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Docket Management Facility  
US Department of Transportation  
1200 New Jersey Avenue SE  
West Building, Ground Level  
Room W12-140  
Washington, DC 20590-0001

Attention: Docket No. DOT-OST-2021-0140

### **Safe Kids Worldwide Comment to U.S. DOT FY 2022-26 Strategic Plan**

Safe Kids Worldwide (SKW) is a national grassroots nonprofit whose mission is to prevent unintentional child injuries, a leading cause of death for American children. We work with an extensive network of more than 400 coalitions in the United States and partners in more than 30 countries who help families and communities reduce traffic injuries, drownings, falls, burns, poisonings and more.

Throughout the world, one child dies of an injury every minute, and almost every one of these tragedies is preventable. Of these preventable deaths, motor vehicle crashes and bike and pedestrian injuries were the leading causes. For example, in the U.S. in 2019, 646 kids ages 0-12 were killed, 6128 were hospitalized and 95237 were treated in emergency rooms as a result of a motor vehicle crash. That same year saw 359 fatal and 15,011 non-fatal injuries among child pedestrians. In addition to motor vehicle and pedestrian crashes, there is the tragically persistent issue of children dying from heatstroke in hot cars. Last year, 26 kids died of heat stroke/hyperthermia after being left unattended in or gaining access to a hot vehicle. This number reflected a large decrease due to the pandemic. On average during the last three years, an average of 44 kids died of heat stroke/hyperthermia.

In the future, vehicle automation has a tremendous opportunity to prevent death and injury by automating the driving process to better remove human error such as distraction, drowsiness, and impaired driving. As vehicle automation evolves, technologies like Advanced Driver Assistance Systems have the potential to make large reductions in traffic fatalities and injuries among all groups, including children.

In order to make sure that kids are considered in future vehicle technologies, SKW issued a Blue Ribbon Panel report in 2018 entitled [Children in Autonomous Vehicles](#). The report calls on “developers of autonomous vehicles (AVs) to ensure that AVs are engineered, deployed and marketed to protect the unique needs of child passengers.”

SKW announced the formation of an automated vehicle consortium to continue this critical work. Eventually, the group became the Safe Kids in Automated Vehicles Alliance (SKAVA). SKAVA is made up of some of the world’s leading experts on children and vehicle safety. Specifically, the group is targeting the areas of education, emerging technologies, research, development and testing, and advocacy with

the goal of ensuring that children's safety is considered as part of future automated vehicle and advanced driver assistance technologies.

SKW is pleased to have the opportunity to comment on the proposed Department of Transportation FY 2022-26 strategic plan. We commend the Department for seeking public comment and for the strategic priority goals which we believe are critical to advancing transportation for ALL people over the next four years.

Specifically, SKW would like to comment on the priority areas of Safety, Equity, and Transformation.

**Safety: Make our transportation system safer for all people. Work toward a future where transportation-related serious injuries and fatalities are eliminated.**

SKW has long prioritized child passenger safety. Specifically, we have worked to ensure that all children are buckled and restrained in a properly fitting car seats, booster seats or seat belts for every trip. Correctly used child safety seats can reduce the risk of death or serious injury in a crash by as much as 71 percent. Unfortunately, more than half of car seats are not used or installed correctly.

*We urge DOT to consider the importance of child passenger safety technicians and to help work to grow the number and reach of technicians and technician instructors across the country. Car seat checks by certified child passenger safety technicians ensure correct use of car seats and effectively reduce errors in restraint installations. However, the services are highly underutilized due to barriers in access, scheduling complications and insufficient resources to meet consumer demand for car seat checks.*

In addition to riding in the car, child and teenage pedestrians are also at risk. In fact, teenagers have a death rate nearly three times that of younger children and account for two-thirds of all child pedestrian deaths. We applaud DOT and others in the traffic safety community for calling increasing attention to the rise in pedestrian fatalities.

*We urge DOT to include children and teenagers as part of an overall comprehensive strategy to stop pedestrian deaths.*

Children left unattended in vehicles can lead to vehicular heatstroke even at relatively low temperatures. Since 1990, Kids and Cars estimates that over 1,000 children have died in hot cars nationwide. Before the COVID-19 pandemic, 53 kids died in 2019 in hot car deaths. These deaths can occur when a parent, guardian, or caregiver mistakenly leaves a child in a vehicle or when an unsupervised child gains access to a vehicle and becomes trapped. Cars heat up very quickly and can reach temperatures of 125 degrees.

DOT has been a great partner in educating the public to check their vehicle for children as part of innovative campaigns like Where's Baby and Park, Look, Lock.

*We urge DOT to continue to work with stakeholders, vehicle manufacturers, and parents to stop hot car deaths.*

**Equity: Reduce inequities. Support and engage people and communities to promote safe, affordable, accessible, and multimodal access to opportunities and services while reducing transportation-related disparities, adverse community impacts, and health effects.**

According to an analysis of 2017-2018 FARS data, American Indian/Alaska Native and Black/African American children were at greater risk of death as motor vehicle occupants than any other race or ethnicity. Further, an analysis of 2009-2010 data found almost twice as many Black/African-American

(45 percent) and Hispanic children (46 percent) who died in crashes were not buckled in car seats or using safety belts compared to White children (26 percent).

Other high-risk and underserved populations of note include rural children and children from families living in poverty. Rural children ages 14 and under are between two and five times as likely to be seriously or fatally injured in a crash than their urban counterparts. In addition, a 2017 study comparing urban and rural areas of three states found that rural locations were associated with higher levels of child restraint system misuse and access to certified child passenger safety technicians is a particular challenge in rural areas. Families living in poverty can benefit from programs offering free or low cost child seats.

SKW was pleased to work with Congresswoman Dina Titus, Chairman Peter DeFazio, and other members of the House Transportation and Infrastructure Committee and Senate Commerce Committee to include provisions in the Bipartisan Infrastructure Law to promote expanding child passenger services to high risk and underserved communities.

The new law amends the 402 and 405 safety grant programs to require states to provide resources to high-risk and underserved communities. Specifically, the new law:

- Amended the highway grant program (402) to include “to encourage more widespread and proper use of child restraints, with an emphasis on underserved populations;”
- Updates the 405 high priority safety grant program to include:
  - Underserved communities to recruit and train nationally certified child passenger safety technicians among police officers, fire and other first responders, emergency medical personnel, and other individuals or organizations serving low-income and underserved populations;
  - Educate parents and caregivers in low-income and underserved populations regarding the importance of proper use and correct installation of child restraints on every trip in a motor vehicle; and
  - The purchase and distribution of child restraints to low-income and underserved populations
- Sec. 9207 Study on child seat accessibility for low income and underserved communities.

SKW believes these new provisions are a great way to help the department’s commitment to transportation equity.

*We urge DOT to make these new provisions a priority and to work with state highway safety offices and stakeholders to ensure that EVERY child has access to and rides in a properly installed car seat or booster seat.*

**Transformation: Design for the future. Invest in purpose-driven research and innovation to meet the challenge of the present and modernize a transportation system of the future that serves everyone today and in the decades to come.**

Mobility in the future will look vastly different than it does today. Vehicle technology is rapidly evolving as manufacturers strive to reach a fully self-driving vehicle. Along the way, technological advancements are making vehicles safer. Unfortunately, children are not always top of mind as these technologies evolve.

That's why in June 2021 SKW announced the Safe Kids in Automated Vehicle Alliance (SKAVA) to ensure child safety is part of the discussion around emerging vehicle technologies. SKAVA began meeting this fall to discuss policy implications, education needs, and current research around automated vehicle technology. As automation assists drivers, how will children be impacted?

Parents and children will certainly use AVs which will create a whole host of policy decisions that must be considered.

Questions such as:

- At what age can children ride in an AV?
- Who is responsible for a child riding alone in an AV?
- Will AVs be designed and compatible with current car and booster seats?
- How do children interact with automated commercial vehicles?

SKAVA is working to identify science and data backed answers to these and many other questions.

In addition to AVs, new technologies like Level 2 and 3 driver assist systems could present new safety opportunities and challenges for kids. How will these systems work around schools, playgrounds, and other areas where they are more likely to encounter kids?

New Advanced Driver Assist Systems (ADAS) help automate safety, but are they safe for kids, bikes, and school buses?

With this new world of technology to address safety issues comes new policy questions that must be answered.

The new Bipartisan Infrastructure Law requires the National Highway Traffic Safety Administration to update several motor vehicle safety standards including those related to distracted and impaired driving, kids in hot cars, as well as an update to the New Car Assessment Program. As NHTSA looks to write new rules, it is critical that children be considered.

*SKW recommends that DOT make sure that children are considered and child safety is a part of any discussion on future vehicle technologies.*

SKW sincerely appreciates the opportunity to comment on DOT's proposed strategic plan. We look forward to continuing to work together with the U.S. Department of Transportation to do more to protect ALL children.