includes PAR data (if the data is not submitted through SDT), on-site crash investigation data, and supplemental data, such as medical records (emergency room records, hospital records or autopsy reports) and toxicology reports. The manual entry process is performed by NHTSA employees and contractors in the field.

NHTSA employees/contractors obtain PAR data and then use that information to collect supplemental crash information that enables NCSA to study the vehicle and component performance and crashworthiness. This supplemental information relates to a specific crash and may include crash reconstruction reports, toxicology data, crash related interviews and

other reporting data obtained by NCSA from police jurisdictions or hospitals. The data from hospitals may be discrete data points, hospital notes and reports, medical imaging (x-ray images, CT scan sets), and coded injury information.

The NHTSA employees/contractors use DOT-approved laptops, to manually enter the data. This data is transmitted via secured channels and encrypted protocols between the DOT-approved hardware and the CDAN system. The police jurisdiction or custodial agency may also provide PAR data to the NHTSA employee/contractor via USB drive, in which case the file is uploaded while the DOT laptop is connected to the CDAN database.

Below is a list of the categories of records and the PII elements of each category that are maintained in the CDAN system:

- Driver records
  - Driver License Number and State
  - Full Name (First, Middle, Last)
  - Street Address, City, State, Zip Code
  - Gender
  - Date of Birth
- Vehicle registration records
  - Vehicle Identification Number (VIN)
  - Title number
  - Owners First and Last Name
  - Owners Street Address, City, State, Zip Code
  - Previous Owner First and Last Name
  - Previous Owner Street Address, City, State, Zip Code
- Medical records
  - Name
  - Address
  - Phone Number
  - Insurance #
  - Guardian name (Parent)
  - Hospital / Medical Personnel information
  - Social Security Number
  - Patient id Number
  - Next of Kin / emergency contact
  - Date of Birth
  - Diagnosis, treatments, medications, x-rays, MRI, CT scan and other hospital related records.
- Death certificates
  - Full Name (First, Middle, Last)
  - Street Address, City, State, Zip Code

  - Gender
  - Date of Birth
  - Social Security Number
  - Father's Name (Next of Kin)
  - Mother's Name (Next of Kin)
  - Informant's Name
  - Informant's Street Address, City, State, Zip Code
  - Date and Time of Death
  - Date and Time of Injury
  - Location of Injury
  - Injury at work (this is for workers involved in accidents, like a law enforcement, road worker, etc.)
  - Race
  - Hispanic Origin
  - Location of crash
  - Death Certificate Number
- Photos
  - VINs
  - License Plates
  - Pictures of Driver Licenses
  - Picture of vehicle operator or passenger injuries
  - Pictures of Emergency Responders
- Interview of Individuals involved in or witness to a crash
  - Name
  - Address
  - Phone
  - Crash location
  - Narrative statement
- Vehicle inspection
  - VIN
  - License Plate
  - Repair Invoices
  - Salvage #
- Scene Inspection
  - Street names (Crash location)
  - GPS coordinates
  - Video
- Police Accident Report (PAR))
  - Police Crash Report ID #
  - Crash Date, Time, Location

- Crash Location (Lat/Long) GPS
- Driver License Number and State
- Full Name (First, Middle, Last)
- Street Address, City, State, Zip Code
- Telephone Number
- Gender
- Date of Birth
- License Plate Number
- Death certificate number
- State of Registration
- 4-Digit GSA City Code
- 2-Digit State Number
- Social Security Number
- Vehicle Identification Number
- Narrative Description of the Accident

- Toxicology Report
  - First Name
  - Last Name
  - Toxicology results (alcohol, drugs)
  - Date of Birth
- EMS Records
  - EMS notification time
  - EMS arrival time
  - EMS time at hospital
  - First Name
  - Last Name
  - Transported to
- Autopsy Report
  - Full Name (First, Middle, Last)
  - Street Address, City, State, Zip Code
  - Gender
  - Date of Birth
  - Social Security Number
  - Father's Name
  - Mother's Name
  - Informant's Name[3]
  - Informant's Street Address, City, State, Zip Code
  - Date and Time of Death
  - Date and Time of Injury

[3] An informant is the individual who supplies the information about the deceased.

- Location of Injury

The PII enables the collection, integration, evaluation and analysis of crashes. Specifically, PII enables NCSA to connect crash outcomes to the crash's contributing factors, which is vital to the agency's efforts to understand the relationship between behaviors, technologies and crash outcomes as well as the development, implementation, and evaluation of safety countermeasures. NCSA publishes the results of crashes and studies without any PII for the public, including States and other highway safety community members, may conduct independent analysis of the data to identify traffic safety issues and evaluate highway safety initiatives.

NCSA responds to over approximately 20,000 telephone, email, and walk-in requests for CDAN statistical information each year. To receive a response from NCSA, a requestor must provide his or her name and contact information to receive the publicly available information. In these cases, NCSA uses the requestor's name and contact information to fulfill these requests. For example, an individual who request a report from NCSA, the request would provide a method for delivery, either an email or mailing address. NCSA does not share or use PII of requestors for any other purpose outside of fulfillment.

PII and CDAN Studies

While NCSA does not publish PII in NCSA crash data sets and reports, the PII obtained in the initial collection plays a critical role in generating these data products. The PII is essential to connect and validate the crash circumstances to the crash outcomes, which is vital to the agency's mission of developing effective traffic safety countermeasures that save lives. The PII enables NCSA to obtain supplemental crash information such as toxicology reports, the health condition/injuries/treatment and death certificates of the individuals involved in the crashes. This supplemental information supports the agency's analysis of the crashes. Also, some PII data are required for NCSA to perform aggregated statistical analyses and other analyses by the studies. NCSA also uses the data to perform quality control on the data collected.

Due to the need to connect the PII from individuals in a crash with supplemental information, each study may use or obtain one or more of the PII data sets discussed above, based upon the type of analysis that is performed. Each study is discussed in more detail below.

For vPIC, certain PII is required by regulation, such as a full seventeen character Vehicle Identification Number (VIN) and a manufacturer's business contact information. This is also described below.

NCSA Studies

NCSA divides its studies into two groups: records-based studies and investigation-based studies. These studies are discussed in more detail below.

Records-based studies

NCSA's records-based studies—Fatality Analysis Reporting System (FARS), Crash Report Sampling System (CRSS) and Non-Traffic Surveillance (NTS)—use PII to link information from a PAR to health data like EMS reports, hospital data, toxicology reports, and death certificates. These links are vital to generating and validating the information coded into the studies.

1. Crash Report Sampling System

The purpose of the Crash Report Sampling System (CRSS) study is to create an estimate of safety related vehicle crashes in the United States, identify highway safety problem areas, measure vehicle crash and safety trends, drive consumer information initiatives, and form the basis for cost and benefit analyses of highway safety initiatives, countermeasures, and regulations. The scope of CRSS is vehicle crashes that involve at least one motor vehicle in transport on a traffic way that resulted in a fatality, serious injury, or property-damage-only (PDO) crashes. The crash reports are chosen from a limited number of jurisdictions that represent a statistical sample of the United States based on geography, population, vehicle miles driven, and the number of crashes nationally.

The categories of records with PII used in the study are:

- Driver records
- Registration records
- Police Crash Report, except:
  - Death Certificate
  - Social Security Number

The CRSS study does not publish or share any PII publicly. Prior to publishing CRSS data, NCSA deidentifies the data and makes it available through the CRSS website at https://www.nhtsa.gov/crash-data-systems/crash-report-sampling-system

2. Fatality Analysis Reporting System

The Fatality Analysis Reporting System (FARS) is NCSA's study of fatal motor vehicle traffic crashes. FARS provides NCSA with a census of motor vehicle fatalities in the United States that permits NCSA to analyze fatality data, multi-year trends in fatalities, quantify problems or potential problems in highway safety, and to evaluate the effectiveness of safety counter measure programs.

FARS uses PII from the PAR to link to health and outcome information from EMS run reports, hospital data, toxicology reports, and death certificates. These links are necessary to validate the information entered in the system. The categories of records with PII used in the study are:

- Driver records

- Registration records
- Death certificates, except:
  - Location of crash
- Police Crash Report, except:
  - License Plate Number
  - Social Security Number
- Toxicology Report
- EMS Records
- Autopsy Report

The FARS study does not publish or share any of the PII data publicly. Prior to publishing FARS data, NCSA deidentifies the data and makes it available through the FARS website at https://www.nhtsa.gov/research-data/fatality-analysis-reporting-system-fars.

3. Non-Traffic Surveillance

The Non-Traffic Surveillance study (NTS) provides counts and details regarding fatalities and injuries that occur in non-traffic crashes and in non-crash incidents. These incidents include crashes occurring on private roads, driveways, and parking lots as well as non-crash incidents, such as fatalities involving children left in hot vehicles or injuries that occur while repairing a vehicle.

NTS non-traffic crash data is obtained from existing NCSA studies: CISS , CRSS, and the FARS. Under the processing protocol for each of those studies, a crash that falls within the scope of NTS is referred to the NTS study for evaluation. In addition, NCSA obtains NTS crashes from the Consumer Product Safety Commission's National Electronic Injury Surveillance System (NEISS) All Injury Program, and the Centers for Disease Control and Prevention's National Vital Statistics System (https://www.cdc.gov/nchs/nvss/index.htm), which are publicly available and do not contain PII.

For the crashes obtained through existing NHTSA studies, the categories of records with PII used in the NTS are:

- Police Crash Report, except:
  - Crash Location (Lat/Long) GPS
  - License Plate Number
  - Death certificate number
  - Social Security Number

For crashes obtained through CPSC and CDC, the data may include the age and sex of the injured individuals, position of the occupant (driver, passenger), injury and cause, vehicle and description (sedan, van, truck, SUV), and locale information and description (public, highway, school, industrial, rural, etc.).

The NTS study does not publish or share any of the PII data publicly. Prior to publishing the data, NCSA deidentifies the data and makes it available through the NTS website at https://www.nhtsa.gov/crash-data-systems/non-traffic-surveillance.

Investigation-based studies

The agency's investigation-based studies—Crash Investigation Sampling System (CISS), Crash Injury Research Engineering Network (CIREN) and Special Crash Investigations (SCI)—also rely on PII to locate the vehicle(s) post-crash, locate the vehicle occupants, and obtain related medical information. CISS also uses PII to link and validate data during case development, data entry, and quality control.

1. Crash Investigation Sampling System

The Crash Investigation Sampling System (CISS) study analyzes a representative sample of the severity of injuries (minor, serious, and fatal injury) crashes from throughout the United States to make national estimates of U.S. crash trends. CISS uses PARs to identify cases and populate them with basic information.

NHTSA contractors then collect additional data for selected CISS cases by visiting crash scenes and tow yards to physically inspect and record damage to vehicles. This inspection generates crash severity data, scene information, images of the vehicle and scene, as well as event data recorder data from the crashed vehicle(s). Investigators also collect medical information to identify the injury outcomes of these crashes.

When required, NHTSA contractors conduct supplemental occupant interviews. Names and contact information for the interviews are sourced from the PAR. NHTSA uses the CISS data in conjunction with crash reconstruction data to evaluate vehicle crashworthiness and injury causation.

The categories of the records with PII used in the study are:

- Medical records
- Death certificates
- Photos
- Interview
- Vehicle inspection
- Scene Inspection
- Police Crash Report, except :
    - 4-Digit GSA City Code
    - 2-Digit State Number
- Toxicology Report
- EMS Records
- Autopsy Report

The CISS study does not publish or share any of the PII data publicly. Prior to publishing the data, NCSA deidentifies the data and makes it available through the CISS website at https://www.nhtsa.gov/crash-data-systems/crash-investigation-sampling-system.

2. Crash Injury Research Engineering Network (CIREN)

The CIREN study combines the expertise of medial and crash experts to determine how injuries were caused during accidents. To obtain the data for the study, NHTSA samples motor vehicle crashes that involve individuals who are admitted to trauma centers throughout the U.S. Each center screens the incoming admissions for eligible study subjects and then approach them for consent to participate.

The categories of the records with PII used in the study are:

- Medical records
- Photos, except :
  - Pictures of driver licenses
- Interviews
- Vehicle Inspection, except:
  - Repair Invoices
- Scene Inspection
- Police Crash Report, except :
  - 4-Digit GSA City Code
  - 2-Digit State Number
- Toxicology Report
- EMS Report
- Medical Examiner/Coroner's Report

CIREN data consists of multiple discrete data fields of information about details specific crash types, vehicle, age, restraint use, and injury severity for inclusion. CIREN does not publish or share any of the PII data publicly. Prior to publishing the data, NCSA deidentifies the data and makes it available through the CIREN website at https://one.nhtsa.gov/Research/Crash-Injury-Research-(CIREN)

3. Special Crash Investigations (SCI)

The Special Crash Investigations (SCI) study responds to NHTSA and Department needs for the analysis of a specific crash or a class of vehicle crashes. SCI data is used to assess the safety impact of new, emerging or changing technologies (such as air bags and alternate fuel systems) and to evaluate alleged or potential vehicle safety defects.

NHTSA contractors obtain the PAR and collect additional data for SCI cases by visiting crash scenes and tow yards to physically inspect and record damage to vehicles. This inspection generates crash severity data, scene information, images of the vehicle and the accident scene, as well as event data recorder data from the crashed vehicle(s). Investigators also collect medical information to identify the injury outcomes of these crashes.

When required, NHTSA contractors conduct supplemental interviews with individuals involved in a subject crash. NCSA uses PII in the PAR to contact the individuals. NHTSA and other DOT modes rely on SCI data to better understand specific incident types, e.g. hyperthermia fatalities, and the impacts of new technologies on safety outcomes.

The categories of records with PII used in the study are:

- Medical records
- Death certificates
- Photos - *faces, names, agency, or any other PII is sanitized from the images.*
- Interview
- Scene Inspection
- Police Crash Reports, except
    - 4-Digit GSA City Code
- Toxicology Report
- EMS Records
- Autopsy Records

The SCI study does not publish or share any of the PII data publicly. Prior to publishing the data, NCSA deidentifies the data and makes it available through the SCI website at https://www.nhtsa.gov/research-data/special-crash-investigations-sci.

Vehicle Product Information Catalog and Listing Program and Portal

The NHTSA Vehicle Product Information Catalog and Listing (vPIC-List) program and portal is a web interface (https://vpic.nhtsa.dot.gov/) that permits vehicle and equipment manufacturers to submit information to NHTSA that are required pursuant to certain NHTSA regulatory requirements. This regulatory information is related to motor vehicles and motor vehicle equipment and includes information for Vehicle Identification Number (VIN) decoding, Manufacturer Information Database (MID), Manufacturer Equipment Plant Identification, vehicle model information and a manufacturer's agent for services of process. vPIC facilitates the submission of information for the following regulations:

- 49 CFR 551 – Agent Designation
- 49 CFR 565 – VIN Decoding
- 49 CFR 566 – Company/Manufacturer Identification
- 49 CFR 571.106 – Brake Hose Manufacturers Identification
- 49 CFR 571.205 – Certification of Glazing Materials
- 49 CFR 574 – Tire Identification and Recordkeeping
- 49 CFR 595 – Vehicle Modifications for People with Disabilities

As part of the regulatory requirements, manufacturers must submit business contact information from the manufacturers' employees when submitting the required information. The business contact information includes:

- Manufacturing Plant Contact Information
  - Employee Names and Official Position
  - Contact Business Address, City, State/Province, Country, Postal Code
  - Contact Business Phone Number, Fax, Email
- Manufacturer Main Office Information
  - Manufacturer's Authorized Representative Name and Title
  - Contact Business Address, City, State/Province, Country, Postal Code
- Manufacturer's Contacts
  - Principal Name or Owner Name & Position
  - Contact Name & Position
  - Contact Business Address, City, State/Province, Postal Code, Country
  - Contact Business Phone Number, Fax, Email
- Submitter Contact Information
  - Submitter's Name & Position
  - Submitter's Business Email
  - Submitter's Business Phone Number
- US Agent Designation Information[4]
  - Agent Full Legal Name
  - Agent's Previous Name (if changed)
  - Business Address, City, State/Province, Postal Code
  - Business Phone Number, Fax, Email
  - Full Legal Name of Agent's Authorized Representative[5]
  - Title of Agent's Authorized Representative
- Modifier[6]
  - Name & Position
  - Full Legal Name
  - Previous Legal Name
  - Business Address, City, State/Province, Postal Code, Country
  - Business Email & Phone Number
  - Doing Business As

[4] An agent is an individual or organization in the United States, who represents a foreign manufacturer in the US.

[5] An Agent's Authorized Representative is an individual who has the authority to legally sign on behalf of the foreign manufacturer. It is cases where the Agent is an individual, the Agent and the Authorized Representative are the same person. In cases where the Agent is an organization, the Authorized Representative is an employee of the organization.

[6] A vehicle modifier is a business that modifies a motor vehicle to enable a person with disability to operate or ride as a passenger. Modifiers perform work on vehicles after their first retail sale.

NHTSA makes the vPIC business contact information for each manufacturer available on its portal at https://vpic.nhtsa.dot.gov/.

Access to PII

NCSA restricts access to the CDAN system to Federal government employees and contractors. NHTSA employees and contractors access CDAN using the MAX.gov, a two-factor Authentication as a Service (AaaS) portal that requires all users to be approved by a Federal manager. Once NCSA employees and contractors are authenticated, they can only access CDAN records based on their designated role and privilege level that is required to fulfill the business mission.

CDAN studies do not publish or share any PII with the public. NCSA deidentifies the CDAN data prior to making it available to the public and the data available through the NHTSA CrashStats public website (https://crashstats.nhtsa.dot.gov/#!/), and https://one.nhtsa.gov/Data and https://www.nhtsa.gov/research. Data from FARS, CRSS, and CISS are published annually; other studies release data periodically after review and quality control efforts make the vehicle crash cases are final.

For vPIC, each manufacturer has limited access rights that restrict it to its own account and information. Under the restricted access, each manufacturer identifies employees who are authorized to act on behalf of the manufacturer.

Fair Information Practice Principles (FIPPs) Analysis

The DOT PIA template is based on the fair information practice principles (FIPPs). The FIPPs, rooted in the tenets of the Privacy Act, are mirrored in the laws of many U.S. states, as well as many foreign nations and international organizations. The FIPPs provide a framework that will support DOT efforts to appropriately identify and mitigate privacy risk. The FIPPs-based analysis conducted by DOT is predicated on the privacy control families articulated in the Federal Enterprise Architecture Security and Privacy Profile (FEA-SPP) v3[7], sponsored by the National Institute of Standards and Technology (NIST), the Office of Management and Budget (OMB), and the Federal Chief Information Officers Council and the Privacy Controls articulated in Appendix J of the NIST Special Publication 800-53 Security and Privacy Controls for Federal Information Systems and Organizations[8].

Transparency

Sections 522a(e)(3) and (e)(4) of the Privacy Act and Section 208 of the E-Government Act require public notice of an organization's information practices and the privacy impact of government programs and activities. Accordingly, DOT is open and transparent about policies, procedures, and technologies that directly affect individuals and/or their

[7] http://www.cio.gov/documents/FEA-Security-Privacy-Profile-v3-09-30-2010.pdf
[8] http://csrc.nist.gov/publications/drafts/800-53-Appdendix-J/IPDraft_800-53-privacy-appendix-J.pdf

personally identifiable information (PII). Additionally, the Department should not maintain any system of records the existence of which is not known to the public.

Prior to the initiation of data collection, and in accordance with the PRA, these collections are posted for public comment and reviewed and approved by the Office of Management and Budget (OMB). As part of this process, all study procedures—including the specific information that will be collected from participants and the forms used to collect this information—are published by OMB on reginfo.gov. Prior to submission to OMB, the public is notified of the proposed collection through a Federal Register notice and is given 60 days to provide comments through an electronic docket at regulations.gov. After addressing any comments received during the comment period, NHTSA submits a second Federal Register notice notifying the public that the collection is being submitted to OMB and invites public comment to be sent directly to OMB.

Additionally, NHTSA also informs the public that their PII is collected and stored through this Privacy Impact Assessment (PIA) to inform the public that their PII is stored and used by the system. The PIA identifies the information collection's purpose, use, and storage of PII. It can be found at: https://www.transportation.gov/individuals/privacy/privacy-impact-assessments.

NHTSA is continuing to evaluate whether all, or a portion, of CDAN constitutes a system of records. Should NHTSA to determine that a system of records does exist, it will publish a System of Record Notice (SORN) in the Federal Register and amend this PIA.

Individual Participation and Redress

DOT provides a reasonable opportunity and capability for individuals to make informed decisions about the collection, use, and disclosure of their PII. As required by the Privacy Act, individuals should be active participants in the decision-making process regarding the collection and use of their PII and they are provided reasonable access to their PII and the opportunity to have their PII corrected, amended, or deleted, as appropriate.

Pursuant to the Highway Safety Act,[9] and the National Traffic and Motor Vehicle Safety Act,[10] NHTSA obtains PAR data from States and local jurisdictions and supplemental information from on-site crash investigations, hospitals, EMTs, tow yards, and State vital records agencies. These entities obtain their data from the individuals involved in a crash or through medical treatment or observation. For example, the information collected in a PAR is obtained when law enforcement obtain information from observation and from individuals involved in an crash. Individuals may redress the accuracy of the information transmitted to NHTSA with the reporting entity. In limited circumstances, NHTSA obtains supplemental information directly from individuals involved in a crash. At that time, the individual is an

[9] 23 U.S.C. § 403
[10] 49 U.S.C. § 30182

active participant with NTHSA in collecting crash data as accurately as possible. If an individual has concerns with the data in a PAR or other document, the individual may contact the local jurisdiction or entity to address any accuracies.

An individual may request his or her information from NHTSA through a request pursuant to the Freedom of Information Act (FOIA) data. To process a first party request under the FOIA, NHTSA obtains certain information to confirm that the individual is the person they claim to be. For more information related to PII collected under the FOIA, please see U.S. Department of Transportation's Freedom of Information Act and Privacy Act system of records notice. 84 Fed. Reg. 4605 (February 15, 2019) (https://www.govinfo.gov/content/pkg/FR-2019-02-15/pdf/2019-02356.pdf).

Purpose Specification

DOT should (i) identify the legal bases that authorize a particular PII collection, activity, or technology that impacts privacy; and (ii) specify the purpose(s) for which it collects, uses, maintains, or disseminates PII.

Pursuant to 23 U.S.C. § 403 and 49 U.S.C § 30182, NHTSA is authorized to collect motor vehicle and highway safety data caused by accidents involving motor vehicles; and to collect deaths or personal injuries data resulting from those accidents. Both sections are similar in nature and offer NHTSA broad authority to collect motor vehicle crash data. Section 403 authorizes NHTSA to conduct research and demonstration activities, including demonstration projects and *the collection and analysis of highway and motor vehicle safety data and related information needed to improve traffic safety.*[11] Section 30182 authorizes NHTSA to collect and analyze all types of motor vehicle and highway safety data and related information to determine the relationship between motor vehicle or motor vehicle

[11] Section 403 permits the collection of motor vehicle safety data to:
(A) all aspects of highway and traffic safety systems and conditions relating to--
(i) vehicle, highway, driver, passenger, motorcyclist, bicyclist, and pedestrian characteristics;
(ii) accident causation and investigations;
(iii) communications; and
(iv) emergency medical services, including the transportation of the injured;
(B) human behavioral factors and their effect on highway and traffic safety, including--
(i) driver education;
(ii) impaired driving; and
(iii) distracted driving;
(C) an evaluation of the effectiveness of countermeasures to increase highway and traffic safety, including occupant protection and alcohol- and drug-impaired driving technologies and initiatives;
(D) the development of technologies to detect drug impaired drivers;
(E) research on, evaluations of, and identification of best practices related to driver education programs (including driver education curricula, instructor training and certification, program administration, and delivery mechanisms) and make recommendations for harmonizing driver education and multistage graduated licensing systems; and
(F) the effect of State laws on any aspects, activities, or programs described in subparagraphs (A) through (E).

equipment performance characteristics and--(A) accidents involving motor vehicles; and (B) deaths or personal injuries resulting from those accidents.

Accordingly, NHTSA's crash data studies identify traffic safety issues and provide the data that supports agency decision-making in determining countermeasures, research, rulemaking and safety-related defect trends. NCSA collects data from a motor vehicle crash to help analyze the incident to identify outcomes, causal factors, vehicle and component performance, etc. NCSA requires PII in order to link crash circumstances and outcomes, identify potential interviewees, and verify data as its pre-populated or manually coded into the collection-specific entry systems. Study-specific PII needs and uses are discussed above.

Moreover, NHTSA may only disclose a crash report to the public with a manner that does not identify individuals. *See* 23 U.S.C. § 403(e) and 49 U.S.C. § 30183. Accordingly, all of NCSA study publications, data sets and crash reports are deidentified prior to publication.

For the vPIC application, pursuant to Title 49 United States Code, Chapter 301, NHTSA is responsible for the oversight of the safe manufacturer of motor vehicles and motor vehicle equipment offered for sale or imported into the United States. In order to implement the various manufacturer reporting requirements found in Chapter 301 and its implementing regulations, *see* 49 C.F.R. Parts 500-579, NHTSA requires manufacturers to submit certain information that may be submitted through the vPIC application. As part of these submissions, NHTSA receives various business contact information from the manufacturers and importers of motor vehicles and equipment. NHTSA requires this information to contact the manufacturers during its regulatory oversight activities.

Data Minimization & Retention

DOT should collect, use, and retain only PII that is relevant and necessary for the specified purpose for which it was originally collected.

The PII that is obtained by NCSA and retained within the CDAN system pertains to individuals involved in a motor vehicle crash or incident. Data that is collected and used within the CDAN system comes from PARs, scene diagrams, photographs and video, interview forms, medical records and toxicology reports, etc. The PII collected for each study is required to associate the crash details to supplemental data to determine crash outcomes, causation and severity. NCSA collects PII data that is relevant and necessary for it to analyze each individual crash and that is necessary for the purposes of each specific study. The PII that is collected and provided at the time of a motor vehicle crash or incident ensures that the most accurate information is obtained and analyzed to support NCSA research, analysis and other related uses that can further the goals of reducing crashes in the United States.

NCSA has requested approval from the National Archives and Records Administration (NARA) for a retention schedule that will permit the disposal of PII within three years of the data the PII is collected. This three year period permits NCSA to validate and quality control all of its crash data and medical data before it prepares any statistical analyses or reports for publication.

Use Limitation

DOT shall limit the scope of its PII use to ensure that the Department does not use PII in any manner that is not specified in notices, incompatible with the specified purposes for which the information was collected, or for any purpose not otherwise permitted by law.

NCSA limits the scope of the PII it collects to data necessary to support its studies and to support the administration of the vPIC platform. NCSA limits the use of the PII to obtain supplemental information related to a specific crash and to validate and quality control the information it collects. Once the vehicle crash information is confirmed and finalized, NCSA disposes of the PII. Subject to the approval of NARA, as noted above in the Data Minimization and Retention section, NCSA intends to keep PII data no longer than three years after its collection. Thereafter, only deidentified data remains in the system.

In addition to the information publicly available on the NHTSA websites, NCSA receives requests for information from individuals. NHTSA obtains contact information from the requestor in order to respond to the request and the requestor's PII is used only to fulfill the request. NHTSA does not use this PII for any other purpose and will dispose of the PII in connection with its NARA approved records retention schedule.

For the vPIC application, NCSA a manufacturer's business contact information is required by regulation and made publicly available through vPIC.

Data Quality and Integrity

In accordance with Section 552a(e)(2) of the Privacy Act of 1974, DOT should ensure that any PII collected and maintained by the organization is accurate, relevant, timely, and complete for the purpose for which it is to be used, as specified in the Department's public notice(s).

NCSA has quality control (QC) processes in place to monitor and review the data it obtains for its studies. QC activities are required to ensure each vehicle crash case has accurately captured the data and the data entry and coding are consistent across all studies. NCSA uses a variety of methods to execute QC activities depending on each collection's parameters (high case load/lower number of data elements, vs low case load/higher number of data elements, etc.) to ensure quality—timeliness, accuracy, completeness, etc. NCSA study activities for QC purposes can be divided between sampling and coding. Sampling QC entails ensuring that the case being considered qualifies for the study and the data is

captured and entered into CDAN accurately. Accuracy is validated through double-entry, in some instances. Coding QC includes a variety of automated range, edit, and validation checks as well as site visits and regular analyses to ensure that the collected data remains within expected parameters.

The NCSA QC process includes:

- Edit Checks- an internal program check to assure consistent data.
- In-house Case Review – Each vehicle crash case is reviewed for accuracy.
- Case Review – Each vehicle crash case is reviewed to ensure compliance with protocols and coding conventions
- Data Review – Each vehicle crash case is reviewed to ensure that it includes the required elements needed for the study (e.g., damage sketches, crash reconstruction, images, etc.)
- Data Coding – Each vehicle crash case is reviewed to ensure that data elements are coded correctly correct.
- Deidentification Review – Each vehicle crash case is reviewed to ensure that all PII elements are removed from the case.
- Site Visits – NCSA staff perform on-site inspections to assess the processing of data sampling and coding.
- Reinvestigation Activities – NCSA staff may conduct unannounced site visits to crash locations to measure scenes and vehicles and to interview individuals involved in the crash to assure accuracy and completeness.
- Headquarters Review – Periodically, NHTSA subject matter experts review vehicle crash cases to identify anomalies that, when identified, the case(s) are returned for correction.
- NCSA Review – Prior to release of data, NCSA analysts review data for consistency and completeness.

For vPIC, vehicle and equipment manufacturers submit data to NCSA, which is automatically uploaded to the specific manufacturer's account. The vPIC permits a manufacturer to update its information at any time.

Security

DOT shall implement administrative, technical, and physical measures to protect PII collected or maintained by the Department against loss, unauthorized access, or disclosure, as required by the Privacy Act, and to ensure that organizational planning and responses to privacy incidents comply with OMB policies and guidance.

PII collected and maintained in CDAN is safeguarded in accordance with applicable rules and policies, including all applicable DOT automated systems security and access policies. NHTSA security policy and practices are based on NIST Information Risk Management and Security standards. These are supplemented by privacy-specific guidance provided in NIST

800-122 and NIST Special Publication 800-53 Revision 4, and the DOT Privacy Risk Management Policy 1351.18 and the Office of Management and Budget circular A-130, Section 8b(3), Securing Agency Information Systems. The NIST security guides and standards are used by NHTSA to, among other things; assess information confidentiality, integrity and availability risks, identify required security safeguards, and adjust the strength and rigor of those safeguards to reduce risks to appropriate acceptable levels. Under this policy NITSA has implemented appropriate Administrative, Physical and Technical safeguards to protect the confidentiality, availability and integrity of the CDAN system and information.

NHTSA maintains the security of PII in the CDAN system through each step in the data collection process. Security varies depending on the technology to collect the information, the format of the data and the manner in which it is transferred to the CDAN database. Data collected through DOT laptop technology is encrypted and FIPS 140-2 compliant. NHTSA contractors establish a secure HTTPS connection to upload the data contained within a USB drive, email, or data that was manually entered in their laptops into the CDAN system. Once the upload is complete, the information is deleted from the USB drive, email, and the laptop. Information is securely sent to the CDAN database using secure file transfer protocols to ensure the data is encrypted and protected while in transit.

NHTSA employees or contractors that maintain hard copy files, CD ROMs or USBs with PII are required to store these documents in locked cabinets or storage containers while not in use. Once the PII has been entered and transferred to the CDAN database, NHTSA employees or contractors will lock hard copy files, CD ROMs or USBs in a file cabinet. When a file or document must be shipped, NCSA employees or contractors use an overnight carrier such as the USPS, FedEx, or UPS.

NHTSA employees and contractors with CDAN access must adhere to DOT policy and procedures to ensure that the data collected, regardless of form, is protected from any misuse or unauthorized disclosure. Furthermore, all CDAN users are required to take security training and sign a Rules of Behavior (ROB) document prior to obtaining access to any CDAN system assets.

Further protection of PII in CDAN include:

- All NHTSA employees and contractors undergo the mandatory DOT background checks prior to being granted access to the DOT network. In addition, all CDAN users receive both general, and role-based security training on an annual basis.
- Use of locked cabinets and authorized document carries to ensure that hard copy files, CDROMs or USBs are appropriately secured from unauthorized access.
- NHTSA utilizes role-based security in CDAN to restrict user access to specific applications.

- NHTSA enforces assigned authorizations in CDAN for controlling access to the system using unique username/password combinations and roles and group membership.
- The CDAN system maintains an audit trail of changes made, date/time of change and the user for each database change.

Accountability and Auditing

DOT shall implement effective governance controls, monitoring controls, risk management, and assessment controls to demonstrate that the Department is complying with all applicable privacy protection requirements and minimizing the privacy risk to individuals.

NHTSA is responsible for identifying, training and holding NHTSA employees and contractors accountable for adhering to DOT Privacy and Security policies, and regulations. DOT follows and adheres to Fair Information Practice Principles (FIPPs) for the protection of information associated with CDAN records. In addition to these practices, policies and procedures will be consistently applied, especially as they relate to the protection, retention and disposal of records. NHTSA provides training to employees and contractors on the collection, use, processing and security of CDAN data. The training is mandatory annual security and privacy awareness training. In addition, each NHTSA employee and contractor with access to CDAN must agree to the system rules of behavior. NHTSA Security and Privacy Officers conduct security and privacy reviews of CDAN consistent with the Office of Management and Budget circular A-130, Section 8b(3), Securing Agency Information Systems and follow the DOT Privacy Risk Management Policy 1351.18. https://www.transportation.gov/sites/dot.gov/files/docs/CIOP - Privacy Risk Management - 1351.18 - Policy - 09302014.pdf.

To access the CDAN system, each NHTSA employee and contractor with access to the CDAN system must sign a CDAN Rules of Behavior (ROB) and a CDAN User Access Request form for documenting use and data needs.

Responsible Official

Chip Chidester
Director, Office of Data Acquisition, National Center or Statistics and Analysis
NHTSA
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Approval and Signature

Claire W. Barrett
Chief Privacy & Information Asset Officer
Office of the Chief Information Officer

APPENDIX A – Automated Vehicle Transparency and Engagement for Safe Testing (AV TEST)

AV TEST is a web-based application that supports the AV TEST study and contains data related to emerging automated driving systems. Under the AV TEST study, entities conducting AV tests submit information to NHTSA that is then used to populate a database related to specific automated vehicle testing in the United States. NCSA makes the information available to the public on the AV TEST public website https://www.nhtsa.gov/automated-vehicles-safety/av-test-initiative-tracking-tool. All entities that seek to register their AV test program with NHTSA must provide business contact information before granting them access to AV TEST. This information is name, email address, phone number, work address, role and company name. This information is only used to create a user account. It is not used for any other purpose, and is not publicly available.