Description of document:	National Highway Traffic Safety Administration (NHTSA) Office of Defect Investigation (ODI) Standard Operating Procedures (SOP), 2016-2017
Requested date:	18-July-2017
Release date:	09-April-2019
Posted date:	03-June-2019
Source of document:	FOIA Request NHTSA Executive Secretariat 1200 New Jersey Avenue, SE West Building, 41-304 Washington, D.C. 20590 Fax: (202) 493-2929 Email: NHTSA FOIA Inquiry online form

U.S. Department
of Transportation

**National Highway
Traffic Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

April 9, 2019

RE: Freedom of Information Act (FOIA) Request ES17-002240

This responds to your July 18, 2017 FOIA request seeking each Standard Operating Procedure on the Office of Defect Investigation's internal website.

Enclosed are records responsive to your request.

I have withheld portions of the records containing information whose disclosure would constitute a clearly unwarranted invasion of personal privacy pursuant to FOIA Exemption 6. 5 U.S.C. § 552(b)(6).

Pursuant to 49 CFR Part 7, there is no charge for this response.

I am the person responsible for this determination. If you wish to appeal this decision, you may do so by writing to the Chief Counsel, National Highway Traffic Safety Administration, 1200 New Jersey Avenue, S.E., West Building, W41-227, Washington, DC 20590, pursuant to 49 C.F.R. § 7.32(d). Alternatively, you may submit your appeal via electronic mail to nhtsa.foia.appeal@dot.gov. An appeal must be submitted within 90 days from the date of this determination. It should contain any information and argument upon which you rely. The decision of the Chief Counsel will be administratively final.

You also have the right to seek dispute resolution services from NHTSA's FOIA Public Liaison, Mary Sprague, who may be contacted on (202) 366-3564 or by electronic mail at Mary.Sprague@dot.gov.

Further dispute resolution is available through the Office of Government Information Services (OGIS). You may contact OGIS on (202) 741-5770 or by electronic mail at ogis@nara.gov.

Very Truly Yours,

Andrew J. DiMarsico
Senior Attorney

Enclosures

U.S. Department of Transportation (DOT)

National Highway Traffic Safety Administration (NHTSA)

Office of Defects Investigation

General Standard Operating Procedure (SOP)

Version 1.0

January 4, 2017

DOT – For Official Use Only (FOUO)

Revision History

Version	Author	Date	Revision
1.0	Angel Jackson	January 4, 2017	Initial DRAFT for review and approval.

Final Authorized and Approved By

Approved by Michael L. Brown | January 8, 2017

ODI Director | **Date**

Table of Contents

1.0 Overview

The Office of Defects Investigations (ODI) has created standard operating procedures (SOPs) as a means of establishing direction and guidance to those employees assigned to ODI. These SOPs do not supersede general orders or other policy directives issued by the National Highway Traffic Safety Administration (NHTSA) or the Department of Transportation (DOT).

1.1 Purpose

The purpose of these SOPs is to provide specific guidance to ODI employees on matters or procedures used with ODI.

1.2 Scope

The National Highway Traffic Safety Administration's (NHTSA) Office of Defects Investigation leads the world in protecting the driving public from vehicle safety defects. In 2016, ODI implemented a new organizational structure to enhance the organization's effectiveness to achieve its safety mission. Under this new structure, ODI also implemented new processes and procedures.

This procedure applies to all ODI divisions and staff.

1.3 Prerequisites

None

1.4 Roles & Responsibilities

1.4.1 SOP Performer

All ODI employees are responsible for executing this procedure as applicable and described.

1.4.2 Definitions

The following general definitions will be applicable to interpreting responsibilities and roles as contained within these SOPs:

ODI - Office of Defects Investigation
Office Director – the Office Director of ODI
Division Chief – the chief(s) of a division within ODI
Management – individuals designated as managers with ODI by NHTSA Human Resources
Employees – all ODI employees regardless of rank, assignment, or designation
Supervisor – an employee's immediate supervisor

OPI – Office of Primary Interest. This would be the unit(s) having a vested interest in the policy or issue being discussed in the SOP.

Individual SOPs in this SOP directory may include specific definitions related to the material being covered in the SOP.

1.4.3 Organization

The SOPs are organized according to their content under a general category. The following general categories are established for the SOPs developed for use within ODI:

Number	General Category
SOP 1.0	Standard Operating Procedures Generally
SOP 2.0	Administration
SOP 3.0	Personnel
SOP 4.0	Operations

1.4.4 Review and Revision

These SOPs are created as 'living' documents. It is expected that revisions will be needed to keep the SOPs current and useful in maintaining effective and efficient protocols within ODI. *All ODI employees are responsible for bringing issues that will require a modification to an SOP to the attention of ODI management.* ODI management will consider all suggestive revisions in a timely manner to ensure the SOPs remain current and useful. Managers receiving any revision suggestion shall discuss suggested revisions with the Office Director.

An OPI will be assigned for each SOP. The OPI assigned to SOPs relating to Administration and Personnel general categories will be responsible for reviewing and updating their assigned SOPs at least *annually.* The OPI assigned to SOPs relating to Operations will be responsible for reviewing and updating these SOPs each *January and again in July of each year*. The manager assigned to the OPI will certify to the Office Director when these reviews are completed.

Whenever a NHTSA or DOT directive is issued that affects an SOP the manager of the OPI will be responsible of making corrections to the SOP so that the SOP will conform to such directives. These revisions will be made within *30 days* following the issuance of the directive.

New SOPs

Any employee may suggest the creation of a new SOP to deal with an issue where there is a need to promulgate direction within ODI. These suggestions should be forwarded with recommendations through appropriate channels to the Office Director.

2.0 Document Location

This SOP is located at the following link: http://our.dot.gov/office/nhtsa.nvs/NVS-200/NVS-210/ODI%20Standard%20Opertating%20Procedures/Forms/AllItems.aspx

U.S. Department of Transportation (DOT)

National Highway Traffic Safety Administration (NHTSA)

Office of Defects Investigation Operations

Standard Operating Procedure (SOP)

Version 1.1

September 30, 2016

DOT – For Official Use Only (FOUO)

Revision History

Version	Author	Date	Revision
1.0	Angel Jackson	September 25, 2016	Initial DRAFT for review and approval.
1.1	Angel Jackson	October 4, 2016	Acting OD and DC edits incorporated.

Final Authorized and Approved By

Approved by Mike Brown, Acting ODI Director	November 3, 2016
ODI Director	**Date**

Table of Contents

1.0 Overview

1.1 Purpose

The purpose of this document is to define the Standard Operating Procedure (SOP) to be employed by the Office of Defects Investigation (ODI) for defining the new organizational structure of ODI.

1.2 Scope

The National Highway Traffic Safety Administration's (NHTSA) Office of Defects Investigation leads the world in protecting the driving public from vehicle safety defects. In 2016, ODI implemented a new organizational structure to enhance the organization's effectiveness to achieve its safety mission. Under this new structure, ODI's Director oversees and manages nine divisions: five investigative divisions including four, new Vehicle Defect Divisions (VDD), and the Medium and Heavy Duty Vehicle Division; Correspondence Research; Recalls Management; and, two new divisions, Trends Analysis and Program Support.

This procedure applies to all ODI divisions and staff.

1.3 Prerequisites

None

1.4 Roles & Responsibilities

1.4.1 SOP Performer

All ODI employees are responsible for executing this procedure as applicable and described.

1.4.2 SOP Owner

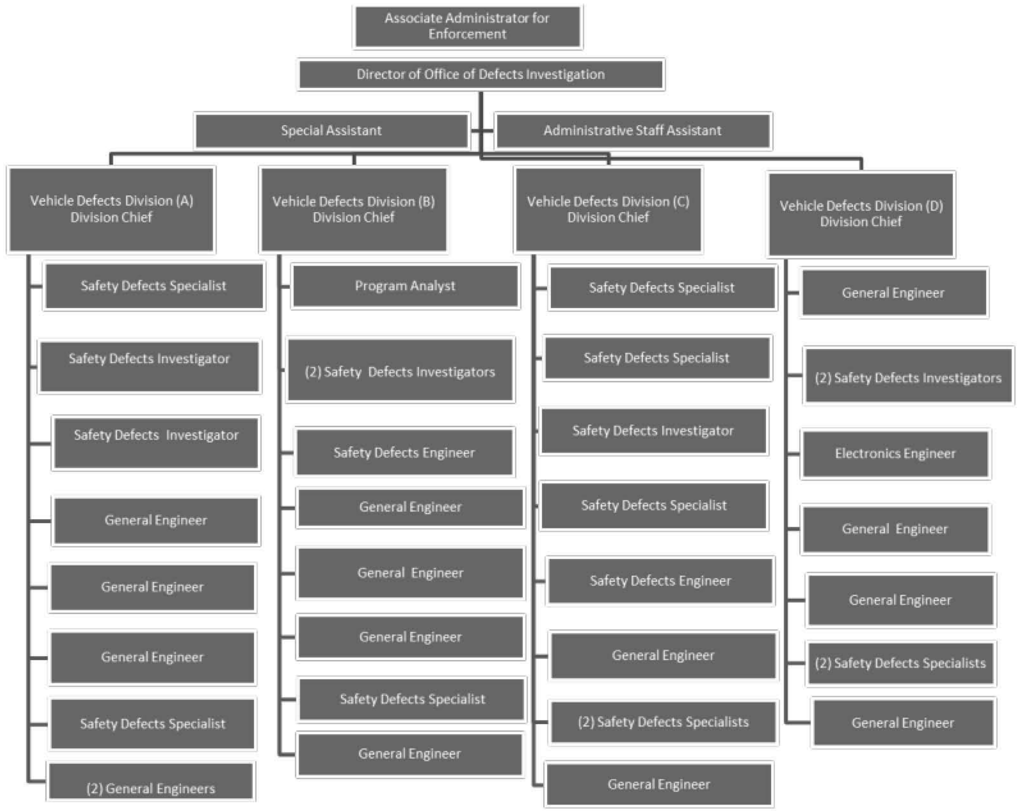
The Program Support Division (PSD) Chief or acting ODI official designated by the ODI Director is responsible for SOP document control, distribution, change management and accuracy.

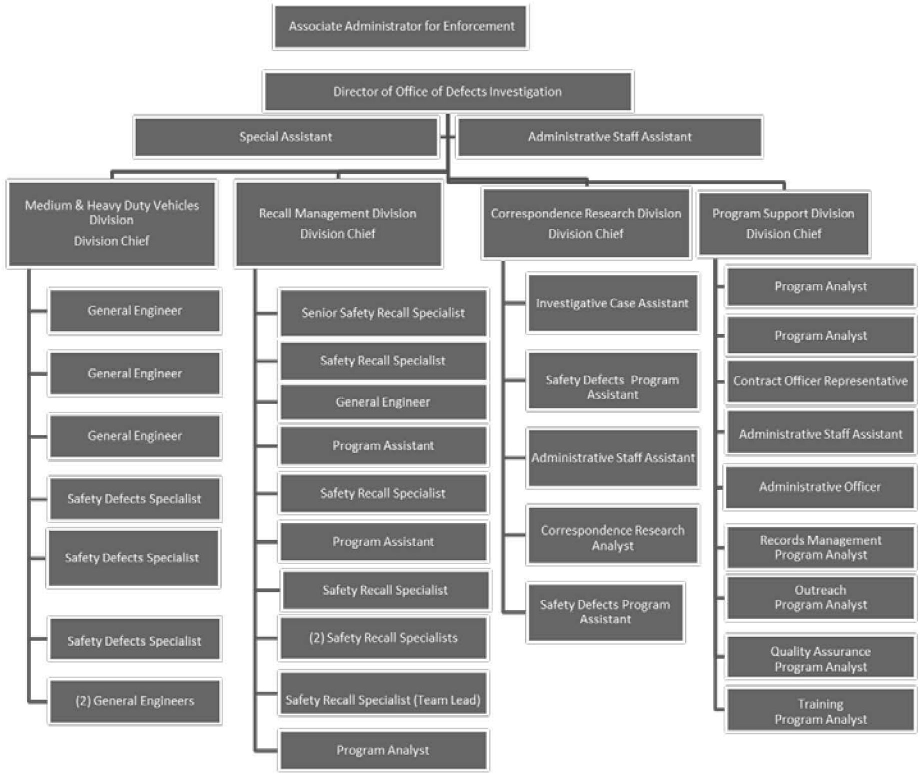
1.4.3 SOP Maintenance

The PSD Chief assigns the person responsible for convening a review, and reissuing this SOP prior to the annual anniversary date of the current approved version.

1.4.4 ODI Organization Charts

The current organizational structure for ODI is shown below.


Associate Administrator for Enforcement
Director of Office of Defects Investigation
Special Assistant
Administrative Staff Assistant
Vehicle Defects Division (A) Division Chief
Safety Defects Specialist
Safety Defects Investigator
Safety Defects Investigator
General Engineer
General Engineer
General Engineer
Safety Defects Specialist
(2) General Engineers
Vehicle Defects Division (B) Division Chief
Program Analyst
(2) Safety Defects Investigators
Safety Defects Engineer
General Engineer
General Engineer
General Engineer
Safety Defects Specialist
General Engineer
Vehicle Defects Division (C) Division Chief
Safety Defects Specialist
Safety Defects Specialist
Safety Defects Investigator
Safety Defects Specialist
Safety Defects Engineer
General Engineer
(2) Safety Defects Specialists
General Engineer
Vehicle Defects Division (D) Division Chief
General Engineer
(2) Safety Defects Investigators
Electronics Engineer
General Engineer
General Engineer
(2) Safety Defects Specialists
General Engineer



2.0 ODI Director

The Director serves as the principal advisor and consultant to the Associate Administrator for Enforcement for all activities related to the functional responsibilities of ODI. He/she consults with leading safety authorities, nationally and internationally, for the exchange of information and ideas relative to achieving the objectives of NHTSA. The Director leads a team of professionals to identify, based on a wide array of data, situations involving significant motor vehicle and motor vehicle equipment safety risks that may warrant investigation and ensures that the highest risks are given sufficient priority.

ODI's Director oversees the planning, design, and execution of nine program areas. These divisions are listed below. In addition, the Director has two direct reports, a Special Assistant and Administrative Staff Assistant.

- Correspondence Research
- Medium and Heavy Duty Vehicles
- Program Support
- Recall Management
- Trends Analysis
- Vehicle Defect Division A
- Vehicle Defect Division B
- Vehicle Defect Division C

- Vehicle Defect Division D

3.0 Correspondence Research

The Correspondence Research Division (CRD) collects information and data from consumers concerning potential safety-related defects, maintains ODI records, and prepares replies to correspondence related to ODI's mission including Congressional and consumer inquiries and requests for information. CRD is led by a Division Chief who will manage a staff including an administrative assistant, investigative case assistant, program analyst and technical writers.

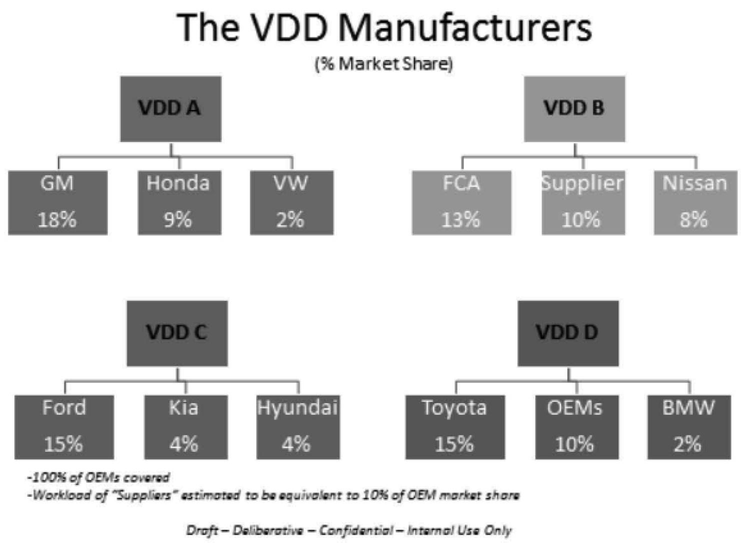
4.0 Investigative Divisions

ODI is the world leader in the investigation, inspection, and testing necessary for the identification and correction of safety-related defects in domestic and foreign motor vehicles and equipment, and in the administration of safety-related defect notification requirements of the National Traffic and Motor Vehicle Safety Act of 1966, as amended. ODI's investigative divisions monitor, research, analyze, and test data from multiple sources in order to determine whether an unreasonable risk to motor vehicle safety exists. ODI looks at all available data to assess the relative frequency and potential severity of any possible safety defect. ODI generally pursues investigations and subsequently insists on recalls where it can most clearly identify and demonstrate safety risk.

ODI's investigative structure is comprised of five divisions: Medium and Heavy Duty Vehicles Division (MHDVD) and four Vehicle Defect Divisions (VDD A, VDD B, VDD C, and VDD D). MHDVD conducts investigations into alleged safety defects in trucks, buses, recreational vehicles, emergency vehicles, motorcycles and other medium and heavy-duty vehicles and equipment, including their components. MHDVD is led by a Division Chief and will be comprised of investigating engineers and safety defect analysts who provide screening support.

The newly formed VDDs are organized by vehicle manufacturer key accounts covering 100% of the vehicle market including vehicle suppliers. Each VDD is led by a Division Chief and each manufacturer account team includes engineers, safety defect investigators and specialists who are responsible for the entire investigative process, and has complete enforcement coverage for their specific manufacturer: consumer complaint screening, early warning reporting review, issue pursuits, consent order process, investigative action, and post-investigative queries.

4.1 Vehicle Defect Division Diagram



5.0 Program Support

The Program Support Division (PSD) is responsible for providing timely and comprehensive administrative, information and financial management, procurement, quality assurance, and training services to support all program areas within ODI to effectively administer premier defects investigation and recall processes. The PSD will provide the essential functions needed to maintain operations in ODI, enabling the workforce to better focus on its core missions. PSD aims to create a differentiating experience by providing the best services to meet the needs of internal and external ODI customers. PSD is led by a Division Chief and will be comprised of employees in seven functional areas: administration, procurement (contracting officer representative), outreach, technology coordination, records management, training, and quality assurance.

6.0 Recall Management

The Recall Management Division (RMD) administers NHTSA's safety recall program and provides monitoring and verification of manufacturer notification and remedy campaigns. RMD provides accurate, timely and useful recall information to a variety of customers including other Agency and Government personnel and the public. To do this, the division engages in a wide variety of administrative, analytical, investigative, and enforcement activities. RMD is led by a Division Chief and will include engineers, program assistants and analysts, and recall specialists.

7.0 Trends Analysis

ODI faces the challenge of managing complexities of unstructured data, changes in technology, social media data, and data captured in the form of video and natural language. To manage these challenges, ODI established the Trends Analysis Division (TAD). TAD's data analytic experts will manage large databases and perform text mining, predictive forecasting, statistical optimization, data visualization, metric calculations, outlier analysis and governance, along with data processing, reporting and querying to identify emerging vehicle safety issues and help detect defect trends and patterns. TAD is led by a Division Chief who will manage a staff of data analysts, statisticians, and engineers.

8.0 Document Location

This SOP is located at the following link: http://our.dot.gov/office/nhtsa.nvs/NVS-200/NVS-210/ODI%20Standard%20Opertating%20Procedures/Forms/AllItems.aspx

U.S. Department of Transportation (DOT) National Highway Traffic Safety Administration (NHTSA)

Freedom of Information Act (FOIA)

Standard Operating Procedure (SOP)

Version 5.3

April 3, 2017

DOT – For Official Use Only (FOUO)

DRAFT

Revision History

Version	Author	Date	Revision
5.0	Diamond Mitchell	October 24, 2016	Initial DRAFT for review.
5.1	Nate Seymour	January 10, 2017	Revised DRAFT for vetting
5.2	Nate Seymour	January 30, 2017	DRAFT for approval
5.3	Delia Lopez	March 28, 2017	Draft to Angel and Steve for approval

Final Authorized and Approved By

Signed by Stephen Ridella	April 3, 2017
ODI Director	**Date**

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5.0 Overview

The Freedom of Information Act (FOIA) requires each Federal agency to disclose agency records upon request and to make certain records available to the public. The FOIA requires agencies to proactively make available certain categories of information, including frequently requested records. While the Office of the Secretary oversees the FOIA for the Department, each operating mode of the Department responds to FOIA requests submitted to it. NHTSA receives FOIA requests through NHTSA Executive Secretariat who routes them to the Office of Chief Counsel (NCC) for processing and final response. FOIA requests for records related to ODI program areas are forwarded to ODI by NCC FOIA specialists.

5.1 Purpose

The purpose of this document is to establish the Standard Operating Procedure (SOP) to process FOIA requests within the Office of Defects Investigation (ODI).

5.2 Scope

This SOP applies to all ODI staff and contract personnel and provides specific guidance to process FOIA requests.

5.3 Prerequisites

None

5.4 Role & Responsibilities

5.4.1 FOIA Point of Contact (POC)

The FOIA Point of Contact (POC) is Delia Lopez. The POC receives the FOIA request from NCC and identifies potential records custodians (e.g. ODI staff and contract personnel that may have records related to the request). The POC forwards the FOIA request, NCC FOIA notice and the search checklist to the potential custodians to begin the process to respond to the request. Once the record custodian responds to the FOIA request, the POC will assemble and transmit the responsive records to NCC.

The POC is responsible for ensuring FOIA responses get uploaded into the FOIA case management software, providing guidance on document submissions and templates, sending requests, communicating with NCC for extensions and updates, assisting with converting records from hardcopy to electronic copy, and assisting with outstanding needs surrounding

FOIA responses. Additionally, the POC is required to complete FOIAXpress Software Training in order to utilize the necessary software to process FOIA requests.

5.4.2 ODI Staff

All ODI staff and contract personnel are responsible for executing this procedure as applicable and described.

5.4.3 SOP Owner

The ODI Officer Director (OD) or acting ODI official is responsible for SOP document control, distribution, change management and accuracy.

5.5 SOP Maintenance

The Program Support Division (PSD) Chief is responsible for convening a review and reissuing the SOP prior to the anniversary date of the current approved version.

5.6 Timeframe

The FOIA requires NHTSA to respond to a FOIA request within twenty (20) days. If the agency fails to respond within the statutory timeframe, the FOIA requester has an immediate right to sue the agency in Federal District Court.

Therefore, ODI staff must respond to a FOIA request within three-five (3-5) business days from the date of receipt from the POC. If an employee is not the records custodian or cannot respond to a FOIA request within three-five (3-5) business days due to a significant office priority (one that is well beyond a normal workload), he/she must notify the POC, Delia Lopez, as soon as the FOIA request is received. If necessary, the POC will request an extension from NCC.

5.7 FOIA Procedures and Duties

Upon the receipt of a FOIA request, the POC will enter it into the FOIA log sheet. The POC shall provide the FOIA log sheet to the OD and PSD Chief on a weekly basis. If there are no pending FOIA requests, the POC shall provide a report informing the OD and PSD Chief that no FOIA requests currently exist.

The POC will determine the responsible division and records custodians to be notified. Records custodians are responsible for conducting a search and submitting all nonpublic records in their possession to the POC.

When responding to a request, the records custodian shall provide all records (e.g., emails, spreadsheets, word documents, photographs, video) related to the request to the POC, regardless of whether the records are classified as confidential, non-confidential, deliberative, etc. In their response, is the records custodian's responsibility to identify records that are confidential, non-confidential, subject to an exemption to disclosure deliberative, or may require redaction for personal identifiers. In addition, the records custodian must alert the POC to any other issues concerning the records and identify any records that are available publicly. The records custodian must be prepared to explain why a record may be subject to an exemption to disclosure, however, NCC determines whether a record is disclosed under the FOIA and may require assistance from each records custodian to make that determination. If a records custodian is aware of other potential records custodians who have not been notified of the FOIA request, he or she shall notify the POC immediately.

Each records custodian shall complete a FOIA Search Checklist, regardless of whether or not the search produced responsive records. See Appendix A or the FOIA Submission Folder on NHTSA's H drive for a blank checklist.

If an employee is requested to produce records by the POC, but he/she is not the appropriate contact for a FOIA request and is certain that he/she does not need to perform a search, the employee must send an email to the POC stating he/she was not involved in the matter and has no responsive records.

NCC only accepts electronic files in response to FOIA requests. All responsive hardcopy records shall be scanned to create a PDF. For responsive records that are too large to send via email, the records custodian shall place the records in the FOIA Submissions Folder on NHTSA's H drive using the following file naming convention:

FOIA Control Number_your last name Example: FOIA#ES12-000666_LastName

After the files have been uploaded to the H drive, the records custodian shall send the POC an email notifying her that the records have been uploaded.

If you have questions, concerning the scope of the request, or how to properly search for responsive records, please contact the POC prior to contacting the NCC FOIA Specialist assigned to the request.

6.0 Document Location

This SOP is located at the following location: FOIA SOP

Standard Operating Procedures

Processing Pursuit Records

Internal Use Only

Change/Revision

Revision Number	**Change Summary**	**Review Date**	**Revision Date**	**Effective Date**
1	File conversion and read-only instructions	8.11	8.11	8.11
2	Reviewed, reformatted and edited this document	1.16		1.16
3	Final	10.16	10.16	10.16

Revision Number	**Change Requested by**	**Request Date**	**Approved by**
1			

Table of Contents

I. Purpose

The purpose of this task is to provide support by processing records used for information gathering and communications by the office of Defects Investigation (ODI) and vehicle manufacturers, during an active investigation.

Records exchanged during an ongoing defect investigation are made publically accessible, following Personally Identifiable Information (PII) redaction.

II. Scope

This document covers the procedures used to receive, review, redact (including Quality Control checking (QC), enter and upload, pursuit related records and information to the Artemis database and repositories.

III. Roles and Responsibilities

Data Specialist - Redacts the record, enters data from the record into the database, and uploads the redacted record to the public repository.

Investigation Case Assistant - Government staffer (FTE) who receives the records, maintains the log and makes the records available to the Data Specialist.

IV. Definitions

Artemis (Advanced Retrieval, Tire, Equipment and Motor Vehicle Information System) is the database and image repository system.

Artemis Record Repositories - Separate store housing for internal and public records.

ODI pursuit records - any official business record created or collected for a Preliminary Evaluation (PE), Engineering Analysis (EA), Audit Query (AQ), Recall Query (RQ), Timeliness Query (TQ), Service Query (SQ), Defect Petition (DP) and Recall Petition (RP).
These records typically include the following:

Resumes

- Opening resume
- Closing resume
- Closing report

IR and Other Correspondence to Manufacturers

- IR letters to subject manufacturer (mfr.)
- IR letters to peer mfrs./suppliers
- Recall request letter to subject mfr.
- Response and other correspondence from mfrs.
- Response cover letter(s) from subject mfr.
- Mfr. IR response data (any and all other documents, electronic media, etc.)
- Response cover letter(s) from peer mfrs./suppliers

- Peer IR response data (any and all other documents, electronic media, etc.)
- IR response extension request & ODI reply
- Recall request response from subject mfr.

Test/ Survey Materials

- Test/survey requests (VRTC, 3rd party, both)
- Test/survey final reports

Other

- Meetings w/mfrs./others & presentations
- VOQ complainant contact list
- Field trips/visits
- Management briefing (closed w/o full recall only)

Confidentiality related records

- Mfr. request for confidentiality
- NCC response to mfr. request for confidentiality
- Redacted copies of confidential materials
- Non-redacted confidential materials

V. Procedures

The following procedures describe the processes for; (1) records receipt and recording; (2) entering information in Artemis; (3) records upload to an Artemis repository.

The procedures described below refer to a new record. Editing and/or updating a record is also covered later in the procedures.

Document Receiving and Recording

Pursuit records are placed in a designated folder by the Investigation Case Assistant (FTE). The Data Specialist copies the folder to the desktop to begin processing. (Working from the desktop is more convenient and there is less chance of error when uploading the file to Artemis.) Records are usually submitted to NHTSA in these file formats:

- Acrobat (.pdf)
- Excel spreadsheet (.xls or .xlsx)
- Access database files (.mdb)
- Occasionally, PowerPoint presentation (.ppt)
- Occasionally, video files

After uploading, the file gets renamed with the name generated by Artemis, consisting of the record type and tracking ID. Generation of a slipsheet will supply the file name (the file name can also be configured without generating a slipsheet, by combining the file type and tracking ID number).
For example:

INRL + Tracking ID for a Response Letter
INRD + Tracking ID for a Response Dat**a**
INME + Tracking ID for a Memo

1. Copy the folder and paste it to the desktop. Location:
\\nhthqnwas128\Conversions\Public\Pursuit Documents\TO BE REDACTED\Document on the Chart

2. Enter **Date Received, Name** and **Date Started** into the spreadsheet used to track the records. Location: (H: NVS/Enforcement/Pursuits/Received2)

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	
1	CASE NAME	DATE	MANUFACTURER NAME	DATE ROSA RECEIVED	INVESTIGATOR	WHO UPLOAD LETTER	DATE LETTER IN	WHO WORKING ON IT	DISC DATE STARTED	DISC DATE FINISH	HOW MANY PARTS FINISH	UPLOAD TO PUBLIC	SEND TO BLF FOR REDACTED	OCC DECISION	NOTES
245	RQ13-002	9/13/2013	GM	9/18/2013	M, LEE	ROSA	9/18/2013	ROSA	9/18/2013	9/24/2013	4 OF 4				
246	RQ13-003	9/9/2013	GM	9/10/2013	E, REICHARD	ROSA	9/11/2013	ROSA	9/11/2013	9/11/2013	7 OF 7				
247	RQ13003	9/23/2013	GM	9/26/2013	E, REICHARD	ROSA	9/26/2013	ROSA	9/26/2013	9/26/2013	4 OF 4				
248	RQ13-003	10/7/2013	GM	10/23/2013	E, REICHARD	ROSA		ROSA		########	35 OF 35 QC	10/7/2014			
249	RQ13-003	10/25/2013	GM		E, REICHARD	ROSA	12/17/2013				1 OF 79				
250	RQ13-003	3/7/2014	GM	3/19/2014	E, REICHARD	ROSA	3/19/2014	ROSA	3/19/2014	3/14/2014	2 OF 2				
251	RQ13-004	3/3/2014	HYUNDAI-KIA	10/16/2014	M, LEE	ROSA	10/16/2014	ROSA	10/16/2014	########	9 OF 9QC	6/24/2015			
252	RQ14-001	8/7/2014	CHRYSLER	8/28/2014	E, FRINGS						1 of 4				
253	RQ14-002	7/14/2014	CHRYSLER	7/17/2014	P, ONG	ROSA	7/30/2014	ROSA	7/29/2014	7/29/2014	2 OF 2	7/30/2014			
254	RQ14-002	8/11/2014	CHRYSLER	8/14/2014	P, ONG	ROSA	8/14/2014	Rosa	8/25/2014	8/27/2014	3 OF 3	8/27/2014			
255	RQ14-005	3/19/2015	FORD	3/24/2015	K, BOWKER	ROSA	3/24/2015					1 OF 16	3/24/2015		
256	RQ14-005	4/24/2015	FORD	5/5/2015	K, BOWKER	ROSA	5/5/2015				1 OF 6				
257	RQ15-001	5/22/2015	NISSAN	5/28/2015	M, LEE	ROSA	5/28/2015	ROSA	5/28/2015	5/28/2015	3 OF 3 QC		5/28/2015		
258	RQ15-001	6/5/2015	NISSAN	6/11/2015	M, LEE	ROSA	6/16/2015				1 OF 55		6/16/2015		
259	RQ15-003	11/6/2015	FCA CHRYSLER	12/23/2015	K, HABIB										
260															

Figure 1 - Sample page of the Pursuit record log spreadsheet.

Note: This spreadsheet is used by both the Investigation Case Assistant (FTE) and the Data Specialist, as a log to track each record. Enter information as each stage of the process is completed.

- *Case Name:* Record type + case number.
- *Date:* Response date.
- *Manufacturer Name:* Name of the manufacturer involved.
- *Date (FTE) Received:* Date the record was received from the outside source.
- *Investigator:* Name of the Engineer assigned to the case.
- *Who Uploaded Letter:* Name of (FTE or Specialist) uploading to Artemis.
- *Date Disc Started:* Date the specialist starts to download and process records from CD.
- *Date Disc Finished:* Date of CD download and processing completed.
- *How Many Parts Finished:* Refers to record parts on the CD
- *Uploaded to Public*: Date published to external repository in Artemis
- *Send to BLF for Redaction*: Date of records sent for redaction
- *OCC Decision:*
- *Notes*:

Using Artemis

The Data Specialist first uses Artemis to enter data from the record, then following conversion (if necessary) redaction, and two QC checks, Artemis is used again to upload the record to the repository. Access to Artemis is through the Internet. The System Administrator provides a user name and password to use at sign-in. The password should later be personalized.

1. Open the web browser (Internet Explorer).
2. If previously saved, find and select **Artemis** from the favorites list.
3. Enter **User Name** and **Password** then click **Accept** and **Login**.

In Artemis, the first screen after login is a home page that describes the current user and provides information regarding support. The navigation menu is seen on the left. To access areas for data entry, search, adding or editing data, click the down arrow beside the applicable section.

4. Click the down arrow next to **Pursuit Mgmt**.
5. Click **Search** to begin the data entry process by first searching to verify whether a record already exists, before adding a new record to a case.

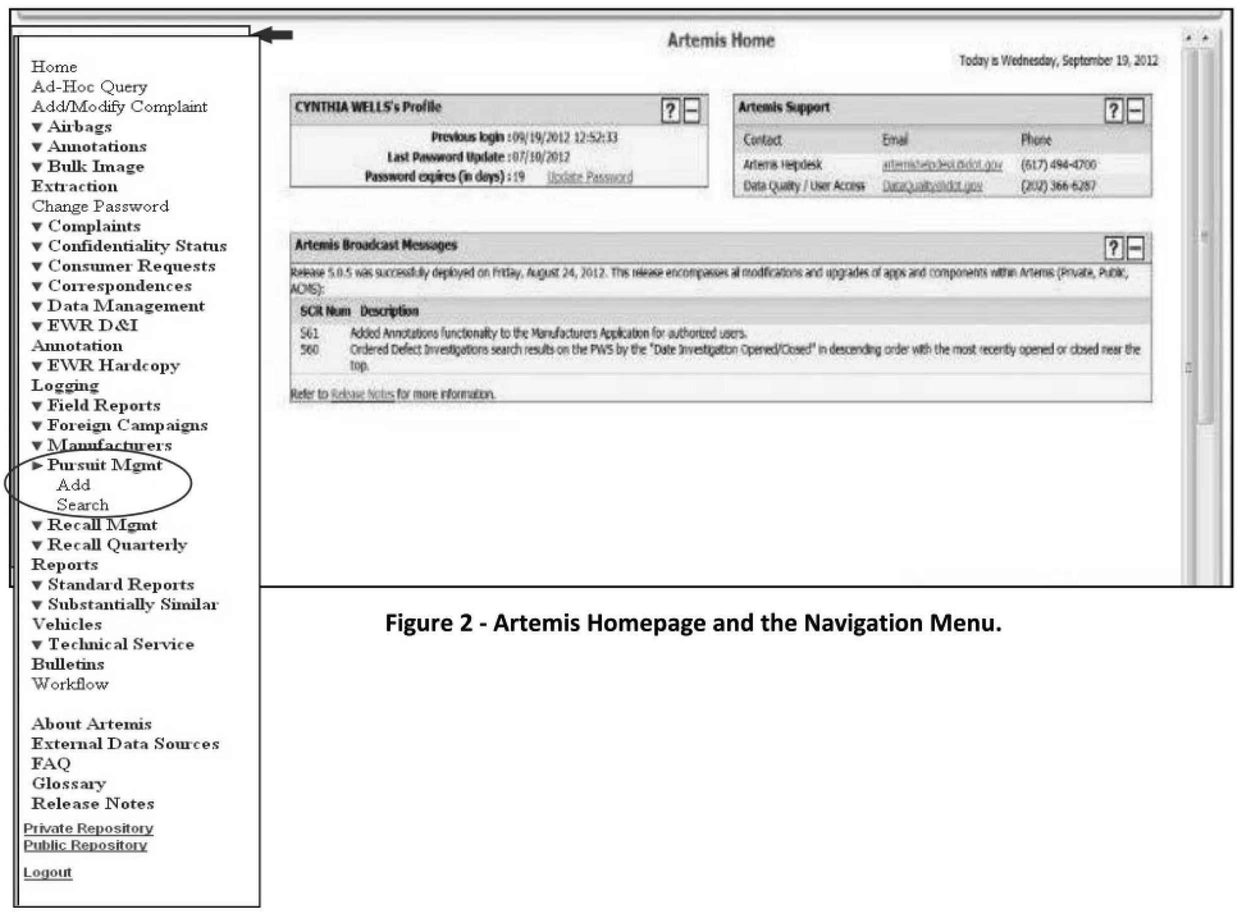


Figure 2 - Artemis Homepage and the Navigation Menu.

6. Click the **Resumes** tab then **Resume Search**.

7. Enter the **Pursuit Number, Type** (record type), **Yr** (year of record), **Num** (case number) this will associate this record with the investigator and investigation (case). This information is found on the record. Record types are:

   PE (Preliminary Evaluation) EA (Engineering Analysis) DP (Defect Petition)
   IE (Initial Evaluation) AQ (Audit Query) RQ (Recall Query)
   EQ (Equipment Query)

   Pursuit Num[ber] = example: PE07-052 Type = PE (record Type, use dropdown arrow)
   Yr = 07 (year of the investigation)
   Num = 052 (case number)

   Note: If there is no case number on the record, then the case may not have been added in Artemis yet. Notify the team lead and the Investigation Case Assistant and wait until notified that a case has been opened in Artemis.

8. Click **Find Resumes**.

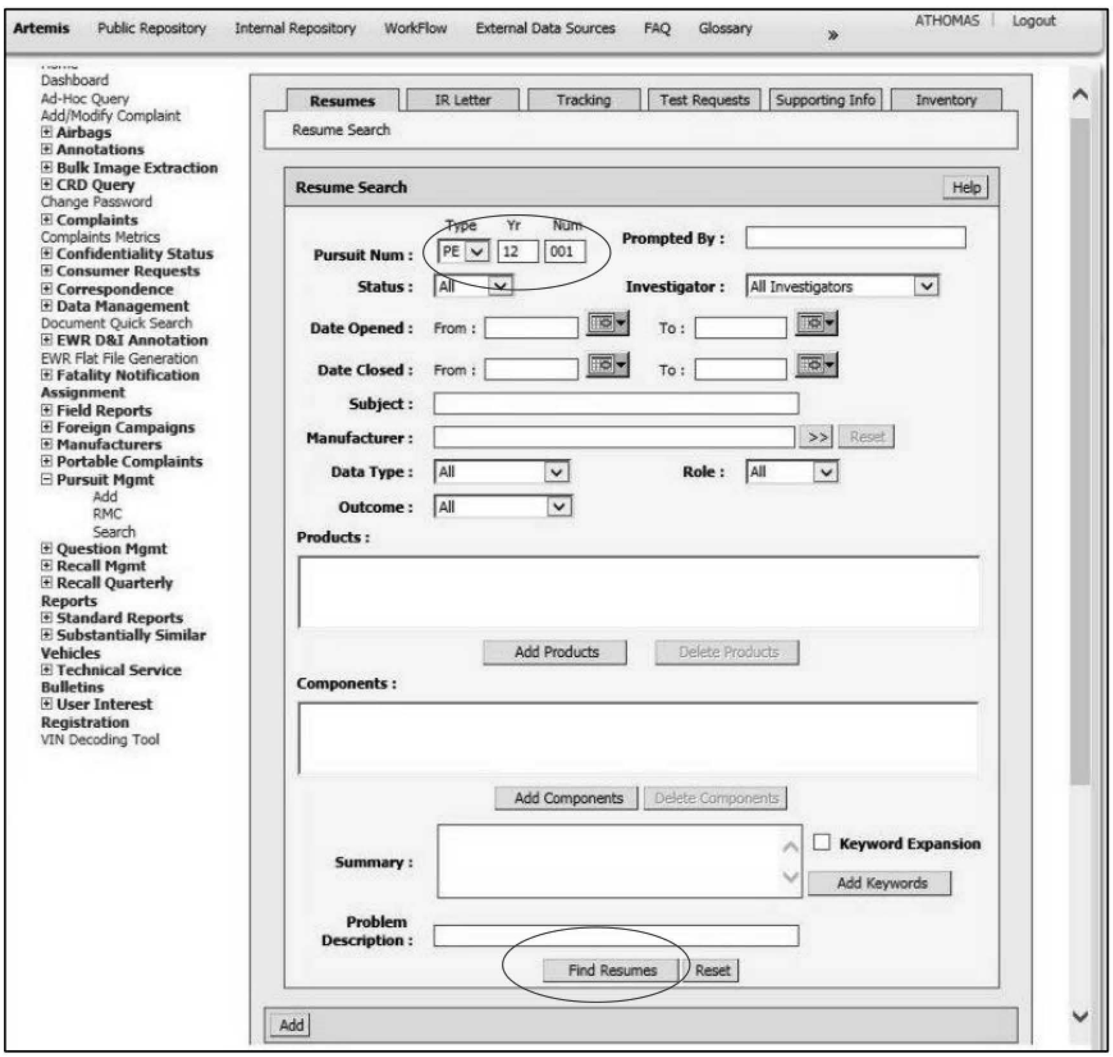


Figure 3 - Navigation Menu, Resume Search screen and Pursuit Number entry fields.

9. Under Resume List/Resume Search Results, click on any result in the list, do this to move to the next screen, Resume Details.

10. Click on any record link listed under **Pursuit Number** (first column, example PE-12-001).

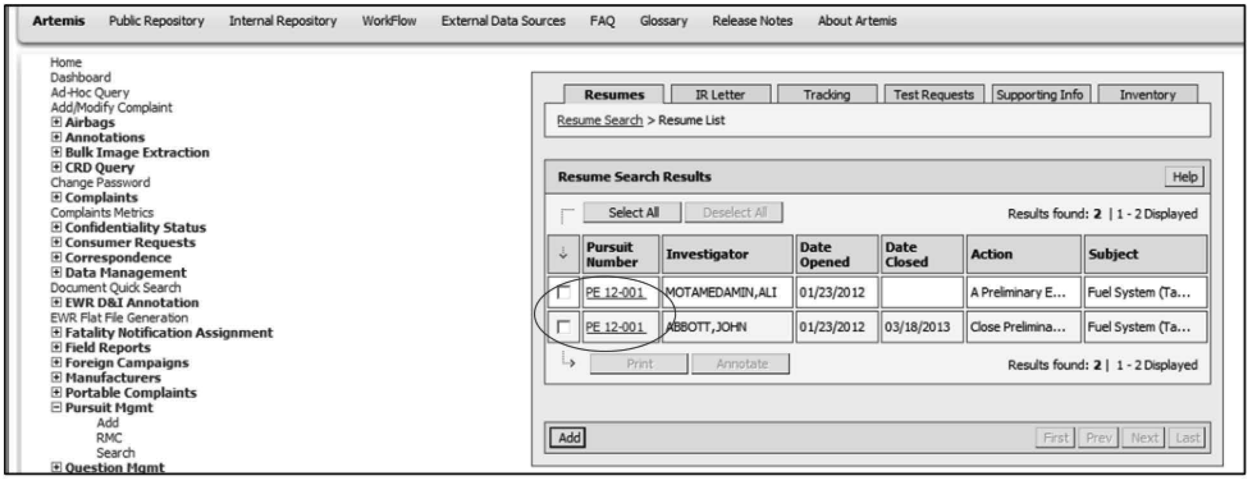


Figure 4 - Search results list.

Once open, do nothing on this screen, go directly to the **Tracking** tab on top.

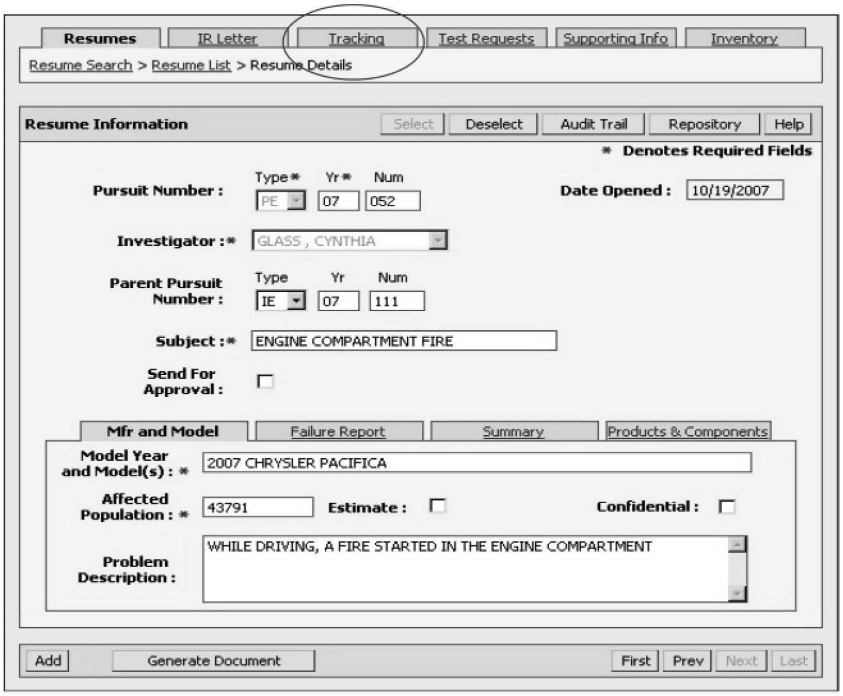


Figure 5 - Resume Details screen, used here only to move to Tracking.

11. Click on the **Tracking** tab. If the Tracking Search Results list under Milestone/Action doesn't open automatically, click directly on the words "**Tracking List**".

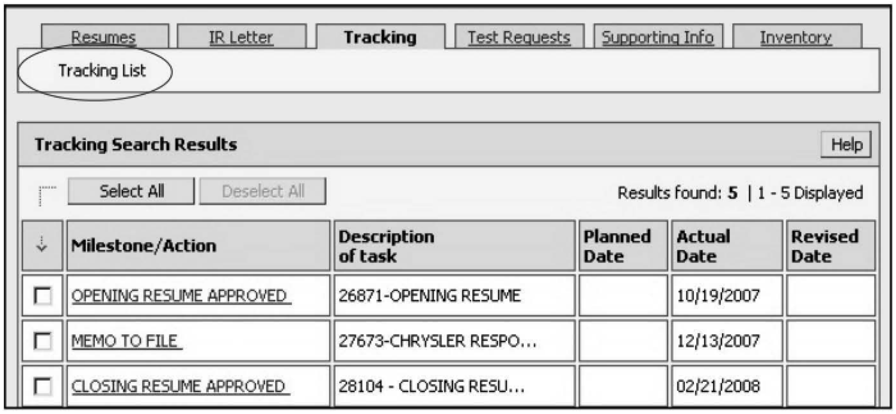


Figure 6 - Tracking tab and the Tracking Search Results list.

12. Under **Milestone/Action** click on any record in the list just to open the Tracking Details screen.

13. Once open, click **Add** to open a blank screen on which to enter details for the new record.

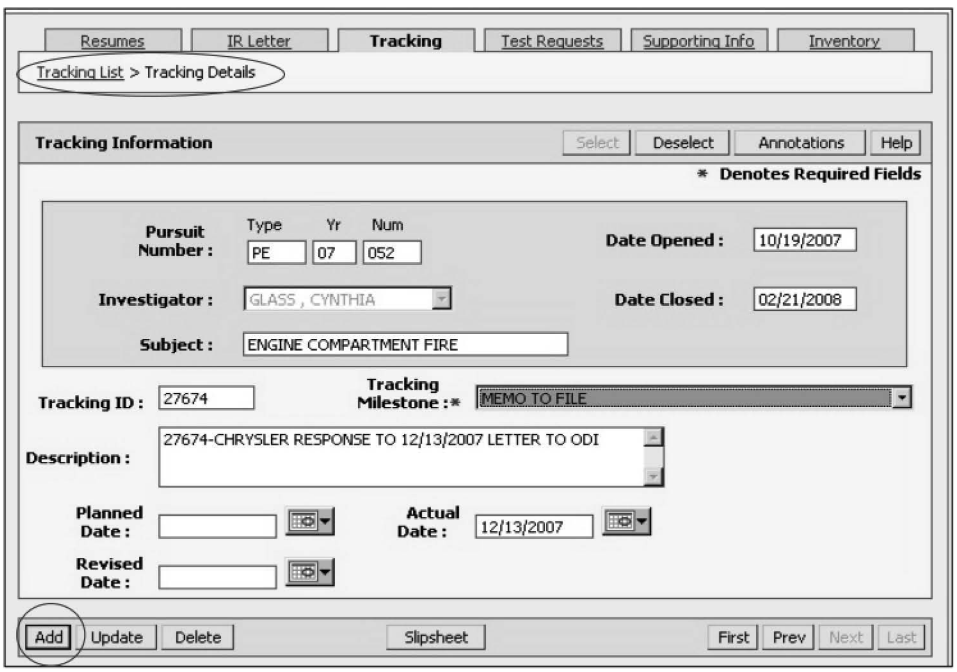


Figure 7 - Adding a new pursuit record.

Note: It does not matter which record is opened for Tracking Details because the objective is to start a new record therefore to get to a blank screen (Figure 8).

Adding a New Record in Artemis

1. Select a **Tracking Milestone*** from the dropdown list. The red star indicates that this is a required field. The selection depends on the record type as follows. (Figure 8).

   MFR IR Response Letter
   MFR IR Response Data
   MFR IR Response Data CONFIDENTAL
   Memo

   Note: Choosing a Milestone may require communication with the Investigation Case Assistant to determine the best description of the record. For example, a record requiring the milestone of Data Confidential may not be for public upload and that determination should be made by the FTE.

2. In the **Description** field, enter a description that includes the following information, for example a MFR IR Response Letter would include; Manufacturer Name, RESPONSE TO and Date " (of the response letter) plus a brief statement about what the record is regarding. This can usually be taken from the subject line of the letter or body of a memo or response data. Add the words "Confidential" to a confidential marked record description. Also, note here if a record is a part 1 of 2 or more. (e.g., CHRYSLER RESPONSE TO12/13/2007 LETTER TO ODI)

3. Enter **Actual Date**. Use the date that is on the letter. If no date is seen in the letter heading, read through to find the date in the body of the letter.

4. Click **Save** to generate a Tracking ID and save the record. (Button will darken with data entered).

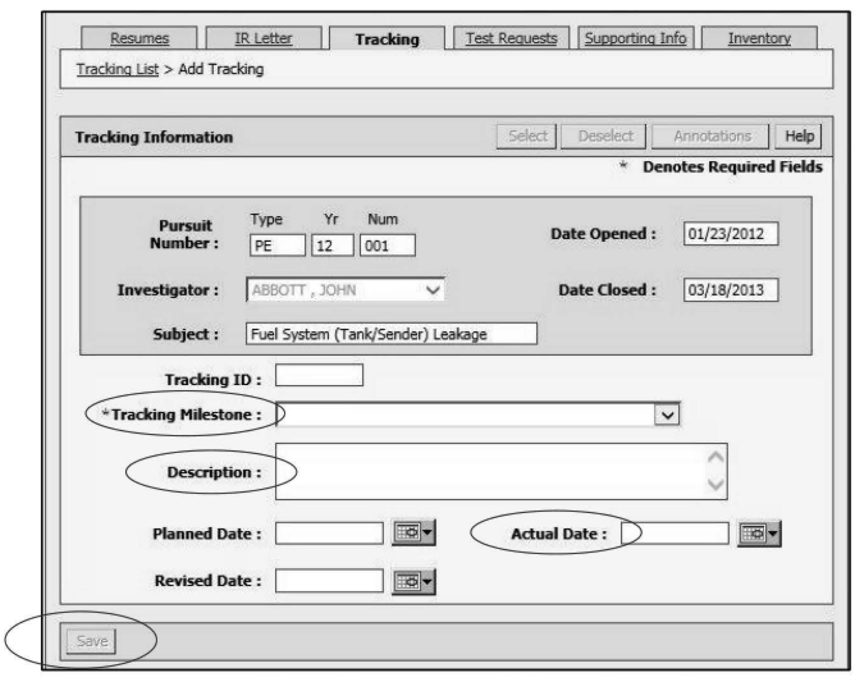


Figure 8 - Enter Tracking Milestone, Description and Actual Date.

Note: The new record does not receive a Tracking ID until after clicking **Save**. Once saved, the Tracking ID number automatically populates in the **Tracking ID** field and in the **Description** field in front of the text. (Example: 27674 - CHRYSLER RESPONSE TO12/13/2007 Letter to ODI).

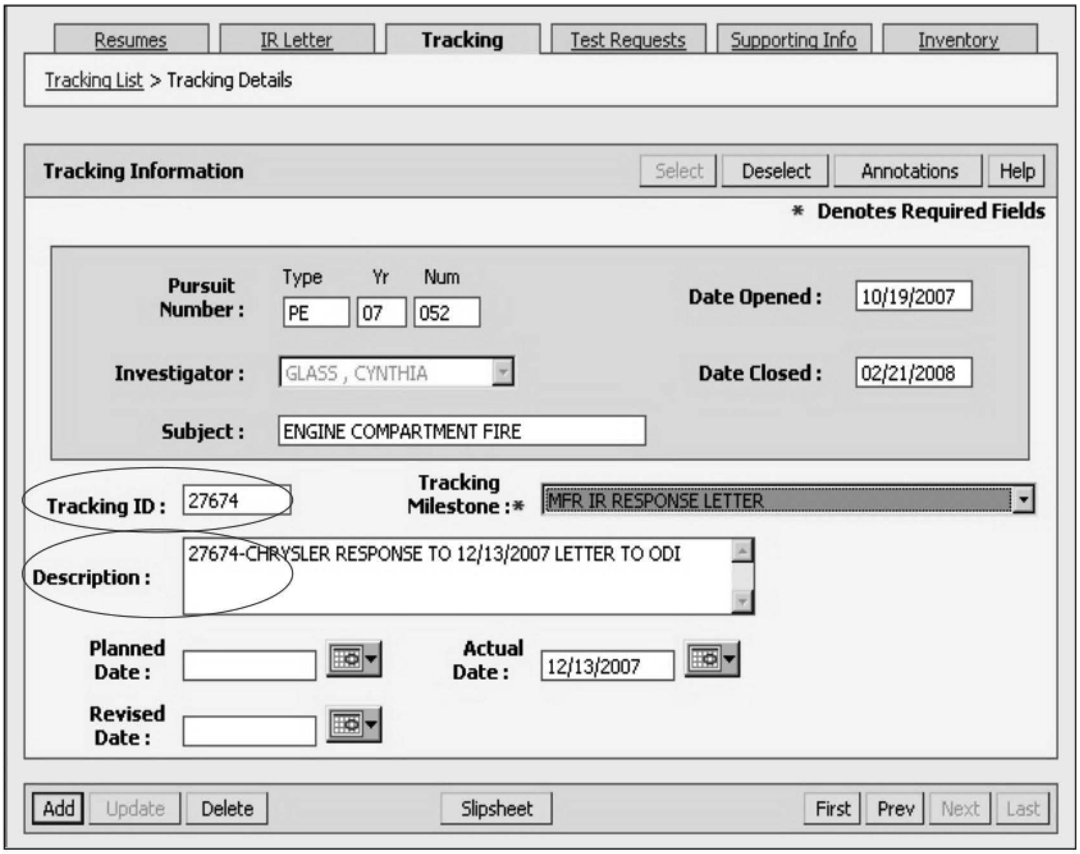


Figure 9 - Tracking ID field populated and added to the description.

Update or Edit a Record in Artemis

Use the Tracking ID to find and select a record to review, edit or update. Follow steps 1 (page 9) to step 11 (page 12). In Figure 6, see the 'Description of Task' in the Tracking List where the Tracking ID is displayed in front of the description.

1. Click on the record that corresponds to the specific record sought.
2. Click **Update** to save the record.

Record Redaction and Quality Control Checking

After a record is entered in Artemis and before uploading to the public repository of Artemis, records that contain PII must be redacted. If a record does not contain PII or is to be placed in the internal repository only, no redaction is needed. The redaction process and policy is found in Appendix B.

Redacted records are quality control checked (QC'd) twice, before uploading to the internal repository. QC is handled by different staff members from the one redacting. The QC'd records are placed in an folder that is made assessable uploading to the Internal Repository.

Redaction

1. After redaction, place the record in the designated folder specifically for redacted records that need to be QC'd.
   \\nhthqnwas128\Conversions\PURSUITS\Pursuit Records\NEED TO BE QC

2. After QC, the record is placed in a designated folder for the Data Specialist to retrieve and upload to the repository.
   \\nhthqnwas128\Conversions\PURSUITS\Pursuit Records\Ready for Upload

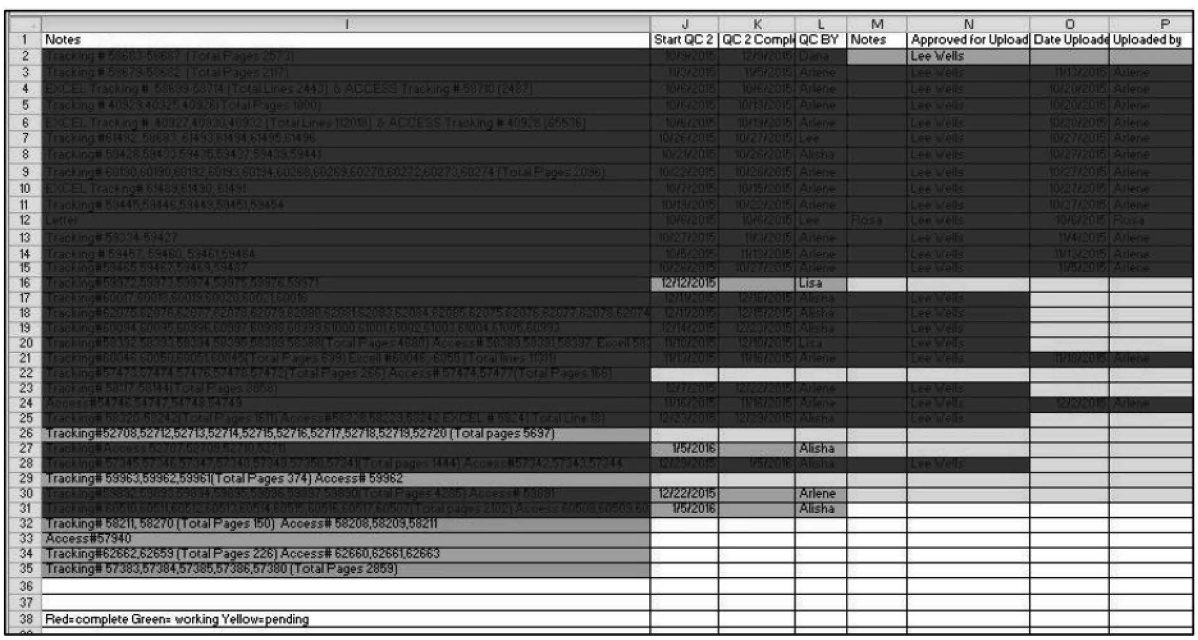


Figure 10 - Spreadsheet for tracking completed tasks.

Record Conversion

Microsoft Word documents and PowerPoint presentations (*.doc/*.docx or *.ppt) MUST be converted to **pdf** file format before uploading to the public repository.

Database and spreadsheet files (*.mdb or *.xls or *.xlsx) are uploaded as READ ONLY with a password to disable modify but kept in their original format (If the file size is not greater than 25MB). Over 25MB must be saved as a ZIP file (redacted first).

Note: If a record is very large (over 25mb) after redacting, it will not be able to be uploaded into the Artemis repository. Compress the file by either of these methods:

(1) Zip it - Right-click the file or folder, select Send to, and then click Compressed (zipped) folder. A new compressed folder is created in the same location. To rename it, right-click the folder, click Rename, and then type the new name.

(2) Compress it in Acrobat (requires opening it in Acrobat after retrieving it from the QC folder).

(3) Split the file into 2 (or more) parts, if compression is still too large to upload as one file.
   a. If necessary to split the file, part 2 of the file must be added in Artemis to receive a Tracking ID number. Use the same steps as before redaction.
   b. Make a notation in each Description field to say "Part 1 or Part 2". Recall the first record to add the notation for part 1.

Upload the Record to the Artemis Public Repository

1. Retrieve a QC'd record from the QC work folder, to upload it to Artemis.
   \\nhthqnwas128\Conversions\PURSUITS\Ready for Upload

2. In Artemis, repeat steps 1 (page 9) thru step 11 (page 12) to get to the Tracking details list.
   a. Click Find Resume.
   b. From Resume Details screen (do nothing on this screen), click on the **Tracking** tab to bring up the Tracking List (if a screen with no data appears, click "Tracking List".
3. Scroll down under the **Description of task** list to find the record by Tracking ID number, then if found, click on the **Milestone/Action** link, of the correct file, to open the record.

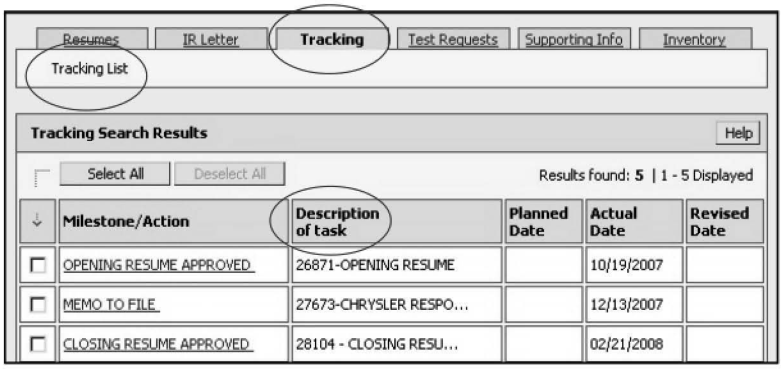


Figure 11 -Identified Tracking ID number to select record.

4. Review the record then, click **Upload to Internal Repository**.

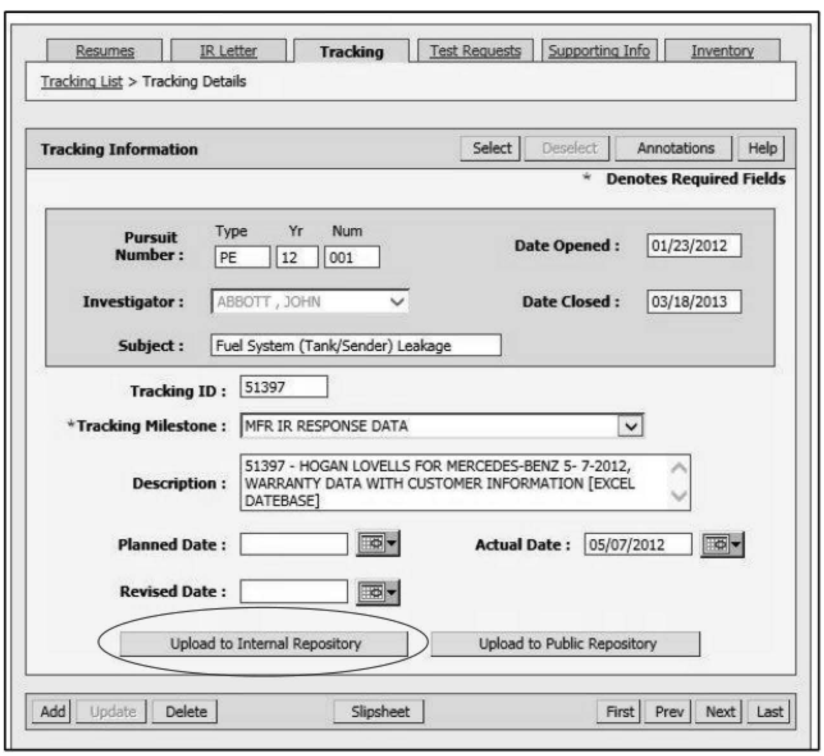


Figure 12 - Click the Upload to Public Repository button.

5. Place a check in the box for Public Repository*
6. Click Browse to retrieve the file from the network folder or the desktop, (use the folder copied there at the beginning of the procedure.

   Note: Errors are possible when retrieving directly from the network instead of the desktop.

Figure 13 - Browse to the file then Upload.

7. Click **Upload** and see a message indicating whether the upload is successful or not. If an error message occurs, repeat the process and if again not successful, contact management. A successful result concludes the upload process.

Figure 14 - Message indicating a successful upload.

8. Click X (right corner) to close.

   Note: Leave window open if planning to upload several records consecutively, the screen will change when 'Upload to Internal Repository' is clicked on the Artemis Tracking screen.

9. If applicable, continue to the next record to upload, double click it from the file list and it will open in Artemis (if Artemis is left open when completing the previous upload). Then repeat steps 4-7 above to continue to upload all on the list.

10. To exit Artemis Click **Logout**. Do not logout if planning to continue uploading from the list.

VI. APPENDICES

Flow chart

Converting Email to PDF, Redacting and Scanning Instructions

Redaction

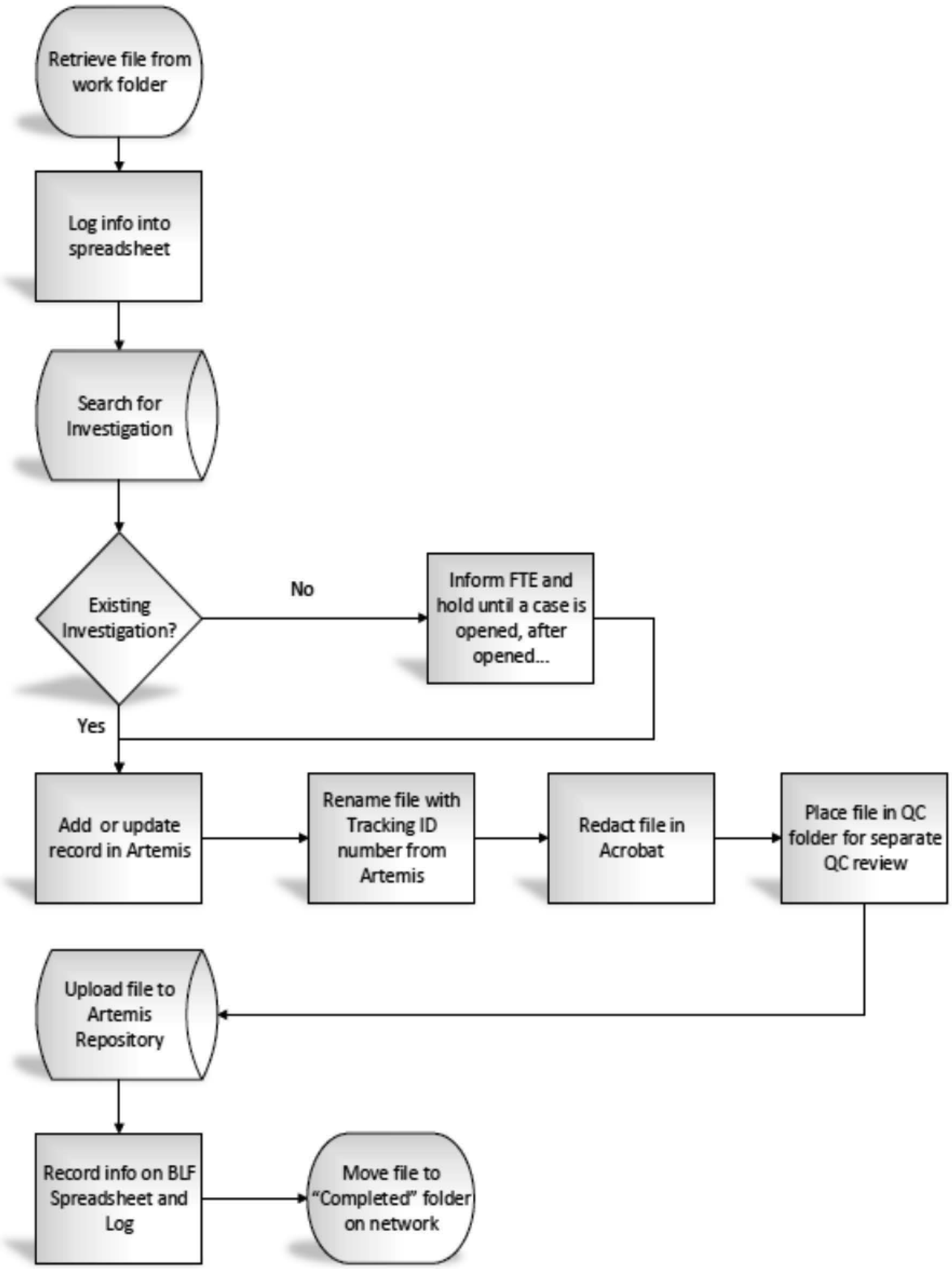
Examples of redaction

Using Adobe Acrobat to redact

How to Create a CD

Alternative Method of Uploading to the Artemis Repositories.
Note: To be used in case the "Upload to Internal Repository" button does not work in Artemis. This is the old method of uploading and may still be used in the case of malfunction.

Pursuits Processing Flowchart



Converting Email to PDF, Redacting and Scanning Instructions

Converting an Email to PDF Format

Some documents that arrive as email are processed by first converting them to pdf format, if necessary. The software used to convert the document is Adobe Acrobat, before converting:

1. In Outlook, double-click on an email (sent from the Operations Manager) to open it.
2. Click on the **Adobe PDF** tab at the top of the screen.
3. Click **Convert to Adobe PDF**.
4. The **Save Adobe PDF File As** window will open in **Windows Explorer**.
5. Browse to the location where the file is to be saved and create a file name.

   Note: Usually the ODI number will show up as the file name, delete the text part of the ODI number and keep the numeric part as the new name, if no file name shows, create a number. Example: 10029873.pdf

6. Click **Save** and the conversion process will began.
7. The file will open **in Acrobat** for review, this is the email converted to a PDF file. Close that without saving because it is already saved to the designated location.
8. Copy the attachment from the email to the same location as the new pdf file.
9. Combine the two files.

To Combine Files

1. Select the files to be combined. (Hold **Shift** to select if one is under the other, hold **Ctrl** to select if the files are separated).
2. Right-click on the group of files, on the menu, click **Combine files in Acrobat**.
3. At the Combine File window, click the **Combine files** button in the right corner.
4. After the document is combined, the new Adobe Acrobat file will open to show the combined document and attachment(s).
5. Select **File/Save As** and save the new document and name it "**Binder**" (to be renamed later) for the update process.

Scanning Documents

Documents received in the form of hardcopy pages, compact discs, email and photographic images, are first scanned then redacted (if to be publically viewed). Then the information is stored and available to be viewed both publically and/or internally. Scanning is done using the following hardware and software.

Hardware

Panasonic High Speed Scanner, connected to a computer system database.

Software

RTIV (Reliable Throughput Imaging Viewer) is the software application used to scan documents into high-quality images, at a high speed, using the Panasonic High Speed Scanner, to create image files.

Included are functions such as cropping, deskew, and other image enhancing capabilities like; the ability to display a multiple number of pages side by side, flexible file naming and ease in transferring image data to and from other applications. Other options include, a MultiStream function to scan both low resolution color images and high resolution black and white binary images in a single scanning session. The data is output in **PDF** format.

Using RTIV

Use the RTIV system to scan all document types, each type may require a different process. To launch the RTIV application:

1. Double-click on the **RTIV icon** on the computer desktop to open the application.
2. Double-click the application **Copyright icon** to open or close the application.

On the RTIV main screen, documents are indexed, scanned and saved to the appropriate location. The main screen is comprised of the following areas:

- Menu bar: select RTIV menu items.
- Tool bar: icons of frequently used menu items.
- File window: names of the image files displayed are shown.
- Image window: image data read from the scanner or image file is displayed.
- Status bar: Information on the current status of the document.

Note: The toolbar and file window frame can be dragged to a preferred position on the screen.

Set the Scanning Conditions

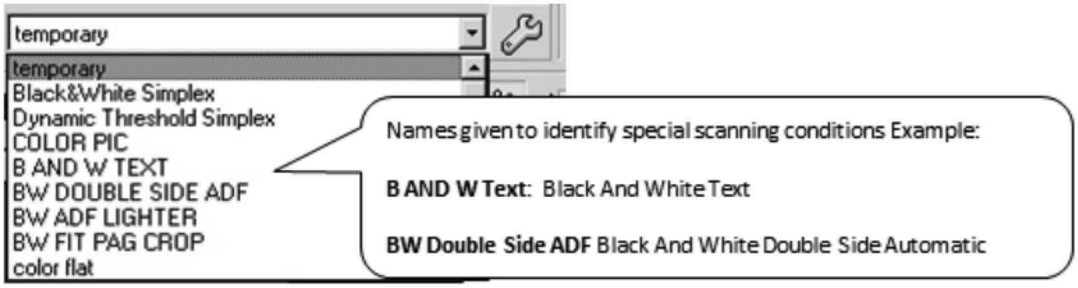
Before starting, establish the correct scanning conditions for the particular document by opening each menu and choosing a setting (once set changes can be made).

1. Select **Scan Setting** from the menu or click on the icon on the menu bar.

Note: When any of the scanning conditions are changed and the [OK] button is clicked, the conditions are automatically saved as **temporary**. For example: If the paper size is changed from A3 to letter size, the scan setting name will change to "temporary". Scan setting names are created by the user and are used to identify special scanning conditions.

Note: Scan Setting must be selected **BEFORE** selecting scanning options, if not, the scanning process will use the settings set from the previous page(s) scanned.

Below are examples of some names created and saved to Scan Setting:



- **Paper Source**
  - Sets the side or sides of the sheets to be scanned
  - ADF Simplex: Automatic Document Feeder/Standard single page
  - ADF Duplex: Automatic Document Feeder/Standard two sided page
  - Flatbed: Flatbed on the scanner
- **Page Size - Specify the size of the paper to be scanned**
  - Letter: Standard letter size paper.
  - Legal: Standard legal size paper.
  - Other Options: A3, A4, A5, A6, B4, B5, B6 etc.
- **Landscape Check box**
  - In this mode, the paper is placed in such a way that its width is greater than its height. (Grayed out/Never changed)
- **Image Type -** Select the scanning mode, the two used are:
  - Black and White
  - 24 bit Color
- **Advanced Image Enhancements Check box**
  - Select the display status of the [Image Enhance] tab. (Never checked)
- **Resolution Drop down menu**
  - Setting always **300**

Set the Scan Settings Indicated for Paper Setting

- **Rotate:** Default is OFF, stays unless there are multiple pages that require rotating.
- **Duplex Type:** Set to the default Book, **never** change.
- **Blank Page Removal:** To skip scanning pages with no text or images, set to; (perfectly white, perfectly black or plain).
- **Custom Size:** Paper sizes not on the [Page Size] list. Up to 50 sizes can be registered. (Normally the custom size is not checked).
- **Automatic Binary/Color Distinction: (**Never change) the ratio of black and white to color pages.
- **Automatic Crop:** Automatically recognizes and crops the image size. (**Check in all settings**).
- **Deskew:** Corrects the skew in scanned images, restoring the images to the upright position. (**Check in all settings**).
- **Margin:** When selected, documents are scanned over a slightly larger area at their tops and bottoms than the size specified by Scanning Size. (**Never change**).
- **Fit to Page:** Scans the image of an area slightly larger than the specified scanning area while reducing it so that it has the same dimensions as the scanning area. (**Check in all settings**).

- **Detect Paper Width:** the scanner automatically detects the paper size. (**Should be checked in all settings**)
- **Length Control:** The scanner scans the documents in the size that corresponds to their length. (**Never change**).

Image Enhance Screen (to adjust brightness and contrast)

- **Brightness** adjusts the brightness of the scanned images. Any value from 1 to 255 can be set, the default setting is 128. The **lower** the value, the **darker** the scanned result.
- **Contrast** sets the contrast between white and black in the dither mode, Gray scale mode or Color mode. Any value from 1 to 255 can be set, the default setting is 128. The **lower** the contrast value, the softer the image with **less** difference between white and black. Conversely, the **higher** the contrast value, the sharper the image with **more** difference between the white and black.

Paper Feed

- **Manual Feed Mode:** When the Manual Feed Mode is used, every time one sheet has been scanned, the next sheet can be scanned without instructing the scanner to scan it. (OPTIONAL)
- **Detect Double Feed:** This function detects the feeding of more than one sheet of the document at a time. (OPTIONAL)
- **Feeding Speed:** This function enables the feeding speed at which documents are scanned to be changed. (OPTIONAL)
- **Skew Stop:** This function stops the scanning when the paper fed by Automatic Document Feeder is significantly skewed (not straight). (OPTIONAL)

Note: Area and **Control Sheet** are not used during any scanning process .

Batch Name

- Save each scan with a file name. Files are saved to the local hard drive (**C:\\Working**) folder. This (batch) folder is created to hold scanned files each day, in groups of 10-12 or by preference. Use the following format to create the batch name:

Scanner's **first** and **last** name **initials**, current **month** (2 digits), day and year (2 digits), document name, under-score and a letter for I (Internal) or P (Public).
Example: CW100608NAR (or Congress, or EMAIL, or RESPONSE etc.)

Scan the Document (after all scan settings are set)

1. Select **Scan** on the menu bar **or** from the drop down menu **or** click on the **Execute Scan** button.

At **Save in:** browse to the location to save the file. All files are saved on the C:\\drive in the Working folder, unless otherwise instructed. Type the file name in the **File name:** field, this will vary depending on the type of document. For example:

Investigation -- Invest
Recall --- Recalls
Technical Service Bulletin ------------------------- SB
Foreign Campaign ----------------------------------- Foreign
Electronic Vehicle Questionnaire ---------------- EQ
Vehicle Owner Questionnaire -------------------- VQ
Consumer Letters ----------------------------------- Letters

2. Set the **File Setting** for **Multi Page,** then select the **Save** button, the scanning window will open to start scanning.

When the scanning process starts, a small scanning window will open in the upper left corner indicating the number of pages scanned.

3. After scanning the pages that were placed on the scanner's automatic document feeder are scanned, choose **Continue Scanning** or **End.** If the choice is to continue scanning, settings can be changed at this point if necessary.

To change settings

1. Click on the down arrow and open the preset **Scan Setting** list. Choose a different setting and then click **Continue.**
2. Repeat this process until the last page is scanned and click the **End** button. The document should now be in the C:\\Working folder or in another folder indicated at batch name setup.

Delete Blank Pages

If there are any blank pages in the scanned file after saving, they can now be deleted.

1. Select **Delete Blank Pages** from the Page menu.
2. When the Delete Blank Pages dialog box appears, select **OK**. If some pages have been identified as blank pages, the **Pages** list dialog box is displayed.
3. Select the pages displayed on the list, and check their content in the image display section.
4. Click the **Delete** button.

Note*:* By removing the check mark at the top of the list, pages can be removed from being subject to deletion.

Redaction

Redaction is the process used to permanently delete or obscure sensitive information and inappropriate or offensive language from files, in accordance with various privacy laws, the Privacy Act of 1974 (the Privacy Act), the E-Government Act of 2002 (Public Law 107-347), the Federal Information Security Management Act (FISMA), Department of Transportation (DOT) privacy regulations, Office of Management and Budget (OMB) mandates, and other applicable DOT Records Management procedures and guidance.

The goal of redaction is to provide privacy by blocking Personally Identifiable Information (PII) found on records obtained by NHTSA for the purpose of collecting/processing data regarding possible vehicle defects that may or may not have resulted in accidents or incidents by the public. Redaction allows NHTSA to make those records available to the public without compromising personal consumer information.

Staff must identify the various document types that require redaction and recognize the specific criteria to redact based on the DOT Redaction Policy as follows in this document. After redaction, documents are reviewed, and then quality control checked (QC'd) before uploading to the Artemis Public Repository or in the case of IVOQs and EVOQs they are taken from Artemis then QC'd and redacted if necessary.

Note: All records do not have a public and private file.

Public Repository: All documents except when requested and Service Bulletins (SB), TRIN, TRIR, TRCD, Google Alerts, Sometime TRTR. All files must be redacted before uploading them to the public repository.

Private Repository: All files belong in the private repository except: CSC (Customer Satisfaction Letters) and Google Alerts.

The following chart lists the information to be redacted for the major document types as well as information not to redact, according to the policy set by NHTSA's Chief Counsel Office.

Record Types	Redact	Do NOT Redact
• Consumer Complaints • Correspondence letters • Congressional letters • Newspaper excerpts • Internet Clippings • Internet Printouts	• Names • Street addresses • Zip or postal codes • Social Security numbers • Dates of birth • Ages • Driver's license numbers • Family/friend names • Faces/injuries/deceased bodies in photos • Car tags or license plate numbers (private vehicles only) • Phone numbers – home, business, fax and mobile numbers • Signatures from the consumer, family, friends, or witnesses • Insurance claim numbers • Insurance policy numbers • Warranty/Invoice claim numbers • Junkyard/Insurance claim centers stock numbers (usually painted on vehicles) • Bank account numbers • Credit card numbers • Last 6 digits of the VIN • Foreign VIN last 6 digits • E-mail addresses • VIN barcode (at least part of barcode) • Citation numbers • Police accident report case number • Court reference numbers • Website address or URL	• State • City • First 11 characters of • VIN number • Car tags or license • plates of commercial vehicles • Names and addresses of parties acting in their official capacity (e.g., lawyers, doctors, automobile dealers, automotive service businesses, police officers, EMT, coroners, nurses, Government officials, judges etc.)

Record Types	Redact	Do NOT Redact
• Death Certificates • Autopsy Reports • Other information related to deceased individuals	• Names • Street addresses • Zip or postal codes • Social Security numbers • Dates of birth • Ages • Driver's license numbers • Family/friend names • Faces/injuries/deceased bodies in photos • Car tags or license plate numbers (private vehicles only) • Phone numbers – home, business, fax and mobile numbers • Signatures from the consumer, family, friends, or witnesses • Insurance claim numbers • Insurance policy numbers • Last 6 digits of the VIN • Foreign VIN last 6 digits • E-mail addresses • VIN barcode (part of barcode) • Citation numbers • Police accident report case number • Any unique identifier for death certificates/autopsy reports (e.g. Report number)	• State • City • First 11 characters of • VIN number • Car tags or license • plates of commercial vehicles • Names and addresses of parties acting in their official capacity (e.g., lawyers, doctors, automobile dealers, automotive service businesses, police officers, EMT, coroners, nurses, government officials, judges etc.)
Medical Records, such as, doctor reports and medical reports	Replace with disclaimer page (page 33)	Replace with disclaimer page (page 33)

Record Types	Redact	Do NOT Redact
• Work Orders • Repair Invoices • Warranty Information • Insurance claims	• Names • Street addresses • Zip or postal codes • Social Security numbers • Dates of birth • Ages • Driver's license numbers • Family/friend names • Car tags or license plate numbers • (private vehicles only) • Customer phone numbers – home, business, fax and mobile numbers • Signatures from the customer • Insurance claim numbers • Insurance policy numbers • Bank account numbers • Credit card numbers • Last 6 digits of the VIN • Foreign VIN last 6 digits • E-mail addresses • VIN barcode (or part of barcode)	• State • City • First 11 characters of • VIN number • Car tags or license • plates of commercial vehicles • Names and addresses of parties acting in their official capacity (e.g., lawyers, doctors, automobile dealers, automotive service businesses, police officers, EMT, coroners, nurses, government officials, judges etc.)

Record Types	Redact	Do NOT Redact
• Lawsuit Documents (Depositions, complaints, other supporting documents etc.)	• Names • Street addresses • Zip or postal codes • Social Security numbers • Dates of birth • Ages • Driver's license numbers • Family/friend names • Faces/injuries/deceased bodies in photos • Car tags or license plate numbers • (private vehicles only) • Phone numbers – home, business, fax and mobile numbers • Signatures from the consumer, family, friends, or witnesses • Insurance claim numbers • Insurance policy numbers • Warranty/invoice claim numbers • Junkyard/Insurance claim centers stock numbers (usually painted on vehicles) • Bank account numbers • Credit card numbers • Last 6 digits of the VIN • Foreign VIN last 6 digits • E-mail addresses • VIN barcode (part of barcode) • Citation numbers • Police accident report case number • Accident incident date • Mile markers • Street names (where the accident occurred) • PII in lawsuit caption if PII is of individuals not acting in official/commercial capacity • Court reference number • Witness PII: e.g. name, address, telephone, DOB, faces, signatures etc.	• Lawyers involved in the lawsuit Names and addresses of commercial organizations • Names and addresses of parties acting in their official capacity (e.g., lawyers, doctors, automobile dealers, automotive service businesses, police officers, EMT, coroners, nurses, government officials, judges etc.)

Record Types	Redact	Do NOT Redact
• Petition Information found in pursuits (i.e. DP investigation files) • Petition Request letters	• Petitioner's address (including city and State) • Telephone number • Zip or Postal Codes • Social Security numbers • Dates of Birth • Age • Driver's License numbers • Family/Friend names • Third-party names and witness information Street Addresses • Faces/injuries/deceased bodies in photos • Car tags or license plate numbers • Phone numbers, home, business, fax and mobile numbers • Signatures from the consumer, family, friends, or witnesses • Insurance claim numbers • Bank account numbers • Credit card numbers • Last 6 digits of the VIN • E-mail addresses • Foreign VIN last 6 digits • VIN barcode (part of barcode)	• Petitioner's Name(s) • Names and addresses of parties acting in their official capacity (e.g., lawyers, doctors, automobile dealers, automotive service businesses, police officers, EMT, coroners, nurses, government officials, Judges etc.)

Inappropriate or Offensive Language

The use of inappropriate or offensive language in the context of the Complaint Description section should be brought to the attention of the Supervisor for determination of further action (editing, retain original text, review by Artemis Program Manager, review by the Director of CRD, referral to Chief Counsel's Office, etc.)

Inappropriate or offensive language includes, but is not limited to, any language or content that is sexually oriented, sexually suggestive or abusive, harassing, defamatory, vulgar, obscene, profane, hateful, or that contains racially, ethnically or otherwise objectionable material of any kind.

Should an item in the Description field be deemed to contain inappropriate or offensive language, the text should be removed and replaced with "!@#$%".

After redacting a document, place a *Disclaimer* on the page. Choose the disclaimer statement according to the correct exemption (see Exemption List (page 22). Choose placement of the disclaimer according to document type, see the following examples.

Disclaimers for Medical Records, Videos and Damaged Pages

Instead of redacting PII for medical records, videos, and damaged pages, replace the entire file with the appropriate disclaimer page (text should cover the whole page).

For medical report files:	**For videos:**	**For damaged pages**:
To protect the privacy of individuals, NHTSA does not make medical records available to the public without authorization. For this reason, documents falling into this category have not been included in this complaint record.	*To protect the privacy of individuals, NHTSA does not make Videos that contain Personal Identifying Information available to the public without authorization. For this reason, Videos falling into this category have not been included in this complaint records.*	*Pages were destroyed during the mail process, therefore they will be omitted.*

The following figures (#) show examples of various document type redaction methods and disclaimer placements, using the procedures discussed in this section.

Form Approved: O.M.B. No. 2127-0008

U.S. Department of Transportation National Highway Traffic Safety Administration	**DOT Auto Safety Hotline** **Vehicle Owner's Questionnaire** **To Report Vehicle Safety Defects** **1-888-DASH-2-DOT** **(1-888-327-4236)** **INTERNET:www.nhtsa.dot.gov/hotline**	FOR AGENCY USE ONLY 100148 Date Received: 15-JUN-2010 **Repository** ☐ Reference No. 10336447

OWNER INFORMATION (Type or Print)

Name [xxxxxxxxxxxx]		Daytime Telephone Number [xxxxxxxxxx]
Address [xxxxxxxxxxxxxx] [xxxx[		E-mail Address [xxxxx]@AOL.COM
City [xxxxxxxxx]	**State** MA **Zip Code** 01907	Evening Telephone Number [xxxxxxxx]

The information you provide will be used to identify potential safety-related defects. We may share your information with the applicable vehicle manufacturer during an investigation or recall in accordance with the routine uses described in the agency's Privacy Act notice. See 49 FR 53971 (Sep. 3, 2004).

VEHICLE INFORMATION

17 digit Vehicle Identification Number Located at bottom of windshield on driver's side	Make	Model	Model Year
1HGCM665X4A007806	HONDA	ACCORD	2004

Date Purchased	Dealer's Name and Telephone Number			Engine:	Fuel Type:
Original Owner ☐	Dealer's City	State	Zip Code	No: Cylinders 6	

Transmission Type	☐ Antilock Brakes ☐ Cruise Control	Powertrain	Multiple Failure: 1	Incident Date(s) 10-JUN-2010

FAILED COMPONENT(S)/PART(S) INFORMATION

Vehicle Component Code: 103000 POWER TRAIN: AUTOMATIC TRANSMISSION	Failure Mileage	Failure Speed
	91000	60

ADDITIONAL ITEMS TO BE COMPLETED WHEN REPORTING A TIRE FAILURE

Tire Make	Tire Model (Name or Number)	Tire Size (Example P215/65R15)
DOT No. (Example: DOTMAL9ABC036)	☐ Original Equipment ☐ Prior Repair	Failure Location:
Tire Component Code		Tire Failure Type:

ADDITIONAL ITEMS TO BE COMPLETED WHEN REPORTING A CHILD SEAT FAILURE

Make:	Date Manufactured:	Model No./Name:
Seat Type:	Installation System:	
Child Seat Component Code:	Failed Part:	

APPLICABLE INCIDENT INFORMATION

(Please describe in detail the incident(s), Failure(s), Crash(es), and Injury(ies).)

Crash	Fire	Number of Persons Injured	Number of Deaths	Reported to Police
☐ Yes ☒ No	☐ Yes ☒ No			N

Narrative Description of Incident(S), Crash(es), and Injury(ies).
Please describe (1) events leading up to the failure, (2) failure and its consequences, and (3) what was done to correct the failure; i.e, parts repaired or replaced (and if old part is available).

WE WERE LUCKY THAT WE WEREN'T KILLED!!!2004 HONDA ACCORD EXL 6CYL VIN#[XXX]. WE WERE TRAVELING ON ROUTE 95 NORTH OF BOSTON IN THE MIDDLE LANE AT AN APPROX. SPEED OF 60 MPH ON JUNE 10, 2010 AT APPROX. 6:15PM. I WENT TO PASS THE CAR IN FRONT OF US AND STARTED TO PULL INTO THE PASSING LANE ON THE LEFT. SUDDENLY, THE CAR JERKED VIOLENTLY AND SLOWED DOWN SUDDENLY. THE CAR IN BACK OF US ALMOST HIT US AND SWERVED INTO THE LANE ON THE RIGHT TO AVOID HITTING OUR CAR. THE OTHER DRIVER WAS ALMOST RUN OVER BY A SEMI TRUCK WHO JAMMED ON HIS BRAKES. I THOUGHT HE (THE TRUCK) WAS GOING TO JACK KNIFE. I SEE THAT THIS TRANSMISSION PROBLEM IS A RECALL ITEM FOR HONDA. THE HONDA DEALER (KELLEY HONDA IN LYNN, MASS.) SAYS THAT THEY WILL NOT HELP US FINANCIALLY TO REPLACE THE TRANSMISSION. THE CAR HAS 90,000 MILES AND IS IN GOOD SHAPE OTHERWISE. WE ARE VERY UPSET AT HONDA'S REACTION TO THIS SAFETY FAILURE AND WE FEEL STRONGLY THAT THE US GOV'T SHOULD STEP IN BEFORE PEOPLE ARE NEEDLESSLY KILLED IN CARS WITH THIS TRANSMISSION. WE ALSO NOTE ON THE INTERNET THAT THERE ARE TONS OF PEOPLE WITH THE SAME PROBLEM AND VERY DANGEROUS EXPERIENCES. PLEASE HELP AND GET THE WORD OUT!! [XXX]
INFORMATION REDACTED PURSUANT TO THE FREEDOM OF INFORMATION ACT (FOIA), 5 U.S.C. 552(B)(6). *TR

Include, if available: Police/Fire Department Report, Photos, and Repair Invoice. ATTACH ADDITIONAL SHEETS IF NECESSARY

The Privacy Act of 1974-Public Law 93-579 This information is requested pursuant to authority vested in the National Highway Traffic Safety Act and subsequent amendments. You are under no obligation to respond this questionnaire. Your response may be used to assist the NHTSA in determining whether a Manufacturer should take appropriate action to correct a safety defect. If the NHTSA proceeds with administrative enforcement or litigation against a manufacturer, your response, or a statistical summary thereof, may be used in support of the agency's action.

EVOQ redaction and Disclaimer placement (circled in red) example.

Use the following disclaimer when a modification is made to the original document (redaction).

"INFORMATION Redacted PURSUANT TO THE FREEDOM OF INFORMATION ACT (FOIA), 5 U.S.C. 552(B)(6)."

Make the disclaimer bold and place it on a separate line of the description field, top of the document (example spreadsheet) or insert the disclaimer on the bottom of the (IVOQ) description field, to avoid blocking more important details, when the mouse is over the complaint file in the search result field.

D13 f_x 2003

	A	B	C	D	E	F	G	H
1	VIN_NUM	MAKE	MODEL_LINE_CD	FULL_MODEL_YEAR_CD	MFG_DT	IN_SERVICE_DT	STATE_CD	
2	**INFORMATION Redacted PURSUANT TO THE FREEDOM OF INFORMATION ACT (FOIA), 5 U.S.C. 552(B)(6)**							
3	JNKAY41E03MXXXXX	NISSAN	M45	2003	08-Jan-02			
4	JNKAY41E03MXXXXX	NISSAN	M45	2003	31-Jul-02	08-May-04	GA	
5	JNKAY41E03MXXXXX	NISSAN	M45	2003	27-Jul-02	29-May-03	IL	
6	JNKAY41E03MXXXXX	NISSAN	M45	2003	24-Jul-02	11-Oct-03	OR	
7	JNKAY41E03MXXXXX	NISSAN	M45	2003	27-Jul-02	28-Feb-04	CA	
8	JNKAY41E03MXXXXX	NISSAN	M45	2003	25-Jul-02	12-May-04		
9	JNKAY41E03MXXXXX	NISSAN	M45	2003	25-Jul-02	18-Oct-03	NY	
10	JNKAY41E03MXXXXX	NISSAN	M45	2003	29-Jul-02	21-Oct-03	MA	
11	JNKAY41E03MXXXXX	NISSAN	M45	2003	25-Jul-02	28-Jun-03	NJ	
12	JNKAY41E03MXXXXX	NISSAN	M45	2003	26-Jul-02	15-Nov-02	CA	
13	JNKAY41E03MXXXXX	NISSAN	M45	2003	26-Jul-02	11-Sep-03		
14	JNKAY41E03MXXXXX	NISSAN	M45	2003	26-Jul-02	11-Jul-03	CA	
15	JNKAY41E03MXXXXX	NISSAN	M45	2003	29-Jul-02	12-Feb-03	NY	
16	JNKAY41E03MXXXXX	NISSAN	M45	2003	26-Jul-02	16-Nov-02	NY	
17	JNKAY41E03MXXXXX	NISSAN	M45	2003	02-Aug-02	26-Mar-03	AL	
18	JNKAY41E03MXXXXX	NISSAN	M45	2003	26-Jul-02	19-Jun-03	GA	
19	JNKAY41E03MXXXXX	NISSAN	M45	2003	29-Jul-02	12-Nov-03	FL	
20	JNKAY41E03MXXXXX	NISSAN	M45	2003	30-Jul-02	15-Dec-03	PA	
21	JNKAY41E03MXXXXX	NISSAN	M45	2003	31-Jul-02	16-Feb-04	WI	
22	JNKAY41E03MXXXXX	NISSAN	M45	2003	26-Jul-02	04-Oct-02	TX	
23	JNKAY41E03MXXXXX	NISSAN	M45	2003	27-Jul-02	07-Feb-03	CT	
24	JNKAY41E03MXXXXX	NISSAN	M45	2003	02-Aug-02	03-Jul-03	NC	
25	JNKAY41E03MXXXXX	NISSAN	M45	2003	31-Jul-02	20-Dec-02	FL	
26	JNKAY41E03MXXXXX	NISSAN	M45	2003	31-Jul-02	11-Apr-03	VA	
27	JNKAY41E03MXXXXX	NISSAN	M45	2003	02-Aug-02	30-Sep-03	VA	
28	JNKAY41E03MXXXXX	NISSAN	M45	2003	30-Jul-02	20-Jan-03	OH	

Example of Disclaimer placement and XXX redaction on database, supplied on CD

INFORMATION Redacted PURSUANT TO THE FREEDOM OF INFORMATION ACT (FOIA), 5 U.S.C. 552(B)(6)

U.S. Department of Transportation
National Highway Traffic Safety Administration

April 15, 2010

[redacted]
Riasa, VA [redacted]

NVS-216 knt
Ref. #: 16313169

Dear [redacted]

Thank you for your correspondence that was received by the National Highway Traffic Safety Administration (NHTSA), Office of Defects Investigation (ODI) concerning 2006 Jeep Liberty vehicle. In order to respond to the overwhelming number of letters received by ODI, we are answering you with this form letter.

NHTSA is the Federal agency responsible for improving safety on our Nation's highways. We are authorized to order manufacturers to recall and repair motor vehicles or items of motor vehicle equipment when our investigations indicate that they contain serious safety defects in their design, construction, or performance. We also monitor the adequacy of manufacturers' recall campaigns. In order for the agency to initiate an investigation, sufficient data must exist to warrant the expenditure of agency resources. We cannot act on isolated problems or resolve disputes between individual owners, dealers, or manufacturers.

Example of Dsclaimer placement and redaction on Correspondence Response Letter

Information is redacted based on NHTSA Chief Counsel's finding of confidential treatment. Usually, redactions are based on exemption 4 or 5 U.S.C. 552(b)(4). Some basis may vary ((B)(6)); therefore, use the appropriate numbered exemption by checking the Exemptions List below.

Exemptions List (Excerpt from Freedom of Information Act, 5 U.S.C §552) *Possible Exemptions:*

This section does not apply to matters that are:

(1)
(A) Specifically authorized under criteria established by an Executive order to be kept secret in the interest of national defense or foreign policy and (B) are in fact properly classified pursuant to such Executive order;

(2) Related solely to the internal personnel rules and practices of an agency;

(3) Specifically exempted from disclosure by statute (other than section 552b of this title), provided that such statute (A) requires that the matters be withheld from the public in such a manner as to leave no discretion on the issue, or (B) establishes particular criteria for withholding or refers to particular types of matters to be withheld;

(4) Trade secrets and commercial or financial information obtained from a person and privileged or confidential;

(5) Inter-agency or intra-agency memorandums or letters which would not be available by law to a party other than an agency in litigation with the agency;

(6) Personnel and medical files and similar files which, if disclosed would constitute a clearly unwarranted invasion of personal privacy

(7) Records or information compiled for law enforcement purposes, but only to the extent that the production of such law enforcement records or information (A) could reasonably be expected to interfere with enforcement proceedings, (B) would deprive a person of a right to a fair trial or an impartial adjudication, (C) could reasonably be expected to constitute an unwarranted invasion of personal privacy, (D) could reasonably be expected to disclose the identity of a confidential source, including a State, local, or foreign agency or authority or any private institution which furnished information on a confidential basis, and, in the case of a record or information compiled by a criminal law enforcement authority in the course of a criminal investigation or by an agency conducting a lawful national security intelligence investigation, information furnished by a confidential source, (E) would disclose techniques and procedures for law enforcement investigations or prosecutions, or would disclose guidelines for law enforcement investigations or prosecutions if such disclosure could reasonably be expected to risk circumvention of the law, or (F) could reasonably be expected to endanger the life or physical safety of any individual;

Using Adobe Acrobat to Redact

Redaction requires performing a series of steps to apply marks that will obscure PII on a document. Acrobat is the application used to redact, currently, version XI Pro.

Before redacting, create an ACTION, this is used to **assign** the many **steps** needed to redact, to a single **button** that can then be used to apply those steps with one click, instead of clicking through several steps each time the marks are to be used. These steps will also **sanitize** the file (sanitization is the process of ensuring that only the intended information can be accessed from a document) and reduce the file size.

After creating the Action button there are other customizations of commands that will be used regularly in the redaction process, add icons for those commands by customizing the Tool Bar, this will promote efficiency and save time when redacting many pages of documents.

Create an Action Button

1. Open an Adobe Acrobat (pdf) document and select **Tools**, on the Tool bar.

2. Click the down arrow beside **Action Wizard** then click **Create New Action,** a new window will open: **Action steps to show**. Use the **Add** arrow to add the following instruction steps to create the Action Button.

Note: The Add arrow ➔moves actions from the Choose **Tools to add** [list] (on the left) to the **Action steps to show** [list] (on the right). Click this each time to move steps from one side to the other to create the final action button.

Note: Under **Files to be Processed** use: Currently open file as default

3. Under **Choose tools to add:** click the down arrow beside **Protection:**
   a. Click on **Sanitize Document** and click the **ADD** arrow
   b. Click on **Remove Hidden Information** and click the **ADD** arrow
   c. Click on **Apply Redactions** and click the **ADD** arrow.

4. Under Choose tools to add: click the down arrow beside Document Processing:
   a. Click on **Reduce File Size** and click the **ADD** arrow.

5. Under **Choose tools to add:** click the down arrow beside **Save & Export**
   a. Click on **Save** and click the **ADD** arrow.

6. Under Action steps to show: click on Remove Hidden Information:
   a. Click on **Specify Settings,** all boxes remain checked unless otherwise instructed.
   b. Uncheck the **Prompt User** box, then click **OK**.

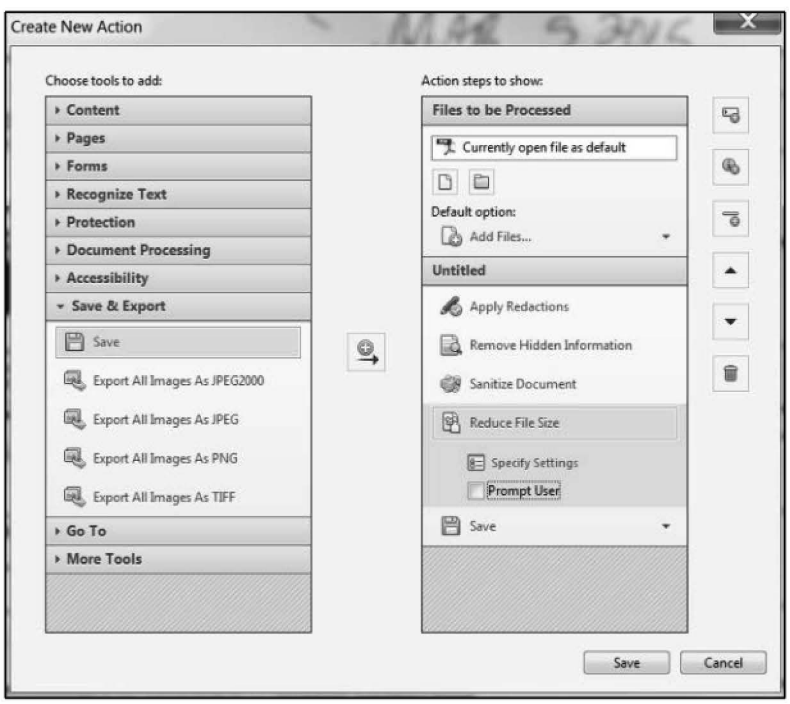
Note: Settings can be changed later if necessary.

7. Under Action steps to show: click on **Reduce File Size**:

a. Uncheck the **Prompt User** box. (No changes to Specify Settings).

8. Under **Action** steps to show: click Save:
   a. Click **Specify Settings** then;
   b. Under Output Options: click **Add to original file names** and;
   c. Type an **'a'** in the **Insert After** box and click **OK**.

9. Click on **Save** (on Create New Action screen). The **Save Action** window will open.



10. At the Save Action window: Under Action Name type: Apply Redaction.
    a. Click **Save.** There should now be a New Action on the Action Wizard menu called Apply Redaction.

Note: All Pursuit documents must include Recognize Text Using OCR, therefore it must be added to the Action steps to show.

Customize the Toolbar

To add icons to the first row of tool icons:

1. Right click on the Toolbar and choose **Quick Tools.**

Or, use the Tools drop down menu; choose View --> Tools --> Protection.
Or, use the quick tools by clicking TOOLS on the lower tool bar.

Note: Use any of the above methods to open the **Protection** area to add icons for customization.

2. At the **Customize Quick Tools** window, click on a tool, then click on the center arrow, this puts the chosen tool over on the other side of the window. Continue to choose all desired tools in this manner then;
3. Click **Ok** and the chosen tool icons will appear on the top row tool bar.
4. Set the redaction **box color** to **Black** then **Click** each;
    - Mark for Redaction
    - Redaction Properties
    - Redacted Area Fill Color
    - Black Redact

Apply the Reaction

1. Create a (**Working Folder\Public**) folder on the C: drive to store saved files.
2. Open the document and click on the **Mark for Redaction** icon, the cursor changes to a plus sign.
3. While holding down the left button on the mouse, drag the plus sign over the area that's being redacted and a red square will **highlight** the redaction area.
4. Click **Apply Redaction.** This will create a black box where the redlined selection was made. Continue to apply redaction marks on all areas of PII.
5. After all of the redaction marks have been applied, permanently redact the entire page by selecting **OK**. Redaction has been successfully applied.
6. Would you like to examine your document for additional document information?
7. Click **NO**.
8. Select the **Save** icon or use File/ Save As and click **Save/Yes.** The file will be saved in the same location as the original file (C:\\Working Folder\Public) created in step 1.

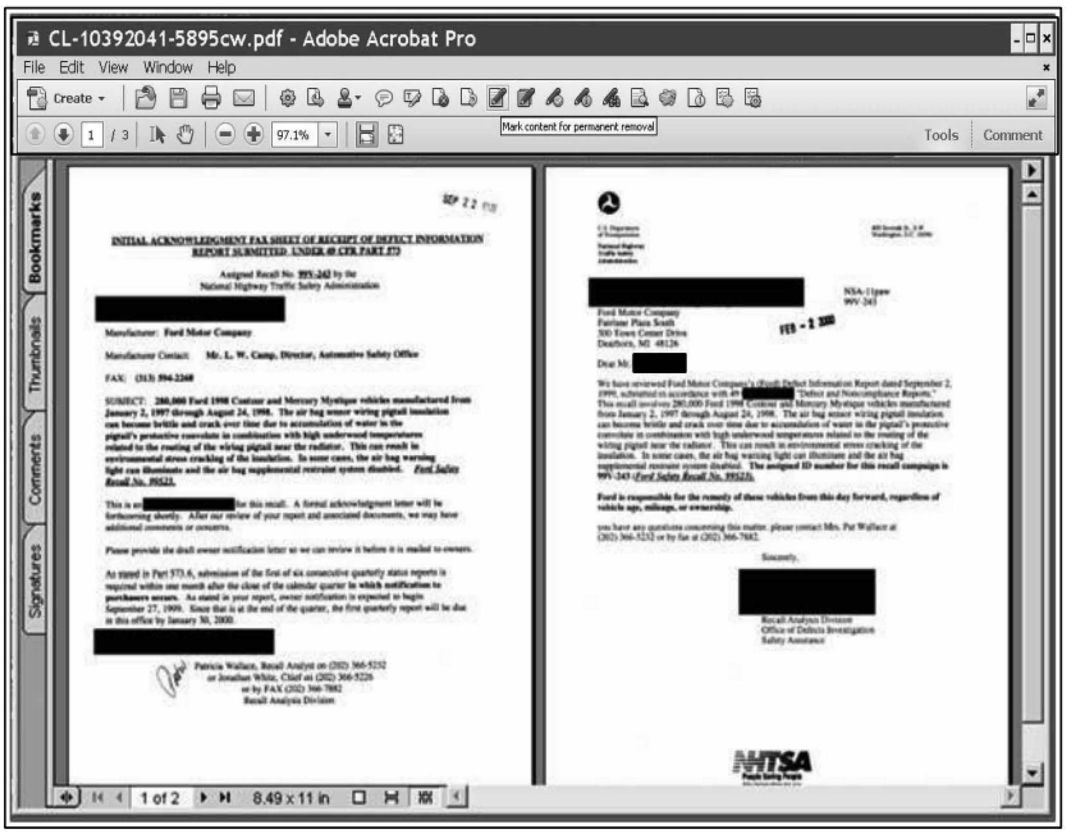
Examples of Redacted Documents

The areas marked in black below show where the information was redacted.

SR Detail (Query)

SR Number: 1-12424386 timing chain/valves
Contact Name: [redacted]
Contact Role: Owner
Account/Rtlr:
Address: [redacted]
City: Winneconne **State:** WI
Postal Code: [redacted] **Country:** USA
Work Phone: **Home Phone:** [redacted]
Email:
VIN: 1G8JS52F6YY[redacted]
Mileage: 67,000
Working Rtlr: (10076) Saturn of Appleton

Example - Redacted PII.



Example - Redacted PII.

Note: When redacting an **IVOQ document only**, if a VIN number is found in the complaint description in part or whole, confirm or copy the VIN to the VIN field in Artemis and remove it and its label "VIN" from the complaint descript ion.

POWER TRAIN: DRIVELINE	3/31/2010 - WENTZVILLE, MO MY ISSUES OCCURRED 5 YEARS AGO, IT WAS THE FIRST YEAR TOYOTA USED THE COMPUTERIZED ACCELERATION IN THEIR CARS. THIS INFORMATION IS IMPORTANT TO THE INVESTIGATION BEING CONDUCTED BY NASA. FEBRUARY 21, 2005 WE PURCHASED A BRAND NEW TOYOTA SOLORA BY JUNE WE SOLD IT. THE CAR FAILED TO ACCELERATE ON SEVERAL OCCASIONS BY NOT RESPONDING WHEN I PUSHED THE GAS PEDAL. I REALIZE THIS IS THE OPPOSITE END OF THE SPECTRUM, BUT TRUST THAT IT IS RELEVANT. PLEASE ENSURE NASA GETS THIS INFORMATION IT WILL GIVE THEM MORE TO WORK WITH. I AM WRITING YOU TODAY BECAUSE FOLLOWING A NEWS BROADCAST ABOUT TOYOTA MY CHILD ASKED ME IF I REMEMBERED OUR INCIDENT THAT ALMOST COST US OUR LIVES IN THAT CAR. I HAVE PLACED THIS INFORMATION IN YOUR HANDS TO DO THE RIGHT THING WITH. VIN# 4T1CA30P15U055464 CASE NUMBERS ON FILE WITH TOYOTA 200504110025 - APRIL 11, 2005 200505090783 ûMAY 9, 2005 200505120765 - MAY12, 2005 THE ISSUES WERE FIRST HANDLED AT THE DEALERSHIP LEVEL WHERE THE VEHICLE WAS PURCHASED, BEFORE I REALIZED THERE WAS A SERIOUS SAFETY ISSUE WITH THE VEHICLE. IF YOU HAVE ANY QUESTION I CAN BE REACHED AT 636-887-2911 SUAUNE MYERS Source: NHTSA Website

Example - X's used to redact PII.

REQUEST NUMBER TWO DATA.xls [Compatibility Mode] - Microsoft Excel

	A	B	C	D	E	F	G
1	VW File Number	Category	Vehicle Owner Name	Vehicle Owner Address	Vehicle Owner Phone	VIN	Make
2	90187858	Consumer Complaint	REDACTED	REDACTED	REDACTED	3VWAJ71K77MXXXXXX	Volkswagen
3	90198558	Consumer Complaint	REDACTED	REDACTED	REDACTED	3VWAL71K39MXXXXXX	Volkswagen
4	90176126	Consumer Complaint	REDACTED	REDACTED	REDACTED	3VWAL71K49MXXXXXX	Volkswagen
5	90180149	Consumer Complaint	REDACTED	REDACTED	REDACTED	3VWAL71K49MXXXXXX	Volkswagen
6	90177845	Consumer Complaint	REDACTED	REDACTED	REDACTED	3VWAL81KX9MXXXXXX	Volkswagen
7	90181183	Consumer Complaint	REDACTED	REDACTED	REDACTED	3VWBA71K78MXXXXXX	Volkswagen
8	90190664	Consumer Complaint	REDACTED	REDACTED	REDACTED	3VWBJ71K28MXXXXXX	Volkswagen
9	90195104	Consumer Complaint	REDACTED	REDACTED	REDACTED	3VWBJ71KX8MXXXXXX	Volkswagen
10	90180990	Consumer Complaint	REDACTED	REDACTED	REDACTED	3VWCL71K09MXXXXXX	Volkswagen
11	90190735	Consumer Complaint	REDACTED	REDACTED	REDACTED	3VWCL71K09MXXXXXX	Volkswagen
12	90190724	Consumer Complaint	REDACTED	REDACTED	REDACTED	3VWCL71K19MXXXXXX	Volkswagen
13	90185521	Consumer Complaint	REDACTED	REDACTED	REDACTED	3VWCL71K29MXXXXXX	Volkswagen
14	80323358	Consumer Complaint	REDACTED	REDACTED	REDACTED	3VWCL71K29MXXXXXX	Volkswagen
15	90181082	Consumer Complaint	REDACTED	REDACTED	REDACTED	3VWCL71K39MXXXXXX	Volkswagen
16	90155879	Consumer Complaint	REDACTED	REDACTED	REDACTED	3VWCL71K69MXXXXXX	Volkswagen
17	90189804	Consumer Complaint	REDACTED	REDACTED	REDACTED	3VWCL71K69MXXXXXX	Volkswagen

Example - PII redacted in a Pursuit document (an Excel spreadsheet).

Note: For **Pursuit documents ONLY**: replace the Name, Address and Phone Numbers with the word "Redacted". Use 'XXXXXX' on the last 6 numbers of the VIN (Figure #).

1. Pull the Pursuit Information spreadsheet from the CD (provided by Engineer).
2. Redact PII as indicated above.
3. Add Disclaimer (see Figure 3).
4. Create a password (to prevent any further changes to document) by;

Save as -->Tools --> General Opt ions --> Read Only --> type password (3 letter code) ---> OK -->Repeat Password --> Save

Note: The 3 letter password is created by the Document Handler via a personal system (discuss with management).

5. Save redacted copy to the, previously created, desktop folder on hard drive (specifically for Pursuits).
6. Save a copy to the Pursuits QC folder on the DOT network. (Save original copy to the QC folder).
7. Create a Tracking Number (for Artemis) and upload to the Public Repository.
8. Return CD to Engineer.

Note: If a document it too large (over 25mb) save the redacted file to a CD, create a slip-sheet and pass it to the Investigation Case Assistant to handle further.

Form Approved: O.M.B. No. 2127-0008

U.S. Department of Transportation
National Highway Traffic Safety Administration

DOT Auto Safety Hotline
Vehicle Owner's Questionnaire
To Report Vehicle Safety Defects
1-888-DASH-2-DOT
(1-888-327-4236)
INTERNET:www.nhtsa.dot.gov/hotline

FOR AGENCY USE ONLY 100148

Date Received	Repository ☐
15-JUN-2010	Reference No. 10336447

OWNER INFORMATION (Type or Print)

Name (b)(6)		Daytime Telephone Number (b)(6)	E-mail Address (b)(6)
Address (b)(6)			
City SWAMPSCOTT	State MA	Zip Code (b)(6)	Evening Telephone Number (b)(6)

The information you provide will be used to identify potential safety-related defects. We may share your information with the applicable vehicle manufacturer during an investigation or recall in accordance with the routine uses described in the agency's Privacy Act notice. See 49 FR 53971 (Sep. 3, 2004).

VEHICLE INFORMATION

17 digit Vehicle Identification Number Located at bottom of windshield on driver's side	Make	Model	Model Year
1HGCM665X4(b)(6)	HONDA	ACCORD	2004

Date Purchased	Dealer's Name and Telephone Number			Engine: No: Cylinders 6	Fuel Type:
Original Owner ☐	Dealer's City	State	Zip Code		

Transmission Type	☐ Antilock Brakes ☐ Cruise Control	Powertrain	Multiple Failure: 1	Incident Date(s) 10-JUN-2010

FAILED COMPONENT(S)/PART(S) INFORMATION

Vehicle Component Code: 103000 POWER TRAIN: AUTOMATIC TRANSMISSION	Failure Mileage	Failure Speed
	91000	60

ADDITIONAL ITEMS TO BE COMPLETED WHEN REPORTING A TIRE FAILURE

Tire Make	Tire Model (Name or Number)	Tire Size (Example P215/65R15)
DOT No. (Example: DOTMAL9ABC036)	☐ Original Equipment ☐ Prior Repair	Failure Location:
Tire Component Code		Tire Failure Type:

ADDITIONAL ITEMS TO BE COMPLETED WHEN REPORTING A CHILD SEAT FAILURE

Make:	Date Manufactured:	Model No./Name:
Seat Type:	Installation System:	
Child Seat Component Code:	Failed Part:	

APPLICABLE INCIDENT INFORMATION
(Please describe in detail the incident(s), Failure(s), Crash(es), and injury(ies).)

Crash	Fire	Number of Persons Injured	Number of Deaths	Reported to Police
☐ Yes ☒ No	☐ Yes ☒ No			N

Narrative Description of Incident(S), Crash(es), and Injury(ies).
Please describe (1) events leading up to the failure, (2) failure and its consequences, and (3) what was done to correct the failure; i.e, parts repaired or replaced (and if old part is available).

WE WERE LUCKY THAT WE WEREN'T KILLED!!!2004 HONDA ACCORD EXL 6CYL VIN#[XXX]. WE WERE TRAVELING ON ROUTE 95 NORTH OF BOSTON IN THE MIDDLE LANE AT AN APPROX. SPEED OF 60 MPH ON JUNE 10, 2010 AT APPROX. 6:15PM. I WENT TO PASS THE CAR IN FRONT OF US AND STARTED TO PULL INTO THE PASSING LANE ON THE LEFT. SUDDENLY, THE CAR JERKED VIOLENTLY AND SLOWED DOWN SUDDENLY. THE CAR IN BACK OF US ALMOST HIT US AND SWERVED INTO THE LANE ON THE RIGHT TO AVOID HITTING OUR CAR. THE OTHER DRIVER WAS ALMOST RUN OVER BY A SEMI TRUCK WHO JAMMED ON HIS BRAKES. I THOUGHT HE (THE TRUCK) WAS GOING TO JACK KNIFE. I SEE THAT THIS TRANSMISSION PROBLEM IS A RECALL ITEM FOR HONDA. THE HONDA DEALER (KELLEY HONDA IN LYNN, MASS.) SAYS THAT THEY WILL NOT HELP US FINANCIALLY TO REPLACE THE TRANSMISSION. THE CAR HAS 90,000 MILES AND IS IN GOOD SHAPE OTHERWISE. WE ARE VERY UPSET AT HONDA'S REACTION TO THIS SAFETY FAILURE AND WE FEEL STRONGLY THAT THE US GOV'T SHOULD STEP IN BEFORE PEOPLE ARE NEEDLESSLY KILLED IN CARS WITH THIS TRANSMISSION. WE ALSO NOTE ON THE INTERNET THAT THERE ARE TONS OF PEOPLE WITH THE SAME PROBLEM AND VERY DANGEROUS EXPERIENCES. PLEASE HELP AND GET THE WORD OUT!! [XXX]
INFORMATION REDACTED PURSUANT TO THE FREEDOM OF INFORMATION ACT (FOIA), 5 U.S.C. 552(B)(6). *TR

Include, if available: Police/Fire Department Report, Photos, and Repair Invoice. ATTACH ADDITIONAL SHEETS IF NECESSARY

The Privacy Act of 1974-Public Law 93-579 This information is requested pursuant to authority vested in the National Highway Traffic Safety Act and subsequent amendments. You are under no obligation to respond this questionnaire. Your response may be used to assist the NHTSA in determining whether a Manufacturer should take appropriate action to correct a safety defect. If the NHTSA proceeds with administrative enforcement or litigation against a manufacturer, your response, or a statistical summary thereof, may be used in support of the agency's action.

Example - VIN# and PII redacted in an IVOQ document (in Artemis).

Prepare Records for Uploading to Artemis

After data entry of a document into Artemis and assigning the proper file name, the document is then batched (placed in a specific folder with other files) by:

1. Attach a **Data Service Request (DSR)** sheet to the a hardcopy file, (these original hardcopy files accompany the electronic version to be used the compare the redaction during Quality Control Check (QC) review). Add information about; Service Type, Document Type, Document Count, Service Request, Scanning Procedure and File name. (See sample DSR in Appendix).

2. Assign a **Batch Name**. The batch (folder) name is assigned by the person scanning the documents. The name starts with the scanner's first and last initials (example: **CW)** followed by the two numeral month and day (example: **0815)** followed by a prefix (example: **EQ** - for Electronic Questionnaire) followed by **_I** for Internal depository or **_P** for Public depository. Example: **CW0815EQ_I**

Each document has a **Document Type**, a **Prefix**, and an **Index Identifier** in the batch name, identifying the type of document. Use the following abbreviations to make the File Name:

Document Type Identifier	Prefix	Index
Electronic Vehicle Owner Questionnaire	EQ	EQ
Vehicle Owner Questionnaire	VQ	VQ
Recall	RECALL	Various
Service Bulletin	SERVICE	SB
Customer Satisfaction Letter	CSC	CSC
Google Alert	Accident CPSC	ALRT
Test Report	TESTRPT	TRTR
Registered Importation	REGIMPORT	TRRI
Information Request	INFOREQUEST	TRIR
Investigation	INVEST	TRIN
Federal Register	FEDREG	TRFR
Control Document	CONTROL	TRCD
CAFÉ Enforcement Letter	CAFÉ	CAFÉ

1. Group the batch of documents created in the 'Update in Artemis' process. Create a batch name and place the documents in the folder.
2. This will be the batch for the internal repository. Place a **copy** of the batch in the \\nhthqnwas128\Conversions\Internal folder for uploading to the internal repository in Artemis.

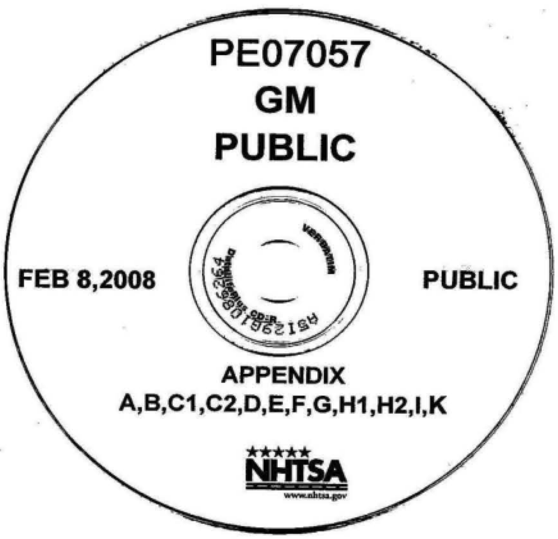
NOTE: Pay close attention to the instructions, because some email is marked **Private Only** or **Internal Only**. That means there is to be NO Public version. If a public version is needed, copy the batch for the public version and save it to the <u>C:\\Working folder for redaction</u>, all files in the public repository must first be redacted. Quality Control.

How to Create a CD

CD creation is by request , after the redaction Process is complete;

1. Save the redacted file to a CD.
2. Make three (3) copies of the CD.
3. Give these to the TIS Division staff.
4. Create a cover for the CD to show the contents.
5. Each CD cover should say "Public" and include attachments, if any.

Sample covers:



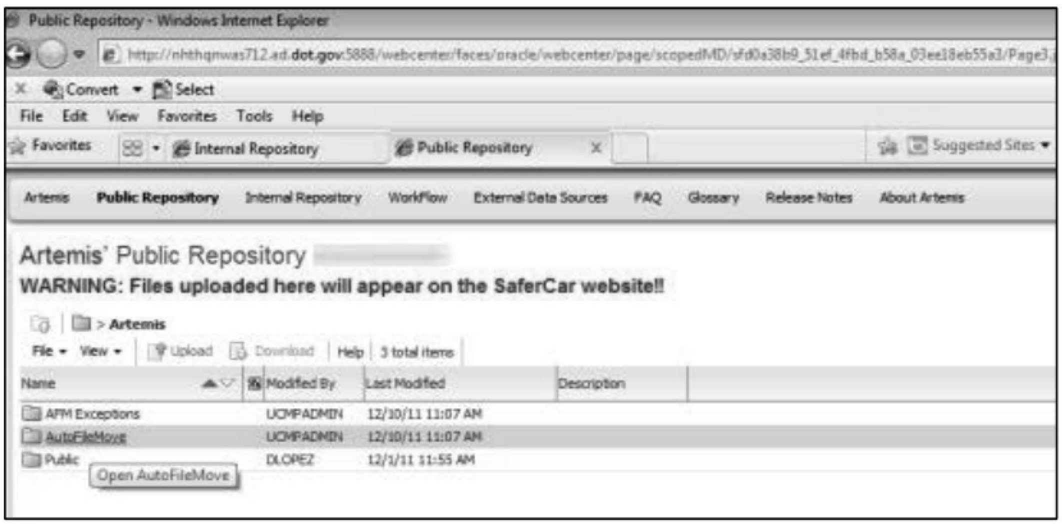
The Alternative Method to Upload Pursuit Records

This method uses the Oracle Content Server application and 2 windows in Artemis open at the same time, this enables dragging, dropping, copying and pasting files and text between two application and 2 windows in one application.

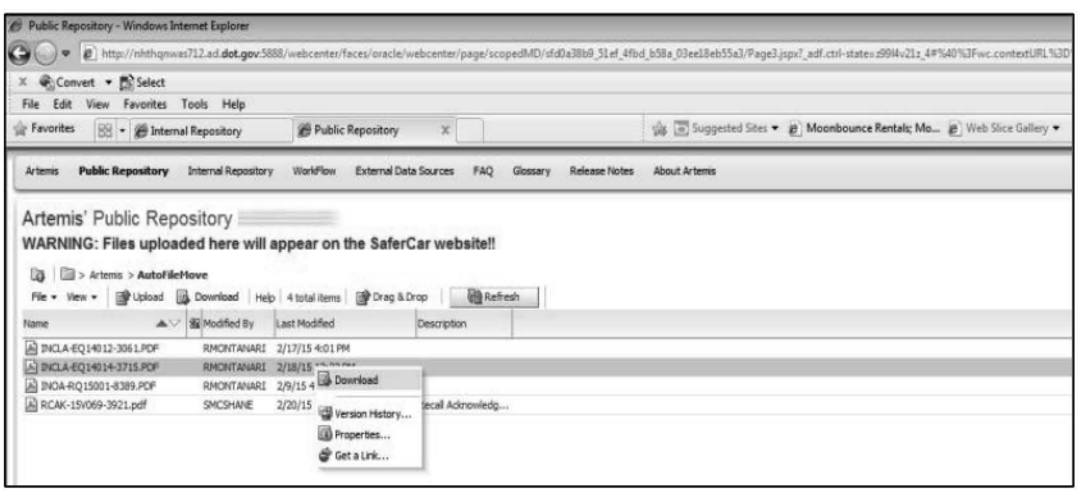
1. Copy the QC'd file from the network folder and paste it to the desktop. Rename it, **Drag** the file to the **Oracle Content Server** icon (placed on your desktop by the System Administrator) and drop it, to copy it, to the Artemis server.

   The record is now in the Artemis server but must be **published** to both repositories and specific data must be entered into the database to make it retrievable and searchable.

2. In Artemis click the Public (external) Repository tab.
3. Click on the AutoFileMove folder.

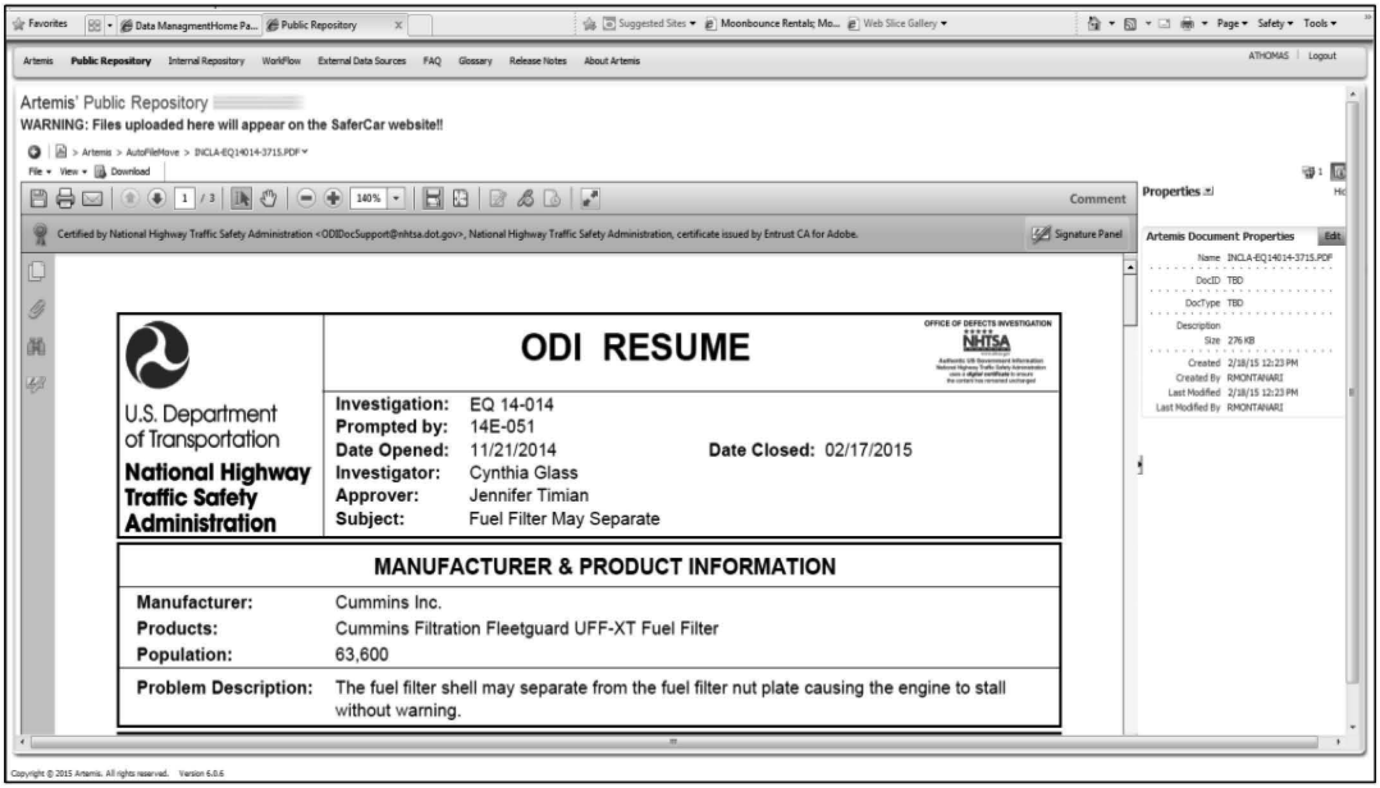


4. At the top of the screen, right click on the **Description** tab.
5. Right click on the appropriate record and select **Properties**



NHTSA-ES17-002240- 068

6. Click the **Edit** button and enter the description.



NOTE: Copy the description (without the tracking number) from "Artemis screen 1" and paste it to the public or internal repository in AUTO FILE MOVE FOLDER on the other open screen of "Artemis screen 2" (2 screens open at this point).

7. Click **Save** and enter date completed, in the log.

U.S. Department of Transportation (DOT)

National Highway Traffic Safety Administration (NHTSA)

Level 1 VOQ Screening

Standard Operating Procedure (SOP)

Version 1.1

November 3, 2016

DOT – For Official Use Only (FOUO)

Revision History

Version	Author	Date	Revision
1.0	Cheryl Hurt	October 21, 2016	Initial Document Release
1.1	Angel Jackson	November 3, 2016	Approved by ODI Acting Director

Final Authorized and Approved By

Approved by Mike Brown, Acting ODI Director	November 3, 2016
ODI Director	**Date**

Table of Contents

1.0 Overview

1.1 Purpose

The purpose of this document is to define the Standard Operating Procedure (SOP) to be employed by the Office of Defects Investigation (ODI) in the Level 1 Vehicle Owner's Questionnaire (VOQ) screening process.

This process supports the ODI goal of ensuring that all VOQ submissions are reviewed in a timely manner, and clearly defined repeatable steps are performed by all Vehicle Defects Divisions (VDD) in an effort to identify potential safety risks that warrant further review by ODI staff.

1.2 Scope

The Level 1 VOQ Screening process comprises the initial actions performed by ODI to screen all incoming consumer VOQ submissions. This procedure applies to the review process of all VOQs across all ODI VDD teams.

1.3 Prerequisites

ODI Level 1 screeners must have valid user accounts, and appropriate access and training on supporting IT systems necessary to retrieve inbound VOQ records, update records with findings, observations, and decisions. In addition, easy access to relevant process reference materials, team resources, and published ODI guidance and policy are required.

- ACM
- Artemis

1.4 Roles & Responsibilities

1.4.1 SOP Performer

An ODI screener is responsible for executing this procedure as described.

1.4.2 SOP Owner

The Program Support Division (PSD) Chief or acting ODI official designated by the ODI Director is responsible for SOP document control, distribution, change management and accuracy.

1.4.3 SOP Maintenance

The PSD Chief assigns the person responsible for convening a review and reissuing this SOP prior to the annual anniversary date of the current approved version.

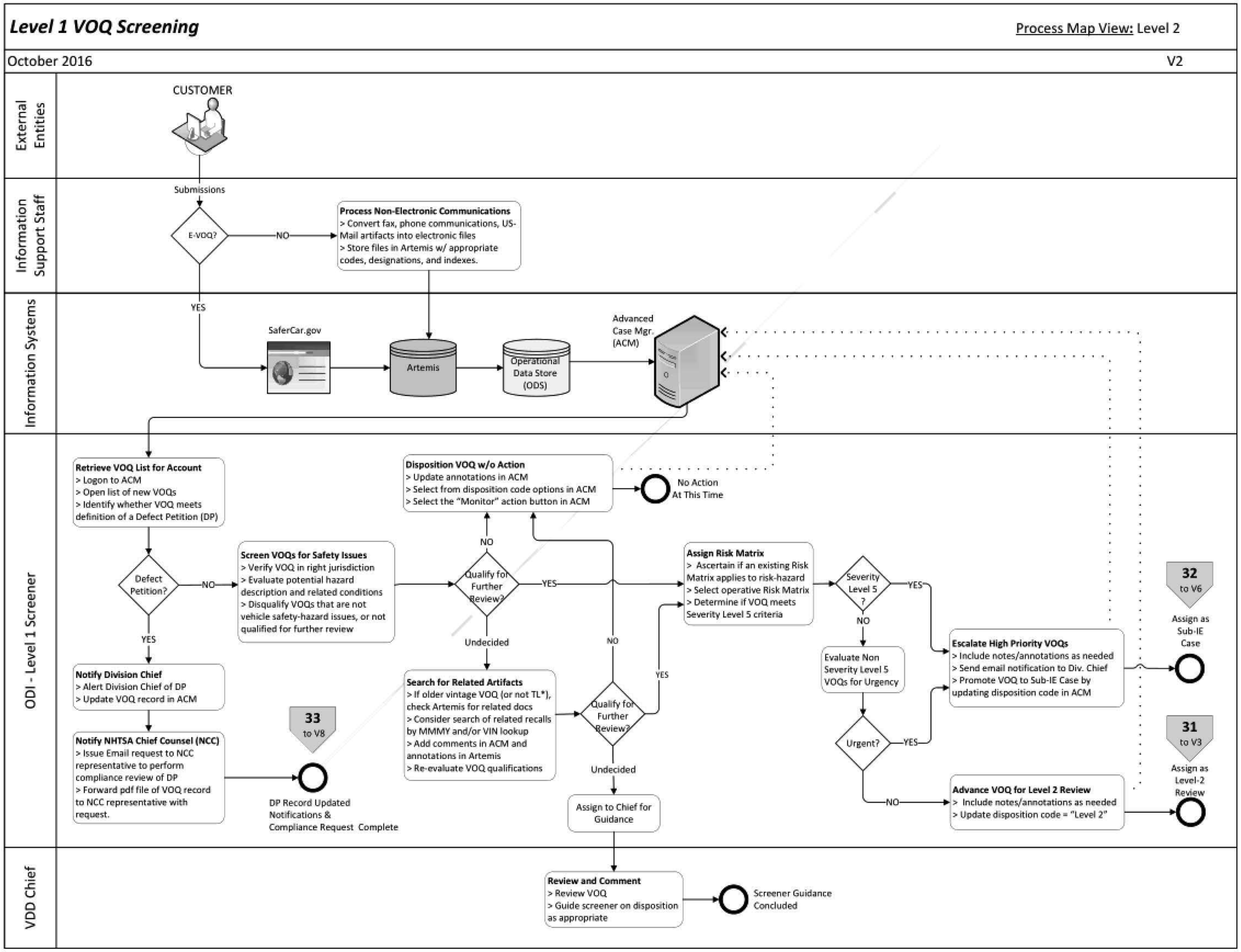
2.0 Process Overview

2.1 Process Description

The Level 1 VOQ Screening process originates with the receipt of consumer complaints as VOQ's from multiple sources (SaferCar.gov website, emails, SaferCar mobile application, US mail and phone calls). The Screener executes the Level 1 Screening process to make a determination on whether the issue qualifies as a potential safety defect that merits a more in-depth review. The process concludes with the Screener dispositioning the issue by making the appropriate assignment in the Advanced Case Manager (ACM) system indicating that the issue a) does not qualify for further review, b) the issue does qualify for further review with urgent escalation, or c) the issue qualifies for further review with standard advancement to a "Level 2 Review".

2.2 Level 1 VOQ Screening Process Diagram

The process diagram illustrates the flow of the process which employs the procedure described in this document.



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3.0 Procedure Steps

Follow the steps below to execute the Level 1 VOQ Screening procedure.

Step 1. **Log on** to ACM.

Step 2. **Open** the list of assigned VOQ records.

Step 3. **Open** and review a complaint to determine if it requests a Defect Petition (DP).

	If the complaint contains the term "petition" or if the complainant requests the agency to open an investigation, refer the complaint for consideration as a DP.

- If so, notify the Division Chief of the request for a DP and update the VOQ record in ACM.
- Reference the DP process or procedure documentation for further instructions on handling of a DP.

Step 4. **Verify** the VOQ is assigned to the appropriate VDD team based on manufacturer responsibilities. If not, change the VOQ assignment in ACM to route the VOQ to the appropriate VDD team for review. This completes the required actions for this VOQ.

Step 5. **Evaluate** the VOQ complaint for indications of a potential safety defect or hazard.

- Disqualify VOQs unrelated to vehicle safety issues or not otherwise qualified for further review. Complete Step 6 to disqualify the VOQ.

Step 6. **For Disqualified VOQs:**

- **Assign** a disposition code in ACM for the VOQ from the drop down menu indicating no further action to be taken (see Appendix A for the list of VOQ Dispositions).
- **Select** the "Monitor" action button in ACM to complete the screening process.

Step 7. **For Undecided VOQs:**

- In cases where the VOQ disposition is not obvious or clear, review other internal ODI information: a) If the VOQ is of older vintage, or not originated by phone (indicated by TL*), query Artemis for potentially related documents, b) Consider searching for related recalls by Manufacturer, Make, Model, Year (MMMY) and/or VIN lookup.
- **Document findings** as appropriate by adding annotations in ACM and Artemis.

Step 8. **Re-evaluate** VOQ's qualifications for further review:

- If the VOQ qualifies for further review advance to step 9
- For disqualified VOQs, execute step 6 to complete the VOQ screening
- For VOQs where qualification remains uncertain, seek Chief guidance on appropriate disposition by assigning VOQ for Supervisor Review in ACM.

Step 9. **For Non-Disqualified VOQs:**

- **Select** the operative Risk Matrix in ACM from the drop-down list.
- **Use** the Severity Reference Table (see Appendix B) to determine if the VOQ meets Severity Level 5 (SL-5) criteria.

Step 10. **For Non-Severity Level 5 VOQs:**

- **Determine** if the VOQ merits urgent treatment under current Agency priorities.

Step 11. **Promote** the VOQ to a Sub-IE case if the VOQ meets the Severity Level 5 criteria on the applicable Risk Matrix, or is determined to be an urgent complaint.

- **Add** notes and annotations to the ACM record as appropriate to complete the screening process.
- **Click** the "email" button in ACM to send an email notification to the Division Chief to complete the screening process.
- **Update** the VOQ disposition code in ACM to "Sub-IE".

Step 12. **Advance** the VOQ for a Level 2 VOQ Review if the VOQ is not rated Severity Level 5 or considered an urgent complaint.

- **Add** notes and annotations to the ACM record as appropriate to complete the screening process.
- **Update** the VOQ disposition in ACM to "Level 2".

4.0 Document Location

The repository for all ODI SOPs and supporting information is located at the following link:

http://our.dot.gov/office/nhtsa.nvs/NVS-200/NVS-210/ODI%20Process%20Documentation/SitePages/Home.aspx

5.0 Quality Assessment

The SOP Owner performs quality assessments on SOPs on a regular basis (at a minimum frequency of at least annually), as well as performing regular audits to ensure compliance and process accuracy. Areas of non-compliance within ODI will be identified and an improvement plan will be implemented in which corrective actions will be tracked and managed.

The SOP Owner is ultimately responsible for ensuring all VDD Chiefs are monitoring the SOP processes to ensure the procedures in use are consistent with this SOP.

5.1 Quality Audits

Quality audits will be performed to validate processes employed are executed in accordance with defined ODI procedures. The specific details of these audits are in development and may include actions such as ad hoc spot-checks as well as in-depth statistical analyses of the results from VOQ screening processes described in this SOP. For example, the selection made in Appendix A as to the reasons for disqualifying a VOQ, or the decision as to whether a non-disqualified VOQ should be scored at a Severity Level 5, may be studied using inter-rater reliability measures, or reviews against "gold standard" consensus findings based on multiple reviews of a particular VOQs

5.2 Quality Audit Reports

Quality audit reports will be prepared by the SOP Owner and will be provided to the ODI Director and the VDD Chiefs for review and action as appropriate.

5.3 Feedback

To request corrections or changes, please send an email to the SOP Owner with "Requested change to the Level 1 Screening SOP" in the subject line.

Appendix A. VOQ Dispositions

Reasons to disqualify a VOQ from promotion to Level 2 Review during Level 1 Screening:

Table A-1 *VOQ Dispositions Reference Table*

Level 1 Screening Criterion for Disqualification from Level 2 Review		Definition	Example(s)
1.	No, or Minimal Safety Consequence	The complaint has no relation to safety in the use or operation of a motor vehicle.	Examples: – Paint peeling – Air conditioning issue – Car will not start – Serpentine belt squeals – Uncomfortable seats – Repair Cost or Warranty Complaint with no safety defect alleged – Dealer or repair shop customer service complaint with no safety defect alleged – Warranty complaint, with no safety defect alleged
2.	Vehicle Design, Features or Characteristics Complaint	The complaint is an aspect of the vehicle that the consumer finds confusing, annoying, or unexpected, but it is unrelated to a potential safety defect.	Examples: – Instrument cluster does not have oil pressure gauge like their old car. – Deep recess of gages in dashboards is not providing adequate lighting. – Other viewing issue – GPS that does not provide accurate street and signage information.
3.	Roadway or External Influences	Road conditions (other than weather-related, other drivers, etc.) cause a failure or crash with no suggestion of a potential vehicle defect being involved.	Examples: – Potholes – One-lane bridges – Poor lane markings – Glare – Road design, etc.

Level 1 Screening Criterion for Disqualification from Level 2 Review		Definition	Example(s)
4.	Driver-Induced Failure	Driver's action resulted in a safety situation or crash, with no suggestion of an involved potential vehicle defect.	Examples: – Texting – Inattention – Falling asleep at the wheel – Impaired driving, etc.
5.	Weather-Related	Specific weather-related cause for safety consequence, with no suggestion of an involved potential vehicle defect.	Examples: – Snow – Ice – Rain – Wind, etc.
6.	Normal Wear and Tear	Failure or wearing out of a part of the vehicle that has a normal expected life (by miles or time in service), even if the item fails or wears out earlier than the typical expectation.	Examples: – Brake pads or rotors – Tires – Wiper blades – Fluids need replacing- (e.g., engine oil, transmission fluid etc.) – Tailgate struts – Exterior lighting such as headlight, turn signal bulbs fail; even if sooner than owner's manual suggests.
7.	Consumer Opinion Narrative-No Incident	"Third person" complaint – no actual experienced event or incident (includes no "white knuckle" or "close call" incident in addition to no actual incident).	Example: – "I saw an article in the paper today about self-driving vehicles, and I don't like the idea"
8.	Current Pursuit	A current Preliminary Evaluation (PE), Engineering Analysis (EA), DP, Timeliness Query (TQ), Recall Query (RQ) or other official NHTSA Investigation. (Not to be used for Sub-IE or IE cases that have not been promoted to a PE or other official investigation)	Official defect investigation is underway (many different designations)

Level 1 Screening Criterion for Disqualification from Level 2 Review		Definition	Example(s)
9.	Recall Administrative	Issue is related to the administration of a recall: recall is not being performed in a timely manner, or other similar problem, apparently due to an administrative or logistical reason rather than a technical issue or technical dispute.	Examples: – The complainant states that the dealer says that the replacement part(s) associated with the recall is not available. – The complainant states that they have not yet been contacted by the manufacturer regarding a recall that they saw on TV or read about in the newspaper. – Failure to provide recall remedy for out-of-country vehicles (e.g., vehicles belonging to members of the US military).

Appendix B. Severity Level 5 Reference Table

Table B-1 *Severity Level 5 Reference Table*

NHTSA ODI Risk Matrix	Severity Level 5 (SL-5) Definition	Example(s)
Air Bags (Front)	Component/system failure that results in rupture or other unintended hazard condition caused by deployment of the front airbag system with an actual or high probability of death or injury requiring professional medical attention or hospitalization	← See SL-5 definition to the left
Air Bags (Side & Other)	Component or system failure that results in rupture or other unintended hazard condition caused by deployment of any side air bag and/or another passive restraint system with an actual or high probability of death or injury requiring professional medical attention or hospitalization	← See SL-5 definition to the left
Autonomous Braking	Unexpected Braking (no collision risk) resulting in slowing to stop in high-speed (>30 mph) traffic or any automatic braking that occurs with no brake lamp illumination	← See SL-5 definition to the left.
Brake Light & CHMSL	No SL-5 Condition	NA
Brake System	Complete loss of braking or severe loss of directional control/stability while driving with little to no warning	← See SL-5 definition to the left.
Child Restraint	Failure of the car seat to remain attached to the vehicle, or to restrain its occupant in a crash or hard braking situation (SL-6)	Report of car seat flying from rear seat to front seat area in a crash
Cyber Security	Any potential impact while vehicle is in motion to any system, or ability to remotely cause vehicle control system faults through a documented cyber vulnerability	Unintended braking, steering or stalling while the vehicle is in motion or unintended acceleration from a stop or in motion
Door & Liftgate	Component/system failure that results in unintended hazard condition from door/liftgate malfunction, while vehicle in motion, resulting in actual or highly probable death or serious injury to vehicle occupant(s) due to or during a collision and/or occupant ejection with no reasonable detectability	Door/liftgate opens unintentionally/unexpectedly allowing passengers to be thrown from the vehicle or the door/liftgate opens in a crash

NHTSA ODI Risk Matrix	Severity Level 5 (SL-5) Definition	Example(s)
Fire(Non-Crash)	Open flame fire, cause confirmed in at least one incident, with at least one severity factor	Alternative fuel explosive hazard, key-off, interior fire, rapid development
Headlight	No SL-5 Condition	NA
Hood	Component/system failure that results in unintended hazard condition from hood mechanism malfunction while vehicle in motion resulting in actual or highly probable death or serious injury to vehicle occupant(s) with no reasonable prior warning	Hood fails to remain closed blocking driver's vision causing a collision - intrusion into passenger compartment in a frontal collision
Loss of Motive Power(Stall)	WHILE DRIVING - complete loss of motive power, power train "lock-up" (no coasting possible) at high speed (open throttle > 20 mph)	Car engine spontaneously shuts off without warning on a highway and locks the drive wheels
Seat Belt	Component/system failure with no reasonable detectability that results in a hazardous condition from the full loss of seat belt protection with an actual or high probability of death or injury requiring professional medical attention or hospitalization	Bolt holding seatbelt loop to floor of car for the driver or passenger breaks in a low-speed crash and prevents seatbelt from restraining driver or passenger
Speed Control	Any confirmed/repeatable defect in throttle control system (including cruise control & idle speed control) resulting in unrequested throttle increase or failure to decrease or sustain throttle stuck at large throttle opening (Original Equipment (OE) mats only, if related to pedal entrapment) with no override available to driver	Stuck throttle or accelerator pedal entrapment conditions with no brake override function available OR demonstrated/ repeatable electronic faults resulting in throttle increases/ surges greater than normal idle speed control with no input to the accelerator pedal (these should be well documented to show percent of throttle increase, duration & effect on vehicle dynamics)
Steering	Complete loss of steering while driving, or unintended steering forces difficult for most drivers to overcome, with little to no warning	Steering wheel or column joint separation, column lock failure, Pitman arm, unintended Electric Power Steering (EPS), or failsafe failures
Suspension	Sudden failure with evidence of serious control loss due to failure of suspension component or frame mount	Documented incidents of rollover, yaw/stability loss, directional control

NHTSA ODI Risk Matrix	Severity Level 5 (SL-5) Definition	Example(s)
Tail Lights & Other Lighting Systems	No SL-5 Condition	NA
Tires	Tire component separation or rapid air loss ("blow-out") caused by verified tire defect with at least one verified high-speed (>30 mph) loss of control incident	Blowout without any impact with a hard or pointed object, and with verified tire defect
Turn Signals & Hazard Lights	No SL-5 Condition	NA
Vehicle Rollaway	Documented/verified failure of park system or PRNDL resulting in vehicle movement after displayed/apparent shift to Park (includes actual P to R failures)	Broken park pawl, failures of Ignition-Park Interlock (allowing key removal when not in Park) or Brake Transmission Shift Interlock (BTSI) allowing shift from Park without depressing the brake pedal, or confirmed PRNDL misalignment
Wheels	Wheel separation while driving, rim failure or fastener failure	Catastrophic failures of wheel rims or fasteners resulting in sudden wheel separation while driving that are not related to impact damage
Note: *The Generic Severity Level 5 provided below is from an additional Generic Risk Matrix intended for default use only if none of the specific Risk Matrices above apply.*		
Generic	Component/system failure without reasonable warning leading to an unintended hazard with actual or demonstrated high probability of death, injury requiring professional medical attention and/or hospitalization, and/or loss of vehicle control	Abrupt loss of function of windshield wipers without preceding degraded performance, especially noisy operation, or any other warning signs
Version 1.6 – October 20, 2016		

Appendix C. Acronyms

Table C-1 Acronyms

Acronym	Description
ACM	Advanced Case Manager
CHMSL	Center High Mounted Stop Lamp
DP	Defect Petition
EA	Engineering Analysis
EPS	Electric Power Steering
NHTSA	National Highway Traffic Safety Administration
ODI	Office of Defects Investigation
OE	Original Equipment
OEM	Original Equipment Manufacturer
PE	Preliminary Evaluation
PSD	Program Support Division
RQ	Recall Query
SL	Severity Level
SL-5	Severity Level 5
SME	Subject Matter Expert
SOP	Standard Operating Procedure
TQ	Timeliness Query
VDD	Vehicle Defects Division
VIN	Vehicle Identification Number
VOQ	Vehicle Owner's Questionnaire
WCA	Watson Content Analytics

Department of Transportation (DOT)

National Highway Traffic Safety Administration (NHTSA)

Level 2 VOQ Review

Standard Operating Procedure (SOP)

Version 1.1

November 21, 2016

DOT – For Official Use Only (FOUO)

Revision History

Version	Author	Date	Revision
1.0	Steve Cyphers	November 18, 2016	Initial Document Release
1.1	Angel Jackson	November 21, 2016	Approved by ODI Acting Director

Final Authorized and Approved By

Signed by Michael L. Brown	December 29, 2016
ODI Director	**Date**

Table of Contents

1.0 Overview

1.1 Purpose

The purpose of this document is to define the Standard Operating Procedure (SOP) to be employed by the Office of Defects Investigation (ODI) staff to perform a Level 2 Vehicle Owners Questionnaire (VOQ) Review to evaluate and assess VOQs for potential vehicle safety defects.

1.2 Scope

This procedure is applicable for processing of consumer automotive safety complaints which have completed the Level 1 VOQ Screening process and are routed to the Level 2 VOQ Review process for further investigation by the Vehicle Defects Divisions (VDD), and Medium Heavy Duty Vehicle Division (MHDVD) staff.

1.3 Prerequisites

VDD-MHDVD investigators must have valid user accounts, and appropriate access and training on supporting Information Technology (IT) systems necessary to retrieve inbound VOQ records, update records with findings, observations, and decisions. In addition, easy access to relevant systems, process reference materials, team resources, and published ODI guidance and policy are required including:

- Advanced Case Manager (ACM)
- Artemis
- External safety defect screening data sources identified on the NHTSA Safety Defect Screening Links SharePoint site:
    - http://our.dot.gov/office/nhtsa.nvs/nvs-200/nvs-210/nvs-211/screeningguts/default.aspx
- Sub-IE Case Flow system
- Supporting research and analysis tools (Watson Content Analytics [WCA], Cognos, etc.)

1.4 Roles & Responsibilities

1.4.1 SOP Performer

An ODI investigator is responsible for executing this procedure as described.

1.4.2 SOP Owner

The Program Support Division (PSD) Chief or acting ODI official designated by the ODI Director is responsible for SOP document control, distribution, change management (CM) and accuracy.

1.4.3 SOP Maintenance

The PSD Chief assigns the person responsible for convening a review and reissuing this SOP prior to the annual anniversary date of the current approved version.

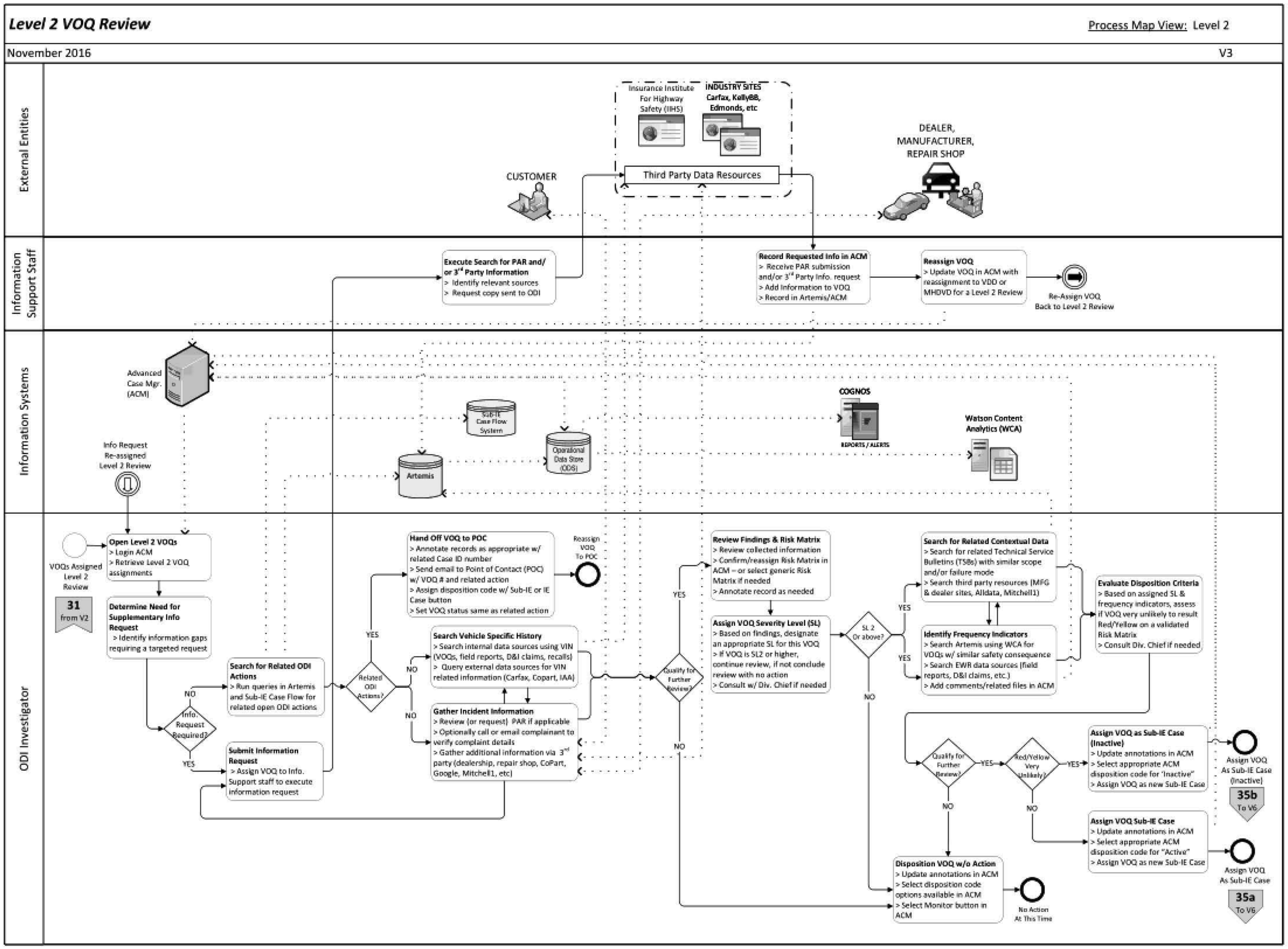
2.0 Process Overview

2.1 Process Description

Level 2 VOQ Review is the process of reviewing consumer complaints that have been advanced for further review from the Level 1 VOQ Screening process to determine if the complaint merits a more detailed examination as an Issue through the Sub-IE Case Escalation process. If the complaint is found to be related to an existing ODI action (Sub-IE Case or pursuits) the appropriate Point of Contact (POC) for that action is notified and the complaint is assigned to them for further action. At the conclusion of this procedure, investigators are expected to arrive at one of three decisions; disposition the complaint to take "No Action At This Time", promote the complaint as a new active Issue to be evaluated in the Sub-IE Case Escalation process, or preserve details of the complaint without action, as a new inactive Sub-IE Case.

2.2 Level 2 VOQ Review Process Diagram

The process diagram illustrates the process flow for the procedure described in this SOP.



3.0 Level 2 VOQ Review Procedure

3.1 Procedure Steps

Follow the steps to execute the Level 2 VOQ Review procedure.

Step 1. **Login** to ACM.

Step 2. **Open** the Level 2 VOQ Review work queue.

Step 3. **Select** and **open** a VOQ complaint from the work queue, review the incident, affected component, and consumer information.

- Based on the complaint details, determine if there is a need for a supplementary information request. This might include a Police Accident Report (PAR), or formal request for supporting information from a 3rd party resource. If so, use ACM to assign the VOQ to the Information Support staff to complete the information request processing. If no additional supplementary information is required at this time proceed to Step 4.

Step 4. **Search** for existing ODI actions that may be related to this complaint.

- **Login** to both Artemis and Sub-IE Case Flow systems.
- **Search** for open ODI actions in Artemis and Sub-IE Case Flow that may relate to the VOQ incident.
- If a related action is identified, **annotate** the ACM VOQ record as appropriate and include the related Case ID.
- **Select** the "Email This Case" button and send an email to the POC for the related case (include the related Case ID in the subject of the email to identify the associated action).
- **Assign** a disposition code in ACM for the VOQ from the drop-down menu (see Appendix A for the list of VOQ Dispositions).
- **Assign** the VOQ to the same status as the related case using the Sub-IE or IE button as appropriate.

	NOTE: Step 5 and 6 may be performed concurrently or in whatever sequence deemed most appropriate by the ODI Investigator. At any point during these steps, the ODI Investigator may seek input or guidance from the Division Chief and relevant ODI Subject Matter Experts (SME).

Step 5. **Search** vehicle-specific history using the Vehicle Identification Number (VIN) in Artemis and or one of the sites listed on the NHTSA Safety Defects Screening Links SharePoint site.

- **Search** internal sources by VIN for other VOQs, Death and Injury (D&I) claims, Field Reports, or Recalls.
- **Search** external sources for available vehicle information using Carfax, Copart, Insurance Auto Auctions (IAA) or another source listed on the Screening Links site.

	Note: Internal and External Sources can be found on the NHTSA Safety Defects Screening SharePoint site at the following link: http://our.dot.gov/office/nhtsa.nvs/nvs-200/nvs-210/nvs-211/screeningguts/default.aspx

Step 6. **Gather** incident information as needed.

- **Review** PAR and or supplemental information if available. If additional information is needed, **submit** a request to the support staff to retrieve as necessary.
- **Call** or **email** the complainant to verify details and substantiate related details about the VOQ.
- **Gather** additional information via third party sources (e.g. dealer or repair shop) as needed.

Step 7. **Determine** if the VOQ qualifies for further review.

- If yes, **continue** to Step 8.
- If no, **update** the ACM annotations as needed.
- **Assign** a disposition code in ACM for the VOQ from the drop down menu indicating "No Action At This Time". (See Appendix A-1 for the list of Level 2 VOQ dispositions).
- **Select** the "Monitor" action button in ACM to complete the Level 2 VOQ Review process.

Step 8. **Review** findings and Risk Matrix assigned to this VOQ.

- **Review** collected information on the VOQ and consult with the Subject Matter Expert (SME) as warranted.

- **Confirm** or **reassign** the Risk Matrix selection in ACM. This may include assigning a generic Risk Matrix if no specific Risk Matrix is appropriate.

	Note: Risk Matrices can be found on the ODI Risk Matrices SharePoint site at the following link: http://our.dot.gov/office/nhtsa.nvs/NVS-200/NVS-210/NVS-211/ScreeningGuts/Risk%20Matrices/Forms/AllItems.aspx

- **Annotate** the VOQ record in ACM as appropriate.

Step 9. **Assign** the VOQ Severity Level (SL) to reflect the appropriate potential risk the VOQ represents based on your findings documented in ACM so far. Seek additional input or guidance from the Division Chief as appropriate.

- If the SL assignment is SL2 or higher, advance to Step 10.
- If the SL assignment is SL1, update annotations in ACM.
- **Assign** a disposition code in ACM for the VOQ from the drop-down menu indicating “No Action At This Time”. (See Appendix A-1 for the list of Level 2 VOQ dispositions).
- **Select** the “Monitor” action button in ACM to complete the Level 2 VOQ Review process.

	NOTE: Step 10 and 11 may be performed concurrently or in whatever sequence deemed most appropriate by the ODI Investigator. At any point during these steps, the ODI Investigator may seek input or guidance from the Division Chief and relevant ODI SMEs.

Step 10. **Search** Artemis for Technical Service Bulletins (TSB) data and third party resources (e.g. Manufacturer or dealer sites, Alldata, Mitchell1) for contextual information, looking for incidents with similar scope and failure mode. Update the ACM record with findings and annotations as warranted.

Step 11. **Search** for frequency indicators. Update the ACM record with findings and annotations as warranted.

- **Search** for similar complaints in Artemis and or WCA.
- **Search** for hazard or trend indicators if similar complaints are found searching for:
  - **Causal Correlations** – review similar complaints to determine if specific cause references appear to be defect related.

- **Trend Indicators** – determine if similar complaints have increased over time with the volume of complaints from data clusters of similar circumstances.
- **Severity Factors** – review similar complaints about associated death or injury circumstances that are logically connected to cause components.

– **Search** the Early Warning Data (EWR) resources for similar safety consequences related to designated product Make-Model-Year and failure component for a minimum period of 30 months prior to the complaint receipt date.

Step 12. **Evaluate** the Level 2 VOQ disposition criteria.

– Based on the assigned SL and identified frequency indicators, determine if the VOQ is very unlikely to result in a RED or YELLOW rating on a fully validated Risk Matrix.

– **Consult** with the SME or Division Chief as warranted.

Step 13. **Determine** if the VOQ warrants further review.

– If yes, **continue** to Step 14.

– If no, **disposition** the VOQ with "No Action At This Time" – selecting a disposition code from the ACM drop-down options (See Appendix A-1).

– **Update** the ACM annotations as needed.

– **Select** the "Monitor" action button in ACM to complete the Level 2 VOQ Review process.

Step 14. **Assign** the VOQ as a new Sub-IE Case using the appropriate disposition code from the ACM drop-down menu per the criteria described below to complete the Level 2 VOQ Review process.

– If it is very unlikely that a RED or YELLOW rating will be achieved, assign the VOQ as an Inactive Issue. Update the annotations in ACM. **Select** the appropriate disposition code in ACM to indicate "Inactive Issue".

– If it is not very unlikely that a RED or YELLOW rating will be achieved with a fully validated Risk Matrix, **assign** the VOQ as an Active Issue. Update the annotations in ACM. **Select** the appropriate disposition code in ACM to indicate "Active Issue".

- If selecting a "Referral" disposition code, include a copy of the referral record in the ACM annotations.
- **Select** the Sub-IE Case button in ACM to assign the VOQ to a new Sub-IE Case to complete the Level 2 VOQ Review process.

4.0 Document Repository

The repository for all ODI SOPs can be found on the ODI SharePoint site at the following link:

http://our.dot.gov/office/nhtsa.nvs/NVS-200/NVS-210/ODI%20Standard%20Opertating%20Procedures/Forms/AllItems.aspx

5.0 Quality Assessment

The SOP Owner performs quality assessments on SOPs on a periodic basis (at a minimum frequency of at least annually), as well as performing regular audits to ensure compliance and process accuracy. Areas of non-compliance within ODI will be identified and an improvement plan will be implemented in which corrective actions will be tracked and managed.

The SOP Owner is ultimately responsible for ensuring all VDD Chiefs are monitoring the SOP processes to ensure the procedures in use are consistent with this SOP.

5.1 Quality Audits

Quality audits will be performed to validate processes employed are executed in accordance with defined ODI procedures. The specific details of these audits are in development and may include actions such as ad hoc spot-checks as well as in-depth statistical analyses of the results from VOQ screening processes described in this SOP.

5.2 Quality Audit Reports

Quality audit reports are prepared by the SOP Owner and provided to the ODI Director and the VDD Chiefs for review and action as appropriate.

5.3 Feedback

To request corrections or changes, please send an email to the SOP Owner with "Requested change to the Level 2 Review SOP" in the subject line.

Appendix A. VOQ Dispositions

Table A-1 Level 2 Disposition Codes

Choice Item		Definition	Examples
01	Create New Sub-IE Case Flow	Promote this VOQ to the next level of review: Sub-IE. This should be based on an assessment that the subject of this VOQ is not very unlikely to be RED or YELLOW on a fully-researched evaluation using an applicable Risk Matrix.	NA
02	Incorporate into an existing Sub-IE Case Flow	Another Sub-IE exists on this topic (make, model, etc.), connect this VOQ to that Sub-IE.	NA
03	Incorporate into an existing IE Case Flow	Another IE exists on this topic (make, model, etc.), connect this VOQ to that IE.	NA
04	No Action At This Time: Minimal Hazard Indicated	Do not promote this VOQ to the next level of review because the hazard described is minimal, e.g., the subject of this VOQ is very unlikely to be RED or YELLOW on a fully-researched evaluation using an applicable Risk Matrix. (Use this code when the reason for the assessment is a low severity score).	Level 2 research indicates that the VOQ is associated with a recognized very low severity or minimal hazard issue, e.g., sun visor, malfunctioning power doors, etc.
05	No Action At This Time: No Actionable Trend Indicated	Do not promote this VOQ to the next level of review because the hazard described is minimal, e.g., the subject of this VOQ is very unlikely to be RED or YELLOW on a fully-researched evaluation using an applicable Risk Matrix. (Use this code when the reason for the assessment is a low-frequency score).	Level 2 research on frequency indicators reveals a very low number of relevant incidents.
06	No Action At This Time: No Vehicle Factor Identified	Do not promote this VOQ to the next level of review because the hazard or incident described was unrelated to a potential vehicle safety defect.	Research performed in the Level 2 Review indicates the incident was related to, e.g., weather, road conditions, or driver error, etc., instead of a potential vehicle safety defect. PAR acquired as part of the Level 2 Review indicates the cause of an accident was a drunk driver instead of a potential vehicle defect.
07	No Action At This Time: Covered by Existing Recall	Do not promote this VOQ to the next level of review because it is already the subject of an existing recall.	The VOQ describes a vehicle hazard or another issue in a make and model that has already been included in a recall, e.g., a new report of an incident with a Takata airbag.

Choice Item		Definition	Examples
08	No Action At This Time: See Remarks	Do not promote this VOQ to the next level of review. Use only for reasons other than those specified above as numbers 4 through 7.	Only for use in unusual cases where one of the specific reasons for "No Action At This Time" applies.
09	Refer within ODI: Possibly relevant to an open investigation	The VOQ may be related to an ODI investigation (beyond Sub-IE or IE case). Refer to a member of the ODI staff responsible for the investigation for consideration.	Send the VOQ to an investigator working on an official ODI investigation (beyond IE status).
10	Refer within ODI: Recall Administrative	Do not promote this VOQ to the next level of review, send it to the ODI Recalls Management Division for their consideration.	The Level 2 review reveals the issue is related to a vehicle that is subject to a recall, but the issue is administrative instead of technical in nature, e.g., the dealer doesn't have the necessary part to perform the repair associated with the recall.
11	Refer within ODI: Customer Services concern for the CRD	Do not promote this VOQ to the next level of review; send it to the ODI Correspondence Research Division (CRD) for their consideration.	The VOQ is based on a letter from an elected official on behalf of a vehicle customer.
12	Refer within NHTSA: VOQ begets legal question	Do not promote this VOQ to the next level of review; send it to the NHTSA Office of Legislation and General Law, or the Chief Counsel's office for consideration.	The VOQ complainant refers to a specific law or regulation that alleges NHTSA must follow but is not following.
13	Refer within NHTSA: Potential Noncompliance (OVSC)	Do not promote this VOQ to the next level of review; send it to the NHTSA Office of Vehicle Safety Compliance (OVSC) for consideration.	The VOQ alleges noncompliance with NHTSA regulations; e.g., the complainant alleges the headlight does not meet regulatory requirements for required brightness (lumens).
14	Refer within NHTSA: Rulemaking Interest	Do not promote this VOQ to the next level of review. Send it to the NHTSA Office of Rulemaking for consideration.	The VOQ identifies an alleged need for new rules to be generated by NHTSA; e.g., for hybrid or electric cars required to generate an audible noise that would reduce the likelihood of blind pedestrians being struck by one of these vehicles.
15	Refer outside NHTSA (Gov't): Referral to CPSC	Do not promote this VOQ to the next level of review. Refer the VOQ to the Consumer Product Safety Commission (CPSC).	The VOQ refers to a vehicle or another mode of transportation, not under NHTSA's purview, e.g., golf-cart used in a gated community or all-terrain vehicle that is not street-legal.
16	Refer outside NHTSA (Gov't): Referral to Transport Canada	Do not promote this VOQ to the next level of review. Refer the VOQ to the Transport Canada (the appropriate Canadian government agency).	The VOQ was submitted by someone in Canada and describes an apparent vehicle safety-related incident in Canada.
17	Defer	TBD	TBD
99	Do not use	TBD	TBD

Appendix B. Acronyms

Table A-1 Acronyms

Acronym	Description
ACM	Advanced Case Manager
CM	Change Management
CPSC	Consumer Product Safety Commission
D&I	Death & Injury
CRD	Correspondence Research Division
DOT	Department of Transportation
EA	Engineering Analysis
EWR	Early Warning Reporting
IAAI	Insurance Auto Auctions Inc.
IE	Issue Evaluation
IT	Information Technology
MHDVD	Medium Heavy Duty Vehicle Division
NHTSA	National Highway Transportation Safety Administration
ODI	Office of Defects Investigation
OVSC	Office of Vehicle Safety Compliance
PE	Preliminary Evaluation
POC	Point of Contact
PSD	Program Support Division
RQ	Recall Query
SCI	Special Crash Investigation
SME	Subject Matter Expert
SOP	Standard Operating Procedure
TSBs	Technical Service Bulletin

Acronym	Description
VOQ	Vehicle Owners Questionnaire
WCA	Watson Content Analytics

U.S. Department of Transportation (DOT)

National Highway Traffic Safety Administration (NHTSA)

Quality Assurance – Pre-Investigative and Investigation Documentation

Standard Operation Procedure (SOP)

Version 1.1

May 9, 2017

Revision History

Version	Author	Date	Revision
1.0	Angel Jackson	May 9, 2017	Initial DRAFT for review and approval.
1.1	Angel Jackson	June 30, 2017	Director Approved - FINAL

Final Authorized and Approved By

Signed by Stephen Ridella	June 30, 2017
ODI Director	**Date**

Table of Contents

1.0 Overview

The National Highway Traffic Safety Administration's (NHTSA) Office of Defects Investigation leads the world in protecting the driving public from vehicle safety defects. ODI, part of NHTSA's Office of Enforcement, investigates possible defect trends, and where appropriate, seeks recalls of vehicles and vehicle equipment that pose an unreasonable safety risk. Prior to opening a defect investigation, ODI reviews and analyzes data from multiple sources including consumer complaints. When recalls are issued, ODI monitors manufacturers and ensures that the manufacturer sufficiently and quickly corrects the identified vehicle safety issues.

Due to the nature of this work, ODI has established processes and standard operating procedures for its pre-investigative, investigative and recall activities. In order to ensure that those policies are adhered to by the appropriate staff, ODI created a Quality Assurance position within its Program Support Division (PSD) to monitor performance and compliance with these processes and SOPs by conducting periodic audits of ODI files, including but not limited to pre-investigative, investigative and recall documents. The Quality Assurance Specialist will also provide updates to the ODI Director and identify any issues that have arisen or are ongoing pertaining to the implementation of internal controls and procedures. The ODI Director is responsible for ensuring corrective action is taken within an appropriate time period by the appropriate ODI staff.

1.1 Purpose

The purpose of this document is to outline an SOP for ODI's Quality Assurance Specialist to conduct periodic audits of ODI files, including but not limited to pre-investigative, investigative and recall documents.

1.2 Scope

This SOP applies to the Quality Control Specialist and any other applicable ODI staff in order to effectively assess compliance with established policies and standard operating procedures, and to ensure corrective action is taken within an appropriate time period.

1.3 Prerequisites

None.

1.4 Roles & Responsibilities

1.4.1 Policy and Procedure Performer

The Quality Assurance Specialist is responsible for executing this SOP as applicable and described.

1.4.2 Document Owner

The Program Support Division Chief is responsible for document control, distribution, change management and accuracy.

1.4.3 Document Maintenance

The Quality Assurance Specialist or the designated official assigned by the PSD Chief will be responsible for convening a review, and reissuing this SOP prior to the annual anniversary date of the current approved version.

2.0 Policy and Procedure

The Quality Assurance Specialist shall conduct periodic reviews of ODI documentation to assess compliance with established policies related to document retention and storage (see below). He/she shall develop a spreadsheet to track the case files and investigations reviewed and denote on the spreadsheet whether there are missing documents. This spreadsheet will be stored and maintained on ODI's SharePoint site. Following each periodic review, the Quality Assurance Specialist shall provide an update to the ODI Director and identify any issues that have arisen or are ongoing pertaining to the implementation of internal controls and procedures. The ODI Director will notify the appropriate Division Chief or other ODI staff of any corrective action needed, and will ensure that the action is taken within an appropriate time period.

Pre-Investigation Documentation

Bi-weekly, ODI Division Chiefs meet with their pre-investigative staff to ensure staff are appropriately documenting and storing all supporting information within the case management system folders. Each month, the Quality Assurance Specialist shall review applicable case folders to ensure appropriate documentation is being submitted and stored.

Assessing Need for Third Party Assistance

Monthly meetings are held between the ODI Director and Division Chiefs to discuss cases requiring third party assistance (e.g., external testing). Each month, the Quality Assurance Specialist reviews the case management system to ensure that all third party assistance cases have included the proper documentation.

Assessing and Adjusting Timeliness Goals

The ODI Director maintains a list of all open investigations which is updated on a monthly basis. The list includes whether a timeliness justification memorandum has been received for that investigation, and if so, the date and approval. Monthly, the Quality Assurance Specialist will review the open investigation files to ensure that timeliness memoranda are included in the appropriate files.

Investigation Documentation Checklist

ODI Division Chiefs conduct a monthly review of all investigations under their purview. They ensure that investigative staff are using and filing the investigation documentation checklist on a regular basis for all preliminary evaluations and engineering analyses. The Quality Assurance Specialist shall review the applicable case management system on a monthly basis to ensure that investigation documentation checklists are submitted and updated for all open investigations.

Protecting Consumer Personally Identifiable Information (PII)

Monthly, the quality control specialist shall review a random selection of fifteen investigative documentations that are uploaded to safercar.gov to review the agency's redaction of PII.

3.0 Document Location

This SOP is located at the following link:

TENTATIVE – Pending approval