

REPORT BY THE

RELEASED

Comptroller General

OF THE UNITED STATES

Status Of The Department Of Transportation's Safety Belt Program

In developing a program to encourage the use of safety belts, the National Highway Traffic Safety Administration, Department of Transportation, relied on the results of past foreign and domestic safety belt use campaigns and other research. These past campaigns were unlike the Safety Administration's multifaceted program and offer limited insight into whether the Safety Administration's program will be successful. However, other research suggests that the program, which is designed to be long term, can increase safety belt use.

The program consists of disseminating public information, conducting educational programs, awarding financial and other incentives for safety belt use, and encouraging public and private safety belt use policies. At the time of GAO's review the program was not fully operational and the Safety Administration needed to give further attention to certain issues relating to its implementation.



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COMPTROLLER GENERAL OF THE UNITED STATES
WASHINGTON D.C. 20548

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Chairmen, Selected Committees
and Subcommittees

As requested in your May 12, 1982, letter (app. I), this report summarizes the results of our review of the National Highway Traffic Safety Administration's, Department of Transportation, development and implementation of a program to enhance safety belt use nationwide. The report also discusses a contract awarded by the Safety Administration to study the feasibility of establishing a nonprofit foundation to support a national objective of reducing traffic fatalities and injuries.

As arranged with your offices, unless you publicly announce its contents earlier, we plan no further distribution of this report until 14 days from the date of the report. At that time we will send copies to interested parties and make copies available to others upon request.

A handwritten signature in cursive script that reads "Charles A. Bowsher".

Comptroller General
of the United States



LIST OF ADDRESSEES FOR GAO REPORT
ON SAFETY BELTS (GAO/RCED-83-39)

The Honorable Bob Packwood
Chairman, Committee on Commerce,
Science, and Transportation
United States Senate

The Honorable John C. Danforth
Chairman, Subcommittee on Surface
Transportation
Committee on Commerce, Science,
and Transportation
United States Senate

The Honorable Mark Andrews
Chairman, Subcommittee on Transportation
Committee on Appropriations
United States Senate

The Honorable William Lehman
Chairman, Subcommittee on Transportation
Committee on Appropriations
House of Representatives

The Honorable Timothy E. Wirth
Chairman, Subcommittee on Telecommunications,
Consumer Protection, and Finance
Committee on Energy and Commerce
House of Representatives

D I G E S T

This report was prepared in response to a request from the chairmen of several House and Senate committees and subcommittees who were concerned that the multimillion dollar program the National Highway Traffic Safety Administration, Department of Transportation (DOT), is developing to encourage safety belt use nationwide may not be well conceived or well designed. The chairmen requested GAO to investigate the development and implementation of this program.

Each year highway accidents cause about 50,000 fatalities and more than 200,000 serious injuries. Occupants of passenger cars, light trucks, and vans account for 34,000 fatalities, including an average of about 640 children, 4 years old or less, and 140,000 serious injuries. Although safety belts have been required in passenger cars since January 1, 1968, most drivers and occupants do not use them. A Safety Administration contractor reported in May 1980 that, based on observations in 19 cities during the period January through November 1979, safety belt usage for drivers of 1964-80 model passenger cars averaged 10.9 percent.

SEAT BELT PROGRAM

DOT's program has generated considerable controversy because past campaigns in the United States to increase safety belt use did not appear to have a lasting effect.

The safety belt program developed by DOT is designed to be a long-term, multifaceted effort to increase safety belt use. The program relies heavily on the voluntary actions by all segments of society and attempts to alter the various attitudes, myths, and perceptions which currently limit safety belt use. The multifaceted approach consists of (1) disseminating public information, (2) conducting educational programs, (3) awarding financial and other incentives, and (4) encouraging safety belt use policies in the public and private sectors. DOT estimated that funding requirements for the safety belt program for fiscal years 1981-83 will amount to about \$27.2 million.

In developing the program, DOT relied on the results of past foreign and domestic campaigns and other research. DOT had not specified the increased safety belt use that it expects to achieve under the program or the time frame and related costs to achieve and maintain such increased use. Also, DOT had not determined whether the benefits to be achieved under the program will outweigh the cost.

GAO found that the results of other prior campaigns offer limited insight into the potential success of DOT's program because mandatory safety belt legislation was being considered when the foreign campaigns were being conducted and the domestic campaigns were short-term, narrowly scoped efforts. A key factor affecting the success or failure of DOT's program will be the willingness of the various voluntary participants, such as educators; civic, service, and safety groups; and automobile dealers and manufacturers to make the long-term commitment of funds and other resources needed to bring about a significant increase in safety belt use. (See p. 8.)

Although the Safety Administration finalized its evaluation plan on January 3, 1983, GAO did not have an opportunity to determine its adequacy for providing management information on the safety belt program's impact in achieving its goals. (See p. 21.)

STATUS OF PROGRAM

DOT will rely on numerous groups, organizations, associations, private companies, and Government agencies to conduct education and incentive programs and adopt use policies to promote safety belt and child safety seat usage. Also, DOT and domestic and foreign automobile manufacturers will present messages on radio and television and in the printed media to explain the benefits of wearing safety belts and to promote their use. As of January 1983, the program was not fully operational. (See p. 26.)

GAO's review showed that DOT needs to give further attention to the following issues relating to the program's implementation:

--Research designed to provide information to program participants on the benefits and ways to conduct incentive programs and adopt mandatory use policies. (See pp. 33 to 37.)

--Development and implementation of DOT's portion of the mass media segment of the program. (See p. 39.)

ESTABLISHMENT OF NONPROFIT
TRAFFIC SAFETY FOUNDATION

In October 1981 DOT contracted with a private company to study the feasibility of establishing a nonprofit foundation to support, enhance, and augment a national educational and advocacy objective to significantly reduce the number of deaths and injuries caused on the Nation's highways. GAO found that DOT complied with Federal procurement regulations in issuing the contract. DOT accepted a final feasibility study from the contractor in January 1983--14 months after the contract's originally scheduled completion date. (See p. 46.)

AGENCY COMMENTS AND OUR EVALUATION

In commenting on the report (see app. VII), DOT stated that the report generally presents a factual and evenhanded description of the safety belt program, but it could not implement GAO's proposals for improving the program.

GAO proposed in its draft report that the Administrator specify the increase safety belt use expected to be achieved by implementing the agency's safety belt program, along with the time frame and related costs to achieve and maintain such increased use. The Committee of Conference in its December 13, 1982, report on DOT's and related agencies' fiscal year 1983 appropriations directed the Safety Administration to immediately refrain from obligating additional operations and research funds for new contracts relating to the safety belt program until certain conditions were met. One of those conditions was that the Safety Administration specify the increase in safety belt use expected to be achieved by the program, the time frame in which that goal will be accomplished, and the estimated out-year costs necessary to maintain belt use at that level.

In its March 2, 1983, responses to the House and Senate Appropriations Committees, the Safety Administration stated that the aggregate effect of the program now planned should result in a national safety belt usage level in the range of 25 percent in the next 3 years. The Safety Administration also stated that the out-year

program costs, as justified in the President's fiscal year 1984 budget, should not exceed \$2.6 million. The Safety Administration stated that in addition the proportion of Federal grants directed by the States to safety belt and child safety seat activities is expected to reach \$5 million in fiscal year 1983, with a gradual increase in future years.

GAO believes that these actions generally are responsive to its proposal and should provide the Safety Administration a basis for monitoring the program's progress and effectiveness. (See p. 24.)

GAO proposed in its draft report that the Safety Administration determine which Federal agency has authority to establish a Government-wide mandatory safety belt use policy and work with that agency to establish a policy with sufficient sanctions to ensure Federal employees' compliance while on official business. In commenting on the report, DOT stated that no single Federal agency has the authority or ability to establish such a policy. Also, DOT stated that the program for Federal employees must be broader than merely establishing a required use policy and that an agency that establishes its own policy will be more committed and enthusiastic about its implementation. Further, DOT stated that the Safety Administration had developed a comprehensive plan for encouraging increased safety belt use by Federal employees that calls for each Federal agency to have a well-publicized mandatory use policy.

GAO believes that these actions are generally responsive to its proposal and if implemented by all Federal agencies, should facilitate greater use of safety belts in the Federal Government. (See p. 44.)

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ABBREVIATIONS

| | |
|-------|--|
| DOL | Department of Labor |
| DOT | Department of Transportation |
| GAO | General Accounting Office |
| NHTSA | National Highway Traffic Safety Administration |
| OSHA | Occupational Safety and Health Administration |
| RFP | request for proposal |

CHAPTER 1

INTRODUCTION

In a May 12, 1982, letter, five congressional committee and subcommittee chairmen (see app. I) expressed concern that a multi-million dollar program the National Highway Traffic Safety Administration (NHTSA), Department of Transportation (DOT), is developing to encourage safety belt use nationwide may not be well conceived or well designed. These chairmen requested that we investigate the development and implementation of this program.

Each year highway accidents cause about 50,000 fatalities and more than 200,000 serious injuries. ^{1/} Occupants of passenger cars, light trucks, and vans account for 34,000 fatalities (including about 640 children, 4 years old and under) and 140,000 serious injuries. Most of the remaining fatalities and injuries result from accidents involving motorcyclists and pedestrians. Details are shown in appendix II.

Every motor vehicle accident involves two collisions. The first collision involves the vehicle--it crashes into something. The second collision involves the occupants--they crash into the vehicle's interior or are ejected from the vehicle. Safety belts--when worn--have been shown to be effective in reducing fatalities and injuries. However, almost since safety belts were initially required in passenger cars, effective January 1, 1968, NHTSA has recognized that usage has never been high enough to significantly reduce traffic fatalities and injuries. From 1971 to 1980, NHTSA conducted numerous educational and mass media efforts designed to increase safety belt usage as shown in appendix III.

Early in 1981 NHTSA initiated a major education program to encourage safety belt use. By September 1981 this program had evolved into a multifaceted effort of activities involving public information, education, financial and other incentives, and use policies. Implementation of the program depends largely on voluntary participation of various segments of the public and private sectors. (See ch. 2 for a more detailed description.)

ESTABLISHMENT OF MOTOR VEHICLE SAFETY STANDARDS

Congressional concern over the increasing number of motor vehicle fatalities led to the enactment of the National Traffic and Motor Vehicle Safety Act of 1966 (15 U.S.C. 1381 *et seq.*). This act was the first significant Federal entry into motor vehicle safety. Its stated purpose was to reduce traffic accidents

^{1/}NHTSA defines serious injuries as those of a severity of Abbreviated Injury Scale (AIS) 3 or greater. See app. IV for an explanation and description of AIS.

and fatalities and injuries to persons resulting from such accidents.

Under the act the Secretary of Transportation must establish motor vehicle safety standards with which motor vehicle manufacturers must conform. According to the act each standard shall be practical, shall meet the need for motor vehicle safety, and shall be stated in objective terms. In prescribing standards, NHTSA must consider, among other things, (1) relevant motor vehicle safety data, (2) whether the proposed standard is reasonable, practical, and appropriate for the particular type of motor vehicle or item of motor vehicle equipment for which it is prescribed, and (3) the extent to which such standards will contribute to carrying out the act's purposes. NHTSA is also responsible for assuring that vehicles meet applicable standards and investigating vehicle safety defects.

In carrying out its responsibilities, NHTSA (or its predecessor agency) 1/ has established more than 50 individual motor vehicle safety standards. Some standards are aimed at preventing accidents and protecting the occupant if a crash occurs. Federal Motor Vehicle Safety Standard 208--Occupant Crash Protection--is one of the latter standards and covers occupant restraint systems.

OCCUPANT RESTRAINT SYSTEMS

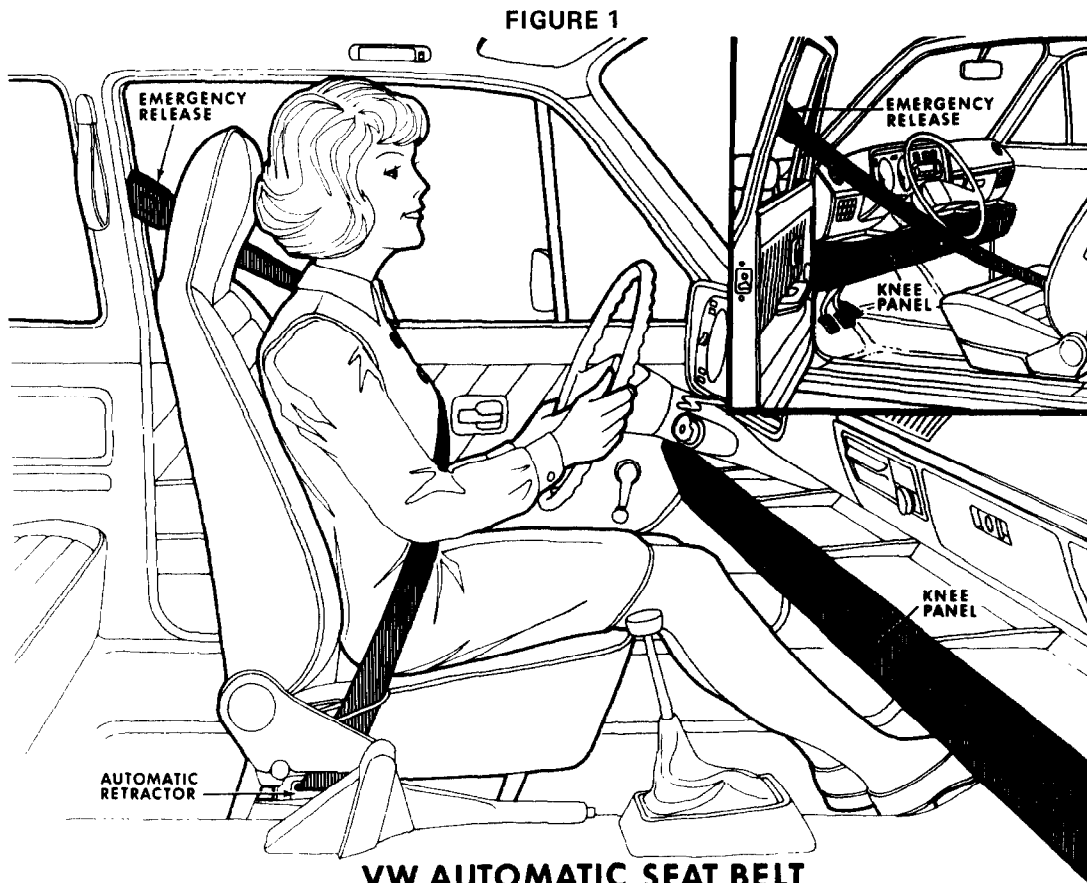
The most common restraint systems for automobile occupants are the lap belt and lap/shoulder belt (safety belts). These systems are considered "active" restraint systems if the occupant is required to buckle up so that the safety belts can provide the designed protection. If the occupant does not buckle up, the safety belt provides no protection. Active lap/shoulder safety belts when worn provide protection by constraining the occupant's body at the pelvis and chest. Safety Standard 208 was initially issued in 1967 to require the installation of lap and shoulder belt assemblies at front "out-board" (excludes center) seating positions, except in convertibles, and lap belt assemblies at all other designated seating positions. Safety belts prevent or minimize injuries in six ways:

- Begin to stop the wearer as the vehicle is stopping:
"ride down" benefit.
- Keep the head and face of the wearer from striking objects such as the steering wheel, windshield, interior posts, or dashboard.
- Spread the stopping force across the strong parts of the occupant's body.

1/NHTSA was established by the Highway Safety Act of 1970 (Public Law 91-605, Dec. 31, 1970).

- Prevent occupants from colliding with each other.
- Help the driver maintain vehicle control, thereby decreasing the possibility of an additional collision.
- Prevent the occupants from being ejected.

In contrast with active belt restraint systems, passive belt and air bag systems are designed to protect occupants without their participation. Passive belt systems are automatically deployed as the occupant enters the vehicle and closes the door. One passive belt system consists of a shoulder belt and a knee bolster to prevent the occupant from sliding under the belt in frontal crashes (see fig. 1). Another type uses both a lap and shoulder belt.



VW AUTOMATIC SEAT BELT
A PASSIVE BELT SYSTEM

An air bag system (see fig. 2) is designed to deploy within a few hundredths of a second after the start of a serious crash and distributes forces widely across the occupant's head and chest as opposed to concentrating the forces at the pelvis and chest as do active belt restraint systems. Air bag systems protect front seat occupants in a frontal crash. While the air bag provides protection in frontal crashes without action by the occupant, a lap or lap/shoulder safety belt should be used with the air bag for adequate protection in lateral and rollover crashes.

In 1969 DOT recognized that safety belt usage was too low to reduce traffic injuries to an acceptable level. Accordingly, on July 2, 1969, DOT issued an advance notice of proposed rule-making to consider installing passive restraint systems in motor vehicles. There have been numerous revisions and postponements of actions taken concerning the standard during the past 13 years as shown in appendix V which describes the chronology of its development and current status.

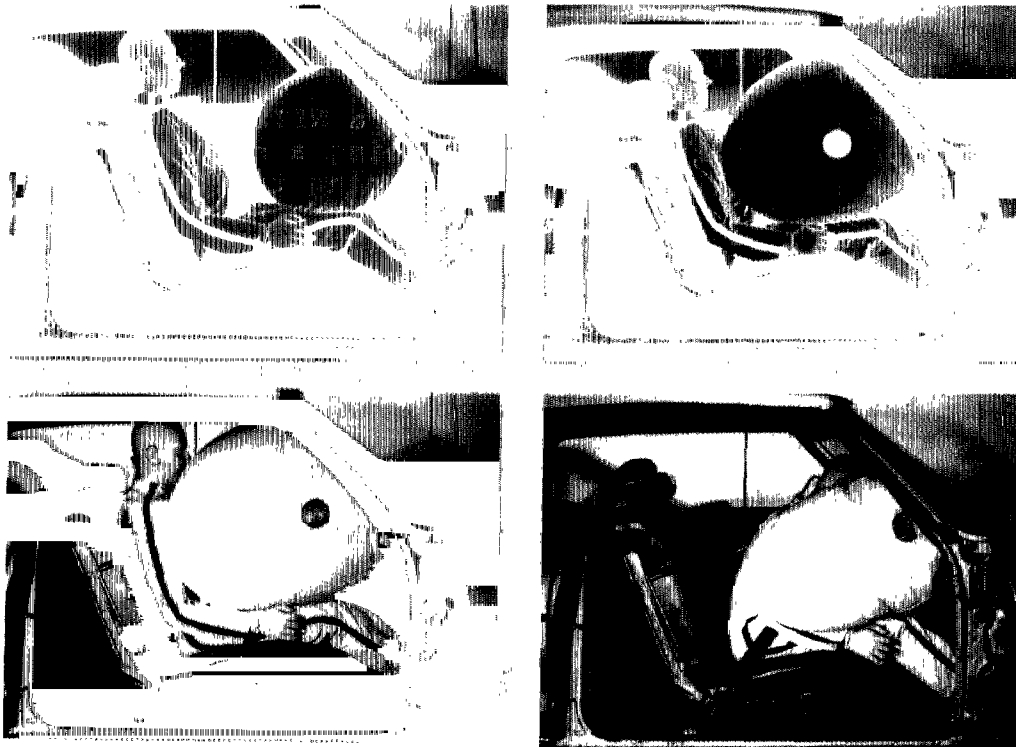
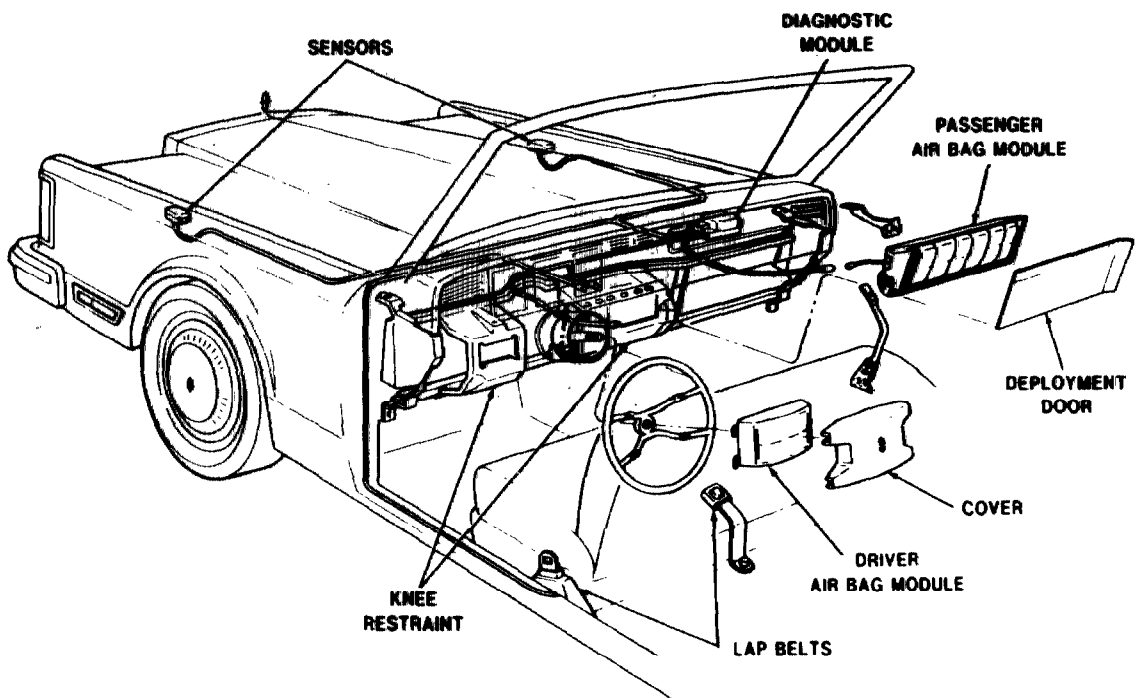
EFFECTIVENESS AND USE OF SAFETY BELTS

Active safety belts have not been as effective as they could be because of the public's reluctance to use them. However, there is substantial evidence that occupant restraint devices can save lives and reduce injuries. Although various estimates are available regarding their effectiveness, NHTSA's studies indicate that safety belts, if properly used by all occupants of passenger cars, light trucks, and vans, could annually reduce fatalities by 17,000 and serious injuries by 74,000, or about 50 percent. NHTSA believes that child restraint devices, if properly used, can be realistically expected to reduce fatalities and injuries from 50 to 60 percent.

A NHTSA contractor reported in May 1980 that based on observations in 19 cities during the period January through November 1979, safety belt usage for drivers of 1964-80 model automobiles averaged 10.9 percent (8.5 percent for lap and shoulder belts, plus 2.4 percent for lap belts alone). During the period July through December 1979, only 6.9 percent of all adult passengers (20 years or older) were observed by the contractor as wearing safety belts. Use of child restraint devices during this 7-month period was somewhat higher, with 22.1 percent of infants (less than 1 year old) having been observed as being properly secured. Small children (1 to 4 years old) were found to be restrained less often--only 4.5 percent were properly restrained in child restraint devices and 2 percent by the vehicles' safety belts.

For drivers, safety belt use declined 2.1 percentage points from 1978 to 1979. However, a preliminary contractor report in May 1982--based on observations during April 1982--showed that safety belt use had increased slightly since 1979. The contractor found that 11.5 percent of drivers and 7.3 percent of all adult passengers were wearing their safety belts and 33.7 percent of

FIGURE 2



A DEMONSTRATION OF AN AIR BAG SYSTEM IN OPERATION.

infants and 14.1 percent of small children appeared to be correctly restrained by child seats.

The Congress has shown an interest in promoting safety belt use. For example, the Highway Safety Act of 1978 (Public Law 95-599, 92 Stat. 2727) stipulated that a State must spend at least 2 percent of the highway safety grant funds apportioned to it each fiscal year for programs to encourage safety belt use. The Congress appropriated a total of \$527 million for the 4 fiscal years 1979 through 1982 for these grants of which at least \$11.6 million had to be spent promoting safety belt use.

OBJECTIVES, SCOPE, AND METHODOLOGY

As stated earlier, we made this review in response to a request from five congressional committee and subcommittee chairmen. The chairmen asked that we consider the following three fundamental questions:

- Does the weight of existing evidence support the conclusion that safety belt usage can be significantly enhanced over a meaningful period by a mass media campaign?
- Assuming that a campaign will be conducted, has NHTSA developed a program which will maximize benefits and minimize costs to the taxpayer?
- Has NHTSA developed an appropriate evaluation plan for such a campaign?

We were also requested to review a NHTSA contract awarded to study the feasibility of establishing a nonprofit foundation to support a national mission of reducing traffic fatalities and injuries.

We discussed the safety belt program with various officials of NHTSA; the Transportation Safety Coordinator, Transportation Research Board, National Academy of Sciences; and the Director, Office of Safety Studies, National Transportation Safety Board, at their headquarters in Washington, D.C. Also, we discussed NHTSA's safety belt program with safety experts in the private sector; namely, the President and the Vice-President for Research, Insurance Institute for Highway Safety; the Director, Highway Safety Research Center, University of North Carolina; the Executive Director, National Safety Council; the President and the General Counsel, Highway Users Federation; the Director, Traffic Safety Department, American Automobile Association; and the President, American Seat Belt Council. We also discussed the program with the Manager, Transportation Issues, and an automotive safety engineer from the General Motors Corporation.

Our review was directed to the reasonableness of the information NHTSA used to justify the safety belt program, efforts being made to achieve maximum benefits at the least cost, and

efforts being devoted to develop an evaluation plan. Also, we examined the contract awarded by NHTSA to determine the feasibility of creating a private highway traffic safety foundation and discussed the matter with NHTSA officials and the contractor.

During our review, we did not attempt to perform technical analyses of the myriad of studies concerning safety belts. NHTSA's justification material included some 163 research studies assessing attitudes, behavior, and effectiveness of safety belts. We did, however, review the methodologies used in the three major studies that NHTSA relied upon to justify its initiation of the safety belt program. These studies are discussed beginning on page 14. Also, we relied on discussions with technical experts inside the Federal Government and from the private sector to make our judgments on the reasonableness of NHTSA's safety belt program. Because the individual program elements had not been fully developed and implemented, we are unable to comment on the safety belt program's overall effectiveness.

We made this review in accordance with generally accepted government auditing standards.

CHAPTER 2

OBSERVATIONS ON THE SAFETY BELT PROGRAM'S

JUSTIFICATION, COSTS, AND EVALUATION PLAN

The safety belt program developed by NHTSA is designed to be a long-term, multifaceted effort to encourage safety belt use. The program relies heavily on the voluntary actions by all segments of society to alter the various attitudes, myths, and perceptions which currently limit safety belt use. The multifaceted approach consists of (1) disseminating public information, (2) conducting educational programs, (3) awarding financial and other incentives, and (4) encouraging safety belt use policies in the public and private sectors. NHTSA estimated that funding requirements for the safety belt program for fiscal years 1981-83 will amount to about \$27.2 million.

In developing the safety belt program, NHTSA relied on the results of past foreign and domestic campaigns and other research. This evidence suggests that safety belt use can be increased using a combination of approaches. However, NHTSA had not established a goal of increased safety belt use that it expects to achieve under the program or the time frame and related costs to achieve and maintain that increased use. Also, NHTSA has not determined whether the benefits to be achieved under this multifaceted program will outweigh the cost of the program.

Our review showed that the results of other prior campaigns offer limited insight into the potential success of NHTSA's program because mandatory safety belt legislation, which was eventually adopted, was being considered when the foreign campaigns were being conducted and the domestic campaigns were short-term, narrowly scoped efforts. A key factor affecting the success or failure of the program will be the willingness of the voluntary groups to make the long-term commitment of funds and resources needed to bring about a significant increase in safety belt use. Subsequent to the completion of our review, NHTSA finalized its evaluation plan on January 3, 1983.

DESCRIPTION OF SAFETY BELT PROGRAM

As previously stated, NHTSA initiated a major, long-term program early in 1981 to encourage safety belt use. In July 1981 NHTSA established a task force to manage that program. The task force consisted of two co-managers who reported directly to NHTSA's Administrator and Deputy Administrator and a core group of designated personnel to carry out its functions. NHTSA's overall strategy to implement the program is contained in its September 4, 1981, plan.

A co-manager of the task force told us that NHTSA had tentatively planned that the President would announce the safety belt program in November 1981. He said that considerable effort was expended to pull the entire program together and have available as much information and material as possible for dissemination to the various groups, organizations, associations, and private companies at that announcement. However, the President did not announce the safety belt program until the proclamation creating the Commission on Drunk Driving on April 14, 1982, was signed--about 5 months later than NHTSA had envisioned.

In May 1982 NHTSA created the Office of Occupant Protection. That office--which began officially on July 31, 1982--is responsible for program design, demonstration, review, evaluation, and public education in the area of safety belt and child restraint use. As of September 28, 1982, that office had 21 professional and 4 support employees.

NHTSA's safety belt program is designed to be a long-term, multifaceted effort to increase safety belt use by addressing numerous attitudes, myths, and perceptions which limit safety belt use, such as the fear of entrapment in case of an accident and that the risk of being injured in an accident is remote. The program will rely on the voluntary efforts by all segments of society, including Government; industry; and private groups, organizations, and associations--referred to by NHTSA as networks. The multifaceted approach consists of (1) disseminating public information, (2) conducting educational programs, (3) awarding financial and other incentives, and (4) encouraging safety belt use policies in the public and private sectors. NHTSA's role will be to provide the leadership and materials, such as films and printed materials (brochures, posters, booklets, and guides), to be used by the networks to communicate the safety messages.

NHTSA plans to rely on these networks to (1) educate specific target groups about the benefits of safety belt and child restraint usage and (2) conduct other related activities such as adopting safety belt use policies and/or providing incentives to encourage employees to use safety belts when driving company-owned, Government-owned, or privately owned automobiles. Program participants are asked to use their existing communication networks to deliver NHTSA's safety belt messages to the general public as well as to their members and employees through their national, State, and local meetings; official publications; and community activities.

NHTSA meets with officials from the various networks to acquaint them with the audiovisual and print materials that are available to present the safety belt and child restraint messages. These officials select those materials which they consider most

appropriate for their use. The available materials are designed to reach, inform, persuade, and convince people of safety belts' effectiveness and utility by providing the following motivational, functional, and responsibility messages:

- Risks of being injured in an automobile crash.
- Dynamics of a crash.
- Responsibility of a driver as "captain of the ship."
- Function of the safety belt to save lives and reduce injuries.
- Value of the safety belt as a safety device in the automobile.
- Economic benefits to the driver and occupants from wearing safety belts.

JUSTIFICATION FOR SAFETY BELT PROGRAM

The NHTSA Administrator told us that NHTSA did not perform a cost/benefit analysis of the safety belt program. NHTSA justified its multifaceted safety belt program on the basis of its review of some 163 previous research studies. Several of these studies discussed past safety belt campaigns in foreign countries and in the United States. In addition, three of these studies provided special information on attitudes, behavior, and factors affecting safety belt use and methods that could be used to increase usage. NHTSA officials told us that the agency relied on these studies extensively in designing its program. NHTSA's January 1982 report "Effectiveness and Efficiency of Safety Belt and Child Restraint Usage Programs; The Safety Potential of Safety Belts, Child Restraints, and Programs To Promote Their Use" summarized the knowledge gained from these studies.

Past safety belt campaigns

NHTSA's January 1982 report indicated that while mass media campaigns alone have not been dramatically successful in increasing safety belt usage rates, there have been several programs which have resulted in significant increases in belt usage. The report pointed out that the most frequent shortcoming of such campaigns, in addition to not being accompanied by other approaches, is that they were usually too brief to have any impact.

In summary, NHTSA's 1982 report concluded that based on the studies which have been conducted, it appears that some of the more important considerations for any national effort to increase voluntary safety belt or child restraint usage are:

- Many other groups and organizations have to be involved in the delivery and implementation of educational, incentive, and belt use policy programs.
- Automobile deaths and injuries must be perceived by the public as a public health problem.
- The interest in child passenger protection should be capitalized on.
- Economic costs of belt nonuse must be documented and presented in an effective manner to organizations and the public.
- Incentives must be provided to organizations and individuals to encourage increased belt usage.
- Public information, education, incentive, and belt use policy programs must be combined and implemented on a large scale over long periods of time by networks of organizations.
- Many different target groups must be addressed in safety belt and child restraint messages and programs.
- A program based on voluntary safety belt usage must be undertaken before any serious interest can be given to a mandatory safety belt usage program.

The report contains examples of campaigns that achieved increased belt usage as well as those that had no apparent effect on belt-wearing behavior. Some of the more pertinent campaign examples cited in NHTSA's report are described below.

Experience gained from past campaigns in foreign countries

NHTSA's January 1982 report indicated that mass media campaigns in several foreign countries were unable to get the majority of vehicle users to buckle up, although most did manage to achieve usage rates in the 20- to 35-percent range. The report also noted that some campaigns which included other program components achieved more than the 20- to 35-percent range. The report contained the following detailed examples involving the British and Swedish safety belt campaigns.

In 1971 belt usage in Great Britain was 12 percent. A campaign was built around a series of mini-interviews conducted by a popular television and/or sports figure with crash victims soon after their operations. These interviews discussed the circumstances of the crash, using it as a case study to address the myths surrounding safety belts. Beginning in 1972 the mass media campaign ran for about 6 weeks each year. The cost of the program was about \$2.5 million each year. The British Government

estimated that during the 6-week period, the advertisements reached 80 to 90 percent of the British public. They were shown 15 to 20 times each week, and it was estimated that the average viewer saw one or another of the spots 8 to 9 times. The British campaign also included large posters for roadway areas and for the backs of buses in the cities. In addition, newspaper advertisements and radio were used sparingly.

As a result of the campaign, usage increased to about 26 percent after the first year, 28 percent the second year, and hovered between 30 to 33 percent thereafter. This represented an overall increase of about 20 percentage points from the 1971 base year.

In 1971 the safety belt usage rate in Sweden was about 15 percent. Beginning in 1971, the Swedish Government conducted several campaigns to increase safety belt use. These campaigns were organized by insurance companies, well-known leaders of public advocacy groups, school authorities, and others. The mass media campaigns used newspaper articles and radio and television information programs.

The first campaign was directed toward private companies to get belt users to influence nonusers. The campaign materials included a film and a company package, with suggestions for activities to be conducted within the firm. In addition, fact sheets and information material directed toward the police were produced.

In the second campaign, a figure was created called "The Belt Man." His task was to remind motorists about the safety belt and asked pupils for their help. The students were given identity cards and Belt Man badges. In each group an attempt was made to reach peer leaders, who could influence other members of the group.

The greatest effort was expended in the third campaign. It was primarily aimed at organizations and companies, but greater emphasis was placed on incentives and rewards. For example, a safety belt pin was given to those promising to use belts. Making use of radio, television, and the press, the campaign also incorporated what was called the "Bingo War." This program utilized bingo cards, where it was possible to win cars, TV sets, and other prizes. These cards were given only to people observed using their safety belts. It is estimated that these campaigns increased belt usage to 36 percent in 1974.

Sweden's mandatory safety belt law became effective in January 1975, and the British Government will make safety belt use mandatory starting in January 1983. After reviewing the foreign countries' data, NHTSA concluded that a usage rate in excess of 30 percent can be expected from a fully implemented voluntary safety belt usage program.

Experience gained from past campaigns
in the United States

The Oakland (Michigan) County Traffic Improvement Association conducted a 3-month media campaign, including some short-term education components. The program consisted of (1) print media such as bumper stickers and posters, (2) a slide show depicting local accident case histories and the value of safety belts in saving lives, and (3) proclamation of safety belt day and the distribution of pledge cards.

In evaluating the campaign's effectiveness in terms of increasing safety belt use, surveys were conducted at 30 carefully selected intersections within the county before and after the campaign. The results showed that driver belt usage increased from 17.5 percent to 20.8 percent. The 3.3-percentage point increase in belt users represented 16,500 more belt users among drivers.

In April 1977 Motorist Information, Inc., initiated a campaign in the Grand Rapids, Michigan, area to increase public understanding and awareness of the value of safety belts and to provide more positive attitudes toward safety belt usage. The initial campaign was for a 6-week period and utilized traditional mass media advertising such as television, radio, billboards, and newspapers. A theme "Somebody Needs You" was developed based on extensive motivational research.

This campaign was initiated as a precursor to a larger effort which was to follow. It was designed to determine whether or not a well-conceived and -executed media program could result in a significant shift in attitudes toward safety belt usage.

An evaluation showed that the reported use of safety belts (always or most of the time) went up from 29 percent to 41 percent, an increase of 12 percentage points. Also, the proportion of people who thought "always wearing a safety belt" was the most important item in a list of safe driving behaviors increased from 14 percent to 24 percent, or an increase of 10 percentage points.

A second campaign was conducted over a 9-week period in the fall of 1977 in southeast Michigan. Advertising included newspaper ads, outdoor billboards and bus posters, and television and radio spots. In addition, a public relations program, including a speakers' bureau and appearances on local radio and television shows, was initiated.

The final results of the 9-week program indicated that safety belt use increased from 12.4 percent to 16.8 percent, an increase of 4.4 percentage points. Initial usage and usage increases were greatest for (1) women, (2) higher socioeconomic drivers, and (3) drivers of newer vehicles.

NHTSA's January 1982 report concluded that while the overall success of this project was modest, it is clear that certain elements of the population were reached and affected more than others. Some communities doubled their belt usage rates. In one community, usage rates increased from 20 to 42 percent and in another from 11 percent to 25 percent.

Another campaign cited was conducted during the 9-month period from June 7, 1971, through March 5, 1972, by the Insurance Institute for Highway Safety which evaluated the effectiveness of using cable television messages to increase safety belt usage. In this study several television messages were developed and aired on one of two cables for a 9-month period. At least one spot was similar to those used in the British program. An average of more than 100 showings per month (or approximately 3 per day) was reported. Observations of persons in cable A areas (which received the messages) and in cable B areas (which received no messages) revealed no difference in belt usage rates. The researchers concluded that television messages, alone, had no effect on belt-wearing behavior.

Other studies NHTSA relied on extensively in designing its safety belt program

NHTSA officials told us they relied extensively on three studies that provided special information on attitudes, behavior, and factors affecting safety belt use and methods that could be used to increase usage in designing the agency's current safety belt program, namely:

- A 1980 study by the National Academy of Sciences.
- A 1977 study by Market Opinion Research, Inc.
- A 1981 study by Tarrance & Associates.

The Market Opinion Research study points out that there is an upper usage limit rate of 46 percent that probably can be achieved under a voluntary safety belt program. Details of the studies are discussed below.

National Academy of Sciences' study

Section 214 of the Surface Transportation Assistance Act of 1978 directed that the Secretary of Transportation enter into appropriate arrangements with the National Academy of Sciences to conduct a comprehensive study and investigation of methods of encouraging the use of safety belts by drivers of, and passengers in, motor vehicles, including, but not limited to, the use of various types of financial incentives and financial disincentives to encourage such use.

The Academy's study entitled "Study of Methods for Increasing Safety Belt Use" was issued in March 1980. Its principal conclusion--representing the views of a committee of experts--was that no single program is likely to work. The study concluded that a combination of different approaches will be needed to overcome public apathy or antipathy toward safety belts and to change safety belt behavior so as to increase both the number of safety belt users and the regularity with which belts are used. The Academy also indicated that attempts to induce people to use their safety belts have generally been too narrowly defined and have not been carried out as part of a consistent, comprehensive campaign.

The study pointed out six key strategies through which the Congress and Federal agencies could help mobilize a national commitment to safety belt use.

1. The States should enact child and youth occupant protection laws: The Federal Government should offer technical assistance and incentives, in grants or other forms, to States that pass laws requiring children up to age 18 to be properly protected while riding in motor vehicles or learning to drive them.
2. The Federal Government, in its own activities, should provide an example of compulsory safety belt use: Federal agencies should require and enforce on-the-job safety belt use by their own employees and should encourage belt use by employees at all times; proper occupant protection should be required of all persons working or living on military bases and of drivers and passengers in vehicles operated under federally funded programs.
3. States should make more productive use of the Federal assistance funds set aside for safety belt programs: The Federal Government should provide more detailed guidance to the States in the use of the 2 percent of their highway safety grant funds that is designated for safety belt programs.
4. The economic costs of not using safety belts should be identified and publicized among the groups that mainly bear those costs: The Federal Government should conduct studies that would specify the costs of nonuse of safety belts; such studies should begin within units of Federal agencies, and their results should be used to educate the public on how personal economic interests would be served by increasing the rate of safety belt use.
5. Employers should require on-the-job safety belt use by their employees: The Federal Government should develop and test (in its own agencies) model safety belt use programs that employers could adapt to their own circumstances. Employers should be made aware of the cost-saving potential of such programs, and insurance companies

should be encouraged to recognize, in their health and accident insurance rate structures, the lowering of risk that employer-operated safety belt programs might bring about.

6. Traffic crash injury and death should be recognized as a major public health problem: Because traffic crashes are one of the five leading causes of death, the Federal Government should involve its health agencies, as well as its traffic safety agencies, in safety belt programs.

The Academy's study indicated that, although past, one-shot media campaigns have had little influence on safety belt habits, media campaigns generally should not be considered valueless. The study stated that it is not known whether different kinds of campaigns might have been more effective. Also, it noted that different levels of effort, different time slots, and different messages might have produced different results.

Market Opinion Research, Inc.

Market Opinion Research, Inc., of Detroit, Michigan, conducted a survey for the General Motors Corporation on safety belt usage. The study entitled "An Analysis of the Factors Affecting Seat Belt Use," dated December 1977, indicated that the most significant factors affecting belt usage were:

- Attitude. People's feelings about the necessity of using belts, including their (misplaced) fear of being trapped by the belts in an accident.
- Interaction. The fact that people may or may not have been asked to wear safety belts by the driver or passenger.
- Perception. People's perception of the discomfort and inconvenience of the belt system.
- Structure. Those factors such as car size and belt types.
- Events. Special events that heighten motivation.
- Demography. Primarily education level.

The survey indicated that many belt users reported that they wore belts because they considered such usage to be a good habit, an exercise in good judgment, not because they fear being in an accident. Nonusers, on the other hand, reported that other safety features like an energy-absorbing steering column are adequate substitutes and that the odds of having an accident are slim enough to make it unnecessary to wear belts often. Also, some nonusers reported a deep-rooted fear of being trapped by belts in a car during an accident. Further, the report indicated that certain key events trigger a brief but higher state of belt usage for those who normally do not wear belts or do so occasionally.

The most frequently mentioned factor was adverse weather and another was when a new car is purchased.

The survey's overall statistics for belt users and nonusers showed:

| | |
|----------------------|------------|
| Confirmed belt users | 18 percent |
| Moderate belt users | 28 percent |
| Confirmed nonusers | 51 percent |

The survey concluded that of these three categories, a determined effort to change the behavior of "moderate" belt users to confirmed belt users would be the most promising goal of any strategies that could be devised. Based on a concentrated effort, the survey indicated that the moderate belt users (28 percent) might be shifted to confirmed belt users, or overall belt usage could rise to 46 percent of all drivers.

The survey included sampling both adults (18 years old and over) and adolescents. The adolescent age groups are defined as ages 15 to 17 and include those who are just beginning to drive or those who are taking driver training and those who may have recently become drivers.

The final maximum sample quotas were set at 1,500 adults and 500 adolescents. The national sampling frame of 240 sampling points was used to identify, down to the block level, the geographical distribution of interviews. This national sample is a probability-proportionate-to-size multistage, clustered sample of occupied dwellings based on the 1970 census and updated yearly by revised census estimates and by Market Opinion Research's own analyses and listing of sampled blocks. Based on 240 sampling points, an average of 6.25 adult interviews were to be obtained per cluster and 2.08 adolescent interviews. The distribution of completed interviews was 1,499 adults and 474 adolescents, totaling 1,973 interviews. In terms of reaching the designated household or a substitute household, the distributions for adults and adolescents were as follows:

| <u>Design</u> | <u>Percent of adult interviews</u> | <u>Percent of adolescent interviews</u> |
|---|--|---|
| Designated household with two callbacks | 65.3 | 60.9 |
| Residence next door | 15.0 | 10.0 |
| Next designated residence | 7.9 | 7.1 |
| Residence next door | 3.7 | 5.1 |
| Remaining designated addresses and substitutes | 8.1 | 16.9 |

V. Lance Tarrance & Associates study

V. Lance Tarrance & Associates in a study for NHTSA entitled "National Safety Belt Study," dated September 4, 1981, indicated that:

- A substantial majority of American adults, including significant percentages of those who infrequently wear safety belts, think that people in general should wear safety belts.
- Most American adults, including infrequent users, can give rational, factually correct reasons why people, including themselves, should wear safety belts.
- A good percentage of American adults are receptive to the idea of being persuaded to wear safety belts more often. About 60 percent of the adult population can be identified as a target group for increased safety belt use.
- The failure to wear belts is generally not a well-thought-out, cognitively justified behavior pattern.
- People do not wear safety belts for three major reasons: (1) they simply do not think about it when they get in their cars, (2) they feel the belts are too uncomfortable, and (3) they have a fear of being trapped by belts if involved in an accident.

The Tarrance study provided a breakdown of the various categories and percentages for safety belt users and nonusers. They are:

| | <u>Percent</u> |
|--------------------------------------|----------------|
| Frequent users--confirmed | 24 |
| Sometime users--likely to change | 25 |
| Infrequent users--likely to change | 22 |
| Sometime users--unlikely to change | 12 |
| Infrequent users--unlikely to change | <u>18</u> |

a/100

a/Does not add due to rounding.

The study concluded that the failure to use safety belts in a large segment of the American public is a behavior quite amenable to persuasive modification attempts. The weak justifications given for not wearing safety belts, the fact that respondents indicate that they should wear them, and the demonstrated change observed during the interview all lend themselves to the interpretation that actual behavior ("in the real world") should be quite susceptible to change. This is a positive interpretation.

The Tarrance study indicated that the survey was based on a national sample of 1,200 American adults drawn using statistically sound random sampling techniques, including 275 randomly generated telephone numbers. These 1,200 respondents were contacted by telephone and asked to respond to a 15-minute questionnaire. The study indicated that all respondents interviewed in this survey were part of a fully representative sample of the American adult population.

Tarrance-instructed personnel conducted the interviews, working from the company's own telephone bank in Houston, Texas. The mean number of calls attempted for each completed interview was 6.3, with a mean refusal rate of 1.2. Editing, coding, and computer processing of the data was done at Tarrance headquarters. The computer tabulations were produced by a private statistical analysis program.

NHTSA relied heavily on the Market Opinion Research and Tarrance & Associates studies in developing the issues to be addressed under its safety belt program. Our review of the methodology used by Market Opinion Research indicated that it followed sound techniques for assessing attitudes, and the study contained appropriate qualification where necessary. Although the Tarrance study was a less extensive effort compared with the Market Opinion Research study, the results of both studies were similar. Both studies are attitudinal surveys.

Attitudinal surveys, unless validated by observing subsequent behavior, are generally a weak basis for predicting future actions. As noted by Patricia J. Labaw in her book "Advanced Questionnaire Design" (Abt Books, Cambridge, Massachusetts, 1980):

"* * * from the point of view of predictive polling, most respondents cannot imaginatively put disparate pieces of information together into new patterns and then imaginatively visualize what their behavior would or would not be in response to this hypothetical information. This is why so called measurement of attitudes by polls is ultimately so fruitless and puzzling to policymakers and so hazardous to people whose future depends on the predictability of such polls."

Often there is a gap between what people say and what they ultimately do and this is a realization that must be accepted when designing programs to alter behavior that is justified, at least in part, by attitudinal surveys.

A second source of input documented by NHTSA concerns the conclusions of a committee of experts representing the insurance and automotive industries; Federal, State, and local governments;

and safety associations. This committee was convened by the National Academy of Sciences, as noted earlier. The committee's principal conclusion about efforts to increase safety belt use is that no single program is likely to work. Rather, according to the committee, it will take a combination of approaches to increase the number and regularity of safety belt users. The committee report documents the first point--that single programs are not likely to work. However, the second point concerning the need for combined approaches is apparently a consensus opinion growing out of the full committee's four meetings.

PROGRAM GOAL FOR INCREASED SAFETY BELT USE

The safety belt program's stated objectives are to (1) increase the awareness of the risk of being involved in a crash and of the dynamics of a crash, (2) increase the understanding of the benefits of safety belts, and (3) provide assistance to organizations and corporations willing to promote safety belt use. However, NHTSA had not specified the increased belt usage expected to be achieved under the program or the time frame and associated costs needed to achieve such increase.

Although progress in achieving the program's stated objectives could be measured to provide NHTSA with useful information, we believe that a goal which specifies an increased safety belt usage rate to be achieved, along with the time frame and related costs to achieve and maintain such rate, would be helpful in monitoring the progress and effectiveness of the program. This information could alert management to the need to modify the program and/or consider other alternatives that might be more efficient and economical.

NHTSA's files contained information indicating that it believed a comprehensive safety belt program had the potential for attaining a usage rate in the range of 30 to 35 percent. In May 1981 NHTSA provided guidance to its regional offices and States on obtaining program effectiveness for occupant protection (includes safety belts) activities. The guidelines state that usage rates up to approximately 30 to 35 percent should be attainable with a comprehensive program involving public information, education programs, and organizational regulation efforts (plus distribution programs in the child restraint area). In addition, NHTSA's January 1982 report on "Effectiveness and Efficiency of Safety Belt and Child Restraint Usage Programs; The Safety Potential of Safety Belts, Child Restraints, and Programs To Promote Their Use" states with respect to the effectiveness of a fully implemented, voluntary usage program that:

"For each one percent increase in usage on a national basis, NHTSA currently estimates over 180 lives would be saved per year. A savings of 4,400 lives and avoidance of 87,000 moderate to critical injuries could be achieved with only

a 35 percent usage rate, well within the range of voluntary usage achieved in other nations."

NHTSA's draft evaluation plan which indicated that each network operational plan will be reviewed early in its development by the network leader and the evaluation staff to determine (1) the specifics of the administrative evaluation and (2) if any one or more of the proposed activities would be appropriate for an impact level evaluation. If a determination were made that an impact evaluation might be warranted, then the evaluation staff, in cooperation with the task force staff, would develop a detailed impact evaluation plan and submit it to management and the networks for their approval. In addition, a number of special safety belt projects at the State and/or community level would be scheduled for impact evaluations.

Although NHTSA finalized its evaluation plan on January 3, 1983, we did not have an opportunity to determine its adequacy for providing management information on the safety belt program's impact in achieving its goals to (1) increase the awareness of the risk of being involved in a crash and the dynamics of a crash, (2) increase the understanding of the benefits of safety belts, and (3) provide assistance to organizations and corporations willing to promote safety belt use. The Acting Director, Office of Occupant Protection, told us that the agency will continue to gather information on the public's use of safety belts through various observational surveys.

COSTS OF SAFETY BELT PROGRAM

During the House appropriation hearings in March 1982 on the 1983 budget, NHTSA reported that the safety belt contract funding requirements for fiscal years 1981 through 1983 amounted to about \$9.7 million. At our request, NHTSA developed estimated costs for certain other items. These items included salary, travel, administrative expenses, and section 402 grant moneys made available to States for highway projects promoting safety belt use. NHTSA estimated that the 3-year funding requirements for these items amounted to about \$17.5 million, or a total of \$27.2 million for the safety belt program for fiscal years 1981 through 1983.

A breakdown of funding requirements for the safety belt program follows.

Funding Requirements for the Safety Belt Program

| <u>Program activity</u> | <u>Fiscal years 1981 and 1982</u> | <u>Requested funds for fiscal year 1983</u> | <u>Total</u> |
|--------------------------|-----------------------------------|---|---------------------|
| Networks | \$3,474,000 | \$ 340,000 | \$ 3,814,000 |
| Mass media | 1,645,000 | 850,000 | 2,495,000 |
| Evaluation | 620,000 | 336,000 | 956,000 |
| Research and development | 1,250,000 | 1,150,000 | 2,400,000 |
| Salaries | 1,578,248 | 1,657,291 | 3,235,539 |
| Travel | 130,000 | 93,750 | 223,750 |
| Administrative expenses | 315,648 | 331,458 | 647,106 |
| Section 402 grants | <u>8,600,000</u> | <u>4,800,000</u> | <u>13,400,000</u> |
| Total | <u>\$17,612,896</u> | <u>\$9,558,499</u> | <u>\$27,171,395</u> |

The funding requirements shown for the networks, mass media, evaluation, and research and development are amounts which NHTSA programmed for those activities. They total \$9.7 million for the 3-year period. NHTSA estimated salaries, travel costs, and administrative expenses based on the number of employees known to have worked on the safety belt program at different periods since its inception in 1981. The amount of time these employees spent on the program was estimated. To assure that expenses incurred by all DOT employees were included, NHTSA added 25 percent to its initial salary and travel cost estimates. Administrative expenses were estimated to be 20 percent of the adjusted salary costs. The section 402 grant moneys shown as committed to projects promoting safety belt use were derived by NHTSA from highway safety plans submitted by States. Because of time constraints imposed by the request, we were unable to verify the accuracy and reliability of these estimates.

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In July 1982 NHTSA completed a preliminary report on its study of the economic costs to society of 1980 motor vehicle accidents. In that draft report, NHTSA estimated that in 1980 there were 28 million accidents, resulting in the death or injury of roughly 4 million persons and damage to nearly 48 million vehicles. NHTSA estimated the economic costs to society at \$56.8 billion. These costs are shown in the table on the following page.

Societal Costs of Motor
Vehicle Accidents in 1980

| <u>Description</u> | <u>Amount</u> |
|--------------------|---------------|
| | (billions) |
| Property damage | \$20.6 |
| Lost productivity | 14.2 |
| Insurance: | |
| Motor vehicle | \$13.7 |
| Medical | <u>0.1</u> |
| Legal and court | 13.8 |
| Medical | 3.9 |
| Other | 3.3 |
| | a/ <u>1.0</u> |
| Total | <u>\$56.8</u> |

a/Includes \$8.6 million for coroner-medical examiners; \$63.7 for public assistance administration; \$335.8 million for government motor vehicle safety programs; and \$570.5 million for emergency costs, such as police, fire, and emergency medical services.

NHTSA's preliminary report states that the purpose of presenting these costs is to place in perspective the tragic losses resulting from motor vehicle crashes and to provide information for Government and private sector officials to use in structuring programs to combat these needless losses. Also, NHTSA indicated that these numbers are inappropriate for use in placing a dollar value on human life or injury. Further, NHTSA indicated that whether society should spend more or less than these amounts to avoid such injuries or fatalities is a moral judgment which only society itself can make through the passage of legislation and through guidance to its elected officials.

CONCLUSIONS

The voluntary safety belt program developed by NHTSA has an overall goal to increase belt usage thereby reducing fatalities and injuries. NHTSA's safety belt program strategy contemplates using education, financial and other incentives, employer use policies, and various mass media activities as an inducement to increase the use of safety belts. Any observed increases over the short term may or may not have significant impact on long-term safety belt use. If the level and intensity of the various programs are not maintained over a long period of time, the short-term behavioral changes observed may be erased. Even if the programs are maintained at the same level, long-term changes could deviate substantially from the shorter term results.

NHTSA's stated objectives of the safety belt program are to (1) increase the awareness of the risk of being involved in a crash and the dynamics of a crash, (2) increase the understanding of the benefits of safety belts, and (3) provide assistance to organizations and corporations willing to promote safety belt use. Progress in achieving these objectives could be measured to provide NHTSA with useful information. However, congressional and private sources have questioned whether past safety belt campaigns were successful in increasing safety belt use and whether NHTSA's safety belt program is well conceived or well designed.

AGENCY COMMENTS AND OUR EVALUATION

In our draft report, we proposed that the Secretary of Transportation direct the NHTSA Administrator to specify the increased safety belt use expected to be achieved by implementing NHTSA's safety belt program, along with the time frame and related costs to achieve and maintain such increased use.

In commenting on this report (see app. VII), DOT stated that NHTSA has not specified the safety belt use expected to be achieved under the program because NHTSA simply cannot predict with any degree of reliability how successful the program will be at this time. DOT stated that NHTSA's approach to implementing the safety belt program is similar to that used for Federal public health programs relating to smoking and high blood pressure. According to DOT the approach used in those programs has been to first increase the people's awareness of the problem and to get them to recognize that they are not immune to their potential effects. Second, according to DOT, those programs provided the public several different approaches it could use or actions it could take to modify their behavior. Finally, DOT stated that as a part of these programs, the public was provided several different messages to reinforce its resolve to behave in the appropriate manner.

DOT stated that from an evaluation standpoint, NHTSA has several levels of activity underway to determine program impact. DOT's position was that NHTSA should be allowed to monitor and evaluate the results of various program elements now being implemented with respect to (1) changes in the levels of public knowledge about vehicle accidents, (2) attitudes toward safety belt use, and (3) changes in levels of observed national safety belt use. DOT stated that, at a later stage of the program, information from these evaluation efforts should permit NHTSA to make some predictions about the safety belt use to be achieved. Although DOT was reluctant to specify the safety belt use to be achieved at this time, it believed that the program was founded on sound research and experience gathered in numerous cases nationwide, and it was confident that the program will be successful.

The evaluation efforts that DOT states NHTSA is conducting with respect to public knowledge, attitudes, and actual safety belt use are commendable. However, we believe that NHTSA should specify at the beginning of the program the increased safety belt use to be achieved so that the program's progress and effectiveness may be properly monitored. The information obtained by NHTSA from its ongoing evaluation efforts could be used by the agency to later revise, as appropriate, the rate established for increased safety belt use expected to be achieved by the program. Also, such information as it relates to NHTSA's ability to increase safety belt use through the program's implementation would help the Congress in performing its oversight function, particularly with respect to determining future years' funding levels.

We noted that the Committee of Conference in its December 13, 1982, report on DOT's and related agencies' fiscal year 1983 appropriations directed NHTSA to immediately refrain from obligating additional operations and research funds for new contracts relating to the safety belt program until NHTSA specified the increase in safety belt use expected to be achieved by the program, the time frame in which that goal will be accomplished, and the estimated out-year costs necessary to maintain belt use at that level. NHTSA was not to obligate such funds for the program until both the House and Senate Appropriations Committees approved written agency submissions describing how this condition had been met.

In its March 2, 1983, responses to the Appropriations Committees, NHTSA stated that the aggregate effect of the program now planned should result in a national safety belt usage level in the range of 25 percent in the next 3 years. NHTSA stated that the out-year program costs, as justified in the President's fiscal year 1984 budget should not exceed \$2.6 million. Also, NHTSA stated that the proportion of Federal grants directed by the States to safety belt and child safety seat activities is expected to reach \$5 million in fiscal year 1983, with a gradual increase in future years.

We believe that these actions generally are responsive to our proposal and should provide NHTSA a basis for monitoring the program's progress and effectiveness.

CHAPTER 3

EFFORTS TO IMPLEMENT THE SAFETY BELT PROGRAM

As of January 1983 the program was not fully operational. Numerous groups, organizations, associations, private companies, and Government agencies that make up NHTSA's eight basic networks had agreed to participate in the program. NHTSA will depend on these networks to conduct education and incentive programs and adopt use policies to promote the use of safety belts and child safety seats. Mass media activities conducted under the program had been limited essentially to domestic and foreign automobile manufacturers sponsoring spots on radio and television to explain the benefits of wearing safety belts and to promote their use.

Our review showed that NHTSA needs to give further attention to the following issues relating to the program's implementation:

- Research designed to provide information to program participants on the benefits and ways to conduct incentive programs and adopt mandatory use policies.
- Development and implementation of DOT's portion of the mass media segment of the program.

HEAVY RELIANCE ON VOLUNTARY PARTICIPATION BY THE PUBLIC AND PRIVATE SECTORS

NHTSA developed the following eight basic networks to help implement its safety belt and child safety seat program:

- Educators.
- Civic, service, and safety groups.
- Medical, physician, and child restraint groups.
- Automobile dealers and manufacturers.
- Private employers.
- Government employees.
- Military.
- Law enforcement and emergency medical services.

The typical sequence of events NHTSA followed to enlist the aid of the numerous groups, organizations, associations, private companies, or Government agencies that comprise a network is to:

- Contact national level or corporate executives, mutually develop an action plan, and obtain a commitment to participate.
- Enter into a contract or agreement to specify the terms and conditions for activities to be conducted by regional, State, and/or local charters or other organizational levels.
- Package, reproduce, and distribute appropriate models or kits of audiovisual and printed materials.
- Coordinate with NHTSA regional and State safety offices to follow up on and help in networking activities at the State or local levels.

In May 1982 NHTSA developed a plan that identified audiovisual and printed materials which it believed were needed to support the education portion of its safety belt campaign to be carried out by the networks. That plan, which was approved by the Secretary of Transportation on August 4, 1982, calls for (1) duplicating nine films, seven brochures, two booklets, and three posters and (2) developing and duplicating four variations of a slide show and 10 network curriculum packages. A summary of the materials to be duplicated for the various networks and their estimated costs are shown in the following table.

Estimated Costs of Audiovisual and Printed
Materials To Be Duplicated for Distribution by
the Networks

| <u>Description</u> | <u>Number</u> | <u>Unit price range</u> | <u>Estimated costs</u> |
|--------------------|---------------|-----------------------------|----------------------------|
| Films and slides | 66,750 | \$7.00 to \$45.00 | \$1,163,750 |
| Brochures | 2,356,000 | 0.05 to 0.70 | 456,650 |
| Posters | 602,000 | \$0.40 | 240,800 |
| Guides | 90,000 | 1.50 | <u>135,000</u> |
| Total | | | <u>\$1,996,200</u> |

NHTSA provided us the general status of and plans for its networks, and the information is presented in appendix VI. To offer further insight into NHTSA's efforts regarding (1) the establishment of a mandatory use policy for Federal employees, (2) research on financial and other incentives and use policies, and (3) the complexity of obtaining the participation of one network in the program, the Government employees and private employers networks and the Boy Scouts of America (a component of the civic, service, and safety network) are discussed below.

Government employees

NHTSA views safety belt use policies as a potentially powerful technique for increasing safety belt usage by employees of private companies and the Federal Government. In its March 1980 report the National Academy of Sciences suggested that the Federal Government should provide an example of compulsory safety belt use and should require and enforce on-the-job safety belt use by its employees. The report also noted that some units of the Federal Government had voluntary safety belt programs and that safety belt regulations applied in DOT and the General Services Administration. However, the Academy's report stated that there was little enthusiasm for enforcing the regulations.

NHTSA recognized in its September 4, 1981, safety belt program implementation plan that the Federal Government should serve as an example to private industry in setting safety belt usage policies. That plan as modified in February 1982 included the following objectives for its Government employees network:

- Establish a NHTSA policy on safety belt use.
- Re-establish DOT's policy on safety belt use.
- Encourage other Federal agencies to establish safety belt use policies and conduct campaigns to increase their employees' use of such belts.

NHTSA's achievements as of mid-August 1982 regarding these objectives and its plans for future activities are discussed below.

NHTSA's mandatory safety belt use policy

To prepare the agency's employees for a mandatory safety belt use policy, the NHTSA Administrator arranged a briefing that was presented on six occasions between November 2 and 13, 1981, by NHTSA's Deputy Administrator and the responsible co-manager of the safety belt task force. The briefings concerned (1) the effectiveness of safety belts in reducing fatalities and serious injuries and (2) the agency's ongoing campaign to increase safety belt use nationwide. According to the NHTSA safety belt task force member responsible for the Government employees network,

most, if not all, of NHTSA's headquarters employees attended a briefing session.

On December 15, 1981, NHTSA established a mandatory safety belt use policy for its employees when they ride in motor vehicles while on official Government business. NHTSA's stated objectives for this policy are threefold:

- To reduce the likelihood of injuries and fatalities resulting from crashes involving agency employees.
- To aid other Federal and State efforts to encourage the public to use safety belts.
- To demonstrate to the public that NHTSA's position and internal policies regarding safety belt use for employees are consistent.

That policy provides that any NHTSA employee using a motor vehicle for official Government business and not wearing a safety belt will be subject to disciplinary and/or adverse action in accordance with established NHTSA personnel procedures. The Administrator issued guidelines on February 3, 1982, to supervisors for implementing the agency's safety belt use policy. In those guidelines, the Administrator stated that while it was not his intention to focus exclusively on the punitive aspects of the policy, there was a need to point out a reasonable penalty for employees and supervisors who fail to comply.

Supervisors are required to write a performance standard for each employee that addresses compliance with the order. They are instructed to (1) issue letters of admonishment or reprimand--for failure to comply with the order in those incidents where it is obvious that an employee did not use the available belt system while on official business--after obtaining technical concurrence of the Director, Office of Personnel, or designee or (2) issue memorandums of appreciation to recognize situations where use of the available belt system avoided injuries, as appropriate. This information must be considered at the time of the performance rating for both the employee and the supervisor.

DOT's policy on safety belt use

On July 26, 1974, DOT established a policy on the use of safety belts by all DOT employees. DOT's policy includes the following provisions:

- "Each seated occupant of a moving motor vehicle which is in use on official DOT business shall properly utilize the complete occupant restraint system provided.

--"Each seated occupant of all motor vehicles, regardless of ownership, shall be encouraged to utilize properly the complete occupant restraint system provided while moving on property which is owned or leased by the Office of the Secretary or the operating administrations, including parking areas.

--"All DOT personnel shall be encouraged, on a continuing basis, to utilize properly the occupant restraint system available in any moving motor vehicle, regardless of ownership, while engaged in personal business."

DOT's Assistant Secretary for Administration and the heads of operating administrations (Federal Highway Administration, Coast Guard, Federal Aviation Administration, Federal Railroad Administration, NHTSA, Urban Mass Transportation Administration, Saint Lawrence Seaway Development Corporation, and Research and Special Programs Administration) and other organizational components are responsible for establishing and implementing programs to ensure compliance with the policy.

In a July 13, 1982, memorandum to the heads of the operating administrations, assistant secretaries, and regional representatives, the Secretary of Transportation stated that:

"* * * the question is often asked, what is being done within DOT to improve belt use? Thus, the Department needs to demonstrate its commitment to safety belts."

* * * * *

"DOT employees have been encouraged to use safety belts through the policy expressed in DOT Order 3902.5 of July 1974. I endorse that policy, and ask that you revive the program within your organization. * * * NHTSA * * * offered to assist with an educational program to encourage safety belt use by your employees. * * * [It] can provide audiovisual and print materials, speakers, and background information to assist you in this effort."

NHTSA's plans for increasing use of safety belts within DOT has as its goal to have each operating administration:

1. Conduct educational programs on effectiveness of safety belts and probability of being in an accident.
2. Issue a policy directive based on DOT's safety belt policy and similar to NHTSA's policy.

3. Have agency heads or top management officials take the lead in wearing their safety belts and promoting belt use.
4. Over time, and at appropriate intervals, remind employees of the need to use safety belts.

NHTSA had not established a target date for achieving that part of the goal to have each operating administration issue a safety belt policy. However, as a result of a briefing given by NHTSA representatives to DOT officials on November 5, 1981, the Coast Guard on its own initiative issued an instruction on May 5, 1982, to mandate the use of occupant restraint systems by Coast Guard personnel when driving or riding in motor vehicles on official business.

Regarding its goal to help the operating administrations conduct education programs, NHTSA planned to prepare an instructional kit of appropriate films, suggested presentations, sample print materials for handouts and posters, and resource materials in coordination with DOT's Safety and Health Officer during September and October 1982, and

- conduct demonstration on how to use kit for all modal safety and health officers (mid-November 1982) and
- distribute kit to modal safety and health officers and provide technical assistance (early January 1983).

During February/March 1983, NHTSA also plans to complement the above with a 1-week exhibit in the lobbies of DOT's headquarters. The exhibit is to consist of a static display along with continuous loop movie projector showing films that demonstrate the effectiveness of safety belts.

Other Federal agencies

NHTSA's objectives as revised in February 1982 for this segment of the program called for, among other things, the following tasks to be completed relating to conducting a campaign to increase safety belt usage by Government employees:

- Send letter from Secretary of Transportation to the Secretaries of the Departments of Defense, Health and Human Services, and Labor (DOL) asking for their help.
- Plan Government-wide program with the Occupational Safety and Health Administration (OSHA), DOL.
- Send a letter from the Secretary of Transportation to agency heads asking them to establish policy and conduct campaigns.

- Distribute film and print materials to agency safety officers with suggestions on how to present the materials.

According to a June 24, 1982, memorandum from the NHTSA Administrator to the Secretary of Transportation, NHTSA staff members had explored with officials in the Departments of Defense, Health and Human Services, and Labor their interest in helping to promote the use of safety belts. Those officials reportedly expressed a willingness to participate. On July 13, 1982, the DOT Secretary wrote to the Secretaries of these Departments asking for their help. NHTSA began working with OSHA officials about this same time.

A draft plan provided to us on August 16, 1982, described DOL's and DOT's goal to increase safety belt usage among Federal employees. A meeting was held on September 1, 1982, between the Deputy Administrator, NHTSA, and the Deputy Assistant Secretary for Safety and Health, DOL, to approve the plan's implementation concept. Each Federal agency's comprehensive program is to have five elements.

- A well-publicized safety belt mandatory use policy.
- Management (i.e., agency heads, assistant secretaries, administrators, office directors, and supervisors) must set the example and insist when accompanied by other agency employees that all employees buckle up before the vehicle's engine is started.
- An ongoing effort to educate employees about how safety belts work, their effectiveness in reducing fatalities and injuries, and the risks of being in an accident.
- Provide incentives and enforcement.
- Reinforce the safety belt program by conducting repeated campaigns, contests, and surveys using posters and handouts at appropriate intervals.

The plan describes the general strategy for its implementation. First, in a joint letter from the Secretaries of DOL and DOT, all agency heads will be asked to implement a comprehensive safety belt use program within their agency. At the time of our review, NHTSA anticipated that this letter would be sent out in early November 1982. Program materials and technical information was to be distributed about mid-January 1983 directly to agency safety and health officials in the Washington, D.C., area in sufficient copies (less "handouts" and films) for distribution throughout their Washington and field offices. Federal agency heads were to be asked to send their safety and health managers to a half-day workshop in early December 1982 to obtain guidance on how their individual agency programs should be implemented and how to obtain materials. Program materials, technical information and films will be distributed through OSHA's regional offices to

the 89 field Federal Safety and Health Councils. The councils will hold workshops in mid-January 1983 on use of the materials and will lend the films to agency field installations.

Also, according to the Acting Director, Office of Occupant Protection, NHTSA planned with the Department of Defense to conduct a workshop series on both alcohol and safety belts.

NHTSA's efforts to encourage Federal agencies to adopt safety belt use policies and conduct programs promoting the use of safety belts should be helpful in increasing Federal employees' use of safety belts.

Private employers

The private employers network offers great potential for significantly increasing safety belt usage. NHTSA had awarded research contracts to obtain information for use in convincing private employers that establishing safety belt use programs, including incentive programs and mandatory use policies, could be to their economic advantage and contribute to their employees' general welfare and safety. However, all of the results had not been received at the time of our review.

The National Academy of Sciences, in its March 1980 report, urged NHTSA to initiate more efforts to encourage employers to promote the use of safety belts by their employees. As a result, NHTSA awarded a \$76,220 cost-plus-fixed-fee contract on September 24, 1980, to Pabon, Sims, Smith, and Associates, Inc., to assess the costs incurred by employers because their employees were not wearing safety belts when accidents occurred. The contract's originally scheduled completion date was September 24, 1981. Modifications to expand the scope of work by adding five employers to the project and to obtain input from the National Safety Council subsequently increased the total cost of the contract to \$105,818. In a July 1982 report on the results of its work, the contractor provided a set of case studies and information on both the direct and indirect employers' costs associated with employees not wearing safety belts. A manual was also provided which was designed to enable employers to calculate their costs of employees' failure to wear safety belts.

An example follows of the cases prepared for the study to show the potential for employers to reduce their costs from employees who are wearing their safety belts when involved in motor vehicle accidents.

Comparison of Results of Employees Wearing and
Not Wearing Safety Belts When Involved in Collisions

| <u>Factors</u> | <u>Not wearing safety belt</u> | <u>Wearing safety belt</u> |
|----------------------|---|--|
| Driver | Male operations supervisor for a large electric utility company | Male construction technician for State Department of Transportation |
| Vehicle | 1980 Dodge Aspen | 1974 Ford pickup truck |
| Speed | About 35 miles per hour | About 35 miles per hour |
| Accident description | Struck by 1977 Plymouth at 35 miles per hour on driver's side | Struck on driver's side by 1979 Chevrolet truck that crossed the center line while traveling in the opposite direction |
| Injuries | Four broken ribs, 3-inch laceration on left side of head, broken left femur | Sore ribs on left side |
| Injury level | AIS-2 | AIS-1 |
| Time lost from job | 7 months | 14 hours |
| Employer's costs: | | |
| Medical/hospital | \$11,933 | \$ 45 |
| Salary continuation | 16,392 | 111 |
| Indirect estimate | <u>28,325</u> | <u>155</u> |
| Total | <u>\$56,650</u> | <u>\$311</u> |

A May 1982 modification to this contract increased its cost by \$69,808 to a total of \$175,626. The modification calls for the contractor to test the effectiveness of several employer programs that might include such things as education, financial incentives, and strictly enforced mandatory use policies. This effort was scheduled for completion in December 1982.

Another study relating to safety belt use policies--conducted outside of the Federal Government--was performed by the Highway Safety Research Institute, University of Michigan. That study, published in "The HSRI Research Review" for November-December 1981, was conducted to investigate the various direct costs borne by the State of Michigan as a result of traffic accidents.

A third study was being conducted by the Virginia Polytechnic Institute and State University under a \$111,415 costsharing contract (Government share, \$92,000) to develop model incentive programs to encourage employees of large industries to use safety belts. The contract was awarded on June 1, 1981, with an anticipated completion date of June 1, 1982. That completion date was extended to December 31, 1982. NHTSA also had information on incentive programs conducted by others, including Berg Electronics, General Motors Corporation, and the University of North Carolina's Highway Safety Research Center.

NHTSA is aware that actions are needed to make its activities in the private employers' network more effective. In a May 21, 1982, memorandum to the Safety Belt Task Force members, the Acting Director, Office of Occupant Protection, stated that:

"* * * Although we have contacted many large corporations and have been successful in receiving assistance, we have merely scratched the surface in stimulating the dedication of corporate resources to occupant restraints and fostering use policies within the corporations themselves. Obviously, this agency will soon become bogged down and become ineffectual by trying to do too much ourselves. We therefore must develop a framework to utilize the talent and energy of others as well. The important questions to be addressed include what specific information must we, or others, be armed with in order to be impressive to corporations (like case histories regarding corporate incentives and use policies, and the economic loss associated with traffic accidents) and how do we reach them * * *." (Under-scoring supplied.)

In a subsequent June 2, 1982, memorandum to a corporate working group (established by that memorandum), the Acting Director summarized activities that had been or would be developed to support the employers' networking activities and made those activities more effective. The corporate working group was assigned the task of developing specific recommended plans for consolidating the information developed or being developed under contracts and developing a delivery system for that information.

On July 9, 1982, NHTSA issued a request for proposal that called for offers to develop an employee safety belt kit that will contain readily available cost-effective materials for employers to use in implementing programs that will educate and motivate employees to use safety belts. According to the Acting Director,

this contractual effort is designed to, among other things, package the results of earlier NHTSA contracts or others' efforts on economic costs and incentives for ready reference by employers interested in establishing safety belt programs for their employees. The request for proposals stated that:

"Initial contacts with business executives in a wide variety of fields have resulted in tremendous support for the principle of the Administration's safety belt use campaign. The vast majority of firms contacted to date are ready and anxious to implement programs to train and motivate employees to use automotive safety belts and child safety seats. Most firms, however, lack the technical resources to design individual programs."

The proposal specifically would require the contractor to:

- Design and write a handbook that employers can use to educate employees, outside groups and organizations, and school children about safety belt use.
- Develop a curriculum that includes information on costs of accidents, dynamics of a crash, the public health dimensions of the problems (i.e., the number of deaths and injuries), the effectiveness of safety belts, and the function and mechanical workings of safety belts.
- Suggest ways in which employers can enhance the educational program with additional, supplemental, and promotional materials, such as using posters around their facilities sponsoring events, including "safety belt week," and on-going incentive programs; and developing a company safety belt use policy, using examples of enforcement policies and sanctions for nonuse.
- Develop a program for maximizing visibility of companies' participation and enhance their public image by providing sample press releases and ways to conduct community outreach activities.
- Prepare a catalog containing a brief description of items that may be ordered from NHTSA or other Government or non-Government organizations, arranged by type of material (i.e., posters, brochures, and films) and including, where appropriate, prices, sizes, limitations on quantities, and limitations on reproductions.

The contract was awarded September 29, 1982. The requested work was to be completed by November 28, 1982.

We did not attempt to evaluate the quality of the contracts' results to date; however, the Acting Director, Office of Occupant Protection, told us that the information developed will be used extensively by NHTSA in its private employer networking activities.

He also told us that NHTSA should have a private employers program implemented early in 1983. A plan being developed in October 1982 by the corporate working group in response to its mandate from the Acting Director will document the strategy. According to the Acting Director, the plan will provide for pretesting of any materials to be developed for employers and will depend heavily on intermediaries to implement the private employers networking programs.

Boy Scouts of America

The Boy Scouts of America is 1 of about 30 groups or organizations that make up the civic, service, and safety network. There are nearly 130,000 local units (packs, troops, and posts) in 410 councils (representing major metropolitan areas) of the Boy Scouts that provide an audience of more than 4,250,000 scouts and scout leaders. In October 1981 NHTSA representatives briefed staff members of the Chief Scout Executive of the Boy Scouts in its national office in Dallas, Texas, on the safety belt program. In a November 24, 1981, letter to NHTSA, the Chief Scout Executive stated that the Boy Scouts would be willing to offer the materials developed for the education portion of the program to local councils and units on a request basis. They also agreed to print articles promoting safety belts in their national periodicals.

However, the Chief Scout Executive stated that the national office would not be able to maintain records on the number of Boy Scout participants or the nature of the program activities carried out through that office. The NHTSA network representative told us that the agency will seek the information which it needs for evaluation directly from the scout participants.

With the cooperation of the Boy Scouts' National Director, Health and Safety Service, NHTSA developed an Audio-Visual and Resource Kit for educating scouts about safety belts. The kit contains materials that illustrate three major concepts:

- The dynamics of a crash.
- The effectiveness of safety belts.
- The myths and misconceptions related to the use of safety belts.

These are the primary concepts that scouts as well as others need to know before making a decision about using safety belts. The kits include six films and a number of brochures and pamphlets.

NHTSA expects to reach the majority of the scouts and their leaders with its safety belt message over a 3-year period. The agency suggests that the kit be used in an educational program for the following scout activities:

- Camp staff training.
- Scout campers.
- Council headquarters activity.
- District roundtables.
- Scout troop, cub pack, and explorer post meetings.
- Courts of honor.
- Scout shows.

NHTSA's approach to maximizing the potential of the Boy Scouts is to participate in as many of its activities as possible to get scout officials interested in the safety belt campaign. NHTSA personnel attended the Boy Scouts' National Council Meeting held in Atlanta, Georgia, in May 1982. This meeting was attended by top executives of the Boy Scouts from 38 States. NHTSA records showed that the council executives ordered 274 audiovisual kits during that meeting.

From May 22, 1982, through June 26, 1982, the Boy Scout headquarters conducted 12 1-week National Camping Schools. Approximately 2,000 scout leaders participated in a 1-hour safety belt program to provide an awareness of the importance of wearing a safety belt in camp vehicles for personal safety and of setting an example for campers and leaders. The participants were given an opportunity to order an audiovisual kit for use in precamp training sessions, precamp staff training, and Camp Scoutmaster Roundtable meetings. The NHTSA representative responsible for scout activities stated that 104 audiovisual kits were provided to them for distribution at those 12 schools. NHTSA is hopeful that during 1983 a segment on safety belts can be incorporated into the training program of all such camping schools.

In the near future NHTSA expects to continue its efforts to have more scout leaders, scouts, and the public participate in its safety belt program through use of the initially prepared 500 audiovisual kits as well as 500 additional kits and other materials to be developed. The agency plans to continue to make contacts with the scout community to generate interest in its kits and other materials by having its headquarters and regional personnel attend major scout functions such as the shows and expositions held each year in the spring and fall and provide safety belt exhibits. For example, in the fall of 1982, the Boy Scouts' six regions will hold meetings. NHTSA personnel want to attend as many of those meetings as time and resources allow.

In addition, NHTSA plans to begin in the fall of 1982 a safety belt program in cooperation with selected scout councils. That program is to be comprised of two curriculums--one for Cub Scout packs and another for Boy Scout troops. NHTSA ordered

10,000 copies of "3 SECONDS TO SAFETY: An Instructional Reading Program About Seat Belts for Grades Three to Six" for distribution by the various councils, as requested, to Cub Scout packs. This program is designed to educate youths in this age bracket about safety belts by having them perform several activities to make them more aware of the importance of using safety belts and to differentiate between fact and fiction concerning safety belt use. According to the Acting Director, Office of Occupant Protection, as of October 1982, the curriculum for Boy Scouts (ages 11-18) was expected to be developed within several months.

MASS MEDIA PORTION OF SAFETY BELT CAMPAIGN

NHTSA's multifaceted safety belt campaign provides for the agency and private industry (primarily automobile manufacturers) to conduct mass media activities to reinforce the educational, incentive, and use policy efforts. We believe that the success of this portion of the campaign will depend largely on:

- The quality, duration, and extent of exposure of the public service materials to be developed for NHTSA under a contract.
- The number, content, and timing of paid spots on radio and television and related activities conducted by private industry.

NHTSA's mass media activities have been limited essentially to domestic and foreign automobile manufacturers voluntarily sponsoring spots on radio and television and in the printed media (sometimes as a part of normal advertising) that (1) explain the benefits of wearing safety belts or (2) promote their use. The number, content, and timing of these spots have been determined by the automobile manufacturers. NHTSA has also awarded a contract for (1) the development of public service advertising for radio, television, and newspapers and (2) the performance of activities to enhance the placement of those materials, once developed, with the mass media to be aimed at general audiences. Some materials will be directed at smaller audience segments and professional and commercial groups.

NHTSA views the mass media portion of its safety belt use campaign as a reinforcer to the more powerful combination of education, incentives (such as cash or other prizes), and use policy efforts being pursued through the network portion of that campaign. According to NHTSA, mass media efforts involving radio, television, and printed materials may be used to make the public aware of the problems associated with its not wearing safety belts, thereby enhancing the effectiveness of other efforts. NHTSA recognizes that mass media efforts alone cannot, under most conditions, be expected to result in dramatic increases in voluntary usage rates.

Mass media contract

On December 9, 1981, NHTSA issued a request for proposal (RFP) for a number of tasks to be performed relating to the design and production of public service materials and performance of activities to enhance placement of the materials in news and entertainment media so as to aid in increasing the voluntary use of safety belts by the American public. The RFP provided that offers had to be submitted to NHTSA by January 19, 1982. On December 15, 1982--nearly 11 months after all offers had been received--NHTSA awarded a \$786,552 cost-plus-fixed-fee contract to Grey Advertising, Inc., New York, New York, to help develop its portion of the mass media program. The contract requires, among other things, that the following tasks be performed:

- Develop themes for six television messages and use those themes in preparing the television, radio, and advertisements called for below.
- Produce six 30-second television announcements, reproduce and distribute 1,000 copies of each television spot in 16mm and 50 copies of each in 35mm color films, and produce and distribute photocscripts (printed frames plus a brief script used to convince television stations to run the spots) for each of the six developed television announcements in quantities of 1,000 for each such announcement.
- Produce 12 30-second radio public service announcements in master tapes suitable for reproduction, reproduce and distribute 2,000 copies of each of the radio commercials (four commercials per disc), individually packaged in a format designed to facilitate their use by radio stations, and provide radio scripts and live announcer copy for each radio spot in camera-ready form for reproduction by the Government. Distribution of produced materials will be in three waves, with four commercials in each wave to 2,000 radio stations.
- Develop six black and white advertisements in five sizes for magazines and the same for newspapers; design seven pamphlets of about 20 pages to provide orientation to the campaign and to enlist participation from target groups and other organizations, including civic groups, employers, physicians, and teachers; and design three posters in four colors for printing by the Government Printing Office.
- Recommend themes and appeals for influencing at least four specialized audiences to be identified by NHTSA and produce for each such audience: an audiovisual presentation, a pamphlet or brochure, a print ad for placement in professional or trade journals, and a portable exhibit to be used at conventions.

According to the Contract Technical Manager, the technical evaluation of the proposals to identify those offerors with whom to negotiate had been complicated by the RFP's provision that such offerors could submit proposals to do all or any of six desired tasks. The RFP gave NHTSA the option of selecting a single proposer to perform all tasks or individual proposers to perform individual tasks. Consideration of the five evaluation criteria set out in the RFP, according to the Contract Technical Manager, was a very time-consuming task.

Although the contract provides that the period of performance for the contract will be 1 year from the date of award, the Contract Technical Manager told us that NHTSA should have some results from the contractor that it can use in its mass media efforts within 5 to 6 months (June or July 1983). He said that NHTSA would not have to wait until the contractor had provided all six of the television public service announcements, for example, before it began trying to get some shown by stations. Further, he said that it might actually be better if the materials developed under the contract were made available over an extended period.

NHTSA had not determined precisely when the results of the mass media contract should be available to most effectively contribute to the campaign's objectives. But the co-manager of the task force responsible for network activities told us that the public service announcements and other materials to be developed under the contract preferably should be available by March 1983 in order to begin reinforcing the information being disseminated by several networks that should be operational by that time.

One of the contractor's tasks is to write, produce, and distribute bimonthly up to 2,000 copies of a one- to four-page NHTSA memorandum reporting on the progress of the campaign to mass media outlets, State and local highway safety officials, and private sector groups involved in the campaign. The contractor is also required to implement a series of visits by celebrities to the largest 20 markets in the United States for media interviews.

According to the Contract Technical Manager, the success of NHTSA's mass media efforts will depend largely on the relationships that the contractor and NHTSA personnel can establish with the media outlets. NHTSA's public service announcements and other materials prepared under this contract will have to compete with all other public service announcements. Therefore, according to the Contract Technical Manager, it is important that the contractor deliver quality products. The Contract Technical Manager said that NHTSA's technical evaluation of the numerous offers received was very time consuming because of its concern for selecting the offeror that appeared most qualified to provide the best products for competing with other public advertising materials for the limited time available.

Automobile manufacturers mass media efforts

Information provided to us by a co-manager of the safety belt task force shows that NHTSA initiated its efforts to get automobile manufacturers involved in the safety belt campaign in the early summer of 1981. Press releases issued by several of these manufacturers on April 14, 1982--the date on which the safety belt campaign was formally announced by the President--expressed their support for NHTSA's safety belt campaign. Those press releases and other documents show the following mass media activities planned or already under way.

Chrysler

"All of our print advertising will contain a message encouraging all car occupants to use safety belts."

Ford Motor Company

"'A buckle-up-your-belt' message is being incorporated into Ford advertising. Next week we will begin to place the 'Get It Together' decal on every Ford-built car right in the assembly plants."

General Motors Corporation

"Developing a customer information advertisement for newspapers and magazines that will explain the benefits of wearing seat belts. Also, underway is a test of a radio seat belt campaign."

American Honda Motor Co., Inc.

"In May, billboards and radio public service messages will be used (to help inform the public of the importance of seat belts) concentrating on the six largest metropolitan areas: Los Angeles, New York, San Francisco, Chicago, Philadelphia, and Washington, D.C. The radio messages will also be broadcast nationally on the ABC network."

Since the April 14, 1982, Presidential announcement of the safety belt campaign, other automobile manufacturers have also begun to conduct mass media activities, including Nissan, Mazda, and Toyota. NHTSA was unaware of (1) how long the automobile manufacturers planned to sponsor radio, television, and printed media spots or (2) the magnitude of such efforts (the frequency and locations). NHTSA's plan indicates that the private sector segment of the mass media portion of the campaign is potentially much greater than its own.

Because the mass media efforts by the automobile manufacturers are an integral part of the comprehensive program NHTSA is implementing, we believe that NHTSA should have information on the planned duration of these efforts, frequency, locations, and themes being utilized by the automobile manufacturers.

However, we recognize that the mass media activities being sponsored by the automobile manufacturers are voluntary.

CONCLUSIONS

Although the safety belt program was not fully operational after 19 months, NHTSA had made progress in its implementation. However, at the time of our review there were several issues that required further attention to help the program realize its maximum impact.

Ongoing research had to be completed to provide information necessary to convince private employers that establishing safety belt use programs, including incentive programs and use policies, could be to their economic advantage and contribute to their employees' general welfare and safety. We did not attempt to evaluate the quality of research completed to date or that which was ongoing to provide this information. However, we believe that NHTSA was aware of the research needed to make its activities in the private employers network (as well as others that may conduct incentive programs and adopt use policies) effective.

The mass media portion of NHTSA's multifaceted safety belt program consists of Federal activities as well as those of the private sector. At the time of our review, NHTSA had recently contracted for development of materials to be used in its mass media activities. Domestic and foreign automobile manufacturers had been voluntarily sponsoring spots on radio and television and in the printed media for several months. However, NHTSA was unaware of how long these manufacturers planned to continue sponsoring such spots or their frequency and locations. We believe that NHTSA should have this information as part of its management oversight of the program. However, because the automobile manufacturers' efforts are voluntary, we are not recommending that NHTSA seek such information from them.

AGENCY COMMENTS AND OUR EVALUATION

In our draft report, we proposed that the Secretary of Transportation direct the NHTSA Administrator to determine which Federal agency has authority to establish a Government-wide mandatory safety belt use policy and work with that agency to establish a policy with sufficient sanctions to ensure Federal employees' compliance while on official business.

DOT stated in its comments (see app. VII) that no single Federal agency has the authority or ability to issue a Government-wide mandatory safety belt use policy. DOT pointed out that the General Services Administration has had a policy since 1973 (revised by an April 23, 1982, bulletin) recommending that heads of Federal agencies promulgate regulations requiring that their employees use safety belts while on official business. DOT stated that it has also had a required use policy since 1974. DOT's position is that it is now up to NHTSA to encourage

agency-specific education and incentive programs to support the provision of the General Services Administration bulletin.

DOT stated that the program for Federal employees must be broader than merely establishing a required use policy. Also, DOT stated that NHTSA is convinced that a Federal agency safety belt program (as well as programs outside the Government) will be more successful if mandatory use requirements are accompanied by other remedies, notably face-to-face education, incentives, and other programs to increase safety belt use among drivers. DOT stated that it had therefore deliberately chosen an agency-by-agency implementation approach for NHTSA's current safety belt program with respect to obtaining Federal agencies' participation.

According to DOT, NHTSA believes that the agency which establishes its own policy will be more committed and enthusiastic about its implementation than if a policy is established outside the agency. DOT stated that agency-level programs are small enough to project a personal tone, large enough to be practical, and more likely to be encouraged within their supervisory and training/education systems.

DOT stated that NHTSA has developed and is implementing--with DOL--a comprehensive plan for encouraging increased safety belt use by Federal employees. DOT said that several other Federal agencies and departments are already implementing programs in response to the plan, including the General Services Administration, DOL (especially OSHA), and the Department of Defense (especially the United States Air Force).

DOT's and the General Services Administration's policies were in effect more than 7 and 8 years, respectively, before NHTSA initiated its current safety belt program. According to the National Academy of Sciences' Transportation Research Board's March 1980 report, there had been little enthusiasm for enforcing either of these policies. NHTSA established a mandatory safety belt use policy in December 1981 with provisions for sanctions against its employees who are observed as not complying. In its comments, DOT stated that as a result of considerable time and effort spent educating NHTSA's employees about the regulations and the need for safety belt use, usage by NHTSA's employees had reached an average greater than 50 percent; whereas, Department-wide such usage was about 22 percent.

We agree with NHTSA that the program for Federal employees must be broader than merely establishing a required use policy. Further, DOT may be correct in its statement that an agency that establishes its own policy will be more committed and enthusiastic about its implementation. Accordingly, we believe that these actions are generally responsive to our proposal and if implemented by all Federal agencies, should facilitate greater use of safety belts in the Federal Government.

The Committee of Conference in its report on DOT's and related agencies' fiscal year 1983 appropriations directed NHTSA to immediately refrain from obligating additional operations and research funds for new contracts relating to the safety belt program until a Government-wide mandatory safety belt use policy for Federal employees is established to set an example for the private sector to adopt similar policies. NHTSA was not to obligate such funds for the program until both the House and Senate Appropriations Committees approved written agency submissions describing how this condition had been met. In its March 2, 1983, responses to House and Senate Appropriations Committees, NHTSA maintained its position that the General Services Administration's April 1982 bulletin establishes a Government-wide policy and provides a foundation for individual agencies and departments to follow in issuing orders requiring safety belt use by their employees while on official business.

CHAPTER 4

CONTRACT TO STUDY THE FEASIBILITY OF CREATING A PRIVATE HIGHWAY TRAFFIC SAFETY ORGANIZATION

On October 20, 1981, NHTSA issued a \$9,903 firm-fixed price contract to Jacobs and Company, 1820 Jefferson Place, N.W., Washington, D.C., 20036 (contractor), to study the feasibility of establishing a nonprofit foundation to "support, enhance, and augment a national educational and advocacy objective to significantly reduce the number of deaths and injuries caused on the nation's highways." That contract was issued on a noncompetitive, sole-source basis in response to an October 19, 1981, proposal from the contractor expressing its desire to conduct such a study.

Although there have been problems with NHTSA administering the contract, we believe that the agency complied with Federal procurement regulations in its issuance. Further, we found nothing illegal about the contractor seeking NHTSA's issuance of the contract and subsequently using the initial study results to establish the Traffic Safety Foundation. However, NHTSA did not determine that a revised feasibility study submitted by the contractor was technically acceptable until January 1983--14 months after the contract's originally scheduled completion date.

STUDY RESULTS TO COINCIDE WITH THE PRESIDENT'S ANNOUNCEMENT OF SAFETY BELT CAMPAIGN

The elapsed time from the date of the contractor's proposal to NHTSA's initial acceptance of the feasibility study was 14 days. The chronology of events was as follows.

| | <u>Elapsed days</u> |
|--|-------------------------|
| Contractor submitted proposal-- Oct. 19, 1981 | |
| Approval of purchase requisition and sole-source justification within NHTSA--Oct. 19, 1981 | 0 |
| Issued contract to contractor-- Oct. 20, 1981 | 1 |
| Contractor submitted invoice and feasibility study--Nov. 2, 1981 | 13 |
| Approval of contractor's invoice by Contract Technical Manager for payment--Nov. 2, 1981 | <u>0</u> |
| Total | <u>14</u> |

The contractor's representative told us that NHTSA contacted him initially to obtain his views on the feasibility of establishing a nonprofit organization to deal with highway safety issues. After that discussion, he submitted the proposal to study the feasibility of establishing an organization that would have corporations, organizations, and citizens involved in implementing NHTSA's highway safety objectives. According to the co-manager of NHTSA's Safety Belt Task Force who was responsible for the corporate outreach activities and who served as the Contract Technical Manager for the contract, the agency wanted the study completed quickly (within about 2 weeks) because President Reagan was expected to announce the agency's multifaceted safety belt program in a Rose Garden ceremony sometime in November 1981.

The manager told us that if the study showed that such a foundation was feasible, NHTSA planned to seek its establishment in time for it to also receive some publicity during the anticipated Presidential announcement.

The contract's statement of work stated that:

"Background. The current thrust of the Reagan Administration is to expand the voluntaryism effort of the American public and other private sector organizations, including corporations and businesses and civic and service associations, in programs which have principally been government operated, but which are basically people oriented programs. Highway safety is clearly a field of endeavor which offers high potential for citizen involvement and corporate participation. Yet, government structure acts as a

hinderance to the full participation by citizens and private sector organizations in highway safety endeavors, particularly in the advisory, advocacy and information disseminating role. Restrictions and limitations on advisory committees, materials development, and the reproduction and distribution of educational materials are but a few examples.

"Solution. One way to provide a mechanism to enhance and augment the national educational and advocacy mission of highway safety is through the creation of a nonprofit 501(c)(3) [of title 26 U.S.C.] foundation. Such a foundation could work in partnership with government, the private sector and citizens groups to maximize the effectiveness of highway and motor vehicle safety through the dissemination of information to the driving public."

The manager accepted a product provided by the contractor on November 2, 1981, and approved its invoice for payment. He told us that he believed the product provided by the contractor satisfied the contract's statement of work. The contract states that:

"* * * The contractor shall be paid * * * upon completion, submission and acceptance of the final deliverable by the Contracting Officer or his designee. The Contract Technical Manager (CTM) is the designated representative of the Contracting Officer authorized to accept the deliverable."

As stated earlier, the President did not formally announce NHTSA's safety belt campaign until April 14, 1982, more than 5 months after the contractor delivered the initial study results. Meanwhile, NHTSA determined that the product--which was delivered, legally accepted by the Government, and paid for--was unacceptable. In response to our question of when NHTSA decided that the contractor's product was unacceptable, the NHTSA Deputy Administrator told us that she could not recall the exact date and it would be difficult for her to make that determination. However, she said that after learning that a product had been received, she read it and concluded that it obviously was not a feasibility study. She then began working directly with the contractor in an effort to get it to provide a study that addresses such questions as:

--Are there any tax-exempt organizations to which private sector corporations could channel contributions to support a national safety belt effort?

--Do existing safety institutions satisfy the need described above?

--Are there similar organizations in other subject fields?

--What kind of activities would such an organization conduct?

The NHTSA Deputy Administrator told us that she believes performance of the study was a worthwhile effort. The Contract Technical Manager determined on January 24, 1983--14 months after the contract's originally scheduled completion date--that a revised feasibility study submitted by the contractor was technically acceptable.

ISSUANCE OF CONTRACT IN COMPLIANCE WITH
FEDERAL PROCUREMENT REGULATIONS

NHTSA's contract to study the feasibility of establishing a highway safety foundation was consistent with the Highway Safety Act of 1966 (23 U.S.C. 401) which authorizes and directs the agency to assist and cooperate with private industry and other interested parties to increase highway safety. The Federal Property and Administrative Services Act of 1949, as amended, and the Federal Procurement Regulations authorize NHTSA and other Federal agencies to negotiate sole-source contracts without obtaining competition "when property or services can be obtained from only one person or firm (sole source of supply)."

NHTSA determined that Jacobs and Company was the sole source of supply for the desired feasibility study. The justification in that determination stated in part that:

"Stephen A. Jacobs is the only consultant to have put together a cooperative government agency-corporate sponsored public service campaign which involved total agency control, reached into every classroom in the nation and was totally paid for by the private sector. This partnership program among corporations and the Federal government was nationally acclaimed and had a White House Kickoff."

* * * * *

"The development of a Foundation feasibility study to create corporate-government cooperation and partnership for a national public service campaign is a national extension of Mr. Jacobs' most recent efforts."

According to Mr. Jacobs' testimony on March 31, 1982, before the Subcommittee on Surface Transportation, Senate Committee on Commerce, Science, and Transportation, the campaign to which the justification referred was developed for the Department of Energy. He said that the campaign was designed to enhance national participation in energy conservation activities, involved 100,000

schools, and was conducted without Federal funds--at a \$500,000 cost saving to the taxpayer.

Whether the characteristics described in the sole-source justification presented above qualifies Jacobs and Company as the only contractor able to perform the feasibility study may be debatable. However, we did not attempt to identify other qualified contractors who may have been interested in performing the study. Therefore, we have no basis to question the agency's judgment in this case.

ESTABLISHMENT OF TRAFFIC SAFETY
FOUNDATION BY CONTRACTOR

On November 9, 1981--1 week after the feasibility study was initially submitted to NHTSA--the contractor incorporated the Traffic Safety Foundation. The Foundation's articles of incorporation filed with the District of Columbia were almost identical to those submitted as a part of the feasibility study prepared by the contractor under the purchase order.

The contract's statement of work required the contractor to prepare the articles of an organization that might be incorporated to fulfill certain roles concerning traffic safety. The contractor's use of similar articles in establishing the Foundation was not illegal. The contract did not prohibit such use and the agency has not objected to it.

The stated purposes of the Foundation are to:

- Engage in charitable and educational activities consistent with and pursuant to section 501(c)(3) of the Internal Revenue Code of 1954 which supports, enhances, and augments the educational and other governmental purposes that concern highway, driver, passenger, pedestrian, and vehicle safety.
- Increase awareness throughout the United States about highway safety and related concerns, including motor vehicle registration, motorcycle safety, driver education, alcohol abuse vis-a-vis highway safety, emergency medical services, pedestrian safety, police traffic services, student transportation, and accident investigation and reporting.
- Support the Government in maintaining its commitment to safety on highways as a national concern demanding support.
- Involve corporate America in participating and funding a public service, full-range highway safety partnership with the Nation.
- Alleviate the burdens of Government imposed on the citizens through taxation in executing these programs.

--Establish a context within which Government, organizations, and individuals can come together in the mutuality of concern over voluntary highway safety actions.

In a mass solicitation to private companies on November 20, 1981, Stephen A. Jacobs, Executive Director of the Traffic Safety Foundation, described the Foundation's program, structure, and funding arrangements. That solicitation stated that: "The Administrator of the National Highway Traffic Safety Administration will be a member of the Foundation's Board." With respect to funding, the solicitation provided that contributors were free to determine for themselves the level of contribution which best reflects their corporate concern and commitment. However, to help in deciding, the Foundation created levels of support as follows:

| <u>Category of contributor</u> | <u>Annual commitment</u> |
|--------------------------------|--------------------------|
| Corporate founder | \$200,000 and over |
| Corporate donor | 100,000 |
| Donor | 50,000 |
| Associate | 25,000 |

The statement that the NHTSA Administrator would be a member of the Foundation's board resulted in controversy over whether (1) companies regulated by the agency might perceive that they were their being coerced into making contributions to the Foundation and (2) the Foundation was merely an instrumentality of NHTSA.

As a part of the March 25, 1982, hearings before the Subcommittee on the Department of Transportation and Related Agencies Appropriations, House Committee on Appropriations, the Chairman asked the NHTSA Administrator:

"Do you see an impropriety in a Federal regulatory agency actively supporting the establishment of a non-profit advocacy organization which plays upon its special relationship to that agency and the people in that agency to solicit funds from the corporations that are regulated by that agency?"

The NHTSA Administrator later provided the following response for the record:

"I would indeed consider the question of appearance of impropriety to be raised by such factual circumstances. If the question is addressed to the Traffic Safety Foundation [TSF], however, it is inaccurate in the following significant respects.

"Neither the NHTSA nor I personally actively supported the establishment of the TSF. We considered the question of whether an entity would be legal, appropriate and beneficial to achieving the goals of the Agency in the private sector, and had not

reached any conclusion on that question at the time TSF was incorporated by Mr. Jacobs. Neither I, nor to my knowledge, the Agency knew in advance that such an organization would in fact be incorporated. No approval or sanction of such action was ever asked of or given by me.

"There is not now and never was any special relationship between the Foundation and the NHTSA that would in fact compromise the integrity of the Agency or its mission. Neither I nor to my knowledge anyone in the Agency had any foreknowledge of what I am informed was a solicitation of funds mailed to several hundred corporations, including apparently nine which are directly or indirectly regulated by the Agency.

"I had never been asked, and had never agreed, to serve such an organization in any capacity. However, in connection with an earlier invitation to serve on a board * * * our Office of Chief Counsel had indicated that such service in and of itself would violate no law or regulation of the Agency, provided no compensation of any kind was involved or contemplated at any time.

"The first I was aware either that a solicitation of funds was made by the TSF or that the voluminous material accompanying such solicitation stated as fact that the Administrator of the National Highway Traffic Safety Administration will ex officio be an initial member of the Foundation's Board was when in early December an existing highway safety organization, the Highway Users Federation, by telephone strongly objected to me that such a solicitation should have been permitted.

"When I learned, after its mailing, that the Foundation's original fundraising solicitation had referred to the office of the Administrator of this agency, I became concerned that a possible appearance of impropriety could arise from the making of such a solicitation to members of industries regulated by this agency. Although I did not consider the Foundation's action in this regard to be improper, from the Agency's perspective I felt it necessary to avoid any suggestion that regulated parties could receive special consideration from NHTSA by contributing to the Traffic Safety Foundation. I contacted Mr. Jacobs and insisted that he immediately send follow-up correspondence to all parties on his mailing list which might have an interest in the actions of this agency informing them that I had declined to serve on the Foundation's board of trustees for that reason."

Mr. Jacobs told us that he subsequently notified each of the companies that had been sent a copy of his November 20, 1981, solicitation for contributions of the Administrator's decline to serve on the Foundation's board. He said that although the Foundation is still incorporated, the prospect of it achieving its intended purpose has been diminished by the adverse publicity.

CONCLUSIONS

NHTSA's issuance of a contract on a noncompetitive, sole-source basis to study the feasibility of establishing a nonprofit foundation to fulfill certain roles concerning traffic safety and the contractor's subsequent incorporation of such an agency was highly controversial. However, NHTSA's issuance of the contract complied substantially with applicable procurement regulations. Although it may be debatable whether the contractor was the only consultant qualified to perform the feasibility study, we have no legal or factual basis for challenging that decision. Further, we have no basis for questioning the legality of the contractor establishing the Foundation shortly after completing the feasibility study it submitted to NHTSA in early November 1981.

The Foundation's claim in its initial solicitation for contributions by private companies that the NHTSA Administrator was on its Board of Directors may have given some organizations the appearance that the Foundation was not an independent entity but merely an instrumentality of NHTSA. We believe that the Foundation's and the Administrator's actions to remove any such appearance were reasonable and appropriate.

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 BARRY GOLDWATER, ARIZ.
 HARRISON H. SCHMITT, N. MEX.
 JOHN C. DANFORTH, MO.
 MANDY LANDEN HASSBAUM, KANS.
 LARRY PRESSLER, S. DAK.
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 TED STEVENS, ALASKA
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HOWARD W. CANNON, NEV.
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 DONALD W. RIEGLE, JR., MICH.
 J. JAMES EXON, NEBR.
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WILLIAM M. DIEPENDORFER, CHIEF COUNSEL
 ARNOLD L. SARVIS, MINORITY CHIEF COUNSEL
 EDWIN K. HALL, MINORITY GENERAL COUNSEL

United States Senate

COMMITTEE ON COMMERCE, SCIENCE,
 AND TRANSPORTATION
 WASHINGTON, D.C. 20510

May 12, 1982

Honorable Charles A. Bowsher
 Comptroller General
 General Accounting Office
 441 G Street, N.W.
 Washington, D.C. 20548

Dear Mr. Bowsher:

As you may know, the National Highway Traffic Safety Administration (NHTSA) is developing a multi-million dollar mass media campaign designed to enhance the usage of seat belts. However, three fundamental questions have remained unanswered in the course of hearings before our respective committees and subcommittees:

- Does the weight of existing evidence support the conclusion that seat belt usage can be significantly enhanced over a meaningful period by a mass media campaign?
- Assuming that a mass media campaign will be conducted, has NHTSA developed a program which will maximize benefits and minimize costs to the taxpayer?
- Has NHTSA developed an appropriate evaluation plan for such a campaign?


Our concern is that the program contemplated by NHTSA may not be well-conceived or well-designed. Given the amount of money involved in the campaign -- \$6 to \$8 million -- we think it imperative that an independent study of NHTSA's effort be conducted.


NHTSA's recent solicitation for a study on "Motivation of Restraint System Usage among Specific Target Groups of Drivers and Passengers" states in part: "The National Highway Traffic Safety Administration is undertaking a nationwide program to encourage the use of safety belts and child safety seats by drivers and passengers of motor vehicles....Research is currently underway to identify the most important motivating, circumstantial and situational factors associated with current belt usage and with past changes in belt-wearing behavior." The underscored portion of this statement raises doubts in our minds as to whether the cart has been placed ahead of the proverbial horse.

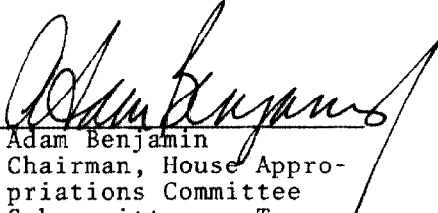
We hereby request that the General Accounting Office investigate the development and conduct of NHTSA's nationwide program to encourage the use of safety belts and report to the Congress as soon as possible, but no later than six months after the date of this letter, whether the benefits of this program are likely to outweigh the costs to the American taxpayer. In connection with this report, we would expect the GAO to include an evaluation of NHTSA's procedures for awarding contracts to study the feasibility of the program or the feasibility of creating any private organization to further (in whole or in part) the goals of the program.


We appreciate your attention to this matter.

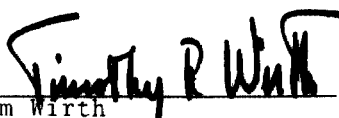
Sincerely,


Bob Packwood
Chairman
Senate Commerce Committee


John C. Danforth
Chairman, Senate Commerce
Subcommittee on Surface
Transportation


Adam Benjamin
Chairman, House Approp-
riations Committee
Subcommittee on Trans-
portation


Mark Andrews
Chairman, Senate Approp-
riations Subcommittee
on Transportation


Tim Wirth
Chairman, House Subcommittee
on Telecommunications,
Consumer Protection and
Finance

FATALITIES AND INJURIES RESULTING FROM HIGHWAYACCIDENTS 1979-80 ANNUAL AVERAGE (note a)

| <u>Description of victim</u> | <u>Fatalities</u> | <u>Serious injuries (note b)</u> |
|---|-------------------|--------------------------------------|
| Occupants of motor vehicles: | | |
| Passenger cars | 27,623 | 118,377 |
| Light trucks and vans | 6,508 | 21,492 |
| Medium and heavy trucks | 1,346 | 1,654 |
| Motorcyclists | 5,017 | 32,983 |
| Occupants of other vehicles | 1,425 | 4,075 |
| Occupants of vehicles not in transport | 132 | 208 |
| Nonoccupants: | | |
| Pedestrians | 8,081 | 13,919 |
| Pedalcyclists (note c) | <u>948</u> | <u>10,052</u> |
| Total | <u>51,080</u> | <u>202,760</u> |

a/These statistics were extrapolated by NHTSA from its National Accident Sampling System.

b/Excludes fatally injured persons.

c/NHTSA defines a pedalcycle as a vehicle operated solely by pedals.

SUMMARY OF SELECTED NHTSA SAFETY BELTACTIVITIES AND COSTS FOR THE PERIOD 1971-80

Information provided by NHTSA--which we did not verify because of time constraints--showed that, from 1971 to 1980, selected safety belt activities which it conducted cost about \$5.2 million. These activities are summarized below.

1971

Surveyed national representative sample of 1,500 drivers to determine usage of and attitude toward safety belts. Results indicated 17 percent usage when belts were available. Contract cost \$127,000.

Conducted radio and TV campaign of varying intensity using public service time. Safety belt usage was observed in the experimental town and in a comparison or "control" town to measure the effectiveness of the campaign. A total of 21,000 observations indicated that the campaign had no significant effect on belt usage. Contract cost \$83,000.

1972

Partly based on the information gained from the above studies, program "packages" (consisting of educational booklets, pamphlets, and audiovisual programs) were developed for specific segments of the driving and riding populations. These populations were: elementary and high school students; driver education students; driver licensee applicants; employees of Government and industry; and judges, lawyers, and legislators. Contract cost \$350,000.

The educational program developed for elementary school children was evaluated and found to increase belt usage by a small but significant amount. Contract cost \$50,000.

1973

Printed and made a nationwide distribution of the safety belt educational materials developed in 1972. Contract cost \$250,000.

Conducted an initial study of warning and interlock systems by equipping rental cars with various types of systems. Found sequential warning systems to be more acceptable to motorists than the interlock. Contract cost \$83,000.

1974

Initiated study to assess effectiveness of safety belt warning and interlock system in 1973 and 1974 model cars in increasing belt usage. Study also assessed owner acceptance and reaction

to the interlock. Interlocks increased belt usage initially to about 75 percent. Contract cost \$382,000.

Sources of comfort and convenience problems and their solutions were determined for active belt systems. Specifications were recommended for Standard 208. Contract cost \$77,000.

1975

Conducted national survey of belt usage in 1973 to 1975 model cars and assessed attitudes and reactions to the 4- to 8-second warning system. Determined that the warning system was not effective in increasing belt usage and that the sequential continuous warning system was more effective and acceptable than the interlock system. Contract cost \$151,000.

Usage of, and reaction to, the Volkswagen passive belt system was assessed through an owner survey. Passive belts were worn 80 percent of the time as compared to 50 percent use of active belts in comparable Volkswagens. Contract cost \$5,000.

Eight safety belt warning systems were evaluated using 800 rental cars. Results indicated that the 4- to 8-second warning system was ineffective; usage increased significantly only when both sequential logic and continuous light were utilized. Contract cost \$100,000.

1976

Conducted national survey of safety belt usage in all cars so equipped. Data collected in late 1976 and 1977 indicates that overall belt usage in the United States was 18 percent. Contract cost \$196,000.

Study of 15,000 towaway accidents was conducted to determine effectiveness of safety belt systems. Results showed lap and shoulder belts were 57 percent and lap belts were 31 percent effective in preventing injuries. Contract cost \$103,000.

1977

Approximately 3 million revised and updated safety belt educational booklets, pamphlets, and audiovisual materials were distributed to specific target groups (e.g., elementary schools, driver education students, employees, etc.). In addition, more than 50,000 of such materials were sent to NHTSA/Regional Administrators to assure their distribution during restraint system demonstrations. This information cost \$400,000.

Engaged in special arrangement with the Canadian Government to obtain and use two of its most popular TV spots to encourage belt usage.

The Tennessee Child Restraint Evaluation Project was initiated to assess the impact of the Tennessee Child Restraint Law. This study also evaluated the impact of a comprehensive public information and education campaign related to the protection of child passengers. Contract cost \$350,000.

Began developing a comprehensive manual for State personnel to encourage voluntary safety belt usage. This manual was designed to reach a variety of interested or involved target groups within the State. This manual was to be used in a series of seminars at the State level designed to facilitate increased belt usage.

Continuing national survey to assess safety belt usage throughout the United States. Contract cost \$209,000.

Evaluate various passive belt concepts in order to develop appropriate comfort and convenience specifications for Standard 208. Contract cost \$118,000.

Develop procedures to help States in their adoption of safety belt usage laws. Contract cost \$77,000.

Assess the effectiveness of the safety belt educational package NHTSA developed for industry employees. Contract cost \$56,000.

1978

Continuing national survey to assess safety belt usage throughout the United States (2-year period). Contract cost \$275,000.

Conduct national survey of drivers to explore attitudes regarding passive restraint systems and to examine which types will be most acceptable and which will be opposed. Contract cost \$76,000.

Determine and rank comfort and convenience indexes for safety belt systems in new cars. Contract cost \$65,000.

Developed new film strips from NHTSA crash tests which relate the dynamics of a crash for the unrestrained passenger.

Initiated an attempt to coordinate NHTSA's, the National Safety Council's, the American Automobile Association's, and the insurance industry's efforts to promote belt usage as well as acceptance of passive restraints.

1979

NHTSA conducted 10 workshop series on general occupant restraint issues. The workshops were designed to acquaint State highway safety personnel on the various types of occupant restraint devices and the primary means for increasing safety belt usage. Program cost \$113,372.

NHTSA conducted 10 workshop series on child restraint issues. The workshops were designed to improve the effectiveness of grassroots organizations in ongoing child restraint programs by describing the methods and materials available for increasing child restraint usage. Program cost \$93,754.

Purchased copies of film (audiovisual materials for child restraint workshop series) for use by grassroots organizations to promote child restraint usage. Distributed copies of film to workshop attendees. Program cost \$42,500.

Research and development projects, including monitoring of belt usage, motivational research, program development, and evaluation projects. Contract cost \$360,000.

Public information materials for safety belts and child restraints. Included reproduction of public service announcements and the purchase of films "Children and Infants in Car Crashes" as well as development of regional public information plan. Program cost \$68,071.

1980

NHTSA conducted 26 workshop series (divided between alcohol and occupant restraints) designed to provide State and local safety personnel direction and motivation to promote safety belt usage. Safety belt share of cost was estimated at \$122,500.

Study of impact of League General Insurance Company child safety seat distribution program for policyholders with young children. Contract cost \$99,790.

Materials for 26 workshops (audiovisual kits), estimated cost \$110,000.

Logistics support for distributing safety belt and alcohol, materials to workshops. Safety belt program share of cost was estimated at \$47,850.

Research and development, including usage rates, motivation, and program design. Contract cost \$580,000.

INJURIES EXPRESSED INTERMS OF ABBREVIATED INJURY SCALE (note a)

| <u>Injury level</u> | <u>Description</u> <u>(note b)</u> |
|---------------------|---|
| 0 | No injury |
| 1 | Minor (e.g., simple cuts or bruises) |
| 2 | Moderate (e.g., simple fracture) |
| 3 | Serious, (not life threatening, e.g., compound fracture or dislocated major joints) |
| 4 | Severe, (life threatening--survival probable, e.g., amputated limbs, depressed skull fracture, survivable organ injuries) |
| 5 | Critical, (survival uncertain, e.g., major spinal cord injury or critical organ injuries) |
| 6 | Maximum, currently untreatable (e.g., massively crushed head--brain extrusion) |

a/The Abbreviated Injury Scale is based on definitions developed by a Joint Committee of the American Medical Association, the Society of Automotive Engineers, and the American Association for Automotive Medicine.

b/Virtually all AIS 6 injuries and over 50 percent of all AIS 5 injuries result in fatalities. It is not unusual for an AIS 3 or 4 injury to result in a fatality to an elderly person or a person with special medical problems.

CHRONOLOGY AND STATUS OF
THE PASSIVE RESTRAINT STANDARD

When worn, safety belts are recognized as being highly effective in preventing occupants in the event of a crash from contacting parts of the vehicle interior (second collision) and from being thrown from the vehicle. On February 3, 1967, Federal Motor Vehicle Safety Standard 208--Seat Belt Installation--Passenger Cars--was issued to require the installation of lap and shoulder belt assemblies at front outboard 1/ seating positions (except convertibles) and lap belt assemblies at all other designated seating positions. That standard became effective January 1, 1968. Although there were no requirements before this time, lap belts were standard equipment on most cars.

By July 1969, however, DOT had concluded that safety belt usage was too low to reduce traffic injuries to an acceptable level. Accordingly, on July 2, 1969, DOT issued a notice of proposed rulemaking to consider "the prompt development and installation of passive restraint systems." These systems were defined as protective systems that require no voluntary action by vehicle occupants. This 1969 notice, entitled "Inflatable Occupant Restraint Systems," anticipated that inflatable cushions (or air bags) would provide protection in frontal collisions for those occupants who had not fastened their safety belts.

In July 1971 DOT observed that "some belt-based concepts have been advanced that appeared to be capable of meeting the complete passive protection options," leading it to add a new section to the standard "to deal expressly with passive belts," 36 Fed. Reg. 12858, (July 8, 1971).

The 1972 version of the standards called for "complete passive protection" on vehicles manufactured after August 15, 1975. Meanwhile, motor vehicles built between August 1973 and August 1975 were to carry either passive restraints or lap and shoulder belts coupled with an "ignition interlock" that would prevent starting the vehicle if the belts were not connected. Most vehicle manufacturers chose the second option.

But, by late 1974, the public's irritation regarding not being able to start their cars without fastening safety belts influenced the Congress to reject the entire standard. The Motor Vehicle and Schoolbus Safety Amendments of 1974 (15 U.S.C. 1410b) contained two sections that effected safety belts. First, section 1410b (b)(1) of the 1974 amendments banned any motor vehicle safety standard requiring ignition interlocks or continuous buzzers to warn that safety belts were not in use. Second, section 1410b (b)(2) of the amendments provided that if a modified standard could be satisfied by any system other than safety belts only,

1/Excludes the center seating position.

the amended safety standard would have to be submitted to the Congress where it might be vetoed by concurrent resolutions of both Houses.

After other revisions and postponements during 1975 and 1976, DOT issued on July 5, 1977, a new mandatory passive restraint regulation, 42 C.F.R. 571.208 (1977), that ordered a "phasing in" of passive restraints based on vehicle size, beginning with large cars manufactured beginning September 1, 1981 (1982 models), mid-size cars manufactured beginning September 1, 1982 (1983 models), and small cars manufactured after September 1, 1983, (1984 models). Although the 1977 regulation withstood tests in the Congress and the courts, in February 1981, the Secretary of Transportation reopened the rulemaking process in part because "economic circumstances have changed since the standard was adopted in 1977" and the "difficulties of the automobile industry," citing high unemployment, sales "at a very depressed level" and losses "by even the largest of the domestic manufacturers."

On April 9, 1981, DOT ordered a 1-year delay in applying the standard to large cars, extending the deadline to September 1, 1982. On the same day, NHTSA proposed the possible rescission of the entire standard; and on October 29, 1981, issued a final rule (Notice 25), 46 Fed. Reg. 53,419, that rescinded the passive restraint requirement and amended Standard 208 to eliminate the requirement.

In the October 1981 rule, DOT stated that before starting the rulemaking in February 1981, it had decided to undertake a major educational effort to enhance voluntary safety belt usage. According to DOT, these efforts would address not only those users/purchasers amenable to change that would have been affected by the 1977 passive restraint rule, but also those currently riding and driving in motor vehicles then on the road. DOT stated that the potential for immediate impact from its planned educational effort was therefore many times greater. DOT added that with the much greater number of persons directly impacted, educational efforts would need to raise safety belt usage in the vehicles on the road during the 1980's by only a few percentage points to achieve far greater safety benefits than the passive restraint requirements could have achieved during the same period.

As part of its October 1981 rescission notice, NHTSA concluded that the passive restraints required by Standard 208, as modified in 1977, could not be justified due to the high costs and the uncertainty of the magnitude, if any, of its safety benefits. The standard could have been satisfied by air bags or by either of two kinds of passive safety belts--"continuous" and "detachable." Both types of passive safety belts provide the emergency release mechanism required by the standard. On the continuous belts, this mechanism could consist of a "spool-out" device that expands the belt, but does not detach it. On the detachable belts, the mechanism allows separation of the belt in the same way that manual safety belts are buckled and unbuckled.

In 1977 NHTSA believed that automatic belts would cost only about \$25 more than manual belts and that air bags would cost approximately \$112 more than manual belts. As of October 1981 NHTSA estimated the incremental cost to be \$75 to \$100 for automatic safety belts and \$300 to \$1,100 for air bags. NHTSA stated that with the annual production of cars in this country there would be a price effect of approximately \$1 billion if automatic belts were required.

In its rescission notice NHTSA found that it was "reasonably certain" that if the 1977 rule were implemented, "the overwhelming majority of new cars would be equipped with automatic belts that are detachable." NHTSA found that detachable belts were the functional equivalent of manual belts already available in motor vehicles, and therefore any increase in usage would be minimal.

State Farm Mutual Automobile Insurance Company and the National Association of Independent Insurers subsequently challenged NHTSA's rescission of the passive restraint standard as arbitrary, capricious, an abuse of discretion, and a violation of law as defined by the Administrative Procedure Act, 5 U.S.C. 706(1976). On June 1, 1982, the United States Court of Appeals for the District of Columbia Circuit decided that NHTSA had unlawfully rescinded the passive restraint standard as proposed in 1977. Because of the obvious difficulties created by DOT's rescinding the standard, the court in an August 4, 1982, order stayed the compliance date for large- and mid-size automobiles until September 1, 1983, the same date the standard would apply to small automobiles. Further, the court ordered that DOT had until October 1, 1982, to advise the court of whether such a compliance date was achievable, or state longer period was required.

On September 8, 1982, the Solicitor General, Department of Justice, on behalf of DOT, petitioned the United States Supreme Court to review the judgment and supplemental order of the court of appeals. On November 8, 1982, the Supreme Court agreed to review the appeals court ruling and order. The appeals court then canceled its August 1982 order.

STATUS AND PLANS FOR IMPLEMENTING NHTSA'S
SAFETY BELT PROGRAM NETWORKING ACTIVITIES

AS OF SEPTEMBER 28, 1982

| <u>Networks/major groups and organizations</u> | <u>Status</u> | <u>Plans</u> |
|---|--|---|
| <u>Educators</u> | | |
| High school driver educators (National Driver & Traffic Safety Ed- ucation Association) (Association of State Supervisors of Safety & Driver Education) | Approximately 9,000 audiovisual (AV) kits have been distributed to State driver education supervisors. Approxi- mately 80 percent of these kits are already in hands of instructors. Remainder to be distrib- uted by the end of October 1982. Some instructors are using the kits in their driver education courses. | All (or nearly all) in- structors can be expect- ed to have used the kits by the end of the fall 1982 semester. The kits will be used for subsequent semesters. |
| National Congress of Parents & Teachers | Contract entered into April 1982 for the Na- tional Congress to dis- tribute teaching mate- rials, promote program, and conduct 15 local incentive programs to promote safety belt us- age (awards made). Many associations are already engaged in promotional efforts for both safety belts and child seats. | Initial distribution of AV kits (approx. 1,500) to be made in October 1982. Later distribu- tion (approx. 3,000) planned by spring 1983. |
| National Science Teachers Association | Contract entered into (Sept. 1981) for the Association to develop teaching module and dis- tribute (with 3-minute film) to approximately 10,000 science teachers, via State science teacher supervisor. Teaching modules have have been developed, pilot tested, and reproduced. | Distribution of 10,000 AV kits and an addi- tional 10,000 workbooks to be initiated in October 1982. |

| <u>Networks/major groups and organizations</u> | <u>Status</u> | <u>Plans</u> |
|--|---|--|
| Commercial Driver Educators (Driving School Association of America) | Contacts made with national organization in fall 1981. Agreed to use AV kits in commercial education classes as soon as they become available. | Estimate distribution of approximately 2,000 AV kits by spring 1982. Expect materials to be incorporated into courses upon receipt. |
| <u>Civic, service, and safety groups</u> | | |
| Boy Scouts of America | Contacts made with national organization in fall 1981. Distribution of AV kits to 12 camp schools in spring 1982. | Expect distribution of 3,000 AV kits by spring 1983. While some activities have been conducted or are already underway (e.g., camp schools and jamborees), major activities to be integrated following spring 1983 distribution. |
| Girl Scouts of the USA | Contacts made in July 1982 with Washington, D.C., office and August 1982 with N.Y. office. Plans initiated to develop possible media, community outreach, and camp activities. | Tentative plans call for activities to begin in mid-1983. |
| National Association of Women Highway Safety Leaders National Extension Homemakers Council General Federation of Women's Clubs Auxiliary to American Optometrics Association Department of Agriculture's Cooperative Extension Service National Safety Council Women's Division | Initial distribution of 2,000 "Get It Together" education and AV kits made in September 1982. Organizations have agreed to take part in national contest to promote safety belt usage. Distribution made to extension centers and to State chapter presidents. NSC Women's Division has agreed to conduct contest for women's groups to recognize and reward local efforts. Activity already beginning at local levels where educational kits | An additional distribution of "Get It Together" education and AV kits may be made in 1983. |

| <u>Networks/major groups and organizations</u> | <u>Status</u> | <u>Plans</u> |
|---|---|---|
| | will be used to educate members and to promote belt usage in the community. Awards contest already initiated to run from September 1982 to May 1983. | |
| National Association of Insurance Women | Contacted in fall 1981. To take part in community outreach (educational) effort. | Distribute about 250 AV kits in fall of 1982. Tentative starting date for activities, November 1982. |
| National Safety Council (and State and local affiliates) | Contacts made since beginning of program (even before 1981). Contracted to provide logistics (pack and distribute kits) and to develop model corporation programs. Additional agreements to provide AV kits to State/local councils and include similar kits (under development) in defensive driving course. Logistics (distribution to other networks) activities underway. | Distribution of AV kits to State/local affiliates by January 1983. Corporate program to start fall 1982. |
| (NHTSA'S NOTE: In addition to activities in cooperation with NHTSA, the National Safety Council has several safety belt and child safety seat promotional programs of its own (e.g., "Make It Click," "Empty Saddles," etc.). | | |
| National Automobile Club (California) | Contact made in fall 1981. The club has promoted safety belt usage in its publications. | Continue promotion through organizational magazine. |
| American Automobile Association Club | Contacted in fall 1982. The Association has agreed to conduct education programs for home and field offices and members. | NHTSA will provide 500 AV education kits by fall 1982. The Association will begin in-house educational program immediately. |

| <u>Networks/major groups and organizations</u> | <u>Status</u> | <u>Plans</u> |
|--|---|--|
| American Association of Retired Persons | Contract awarded September 1982 to develop, field test, and distribute approximately 2,000 educational program kits to local retired (senior citizen) clubs. | Implementation by fall 1983, with education programs in hundreds of local clubs. |
| American Red Cross | Contract signed in May 1982 to develop and distribute safety belt educational curriculum for local American Red Cross use. During July 1982, 3,000 kits were distributed to American Red Cross districts. Many local chapters have ongoing education programs. Child restraint promotion activities underway in several States. | Continue efforts. |
| United Way of America | Contacted in September 1981. | No immediate activity planned. |
| Epilepsy Foundation of America | Contacted in May 1982, again in August 1982. Interested in incorporating safety belt information into epilepsy prevention materials and presentations. | No immediate activity planned. |
| National Head Injury Foundation | Contacted in May 1982. Interested in conducting education programs relative to preventing head injuries through safety belt usage and in the long-term costs of head injuries caused by non-usage of belts. | Expect an agreement to be reached early in 1983. Education programs to be underway by spring 1984. |
| The Salvation Army | Contacted in fall 1981. Arranged for distribution of AV kits to district directors. Most interested in setting up employee/volunteer educa- | Expect distribution of 1,000 AV kits to Salvation Army centers by mid-1983. Employee and volunteer education programs to follow. |

| <u>Networks/major groups and organizations</u> | <u>Status</u> | <u>Plans</u> |
|---|---|--|
| Consumer Product Safety Network | Awarded contract in September 1981 for four pilot consumer group projects to develop materials and promote child safety seat and safety belt usage. Four projects in Iowa, Kansas, Washington, and Wisconsin nearing completion. | The network is interested in expanding to a large number of consumer groups. |
| Consumer Education Research Center | Contacted in July/August 1982. Interested in providing consumer educators information on safety belt program, consumer issues, and ways for increasing safety belt and child safety seat usage. | Initial articles will likely be published this year (fall/winter 1982). |
| Volunteers of America | Contacted in fall 1981 and in August 1982. Interested in conducting both employee and outreach programs to increase safety belt usage. | Expect final agreement to be reached in spring 1983. Program implementation by mid-1983. |
| Radio Emergency Associated Citizens Teams (REACT) International | Contract awarded in June 1982 to support promotion of safety belts and child safety seat use through public information and education projects REACT is engaged in. Includes distribution of bumper stickers at roadside rest breaks. REACT has already engaged in some public information efforts during Labor Day 1982. | Distribution of audiovisual kits will take place in late 1982. Five hundred educational kits to be distributed and used by local clubs by spring 1983. |
| Veterans of Foreign Wars | Considerable interest shown in program. Contacts made at national office in Kansas City in July 1982. Attempts to include safety belt AV kits in Safety Driving Course. | To distribute 500 AV educational kits to be included in driving program by mid- to late 1983. |

Networks/major
groups and

organizations

Ruritan International
Sertoma International
Optimists International
National Exchange
Soroptimists International
Kiwanis International

kits in Safety Driving
Course.

Status

Contacted approximately 14 such organizations by letter to solicit interest in February 1982. Received responses from those listed and several others with initial interest. In addition, Rotary International is reviewing materials. Some followups also made. The Optimists will concentrate on child safety seats. The Ruritans have included a feature article and editorial box in its news magazine regarding program, and NHTSA has received initial requests from memberships.

Plans

Expect minimum of four more groups to engage in activities for membership similar to Ruritan's by spring 1983. Likely distribution of AV kits to selected districts by mid-1983 and mass distribution of printed materials by some groups by mid-1983.

State Highway Safety Offices
National Association of
Governor's Highway Safety
Representatives

Most State Highway Safety Offices have received educational materials and have developed and reproduced their own. Major area of activity is in promoting child restraint usage. Many States are conducting loaner and public information programs. Increased emphasis is in promoting safety belt usage.

Expect more than 20 States to have major public information/education incentive programs underway by mid-1983. Many States have already conducted workshops.

American Association of
Motor Vehicle
Administrators

Contacted in fall of 1982. Association will encourage activity in driver licensing registration, motor vehicle inspection, and crash reporting related to safety belt usage. Some State Motor Vehicle Departments are already engaged in promoting safety belt usage.

Expect more formal relationship with and activity by Association by mid-1983.

| <u>Networks/major groups and organizations</u> | <u>Status</u> | <u>Plans</u> |
|---|---|--|
| <u>Medical, physician, child restraint groups</u> | | |
| American Academy of Pediatrics | Contract signed in September 1982. Due to change in personnel and approach, a new contract modification has been negotiated. Expect new contract modification to be signed by October 1982. The Academy has been and is continuing to be a primary promoter of child restraint usage. | Expect incentive programs involving 30-50 State chapters by spring 1983. In addition, approximately 500 educational AV kits will be sent to individual pediatricians by spring 1983. Actual promotional activity for belts should be well underway by spring 1983. |
| American College of Obstetrics and Gynecologists | Contract signed in April 1982. The college is to encourage promotion of safety belt use by pregnant women. Information to local obstetricians already conveyed in newsletters. | Activity by local obstetricians expected to be in operation by spring 1983. |
| American Association for Automotive Medicine | Contacted in fall 1981. Presently developing medical school curriculum for child safety seat usage. Interested in approaching State medical societies. | Medical school curriculum should be distributed in mid-1983. Negotiations to contact State medical societies could be completed by spring 1983, depending on whether or not the American Medical Association is interested in conducting this effort. |
| American Medical Association | Contact made in July 1982. Followup contact in August 1982. Plans being made to brief appropriate staff relative to the Association's involvement in approaching State medical societies as well as in implementing | Public information and education activity could begin as early as mid-1983 but would be dependent on current negotiations. Plan for approaching State medical societies could be implemented by mid-1983 as well. |

| <u>Networks/major groups and organizations</u> | <u>Status</u> | <u>Plans</u> |
|--|--|---|
| National Child Passenger Safety Association | mandatory safety belt usage legislation resolution passed by the Association. | Contract expected to be signed by November 1982. Operations to begin in early 1983. |
| American Academy of Family Physicians | Contacted in fall of 1981 and several times since to work out possible activities. Presently NHTSA to conduct training program for State directors in October 1982. Distribution of 500 educational AV kits to follow by spring 1983. Academy members to distribute information to patients and to publicize program in organizational publications. | Expect education of State Directors to take place in October 1982. Distribution of AV kits and reproduction of printed materials for distribution by family physicians to occur by spring 1983. Expect physicians to be educating and/or motivating patients to use belts by spring 1983. |
| American Hospital Association | Contacts made in fall 1981. Initial interest in setting up comprehensive education program for hospitals nationwide. Proposal for contract made but more followup negotiations will be required before contract is awarded. | Public information and education program by the Association could begin by spring 1983 if negotiations are successful. However, mid-1983 is more likely. Plan followup contacts during October 1982. |
| American Public Health Association | Initial contacts made in spring 1982. Currently, negotiating an agreement which would involve the use of educational AV | Contract expected to be negotiated by January 1983. Educational activity expected to begin by mid-1983. |

| <u>Networks/major groups and organizations</u> | <u>Status</u> | <u>Plans</u> |
|---|---|---|
| Children's Hospital | kits in State public health associations and in State and local public health clinics. Contract awarded in August 1982 to educate members of Parent Teachers Association in metropolitan Washington, D.C., area to promote safety belt and child safety seat usage. Program initiated. | Continue program. |
| American Nurses Association | Contact made in June 1982 via Nurses Association of American College of Obstetrics and Gynecologists. Attempting to negotiate a contract to have nurses promote child passenger safety. | Expect contract to be awarded by January 1983. Activity to begin by spring 1983. |
| American Dental Association | Contact made in fall of 1981 in attempt to negotiate public information efforts by the Association. Followup efforts began in July 1982. | Already included article in newsletter on need for safety belt usage. Distribute AV kits by mid-1983. |
| American Association of Oral Maxillofacial Surgeons | Contacted in July 1982. Interested in developing plan for informing member surgeons of need to promote safety belt usage. Also interested in developing public information materials. | Actual program implementation expected by mid-1983. |
| American Trauma Society | Contact made in fall 1982. Have received proposal for encouraging the usage of safety belts by personnel in shock-trauma facilities as well as by the hundreds of physicians and lay persons who belong to the Society. | Expect negotiations to be completed and program underway by spring 1983. |

| <u>Networks/major groups and organizations</u> | <u>Status</u> | <u>Plans</u> |
|---|---|---|
| Jaycettes | Contacted in fall 1981. Also participated in their annual meeting. Jaycettes are interested in continuing their child safety seat loaner programs which are ongoing nationwide. | Continue ongoing activities. |
| Wisconsin Physicians Service | Contacted in fall of 1981. Developed and distributed education materials to employees and members. | Continue efforts. |
| Society for Public Health Education | Contacted in late 1981. Interested in conducting groupwide educational program primarily through newsletter. Additional contacts made in September 1982. | Agreement expected by late 1982. Implement program by mid-1983. |
| <u>Automobile dealers and manufacturers</u> | | |
| National Automobile Dealers Association Motor Vehicle Manufacturers Association Automobile Importers of America Highway Users Federation for Safety and Mobility | Contacts were made late in 1981. NHTSA was developing an information and education program for automobile dealers to promote safety belt usage. These organizations are developing plans to pilot-test and implement a dealer/salesman educational program. | Distribute materials to dealers by mid-1983. |
| General Motors Ford Chrysler American Motors Toyota Honda Nissan Volkswagen Mercedes Benz | Most manufacturers were contacted in mid-1981. Most expressed desire to increase belt usage by including safety belts in public information materials (print and electronic) and by developing and implementing programs for increasing usage among employees and families. Most have | Continue ongoing efforts. |

| <u>Networks/major groups and organizations</u> | <u>Status</u> | <u>Plans</u> |
|--|--|--|
| <u>Private employers</u> | already implemented efforts by placing print and electronic media ads and by implementing employee programs. Some such as Ford have also contributed resources to NHTSA's network efforts (e.g., 10,000 films). | |
| <u>Individual companies</u> | NHTSA has contacted approximately 50 large private employers (in addition to auto companies) and has provided materials to conduct employee and/or comprehensive outreach programs. A plan, incorporating several avenues of contact with private employers, is being developed and will be implemented by mid-1983. It is anticipated that this plan will include the activities of the National Safety Council which is expected to play a primary role in developing and executing this plan. | Many private employers (including several large utility companies) have already implemented employee programs. It is expected that more employers will have done so by the close of 1983. the National Safety Council is already actively encouraging employee programs through its contacts with safety supervisors in more than 11,000 companies. It is expected that State and local safety councils, State Office of Highway Safety, and several trade and labor groups will be involved by fall 1983. |
| Group Health Association of America | Contacted in fall 1981 regarding the possibility of member groups promoting safety belt and child restraint usage. Have already conducted a survey with NHTSA to assess the status of activities to promote safety belt and/or child restraint usage and/or interest in doing so. | Continue efforts. |

| <u>Networks/major groups and organizations</u> | <u>Status</u> | <u>Plans</u> |
|---|---|-------------------|
| | Presently preparing a proposal to test the efficacy of various types of intervention in the health maintenance organizations setting to promote safety belt and child restraint usage. Many such groups already conducting member education efforts. | |
| Government Employees Insurance Company | Contacted in fall 1981 relative to interest in implementing both employee and outreach programs. Have already implemented employee education and use policy program. In addition, supported conference to promote safety belt usage and provided incentives for policyholders to buckle up. | Continue efforts. |
| American Family Insurance | Contacted in fall 1981. Already engaged in public information program using billboards, mailings to policyholders, and employees' pay envelopes. | Continue efforts. |
| American Insurance Association | Contacted in fall 1981. Instruction in public information/outreach efforts. Already placed public information ads promoting safety belt usage in periodicals such as Newsweek. | Continue efforts. |
| Other insurance companies contacted: State Farm, Travelers, Nationwide, USAA, Transamerica, Blue Cross, and League General | Most contacted in fall 1981 and followed up to present. Several interested in conducting employee and outreach programs to promote safety belt and/or child | Continue efforts. |

| <u>Networks/major groups and organizations</u> | <u>Status</u> | <u>Plans</u> |
|--|--|--|
| Insurance associations such as the National Association of Independent Insurers and the Insurance Information Institute | restraint usage. Several of these companies have implemented employee and policyholder programs. A few have also been engaged in limited public information efforts. Contacted at various periods since fall 1981. Several interested in employee and outreach efforts, but also interested in automatic restraint issue. | Continue efforts. |
| <u>Government employees</u> | | |
| Department of Transportation | Involved since the inception of the program. The DOT Secretary sent a memo in July 1982 directing all modal administrators to place new emphasis on a 1974 directive requiring safety belt usage by DOT employees while on official business or while riding in Government vehicles. NHTSA has conducted an education program for all employees and has issued an order requiring safety belt usage. An incentive program for employees using the central office has been designed and is being implemented. | Activities to be expanded to other modalities within DOT during 1983. |
| Department of Labor Department of Health and Human Services General Services Administration Department of Agriculture Office of Personnel Management | Agencies and departments contacted in fall 1981 and followed up during summer 1982. Each department and/or independent agency was asked to conduct a comprehensive safety belt usage program | Expect agencies to begin efforts early in 1983. Materials to be sent to such agencies to aid such efforts by January 1983. GSA issued a bulletin in April 1982 calling for |

| <u>Networks/major groups and organizations</u> | <u>Status</u> | <u>Plans</u> |
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| <u>Military</u> | incentive, and use policies. OSHA and OPM will join DOT in promoting such programs among the various agencies. | Government employees driving while on duty. |
| Army | The Air Force (safety command) was contacted during mid-1981 regarding a previously expressed interest in conducting a series of workshops for base safety personnel to motivate them and provide materials for them to promote safety belt usage. This effort was extended in its planning to include other services. An inter-agency agreement with the Department of Defense is presently being negotiated to provide for such a series of workshops. Most services have implemented and are enforcing mandatory belt usage policies. The Air Force especially has done considerable work to enforce existing use policies and to educate airmen on the need to wear safety belts. | Expect contact with Department of Defense to be signed by November 1982. Expect workshop series to begin mid-1983. |
| Navy | | |
| Air Force | | |
| Coast Guard | The Coast Guard was contacted in fall 1981 and was interested in implementing a mandatory safety belt usage policy. | Policy adopted May 1982. |
| <u>Law enforcement and emergency medical services</u> | Contract signed in July 1982 to develop and distribute materials to State and local police | Expect distribution of materials to local officers to begin during fall 1982 and |
| International Association of Chiefs of Police | | |

| <u>Networks/major groups and organizations</u> | <u>Status</u> | <u>Plans</u> |
|---|---|--|
| National Association of State Directors of Law Enforcement Training | chiefs and safety officers to promote belt usage by police and by the public as well as to increase the notation of safety belt usage and/or nonusage in highway crashes. | to be completed by mid-1983. Approximately 4,000 educational kits will be distributed plus public information materials for local police administrators. |
| National Sheriffs Association | Contract signed in July 1982 to develop and distribute training materials for law enforcement training courses. AV materials also to be provided to law enforcement training agencies. Materials developed. | Expect to distribute materials by January 1983. |
| National Sheriffs Association | Contact made in September 1982 to consider plans for distributing educational materials to local sheriffs to promote safety belt usage among deputies and the general public. | Expect contract to be signed by January 1983 and distribution of materials to begin by spring 1983. |



U.S. Department of
Transportation

Assistant Secretary
for Administration

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

JAN 13 1983

Mr. J. Dexter Peach
Director, Resources, Community
and Economic Development Division
U.S. General Accounting Office
Washington, D.C. 20548

Dear Mr. Peach:

We have enclosed two copies of the Department of Transportation's (DOT) reply to the General Accounting Office (GAO) draft report, "Status of the Department of Transportation's Safety Belt Program," dated November 22, 1982.

Generally, the report presents a factual and evenhanded description of the Safety Belt Program. It indicates that the National Highway Traffic Safety Administration's (NHTSA) program is far more comprehensive than previous programs, with greater emphasis on education, incentives, networking, and corporate involvement. The report also concludes that safety belt usage can be enhanced using a combination of approaches. This was precisely the conclusion of a 1980 National Academy of Science report, on which much of the current NHTSA program is founded. The GAO report implies that NHTSA's program has a potential for success and should be given a chance. We obviously agree.

[GAO COMMENT: We indicate in the report that there is evidence to suggest that safety belt usage can be encouraged by a program such as NHTSA's that involves a combination of approaches. However, we noted that a key factor affecting the program's success or failure will be the willingness of the voluntary groups to make the long-term commitment of funds and resources needed to significantly increase the safety belt usage rate and to maintain that rate.]

If we can be of further assistance, please let us know.

Sincerely,

Karen J. Lee
for Robert L. Fairman

Enclosures

DEPARTMENT OF TRANSPORTATION REPLY
TO
GAO DRAFT REPORT OF NOVEMBER 22, 1982
ON
"STATUS OF THE DEPARTMENT OF TRANSPORTATION'S SAFETY BELT PROGRAM"
ASSIGNMENT CODE 34505

SUMMARY OF GAO FINDINGS AND RECOMMENDATIONS

GAO found that in 1981 the Department initiated a long-term program to enhance the use of safety belts which relies heavily on the voluntary participation of all segments of society. The program consists of (1) disseminating public information, (2) conducting education programs, (3) awarding financial and other incentives, and (4) encouraging safety belt use policies in the Government and private sectors.

In developing the safety belt program, the Department relied upon the results of past foreign and domestic campaigns and other research. This evidence suggests that safety belt usage can be enhanced using a combination of approaches. However, the Department had not determined whether the benefits will outweigh the cost of the program. Also, the prior campaigns of others offer little insight into the potential success of the current program because the foreign campaigns were conducted while mandatory legislation was being considered and the domestic campaigns were short-term, narrowly scoped efforts.

GAO recommends that the Secretary of Transportation direct the Administrator of the National Highway Traffic Safety Administration to:

1. "--Specify the increased safety belt use expected to be achieved by implementing the agency's safety belt program, along with the time frame and related costs, to achieve and maintain such increased use.
2. "--Determine which Federal agency has authority to establish a Government-wide mandatory safety belt use policy and work with that agency to establish a policy with sufficient sanctions to ensure Federal employees' compliance while on official business."

SUMMARY OF DEPARTMENT OF TRANSPORTATION RESPONSE

Generally, the report presents a factual and evenhanded description of the Safety Belt Program. It indicates that NHTSA's program is far more comprehensive than previous programs, with greater emphasis on education, incentives, networking, and corporate involvement. The report also concludes (see cover summary) that "...evidence suggests that safety belt usage can be enhanced using a combination of approaches." This was precisely the conclusion of a 1980 National Academy of Science report, on which much of the current NHTSA

program is founded. The GAO report implies that NHTSA's program has a potential for success and should be given a chance. We obviously agree.

While we are generally pleased with the draft report, there are several points that should be made:

Recommendation 1

NHTSA has not specified specific safety belt use rate goals because we simply cannot predict how successful this program will be at this time. As the GAO draft report points out, the approach being used in NHTSA's program is novel. The program is founded on solid research and experience gathered in numerous cases across the country. However, it would be highly speculative at this point to predict specific levels of belt use by specific dates in the immediate future. This is no different than the problem posed initially in the anti-smoking campaign, the campaign against high blood pressure, etc. Clearly, these programs found it difficult, at the start of the programs, to determine specific goals for specific dates.

The approach to each of these public health issues has been similar. The approach has been first to increase the public's awareness of the problem and to get them to recognize that they are not immune to its potential effects. Secondly, the public was provided with a number of different approaches they could use, or actions they could take to modify their own behavior. Finally, the public was provided with a number of different messages to reinforce their resolve to behave in the appropriate manner. These activities are similar to those that form the cornerstone of the NHTSA approach.

From the outset of the program, we have described the criteria by which we intend to measure program progress. They include changes in the levels of public knowledge, attitudes towards safety belt usage, and changes in the levels of observed national usage rates. Thus, from an evaluation standpoint, there are several levels of activity underway to determine program impact.

In addition to the above measures, we have committed ourselves to identifying a substantial number of companies and organizations which are actively involved in the safety belt program. We do know that private sector organizations have contributed to well over \$9 million worth of program effort, indicating their commitment to the success of the campaign.

With regard to NHTSA's progress in accomplishing its goals, we have strong evidence that the public's awareness of the safety belt program has increased significantly since the President's announcement of the program on April 14, 1982. Ongoing nationwide surveys have shown a 15 percent increase in safety belt awareness between January of 1982 and November of 1982. It is not unreasonable to assume that this increase is due, at least in part, to the NHTSA program.

We have also initiated an administrative evaluation contract to determine the extent to which the materials which we have distributed are being used. Finally, the observational surveys of actual usage rates are also continuing. Information from these evaluation efforts should make it possible for us to make some predictions about usage rates at a later stage of the program. However, it is

not possible to make such predictions with any degree of reliability at the present time.

Recommendation 2

Regarding the establishment of a government-wide mandatory safety belt use policy, we would like to point out that the General Services Administration has had such a policy since 1973. No single Federal agency has the authority or the ability to issue a government-wide policy that will be more than just a statement of policy. We have deliberately chosen an agency-by-agency implementation approach, which we believe will have a much greater effect.

Also, as we reported to the House Appropriations Committee in our response to the 1980 recommendations made by the National Transportation Research Board, we have developed and are implementing a comprehensive Federal government plan in conjunction with the Department of Labor. Although this plan is still in its initial stages, it has been endorsed by the Federal Advisory Committee on Occupational Safety and Health (FACOSH). Several agencies and Departments are already implementing programs in response to the plan. Some of these include the General Services Administration (GSA); the Department of Labor (DOL), specifically the Occupational Safety and Health Agency (OSHA); the Department of Defense (DOD), especially the U. S. Air Force; and the Department of Transportation (DOT), specifically NHTSA.

The Department of Transportation provides a good laboratory example. We have had a required use policy since 1974 which has not been heavily enforced. Since the program began, we have spent considerable time and effort educating employees within NHTSA about the regulation and the need for safety belt usage. Usage rates now are approximately 22 percent Department-wide. NHTSA rates have reached an average of greater than 50 percent. We feel that much of this difference has been due to the emphasis and education we have been placing on the safety belt issue.

NHTSA believes that the agency which establishes its own policy will be more committed and enthusiastic about its implementation than if the policy is established outside the Agency. Agency-level programs are small enough to project a personal tone, large enough to be practical, and more likely to be encouraged within their supervisory and training/education systems. We believe our agency-level approach will be most effective.

GENERAL POSITION STATEMENT

NHTSA has been reluctant to set a specific safety belt use rate goal because we simply cannot predict, at this time, how successful this program will be. As GAO points out, the approach being used in NHTSA's program is novel in this country. Although NHTSA's program is founded on solid evidence, it would be speculative at this point to predict specific levels of safety belt use by specific dates in the future. We should be in a far better position to make these kinds of predictions as our experience with this system grows. NHTSA is confident that the program will be successful. We base our conclusions on research indicating a willingness among vehicle occupants to change their

behavior, research on why people don't wear safety belts, and the moderate successes of foreign governments in increasing safety belt use prior to pursuing legislation.

Incidentally, we do not agree with GAO's contention on page 8 that foreign experience means little, since mandatory use requirements were being considered at the time of the voluntary program. The point remains that safety belt use was increased substantially during the voluntary phases. That required use was being considered in some cases, does not negate the successes of the voluntary usage efforts. In some cases, legislation was not being considered. In others, active attempts were made not to mention the possibility of legislation.

[GAO COMMENT: We point out on pages 11 and 12 that mass media campaigns in several foreign countries were able to achieve usage rates in the 20- to 35-percent range. In the cases of Great Britain and Sweden, we recognize that safety belt campaigns achieved rates up to 33 percent and 36 percent, respectively. However, NHTSA noted in its 1982 report "Effectiveness and Efficiency of Safety Belt and Child Restraint Usage Programs; the Safety Potential of Safety Belts, Child Restraints, and Programs to Promote Their Use" that such results have been viewed negatively because most of these nations went on to pass mandatory safety belt use legislation. (Sweden's law became effective in January 1975 and Great Britain's was scheduled to become effective in January 1983.) Therefore, we believe that the effect of the pending legislation on the observed increases in safety belt use in those foreign countries is uncertain. Accordingly, we concluded that these foreign campaigns offer limited insight into the potential success of NHTSA's program because national legislation is not being considered by the United States.]

It is also important to point out that NHTSA's program is far more comprehensive than the foreign programs, with greater emphasis on the combination of education, incentives, networking, and corporate involvement.

The program for Federal Government employees must be broader than merely establishing a required use policy. NHTSA is convinced that a Federal agency safety belt use program (and programs outside Government as well) will be most successful if mandatory use requirements are accompanied by other remedies, notably face-to-face education, incentives, and other programs to increase safety belt use among drivers. As pointed out by GAO in the body of the report, NHTSA is encouraging a variety of programs with other Government agencies to provide the needed education, incentives and use policies.

The General Services Administration (GSA) has issued a Government-wide Bulletin (copy attached) recommending that all agencies issue safety belt use requirements in response to existing regulations requiring the use of "safety equipment." The remainder is up to us to encourage agency-specific education and incentive programs to support the provisions of this bulletin.

GAO states that research must be completed to provide information necessary to convince participants to conduct incentive programs and to adopt belt use policies. We are somewhat puzzled by this since the research regarding the incentives program is nearly complete. The materials are currently being placed in a

form most usable to employers, but research, itself, has essentially been completed and a final report is available. The economic information which is of primary interest to employers has also been gathered and is being placed in a form that will be most usable. While additional materials can, and will, be developed as soon as possible, the bulk of this research has also been completed. The initial draft of the materials will be pilot tested early next calendar year and should be available for widespread use within the next several months.

[GAO COMMENT: We recognized in the report that NHTSA was aware of the research needed to make its activities in the private employers network (as well as others that may conduct incentive programs and adopt use policies) effective. When our review work was completed in September 1982, the results of several research contracts were not expected to be available until late 1982 or early 1983. Because these contract results were not then available, we simply expressed the belief that such research must be completed to provide information necessary to convince private employers that establishing safety belt use programs, including incentive programs and use policies, could be to their economic advantage and contribute to their employees' general welfare and safety.]

We agree with GAO's statement that in order to maximize the impact of the program, the contract to obtain materials useful in conducting the mass-media portion of the program should be expedited. This contract was awarded on December 15, 1982.

In several places, GAO has noted the fact that the costs and benefits of the program have not been tabulated (i.e., pages ii and 8, third paragraph). NHTSA has reservations about using dollar figures to value a life saved or an injury avoided. Nevertheless, the cost effectiveness of the Safety Belt Program can be demonstrated. We know that each 1 percent increase in safety belt use will save about 180 lives and 3,400 serious injuries (Abbreviated Injury Scale, AIS Levels 2 through 5) per year. Using only the economic costs to society attributable to serious injuries and deaths (\$9,400 weighted average for AIS 2 through 5 and \$265,000 for deaths) each 1 percent increase in safety belt use per year will save nearly \$80 million. The FY 1981 and 1982 contract costs for the program are \$6.9 million and the FY 1983 request is \$2.7 million. Even when the larger cost figures (\$27 million for FY 1981 and 1982)* included in GAO's discussion on page 22 are used, the increase in safety belt usage

necessary to justify the program is obviously very small. A single percentage point increase for a single year will more than justify the program. Thus, even if one includes only the economic portion of the cost (not including grief, pain, and other intangible costs, which are impossible to quantify) the program is demonstrably cost beneficial.

[GAO COMMENT: Several experts outside the Federal Government whom we contacted as a part of this review agreed with DOT that if all people not now wearing their safety belts (about 90 percent of the population) were convinced to do so--at the average--each 1 percentage point increase would save 180 lives and prevent 3,400 serious injuries. However, these experts said that the individuals comprising the first percentage point increase would probably be those most concerned with their personal safety and therefore less likely to be involved in accidents causing fatalities and serious injuries. This concept applies to those individuals comprising subsequent percentage point increases to a progressively less extent. Therefore, NHTSA cannot state unequivocally that a single percentage point increase in safety belt use for a single year will more than justify the program. In order to prepare a favorable cost/benefit analysis for the program, NHTSA would have to know the percentage increase where enough lives were saved and/or serious injuries prevented due to the use of safety belts so that the economic value computed for this group would be at least equal to the program's costs.]

On page 21, GAO states that an evaluation plan has not yet been finalized and thus "...we were unable to determine its adequacy for providing management information on the safety belt program's impact..." Although the final evaluation plan has not been publicly released by NHTSA (it should be within the next several weeks), a variety of evaluation efforts are already in place and NHTSA is continually monitoring performance as the program progresses. Included are national samples of belt and child safety use, continuing surveys of attitudes and knowledge regarding safety belt use, and evaluations of the appropriateness of individual educational materials for specific target groups. GAO was briefed on each of these efforts, and we believe that the evaluation efforts are responsive to the management need to evaluate the Safety Belt Program. We hope to improve on these efforts in the future by evaluating individual program elements (e.g., education, incentives) and the delivery systems utilized in the program (e.g., corporations, service groups) as well as specific project evaluations (e.g., a model city).

Overall, we believe GAO has done a good job of describing the program and that the report should be useful to those in Congress and elsewhere interested in the program.

Attachment

* One-half of the \$27 million cited by GAO is Section 402 grant money which would be spent by the States even without this program.

ATTACHMENT

GENERAL SERVICES ADMINISTRATION
Washington, DC 20405

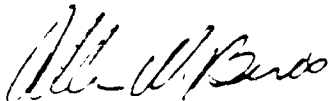
April 23, 1982

GSA BULLETIN FPMR G-156
TRANSPORTATION AND MOTOR VEHICLES

TO: Heads of Federal agencies

SUBJECT: Use of safety belt systems in motor vehicles

1. Purpose. This bulletin reemphasizes the benefits of using safety belts (both seat and shoulder) when operating or riding in a Government vehicle.
2. Expiration date. This bulletin provides information of a continuing nature and will remain in effect until revised or canceled.
3. Background. Despite the decrease in traffic fatalities attributed to the reduction in the speed limit to 55 miles per hour, far too many deaths and serious injuries occur because the occupants of a motor vehicle do not use some form of restraint. The National Safety Council states that if passenger car occupants used safety belts at all times, at least 12,000 lives would be saved annually. During 1982, the National Highway Traffic Safety Administration, the National Safety Council, and other organizations are sponsoring a campaign to promote the use of safety belts by motor vehicle operators and passengers. As part of this drive, the Federal Government is emphasizing its commitment to safe driving by reiterating the benefits associated with the use of seat and shoulder belts.
4. Suggested action.
 - a. Federal agencies have a responsibility to take the lead in ensuring that motor vehicle accidents involving agency personnel are kept to a minimum, that personal safety and prevention of injury are assured and that seat belts and shoulder belts provided in motor vehicles are used by the driver and all passengers.
 - b. The Heads of Federal agencies are responsible for furnishing "...each employee employment and a place of employment which are free from recognized hazards that are causing or are likely to cause death or serious physical harm." (29 CFR 1960.8(a)). In addition, the heads of each agency "...shall acquire, maintain, and require the use of approved personal protective equipment, approved safety equipment, and other devices necessary to protect employees." (29 CFR 1960.8(c)) Regulations should be issued requiring their employees operating or riding in a Government-owned or personal vehicle on official business to wear both seat and shoulder belts at all times. The driver should also instruct passengers to fasten their seat and shoulder belts before operation.
 - c. All supervisors of Government motor vehicle operations should take necessary action to ensure that all employees using Government vehicles are informed of these requirements and should take appropriate disciplinary action necessary to enforce adherence to these requirements.
5. Effect on other issuances. GSA Bulletin FPMR G-85, Use of seat belt systems in motor vehicles, August 29, 1973, is canceled.


ALLAN W. BERES
Commissioner, Transportation and
Public Utilities Service

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