January 20, 2026

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

Re: NHTSA Notice and Request for Comment; Fatality Analysis Reporting System and Non-Traffic Surveillance (Docket No. NHTSA-2025-0721)

Dear Administrator Morrison:

Thank you for the opportunity to provide comments in response to the National Highway Traffic Safety Administration (NHTSA) request for comment (RFC) on the Fatality Analysis Reporting System (FARS) and Non-Traffic Surveillance (NTS) published at 90 *Federal Register* 51812 on November 18, 2025. **The Foundation for Advancing Alcohol Responsibility (Responsibility.org) and the National Alliance to Stop Impaired Driving (NASID) strongly support the continued information collection of FARS and NTS.** Our groups recognize the critical value of these data systems in tracking traffic harm, evaluating countermeasures, and assessing the scope and magnitude of impaired driving and other risky driving behaviors. FARS is the cornerstone of traffic safety knowledge, and its continued national support is needed to guide impaired-driving countermeasures and evaluate progress towards national safety goals.

For over 34 years, Responsibility.org has focused on three core mission areas: to eliminate drunk driving and all forms of impaired driving; eliminate underage drinking; and empower adults to make responsible alcohol choices.

NASID is a coalition established and led by Responsibility.org to eliminate all forms of impaired driving, especially multiple substance impaired driving, through effective and proven measures such as DUI system reform, DUI detection, and improved use of data and technology. NASID membership includes stakeholders working in a public/private partnership to achieve these goals. To learn more about the coalition, please visit NASID.org.

Data are the Cornerstone of Traffic Safety

High-quality data are critical to monitoring trends in traffic harm and ensuring the effective, evidence-driven distribution of resources. These data enable the Department of Transportation and State leaders to target the leading causes of traffic harm while objectively monitoring progress to evaluate the benefits of these investments. Since its inception in 1975, FARS has been the gold standard in traffic safety data. As a census of all crashes on a public roadway where an individual was killed within 30 days, FARS is a

critical pillar in our nation's public safety data systems. Given there are over 40,000 lives lost a year in traffic fatalities, there remains a strong need to address this significant public health concern.[1]

The collection of high-quality traffic safety data, such as FARS and NTS, is essential for accurately monitoring changing trends in roadway risk, identifying emerging issues before they become widespread public-health crises, and evaluating the effectiveness of policies, enforcement strategies, and technological and behavioral countermeasures. Robust data systems also support evidence-based decision-making, ensuring that limited taxpayer resources are directed toward strategies with demonstrated effectiveness and measurable safety benefits. These data promote transparency, accountability, and public trust by enabling independent evaluation, facilitating cross-jurisdictional comparisons, and supporting continuous improvement in traffic safety programs at the local, state, and national levels. Without these data, emerging risks may go unidentified; effective countermeasures may be underutilized, and limited safety resources may not be most effectively allocated.

Critical Value of FARS as a National Resource

The collection, standardization, and maintenance of these data systems would be infeasible without the valuable and full support of NHTSA. The data in FARS are built upon state records, but these records are complex, multi-faceted, and vary significantly across and within states. These data can include police crash reports, toxicology results, death certificates, state vehicle registration files, driver licensing files, coroner/medical examiner reports, and state highway department data. This information is coded into 140 different data elements spanning person, vehicle, roadway, medical response, and crash characteristics in FARS. Without NHTSA developing standard data dictionaries, variable properties, analyst training, and quality control, there would be no uniform system across states to capture and provide these data. The lack of standardization would result in a patchwork of data systems across states with varying quality, completeness, and definitions for key variables and inclusion criteria.

This national standardization provides substantial benefits to researchers, policymakers, and public safety. Without this standardization, cross-state comparisons would be impossible. These cross-state comparisons allow researchers to evaluate how changes in a state policy impacted traffic fatalities relative to jurisdictions with different policies. It allows the identification of national traffic safety metrics and meaningful trend analyses that are only supported by robust and consistent data collection. These data support identifying traffic safety risks based upon standard data elements such as roadway conditions, driver alcohol concentrations, vehicle type, and vehicle safety systems. These analyses provide the drivers for innovation in safety strategies, countermeasure evaluation, and policy development. These data are also valuable for NHTSA because these objective measures are used to grant funds across States. The fair administration of resources across States becomes much more complex if each state has its own system, process, and definitions for risky behaviors.

Towards Continuous Improvement

FARS is continuously improving and has undergone important updates over its 50-year history. Limitations and areas for improvement remain, and NHTSA is aware of many of these challenges. A key

[1] National Center for Statistics and Analysis (2025, April). *Overview of motor vehicle traffic crashes in 2023* (Traffic Safety Facts Research Note. Report No. DOT HS 813 705). National Highway Traffic Safety Administration.

challenge is the delay in collecting and publishing these data to the public. It can take two years for a final data file to be published. This delay inhibits rapid responses to emerging traffic safety crises and does not account for the rapid development and deployment of new vehicles, technologies, and policies. NHTSA should identify strategies to more rapidly make reliable data available to researchers and the public. It is also true that some of the delay in reporting is the positive result of multiple quality checks that ensure only accurate and reliable data are distributed. While other sources of data may be available closer to real-time, these data sources may not have the same robustness or completeness as FARS. NHTSA must continue to strive for a balance between the timely delivery of data and the needed quality assurance.

Responsibility.org and NASID are extremely focused on the continuing harm of impaired driving. The drug data in FARS remains largely incomplete and misleading when used improperly.[2,3] NHTSA has made significant strides in improving these data. This includes allowing for the entry of more than three drugs into FARS for each involved individual and documenting key toxicology testing information such as what equipment was used for testing. Further improvements are necessary, and NHTSA must continue to support state and local toxicology laboratories. These efforts are critical to improving the underlying drug toxicology data that is necessary to facilitate meaningful drugged driving analyses in FARS.

Conclusion

High-quality traffic safety data are essential to understanding and addressing the nation's ongoing traffic safety crisis. FARS and NTS provide indispensable national data that document the magnitude of traffic harm, track changes in risk over time, and support the evaluation of traffic safety policies and countermeasures. These systems ensure that federal, state, and local decision-makers have access to the reliable, standardized information needed to guide evidence-based action and assess progress toward national safety goals. Continued collection of FARS and NTS data serves the public interest by promoting transparency, accountability, and the effective use of taxpayer resources in efforts to reduce preventable deaths and injuries on the nation's roadways. Responsibility.org and NASID strongly support NHTSA's continued collection of FARS and NTS.

Please do not hesitate to contact us if we might be of assistance related to these key data systems, or any other issue related to the critical need to end impaired driving and save lives on our nation's roadways. We appreciate NHTSA's continued leadership on this topic.

Sincerely,

Leslie Kimball
Executive Director
Responsibility.org

---

[2] Berning, A., & Smither, D. D. (2014). *Understanding the limitations of drug test information, reporting, and testing practices in fatal crashes.* (Traffic Safety Facts Research Note. DOT HS 812 072). Washington, DC: National Highway Traffic Safety Administration.

[3] Berning, A., Smith, R. C., Drexler, M., & Wochinger, K. (2022, March). *Drug testing and traffic safety: What you need to know* (Report No. DOT HS 813 264). National Highway Traffic Safety Administration.

Darrin T. Grondel, Ph.D.
Director, NASID
Senior Vice President, Traffic Safety
Responsibility.org