

# ATSIP Response to FARS Federal Register Comments

ATSIP appreciates the opportunity to comment on the extension of the FARS and NTS data collection. As a community of practitioners who work with these data every day, we fully support keeping these programs moving forward. These datasets are critical for understanding what's happening on our roads, identifying trends, and helping states, tribes, and local agencies make informed decisions. ATSIP is in full support of OMB approval of continuation of collection FARS and NTS data.

FARS has been a source of reliable, standardized data on fatal crashes for roughly 50 years. In that time, the FARS dataset has been considered the “gold standard” for safety data. This reputation is built on the extensive training of FARS analysts in the states, the QA/QC procedures applied to the data, and utility of the data for safety analyses. All of this is due to USDOT/NHTSA investments in the program, and the continuous improvement process that has resulted in multiple refinements.

FARS, being a complete record of reportable crashes involving a fatality—those crashes meeting the inclusion criteria for the dataset—simplifies analysis for all who use the data. No statistical massaging is required. If the numbers improve, it's a real improvement. If they get worse, it's a sign of a safety problem. There is no other traffic records dataset in the world that serves this purpose. Sample-based attempts to estimate (rather than count) fatalities have always fallen short on support for detailed analyses of the circumstances, contributing factors, and specifics about the people, vehicles, and locations involved in crashes. The value of complete records on every fatal motor vehicle crash in every state over several decades cannot be overstated.

States in the US learn from each other. USDOT uses the data to identify successes in safety improvement. FARS is the primary support for the work of safety program management throughout the US. It is the primary research dataset as well.

A few points we want to highlight:

1. The reporting burden is growing, and many agencies are stretched thin. With more crashes and more complex data elements, the workload has increased. We encourage NHTSA to continue investing in automation, electronic data transfer, and consistent training so states and tribal partners can keep up without compromising quality.
2. There's real value in making FARS/NTS more usable at the local level. Rural, tribal, and community-level agencies rely on this information, but often lack the tools or guidance to break it down effectively. Additional support—templates, dashboards, or examples—would go a long way.
3. Clear, transparent documentation matters. Consistency across states is essential. Continued communication, updated guidance, and opportunities to connect directly with NHTSA on coding and QA practices help data collectors and analysts do their jobs well.
4. Long-term sustainability requires ongoing support. Not all agencies have the same capacity. Any additional funding, technical assistance, or training opportunities, especially for under-resourced states and tribal partners—will help ensure high-quality national data.
5. We also encourage more timely access to preliminary (even if not finalized) data. States and local partners are being asked to respond to emerging safety issues faster

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than ever. Having earlier access to provisional numbers—clearly marked as preliminary—would help inform proactive decision-making without waiting for the full annual cycle to close.

6. There are “data deserts” in the United States where the only information on crash experience is found in FARS. The ability to conduct data-driven safety decision-making under these conditions rests solely on the availability of FARS data on fatal crashes. Among the important locations of these data deserts are tribal areas that either lack a law enforcement presence or are patrolled by multiple agencies and where the resulting data are locked into multiple databases that (at present) do not share information efficiently or effectively. Fortunately, the FARS data are complete and accurate to a “gold standard” while data on other crashes are not. Decision makers are handicapped by the relative lack of data on non-fatal crashes, but they can at least derive some meaningful information from the data on fatal crashes. Without that they would be working in the dark with, at best, anecdotal evidence, relying on citizens’ complaints of dangers and their own gut instincts on where to spend money to improve roadways.
7. Many of the roads under consideration are major highways (interstates and US and state highways) that run through these data deserts and that are crucial for commerce. These are not “Indian roads” but US and state-owned roadways, often with no Tribal jurisdiction whatsoever, but often with shared jurisdiction.

ATSIP values our partnership with NHTSA and appreciates the focus on maintaining strong, reliable national crash datasets. We look forward to continuing to work together to strengthen our traffic records systems and support data-driven safety decisions nationwide.