



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

1200 New Jersey Avenue SE.
Washington, DC 20590

April 23, 2025

Mr. Eric Hein
[REDACTED]
[REDACTED]

Dear Mr. Hein:

Thank you for your December 16, 2024, email referencing your April 21, 2023, correspondence regarding underride/override data in the Fatality Analysis Reporting System (FARS). We have reviewed your requests and have provided our responses below. The National Highway Traffic Safety Administration's (NHTSA) lifesaving mission relies on accurate data, and we remain committed to improving our crash data collections wherever possible. Since NHTSA representatives met with you about these specific items on April 3, 2023, the agency has taken several additional actions and we have provided details on these updates in the below responses to each of your requests.

"1. Update the Fatality Analysis Reporting System (FARS) analytical user's manual (NCSA 2023), the 2021 FARS/CRSS Coding and Validation Manual (NHTSA 2023), the Model Minimum Uniform Crash Criteria (MMUCC; NHTSA 2023a), and other guidance documents to provide a standardized definition of underride (NHTSA 2022a) and override crashes for the required underride/override data element (see Appendices);"

NHTSA has implemented a standardized definition of underride and override. The Model Minimum Uniform Crash Criteria, 6th ed., released in 2024, includes the data element Vehicle Underride or Override with the following attributes: None or Not Applicable, Underride, Override, and Unknown—as well as a data element that collects the Initial Contact Point clock points. The definition of Vehicle Underride or Override is: "Indicates whether this vehicle experienced an underride or override with another vehicle during the crash. An underride refers to this motor vehicle sliding under another motor vehicle during a crash. An override refers to this motor vehicle riding up over another motor vehicle during a crash. Either can occur with a parked or working motor vehicle." NHTSA has implemented this definition across the FARS and Crash Report Sampling System (CRSS) data collection programs and related documentation.

"2. Modify the existing underride FARS data element, which is already required to be reported by each State, in the FARS analytical user's manual (NCSA 2023), the 2021 FARS/CRSS Coding and Validation Manual (NHTSA 2023), the MMUCC (NHTSA 2023a), and other guidance documents, to differentiate and collect data on rear underride, side underride, and front override crashes (see Appendices);"

NHTSA cannot require States to provide specific data via the FARS program. Even participation in FARS is not mandatory. Instead, the Uniform Procedures for State Highway Safety Grant Programs, 23 CFR Part 1300, Appendix A, encourages participation in FARS by making certain formula grant funding contingent on State participation in FARS. This grant provision, however, does not contain any specific data requirements.

NHTSA has, however, made several alterations to the FARS data element and associated documentation in recent years to improve accuracy. Starting with the 2021 data collection year, the agency amended the underide and override coding, with underide and override assessed for each vehicle in every vehicle-to-vehicle collision. These changes were highlighted in the coding manuals and prominently featured in the related training programs. Preliminary analysis indicates that these revisions are performing well and have improved data coding to more accurately reflect underide fatality risk, and the agency will continue to monitor this as further improvements and clarifications are deployed.

Most recently, the FARS/CRSS underide data element has been further amended to align with the MMUCC 6th ed., starting with the 2025 data collection year. The agency hopes this change will further enhance accuracy and clarity for both coders and researchers.

Researchers can currently determine the underide or override type by combining data from the Vehicle Underide or Override data element with Sequence of Events and other data elements (Initial Contact Point, Damaged Areas, etc.).

“3. Require an Underide/Override “Checkbox” and mandatory reporting of this data element on State Police Crash Report Forms when States upgrade and standardize their electronically reported State crash data systems to enable electronic real- or near real-time uploading of crash data;”

NHTSA cannot require States to provide specific data via the FARS program nor can the agency mandate modifications to State police crash report forms. The Uniform Procedures for State Highway Safety Grant Programs, 23 CFR Part 1300, Appendix A, merely specifies that certain formula grant funding is contingent on State participation in FARS. As noted above, this provision does not contain any specific data requirements. Nevertheless, NHTSA actively encourages States to adopt the MMUCC 6th Ed., which includes the data element Vehicle Underide or Override.

“4. Provide training and information to State FARS analysts and State and local departments on how to identify and record underide and override crashes.”

NHTSA develops and delivers a variety of FARS trainings. State-employed FARS analysts learn how to identify and code Vehicle Underide or Override during their initial onboarding and receive regular refresher training on this data element specifically at annual System-Wide Trainings. FARS analysts are, however, limited to the information in the official State records they receive. NHTSA has also developed and distributed an underide training pamphlet to State and local law enforcement departments. The Government Accountability Office deemed this

effort sufficiently responsive to close out the related recommendation made in the report *Truck Underride Guards: Improved Data Collection, Inspections, and Research Needed* (GAO-19-264).

Thank you again for your queries regarding FARS data quality. If you need more information or have additional questions, do not hesitate to contact Barbara Rhea, Chief of the State Data Reporting Division, at barbara.rhea@dot.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Chou-Lin Chen', followed by a long horizontal line.

Chou-Lin Chen
Associate Administrator
National Center for Statistics and Analysis