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Mr. Jack Danielson
Acting Deputy Administrator
National Highway Traffic Safety Administration
1200 New Jersey Avenue SE
Washington, DC 20590

Request for Comment; Reports, Forms, and Record Keeping Requirements; Docket No. NHTSA-2016-0038

Dear Mr. Danielson:

The Insurance Institute for Highway Safety (IIHS) welcomes the opportunity to comment on the proposed information collection "Crash Risk Associated with Drug and Alcohol Use by Drivers in Fatal and Serious Injury Crashes." As described in the *Federal Register* notice of July 17, 2017, NHTSA proposes to collect data on a sample of seriously injured, crash-involved drivers (cases) and a matched sample of non-crash-involved drivers (controls). The proposed study will collect biological specimens and self-report data for both cases and controls and will examine the risk of being seriously injured in a motor vehicle crash when drivers have used licit and illicit drugs.

While the crash risk associated with alcohol is well-known, considerably less research has focused on the role of drugs other than alcohol in crashes. The evidence has been mixed on the effects of drugs on crash risk. For example, some studies indicate marijuana use could more than double crash risk (Beirness, et al., 2006; Li, et al., 2012), while others show no effect (Romano, et al., 2014; Compton & Berning, 2015). However, several challenges limit causal interpretations of these findings. Many studies relied exclusively on self-reports, and many did not adequately control for confounding variables such as alcohol use.

In 2012, NHTSA completed the most carefully controlled study conducted to date of the risk associated with drug-positive driving in Virginia Beach, Virginia (Compton & Berning, 2015). This large-scale study did not find evidence of increased crash risk for drugs after controlling for demographics and alcohol use. However, the study was based on police-reported crashes, and results could differ in a study examining more serious crashes. IIHS believes the proposed research, which uses the same careful case-control methodology, but focuses on the most serious crashes, would build upon NHTSA's previous study of drivers in Virginia Beach.

In conclusion, IIHS supports the collection of information to examine the crash risk associated with drug and alcohol use by drivers in serious and fatal injury crashes, and we appreciate the opportunity to comment on this matter.

Sincerely,

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References

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