

January 20, 2026

The Honorable Jonathan Morrison
Administrator
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

**Agency Information Collection Activities; Notice and Request for Comment; Fatality Analysis Reporting System (FARS) and Non-Traffic Surveillance (NTS)
Docket No. NHTSA-2025-0721**

Dear Administrator Morrison,

The Virginia Tech Transportation Institute (VTTI) appreciates this opportunity to provide comments in response to the November 18, 2025, notice and request for comments on an extension of a currently approved collection of information managed by the National Highway Traffic Safety Administration (NHTSA).

NHTSA's Fatality Analysis Reporting System (FARS) provides invaluable information for traffic safety research. The unique aspects of FARS allow analysis to support the missions of NHTSA, VTTI, and many other organizations working to improve roadway safety. VTTI encourages NHTSA to prioritize funding to maintain this vital national resource.

As a premier research institute at Virginia Tech, VTTI is an independent, nonprofit organization dedicated to advancing transportation through innovation and finding solutions to the greatest transportation challenges through partnerships with government agencies, corporations such as automotive OEMs and suppliers, and non-government organizations. The research conducted at VTTI has supported significant advancements in public policies for driver, passenger, and pedestrian safety and in the design of vehicles and infrastructure to improve roadway safety.

FARS uniquely provides accurate and comprehensive information on traffic fatalities across the nation. As such, the FARS data are critical for NHTSA to prioritize and develop relevant vehicle safety regulations, testing protocols, and public safety messaging, as well as for the prioritization and development of vehicle safety measures and infrastructure improvements by various companies and organizations.

Operating continuously since 1975, FARS contains anonymized data from police-reported crashes combined with data from other state-level sources, such as driver records, vehicle registrations, and states' highway inventories. In addition, the FARS analyst(s) in each state interpret the available data to provide critical information such as pre-crash and crash characteristics that are not directly coded on the police crash report.

Although FARS contains the most comprehensive information on national traffic fatalities, we do note that the release of the public files has been significantly delayed in recent years compared to earlier years¹. Given the diversity of the states' data collection practices and the complexities of the quality control and resolution process, we recognize that some delay in the FARS release to the public is inevitable. However, to provide more timely analysis to support traffic safety improvements, we hope that NHTSA will reduce the delay in future FARS releases.

Over the years, NHTSA has developed strong working relationships with the states to provide the base data for FARS and has an effective and efficient oversight program to ensure consistency and year-over-year continuity. In addition, NHTSA has continuously advanced the FARS content and data quality by efforts such as supporting states' data improvement programs, expanding the collected information as new areas of focus arise, and deploying technological advancements in the data acquisition pipeline as states' capabilities progress, while maintaining the unique contributions of the FARS analysts and the completeness of the documentation for the files.

It's important to highlight that VTTI conducts customized analysis of FARS data in conjunction with other sources of data, such as integrating findings with analysis of naturalistic driving studies (NDS) across numerous large-scale efforts conducted over the past two decades. By observing driving behavior via video and performance metrics of interest from key-on to key-off, NDS offers a more proactive method for addressing actuarial data shortcomings and improved awareness of crash causation, along with opportunities for understanding emerging trends with rapid technological advancement, while acknowledging cost and scale limitations. As such, these data sources complement each other, and collectively provide broader context that aid objective observations and actionable recommendations, supporting engineering development and policy decisions related to transportation safety. VTTI believes that both epidemiological and naturalistic data sources are needed moving forward, and a concerted strategic planning initiative toward improving the wholistic approach of capturing data for crash causation tracking and countermeasures is warranted.

Given the importance of FARS to support advancements in roadway safety, we urge NHTSA to continue their commitment to maintaining this essential national resource at the current levels of accuracy and completeness.

Sincerely,



Zac Doerzaph
Executive Director, VTTI

¹ The 2016 calendar year FARS was initially released in July 2017, less than 6 months after the January 30, 2017, final qualifying date for the 2016 traffic fatalities. In contrast, the 2023 calendar year FARS was initially released in April 2025, about 9 months longer than the 2016 delay.