Department of Transportation
National Highway Traffic Safety Administration
Information Collection Request Supporting Statements: Part A
State Data Transfer
OMB Control No. 2127-0753

Abstract:[1]

The National Highway Traffic Safety Administration (NHTSA) is submitting this information collection request (ICR) to request an extension with modification of its currently approved information collection for the State Data Transfer (SDT) program. NHTSA is seeking approval to modify the collection to update the burdens and remove one data collection protocol.

NHTSA is authorized by 49 U.S.C. 30182, 23 U.S.C. 403 and Public Law 117-58 Section 24108(d) to collect data on motor vehicle traffic crashes to aid in the identification of issues and the development, implementation, and evaluation of motor vehicle and highway safety countermeasures to support efforts to reduce injuries and fatalities caused by motor vehicle crashes.

The SDT program is a voluntary collection of motor vehicle crash data. State agencies collect motor vehicle crash information on Police Crash Reports (PCRs)[1] for their own data collection purposes. PCRs generally include information about vehicles and individuals involved in a crash; injuries or fatalities; roadway and environmental conditions; and details needed to reconstruct crash scenes. Through the SDT process, participating States electronically transfer their PCR data to NHTSA.

Historically, SDT included two NHTSA defined protocols: the State Data System (SDS) and the electronic data transfer (EDT) protocol. NHTSA plans to sunset the SDS protocol, leaving only the EDT protocol in SDT.

1. SDS Protocol (sunset)

   Established in the early 1980s, the NCSA received PCR crash data from participating States via electronic media such as encrypted CD-ROM/DVD, secure mail, or secure file transfer protocol (SFTP) through SDS protocol. These “annual crash files” became inconsistent over time as States stopped or reduced submissions, creating gaps in data collection. The NHTSA’s supporting contract expired, making the protocol unsustainable, and NHTSA plans to sunset the data collected using this protocol.

2. EDT Protocol

[1] The Abstract must include the following information: (1) whether responding to the collection is mandatory, voluntary, or required to obtain or retain a benefit; (2) a description of the entities who must respond; (3) whether the collection is reporting (indicate if a survey), recordkeeping, and/or disclosure; (4) the frequency of the collection (e.g., bi-annual, annual, monthly, weekly, as needed); (5) a description of the information that would be reported, maintained in records, or disclosed; (6) a description of who would receive the information; (7) the purpose of the collection; and (8) if a revision, a description of the revision and the change in burden.

Implemented in 2015, EDT obtains PCRs and its associated crash data, supplemental crash reports, and crash images through automated electronic transfers. Transfers typically occur nightly after State quality control checks and acceptance into each State's centralized crash data repository. Data is transmitted in State-specific (non-standardized) formats using Extensible Markup Language (XML) or JavaScript Object Notation (JSON) through a web service using the Hypertext Transfer Protocol Secure (HTTPS). NHTSA does not currently provide routine funding for these States.

Starting November 15, 2021, and authorized under Section 24108(d) of the Public Law 117-58, NHTSA established the State Electronic Data Collection (SEDC) program. The SEDC program is a discretionary, grant-funded initiative that helps States establish, upgrade, and standardize centralized statewide crash data repositories for electronic transmission to NHTSA. Grant requirements include electronic data collection, intrastate data sharing, and electronic data transfer to NHTSA. The program objectives are to improve data accuracy, timeliness, and accessibility, particularly for crashes involving vulnerable road users, by supporting State projects to modernize or build their crash data repositories, enable full electronic data transfer to NHTSA, increase alignment with the Model Minimum Uniform Crash Criteria (MMUCC) Sixth Edition, and transmit data in a standardized format.

States funded under the SEDC will be referred to as SEDC States; States continuing to transmit data via the existing EDT protocol without SEDC-funded enhancements will be referred to as Non-SEDC EDT States. This ICR reflects the inclusion of both the Non-SEDC EDT and the SEDC EDT.

The SDT process enables States to submit complete PCR data to NHTSA by applying the EDT protocol. NCSA uses these data to create a census of participating States' crashes, identify highway safety trends, and evaluate the effectiveness of motor vehicle safety standards and emerging technologies. The multiple NHTSA programs the SDT supports include the Fatality Analysis Reporting System (FARS), Crash Report Sampling System (CRSS), Crash Investigation Sampling System (CISS), Special Crash Investigations (SCI), Non-Traffic Surveillance (NTS), Crash Injury Research and Engineering Network (CIREN), and the Corporate Average Fuel Economy (CAFE) program. NHTSA also shares crash data with other Department of Transportation (DOT) agencies for motor vehicle and traffic safety analyses. Under Public Law 117-58 Section 24108(d), the data collected through the SEDC program will be publicly available in the future.

This ICR is a modification to the currently approved OMB Control No. 2127-0753 (expiration Date: 12/31/2026). The current request for this information collection estimated the annual burden to be 312,663 hours and $5,000,000[2]. This request we are seeking approval changes the labor burden to 14,389 hours and cost burden of $6,262,231.02 (an increase of $1,262,231.02). This ICR is adjusted due to a) removing the SDS data collection protocol; b)

[2] https://www.reginfo.gov/public/do/PRAViewICR?ref_nbr=202307-2127-001

adjusting the burden estimate for SEDC EDT based on the latest information after the awarding of the grants to 18 States.

A. Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal and administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

NHTSA is authorized by 49 U.S.C. § 30182, 23 U.S.C. § 403 to collect data on motor vehicle traffic crashes identify issues and develop, implement, and evaluate motor vehicle and highway safety countermeasures. The information collected serves to identify and develop safety counter measures that will reduce deaths, injuries, and economic losses resulting from motor vehicle crashes.

Furthermore, enacted on November 15, 2021, Section 24108(d) of Public Law 117-58 authorized the Secretary of Transportation to establish the SEDC Discretionary Grant Program. This program provides funding to States to upgrade and standardize their crash data systems for electronic data collection and transfer to NHTSA.

The SDT data are used to generate a census of police reported crashes occurring within the participating States. The State agencies already collect the information on PCRs for their own needs. The data is collected in various formats and timelines according to each State's collection programs and systems. SDT enables NHTSA to develop a census of participating States' injury and property-damage-only crashes not available through any other NHTSA data collection program.

NHTSA also collects the PCR information via SDT for additional uses in several existing data collection programs and special studies. The following are brief descriptions of these data collection programs:

- The SEDC Discretionary Grant Program (OMB Control No. 2127-0753) was mandated by the Infrastructure Investment and Jobs Act (IIJA) P.L. 117-58, section 24108(d) to establish a new grant program, titled the State Electronic Data Collection Program. Specifically, section 24108(d)(2) mandated NHTSA to provide grants to States to upgrade and standardize their State crash data systems to enable electronic data collection, intrastate data sharing, and electronic data transfers to NHTSA to increase the accuracy, timeliness, and accessibility of the data including data relating to fatalities involving vulnerable road users. The grants support an increased capacity of the NHTSA data systems, including the Fatality Analysis Reporting System (FARS), the Crash Reporting Sampling System (CRSS), and the Crash Investigation Studies (e.g., Sampling System

(CISS), Special Crash Investigations (SCI)) among others, and make State crash data accessible to the public.

- FARS (OMB Control No. 2127-0006) is a nationwide census of fatalities caused by motor vehicle traffic crashes. In addition to PCR data, FARS includes detailed information regarding the location of the crash, the vehicles, and the people involved. FARS cases can also include toxicology report data, medical records, medical examiner reports, etc.[3]

- CRSS (OMB Control No. 2127-0714) is a nationally representative sample of police-reported crashes involving all types of motor vehicles, pedestrians, and cyclists, ranging from property-damage-only crashes to those that result in fatalities. CRSS data elements are a subset of the data elements on each State's PCR.[4]

- Investigation-based Crash Data Studies (OMB Control Number 2127-0706) includes CISS, SCI and Special Studies. CISS is a nationally representative sample of minor, serious, and fatal crashes involving at least one passenger vehicle—cars, light trucks, sport utility vehicles, and vans—towed from the scene. CISS collects data at both the crash level through scene analysis and the vehicle level through vehicle damage assessment together with injury coding. Data collected through CISS expands upon the information that is collected in a PCR.[5]

  The SCI Program provides NHTSA with the most in-depth crash data collected by the agency. The data collected ranges from basic information contained in routine police and insurance crash reports, to comprehensive data from special reports produced by professional crash investigation teams. Hundreds of data elements relevant to the vehicle, occupants, injury mechanisms, roadway, and safety systems are collected for each of the over 100 crashes designated for study annually.

- The Non-Traffic Surveillance (NTS) is an automated data collection effort for collecting information about non-traffic crashes and non-crash incidents. The NTS data provide counts and details regarding fatalities and injuries that occur in non-traffic crashes and in non-crash incidents. The NTS non-traffic crash data are obtained through NHTSA's data collection efforts for the Crash Report Sampling System (CRSS), the Crash Investigation Sampling System (CISS), and the Fatality Analysis Reporting System (FARS). NTS also includes data outside of NHTSA's own data collections. NTS' non-crash injury data is based upon emergency department records from a special study conducted by the Consumer Product Safety Commission's National Electronic Injury Surveillance System

[3] Additional details about FARS and how the agency collects this information are available in the supporting statements for the ICR with OMB Control No. 2127-0006.
[4] Additional details about CRSS and how the agency collects this information are available in the supporting statements for the ICR with OMB Control No. 2127-0714.
[5] Additional details about CISS and how the agency collects this information are available in the supporting statements for the ICR with OMB Control No. 2127-0706.

(NEISS) All Injury Program. NTS non-crash fatality data is derived from death certificate information from the Centers for Disease Control's National Vital Statistics System.

- CIREN (OMB Control Number 2127-0774) combines crash data collection with professional multidisciplinary analysis of medical and engineering evidence to determine injury causation in every crash investigation conducted. The mission of the CIREN is to improve the prevention, treatment, and rehabilitation of motor vehicle crash injuries to reduce deaths, disabilities, and human and economic costs.

Prior to the introduction of the EDT protocol, participating States' crash data had to be manually entered into NHTSA systems from each State's crash data repository for use by FARS, CRSS, CISS, SCI, NTS, and CIREN. The EDT protocol, developed under the SDT program, automated the transfer of States' motor vehicle crash data to NHTSA's data collection systems and streamlined certain data coding processes within FARS, CRSS, CISS, SCI, NTS, and CIREN.

NHTSA's SDT program enables electronic data transfer directly to NHTSA, reducing the administrative and technical burden on States by eliminating manual data submissions, and accelerating data availability, improving data quality, and standardization. The efficiency and benefits of electronic data collection and transfer is essential to NHTSA's ability to carry out its statutory mission to provide comprehensive, timely, and accurate national motor vehicle crash data for crash analysis.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

NHTSA utilizes the SDT data to identify existing and emerging highway safety trends, assess the effectiveness of motor vehicle safety standards, and study the impact of new and emerging technologies on vehicle and highway safety programs. For example, the data helps study the effectiveness of emerging technologies, such as the impact of advanced driver assistance systems (ADAS)(e.g., lane keeping support, automatic emergency braking, blind spot detection, etc.) on crash-involved vehicles.

NHTSA also uses the SDT data to support the cost-benefit analysis for the Corporate Average Fuel Economy (CAFE) rulemaking, and to estimate what effect vehicle mass has on fatalities. Without the volume of data from the States in the SDT dataset, it would not be feasible to estimate meaningful fatality rates or their relationship with vehicle mass.

Furthermore, SDT data is used to pre-populate several of NHTSA's special studies including FARS, CRSS, CISS, SCI, NTS, and CIREN.

The data is also shared with other DOT agencies like the Federal Highway Administration (FHWA) and the Federal Motor Carrier Safety Administration (FMCSA) to support their

mission to save lives on our national roadways. The SDT data received through SEDC rant will be made publicly available to facilitate the research to save lives in the public domain.

3. **Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also, describe any consideration of using information technology to reduce burden.**

   SDT currently consists of the EDT protocol, an automated electronic information process that reduces the burden on State respondents by limiting manual and redundant data entry and improving the quality of the data and the timeliness of reporting to NHTSA's data collection program. EDT data is used to structure crash cases, pre-populate some of the information multiple data collection programs utilize, and reduces the State resources required to provide the data to NHTSA.

   EDT data transmission typically occurs nightly after State quality control checks are completed. The data is transmitted via a web service using the Hypertext Transfer Protocol Secure (HTTPS) in Extensible Markup Language (XML) or JavaScript Object Notation (JSON). For SEDC Grantees, the grant explicitly funds the modernization of systems so they can transmit data electronically in a standardized format using the Information Exchange Package Documentation (IEPD) data transfer protocol, significantly reducing the burden of manual, redundant data entry.

   NHTSA works with States that choose to participate in EDT to establish automatic data feeds. The data is then populated into NHTSA's data collection systems, wherever possible, to reduce the burden on States. In addition, NHTSA will use the data to populate a separate, uniform census data repository of all crash data received from the participating States. During the implementation phase, the Non-SEDC States will have minimum burden to contend with since NHTSA and its IT contractor have carried out most of the development work associated with the EDT protocol; future SEDC States will have an increased burden due to the IIJA requirements that specify a need to increase alignment to a specific data standardization (MMUCC Sixth Edition). SEDC States will use the awarded discretionary grant funds to help with their data standardization efforts. Following implementation, NHTSA and the State will review the data transfer process annually to determine if there are any required updates to the data feed from either NHTSA or the State, including adding or removing fields, data schema changes, and data attribute changes, etc.

4. **Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

While SDT data overlaps with information collected in FARS, CRSS, CISS, and other studies, there is no duplication. The EDT protocol reduces existing redundancy and manual data entry by automatically pre-populating data directly into NHTSA's FARS, CRSS, CISS, SCI, NTS, CIREN databases. States participating in EDT have seen improved efficiencies and data accuracy. Because of these benefits, the NHTSA advocates for broader SDT adoption as a best practice for crash data management.

Broader SDT adoption by more States will support further efficiencies in FARS, CRSS, CISS, SCI, NTS, CIREN and safety analysis throughout DOT. This is a goal typically shared by both the States and the Federal offices responsible for management of the data. As a result, DOT will advocate for EDT adoption in the States as a best practice to improve the data management between State and Federal entities specific to crash and associated safety data.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

This collection does not impact small businesses or other small entities.

This voluntary information collection involves State agencies that collect crash data. Specifically, the collection involves State governments, the District of Columbia government, U.S. Territory governments and the Secretary of the Interior, acting on behalf of an Indian Tribe. For purposes of this collection, we refer to the respondents generically as "States."

6. Describe the consequences to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

SDT serves as the sole source of comprehensive PCR information, consolidating data on injury and property-damage-only crashes from participating states into a single data feed. SDT data is used to identify, evaluate, and respond to changes in safety on our Nation's roadways. Studies in safety include vehicle technology, roadway infrastructure, passenger safety, other road users and underserved populations. Absent the SDT program and the data it collects, NHTSA's ability to identify emerging highway safety trends, assess the effectiveness of motor vehicle safety standards and the impact of new and emerging technologies would be severely compromised. Furthermore, NHTSA would lack the critical data volume required to estimate meaningful fatality rates, especially regarding vehicle mass for CAFE rulemakings.

NHTSA uses the SDT data to estimate the effects of reducing vehicle mass (to help meet fuel economy targets) on fatalities. Without the volume of data from the States in the sample, it would not be feasible to estimate meaningful fatality rates or their relationship with vehicle mass. NHTSA utilizes the SDT data to identify crash-involved vehicles with advanced driver assistance technologies and evaluate effectiveness of the systems. Without SDT data, NHTSA would not be able to estimate the effectiveness of vehicles equipped with advanced driver assistance technologies. Advanced driver assistance technologies are relatively new

and are only offered in new vehicles, which represent a small proportion of all vehicles, and an even smaller proportion of vehicles involved in crashes. SDT is the most effective way to collect data on vehicles with these new technologies. The SDT data collection provides NHTSA with a large dataset and enhances NHTSA's ability to estimate effectiveness of these new technologies.

Furthermore, the SDT program allows NHTSA to decrease the burden on States associated with NHTSA's existing motor vehicle crash data collections as described above. Absent implementation of the SDT program, States will continue to provide the data separately for each motor vehicle crash data collection, which frequently requires manual data entry. By establishing one electronic transfer of State motor vehicle crash data under SDT, the burden on the participating States is reduced and the data timeliness and accuracy increased. The electronic nature of the SDT program provides higher frequency data transfer with lower effort; without the SDT program, States would be forced to revert to manually entering and providing data separately for each NHTSA crash study, drastically increasing their administrative burden.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- **a. requiring respondents to report information to the agency more often than quarterly;**
- **b. requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **c. requiring respondents to submit more than an original and two copies of any document;**
- **d. requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;**
- **e. in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- **f. requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- **g. that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **h. requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

Most data received from respondents is daily/nightly, there are some respondents that submit weekly or monthly, which is more often than quarterly because the EDT protocol relies on automated, nightly electronic feeds. The information is submitted electronically using secure protocols and at a frequency agreed upon by both State and Federal offices. The electronic-only submittal is intended to decrease the data management and communication burden on all

involved parties. When adopted, the EDT protocol replaces costly and time-consuming manual or paper-based processes.

This collection does not require respondents to submit more than an original and two copies of any document, though respondents may send several copies of one PCR if there are updates to a crash report. The process is automated and happens without human intervention. If there are any updates for a crash after the information has been sent to NHTSA, the States' electronic systems send updates automatically and NHTSA's EDT process receives the information and updates its records automatically.

Through the EDT protocol, NHTSA receives race and ethnicity information from a subset of participating states. Because this data originates from disparate, non-standardized, state-level sources, it generally lacks the granularity required for full compliance with Statistical Policy Directive No. 15 (SPD-15). Therefore, NHTSA does not currently intend to standardize or publish this specific data subset.

Other than above description about the automatic information collection frequency and SPD-15, there are no other special circumstances that would cause this collection to be collected in a manner inconsistent with 5 CFR 1320.5(d)(2).

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to the comments. Specifically address comments received on cost and hour burden. Describe efforts to consult with persons outside the agency to obtain their views.

NHTSA published a 60-day notice on June 25, 2026, requesting comment on NHTSA's intention to submit this ICR to OMB for approval (91 FR 38472). During the comment period, NHTSA received one comment from Mr. Eric Hein.

Mr. Hein's comment supported the renewal of the State Data Transfer (SDT) program but was critical of how underride crashes are currently captured and transferred into NHTSA's national crash databases (such as FARS, CRSS, and CISS). He argued that underreporting and misclassification of underride crashes is a practical utility issue under the Paperwork Reduction Act (PRA). To resolve these data deficiencies at the source, Mr. Hein urged NHTSA to use its existing authorities under the SDT program, specifically by adding a dedicated underride data element to the State Electronic Data Collection (SEDC) discretionary grant requirements and Non-SEDC States, operating under a Memoranda of Understanding (MOUs) and data mapping. This would require participating States to capture and transfer a discrete underride field electronically. He also requested that NHTSA establish adoption timelines and completeness benchmarks for underride reporting, track vulnerable road user underride events separately from passenger-vehicle crashes, and report on progress in the administrative record.

In response to Mr. Hein’s comments, NHTSA has taken several significant steps to enhance the quality, utility, and accuracy of underride data collections, while ensuring consistency with the agency's statutory authorities:

Model Minimum Uniform Crash Criteria (MMUCC) Sixth Edition Alignment: In February 2023, NHTSA published a draft 6th edition of MMUCC for public comment. The 6th edition of MMUCC was finalized and published in January 2024, formally incorporating the standardized "Vehicle Underride or Override" data element (with attributes: None or Not Applicable, Underride, Override, and Unknown) along with an Initial Contact Point clock points element. Under the SEDC discretionary grant program, participating States are required to align their centralized statewide crash repositories with the latest MMUCC 6th Edition standards at a minimum of 25 to 34 percent. While achieving 100 percent alignment is voluntary, the grant program offers a direct, funded pathway, whereas alignment remains fully voluntary for non-SEDC States.

Standardization of Definition and Database Integration: NHTSA has implemented this standardized MMUCC definition of underride and override across both the Fatality Analysis Reporting System (FARS) and the Crash Report Sampling System (CRSS) data collection programs and related documentation.

Statutory Limitations on Mandating Crash Reports: While Mr. Hein requested that NHTSA mandate an underride/override "checkbox" on all State police crash reports, NHTSA published a denial of a related request in April 2025, explaining that the agency lacks the statutory authority to mandate specific data fields, formats, or modifications to individual State crash report forms. Participation in SDT, FARS, the SEDC grant program, and the non-SEDC electronic data transfer (EDT) protocol by States is voluntary. However, NHTSA continues to actively encourage and support States in adopting the MMUCC 6th Edition. Once a State implements the MMUCC underride data element, the SDT automated (EDT) protocol automatically maps and transfers this data nightly to NHTSA's databases.

Improved Database Coding and Quality Checks: Based on a 2020 internal study, NHTSA has implemented multiple updates to improve the accuracy of vehicle underride/override reporting in its crash databases starting in 2021. These updates include:

- Simplified underride/override coding (assessed for each vehicle in every vehicle-to-vehicle collision),
- Replaced coding guidance in manuals,
- Enhanced training for analysts and coders to note the difference in procedures with the combination of underride and override crashes verse a single occurrence for the vehicle performing the action.
- Developed new automated edit checks to verify coding accuracy by recording the action of both vehicles.

GAO Recommendations Addressed: NHTSA has successfully addressed and closed three March 2019 Government Accountability Office (GAO) recommendations (Report GAO-19-264) regarding improved underride data collection and research. This included developing and distributing an underride training pamphlet to State and local law enforcement.

Vulnerable Road User Tracking: Regarding separate tracking of vulnerable road users, researchers can currently determine underride or override details in FARS and CRSS by combining the standardized Vehicle Underride or Override data element with Sequence of Events, Initial Contact Point, Damaged Areas, and other crash-level elements.

NHTSA published a 30-day notice on October 30, 2026, that stated NHTSA's intention to submit this ICR to OMB for approval (91 FR 68595).

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

No payments or gifts are provided to respondents in connection with this discretionary grant program other than the remuneration of contractors or grantees. As stated in the IIJA, NHTSA shall provide grants to States to upgrade and standardize State crash data collection systems to enable electronic data collection, intrastate data sharing, and electronic data transfers to the National Highway Traffic Safety Administration to increase the accuracy, timeliness, and accessibility of the data, including data relating to fatalities involving vulnerable road users. NHTSA can provide up to eighty (80) percent of the funding for the SEDC grants. The State is responsible for no less than twenty (20) percent of the funding, but the State can provide more than twenty (20) percent. Eligible activities for grant funding include the following three cost categories:

(i) equipment to upgrade a statewide crash data repository;
(ii) adoption of electronic crash reporting by law enforcement agencies; and
(iii) increasing alignment of State crash data with the latest Model Minimum Uniform Crash Criteria.

The 20 percent funding that the States commit can be labor hours or a percentage of eligible costs associated with state employees, contractual needs, IT, and equipment costs.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.

All data is handled in accordance with participating State Memoranda of Understandings (MOUs) or grant awards and complies with the Privacy Act, HIPAA Privacy Rights, and FISMA. OMB and DOT data protection mandates and policies are also being followed.

SDT operates under NHTSA's Crash Data Acquisition Network (CDAN), which has a published Privacy Impact Assessment. (https://www.transportation.gov/individuals/privacy/crash-data-acquisition-network-cdan-pia)

While Police Crash Reports transmitted to NHTSA may contain Personally Identifiable Information (PII) such as names, addresses, dates of birth, VINs, and license plate numbers, it is up to the participating State to determine whether they submit PII to NHTSA. Furthermore, NHTSA uses this data solely for crash analysis and does not publicly disclose PII from State crash data. This data is used by NHTSA for crash analysis to identify national trends in road safety and influence the development, deployment, and evaluation of lifesaving safety countermeasures.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

The SDT program does not ask questions or collect information of a sensitive nature, such as sexual behavior, attitudes, religious beliefs, or other commonly private matters.

12. Provide estimates of the hour burden of the collection of information on the respondents and estimates of the annualized labor cost to respondents associated with that hour burden.

The SDT Program receives crash data from States in two ways: (1) the Non-SEDC protocol, under a voluntary MOU between NHTSA and each State, of which there are currently 22 participating States, and (2) the SEDC grant, which imposes specific grant requirements; there are 18 SEDC grantees. Of the 22 Non-SEDC States, 10 have been awarded SEDC grants and will transition to SEDC transmission requirements by January 2030. The remaining eight participating SEDC grantees are actively developing their capabilities to implement electronic data transmission under the SEDC requirements by that same deadline.

This ICR is being modified to remove the legacy SDS protocol and to reflect the ongoing EDT participation by both Non-SEDC States and SEDC grantees. As a result, NHTSA projects a total of 33 annual respondents by January 2030: 12 Non-SEDC States (the 22 original States minus the 10 transitioning to SEDC) and 18 SEDC grantees (the 10 transitioning EDT States plus the 8 SEDC-only States). The transition to the SEDC transmission will happen gradually, with approximately three States migrating per year until all 10 complete the shift by January 2030. The eight SEDC-only States will also begin their SEDC transmissions over this period. Because the transmission requirements differ for Non-SEDC and SEDC grantees, the annual burden for each group is detailed separately below.

States using SDS Protocol

SDS information was previously obtained using a traditional method via electronic media through secured mail or a Secure File Transfer Protocol (SFTP) from participating States on

an annual basis. However, this collection has been sunset, removing the associated State burden.

Non-SEDC EDT Protocol

The State burden associated with the EDT protocol varies between Non-SEDC States and SEDC grantees. This difference is driven by the distinct requirements placed on each group, such as mutually agreed upon data sharing memorandum of understanding for Non-SEDC States or mandatory data standardization and MMUCC alignment for SEDC grantees.

The burden estimate for Non-SEDC States is derived from the actual level of effort reported by states currently using the Non-SEDC EDT protocol. NHTSA projects that each year, one additional state will implement the protocol, while several existing SEDC grantees will transition from Non-SEDC to SEDC requirements annually. Consequently, NHTSA anticipates an average of 17 active Non-SEDC states annually over the next three years (22 in Year 1, 20 in Year 2, and 18 in Year 3) as shown in Table 1. For these states, the burden is limited to annual maintenance, apart from the newly added state, which also includes implementation costs.

Table 1. Number of Non-SEDC Protocol States

Non-SEDC Protocol State	Number of Non-SEDC State Each Year	Number of Non-SEDC State to SEDC State Conversion	Newly Added Non-SEDC States
Current Year	22	0	0
Current + 1	22	1	1
Current + 2	20	3	1
Current + 3	18	3	1
Average Per Year for Next Three Years	20	3	1

Maintenance Burden Calculation for Non-SEDC States

Non-SEDC States report an annual maintenance burden of five (5) hours per respondent, primarily dedicated to troubleshooting connections and refining data mapping protocols. To calculate the economic impact, NHTSA utilizes the May 2024 BLS mean wage for Software and Web Developers ($71.54/hour[6]). Adjusting for total compensation, where wages comprise 61.7%[7] of the package, the fully loaded hourly rate is $115.95. Consequently, the annual maintenance cost per state is approximately $579.75. Based on a projected average of

[6] May 2024 National Occupational Employment and Wage Estimates United States, Occupational Employment Statistics, Bureau of Labor Statistics, U.S. Department of Labor, https://www.bls.gov/news.release/ecec.t01.htm, last accessed April 29, 2026).
[7] *See* Table 1. Employer Costs for Employee Compensation by ownership (Dec. 2025), available at https://www.bls.gov/news.release/ecec.t01.htm (accessed April 29, 2026).

20 participating Non-SEDC States, the total annual collective burden is estimated at 100 hours and $11,595.00 in labor costs.

Implementation Burden Calculation for Non-SEDC States

States report an initial implementation burden of 150 hours per respondent. To calculate the economic impact, NHTSA utilizes the May 2024 BLS mean wage for Software and Web Developers ($71.54/hour). Adjusting for total compensation, where wages comprise 61.7% of the package, the fully loaded hourly rate is $115.95. Consequently, the implementation cost for a new Non-SEDC EDT State is approximately $17,392.50 in labor costs. Based on the addition of one new participating State, the total collective implementation burden is estimated at 150 hours and $17,392.50 in labor costs.

SEDC EDT Protocol

On January 31, 2024, NHTSA issued a Notice of Funding Opportunity (NOFO) to modernize state crash data systems and facilitate electronic data transfer to NHTSA, which is the SEDC program. Twenty-six jurisdictions, including States, Territories, and the Bureau of Indian Affairs, applied for the SEDC grant. Nineteen applicants were awarded the SEDC Grant. There are currently eighteen active SEDC grantees, with one grantee terminating their agreement in the first year of the project.

SEDC grantees must commit to electronically transferring standardized crash data to NHTSA within five years of the award. Key implementation actions and funding uses were identified from each State's workplan and budget for the following three goals:

(i) equipment to upgrade a statewide crash data repository;
(ii) adoption of electronic crash reporting by law enforcement agencies; and
(iii) increasing alignment of State crash data with the latest Model Minimum Uniform Crash Criteria.

Under the SEDC grant, States (excluding American Samoa) are required to provide a 20% non-federal match of the total grant award. Because grant applications required total budget commitments rather than granular labor categories, NHTSA's State burden estimates are derived directly from these matching funds committed. These costs cover both the initial development effort**,** such as repository updates and MMUCC alignment**,** and the ongoing implementation of standardized data transmissions**.** The SEDC grant does not allow operation and maintenance costs, therefore, the same Non-SEDC State calculations are used to estimate the maintenance burden cost for the SEDC grantees.

NHTSA anticipates that during the first two (2) years of the grant, i.e. the previous and current year, all States will be in the development and implementation phase, meaning no data transmission is expected. Beginning next year (Current+1), States will gradually begin

transmitting data using the SEDC protocol, either by converting from an existing Non-SEDC EDT system or joining as a brand-new SEDC state. Specifically, NHTSA estimates that 2 states will begin transmitting data in Year (Current+1), 5 in Year (Current+2), and 5 in Year (Current+3), averaging 4 states per year. Over these next three years, an average of 7 states per year will be actively transmitting data. Concurrently, for the next three years, the number of states in the maintenance phase will scale from 0 Year (Current+1) to 2 Year (Current+2), and 7 Year (Current+3), averaging 3 states per year. Meanwhile, the number of states remaining in the implementation phase will decrease from 16 Year (Current+1) to 11 Year (Current+2), and 6 (Current+3), averaging 11 states per year. The details are shown in Table 2.

Table 2. Number of SEDC Protocol States

SEDC Protocol	States Finish Implementation	Total Number of SEDC State Under Implementation	Number of States for Maintenance
Current Year	0	18	0
Current + 1	2	16	0
Current + 2	5	11	2
Current + 3	5	6	7
Average Per Year for Next Three Years	4	11	3

Implementation Burden Calculation for SEDC States

The collective burden calculation for the 17 SEDC States based on the State's matching fund, except for American Samoa which is not required to provide matching fund. These matching funds represent eligible expenses such as state employee labor, contractual services, IT, and equipment costs. Because this comprehensive project inherently demands a mix of contractual services, IT or equipment needs, in addition to State's personnel costs, some States agreed to a flat 20% match under personnel, contractual or a combination of eligible cost categories rather than calculating an exact mathematical breakdown for each individual line item.

Out of the eighteen SEDC States, 15 committed matching funds for State personnel costs. Among these, only four States itemized their actual labor costs and burden hours, while the remaining 11 committed to a flat percentage. Based on the four states that explicitly provided estimated burden hours for their matching personnel costs, the baseline average per State is 1,284 burden hours annually, with a corresponding average labor cost of $198,512.65. Applying these averages to the 11 States projected to be in the implementation phase each year, the total labor burden hours and cost are 14,121 hours and $2,183,639.15.

Nine out of these fifteen States also committed a percentage of their State-match to contractual costs, which may be used for contractor, IT, or equipment activity costs. The

remaining three States committed their entire matching requirement to the contractual cost category without exact breakdowns for contractual services, IT and equipment costs.

Maintenance Burden Calculation for SEDC States

Non-SEDC States report an annual maintenance burden of five (5) hours per respondent, primarily dedicated to troubleshooting connections and refining data mapping protocols. NHTSA will apply this same annual maintenance burden to the SEDC grantees. To calculate the economic impact, NHTSA utilizes the May 2024 BLS mean wage for Software and Web Developers ($71.54/hour[8]). Adjusting for total compensation, where wages comprise 61.7%[9] of the package, the fully loaded hourly rate is $115.95. Consequently, the annual maintenance cost per state is approximately $579.75. Based on a projected average of 3 participating SEDC States under maintenance phase, the total annual collective burden is estimated at 15 hours and $1,739.25 in labor costs.

Table 3 is a representation of implementation and maintenance burden. The breakdown is based on information received from every SEDC grantees' workplan and budget descriptions. NHTSA estimates burden for development and implementation using actual labor hour and cost breakdowns when available, percent cost commitment, or actual monetary figures provided. Maintenance costs are based on known State maintenance burden reported by Non-SEDC EDT States currently maintaining the EDT protocol.

Table 3. Total Annual State Implementation and Maintenance Burden

Category	Annual Respondents (States)	Burden Per Respondent (Hours)	Annual Total Burden Hours (Hours)	Labor Rate w/o Overhead ($)	Overhead Rate (%)	Labor Rate w/Overhead ($)	Burden Cost Per Respondent ($)	Total Labor Cost ($)
Non-SEDC Implementation	1	150	150	$71.54	61.70 %	$115.95	$17,392.50	$17,392.50
Non-SEDC Maintenance	20	5	100	$71.54	61.70 %	$115.95	$579.75	$11,595.00
SEDC Implementation	11	1,284	14,124	NA	NA	NA	$198,512.65	$2,183,639.15
SEDC Maintenance	3	5	15	$71.54	61.70 %	$115.95	$579.75	$1,739.25
Total	35	1,444	14,389					$2,214,365.90

[8] May 2024 National Occupational Employment and Wage Estimates United States, Occupational Employment Statistics, Bureau of Labor Statistics, U.S. Department of Labor, http://www.bls.gov/soc/home.htm, last accessed April 29, 2026).
[9] Employer Costs for Employee Compensation by ownership (Dec. 2025), available at https://www.bls.gov/news.release/ecec.t01.htm (accessed April 29, 2026).

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. Do not include the cost of any hour burden already reflected in the response provided in question 12.

The SEDC grant, in compliance with IIJA, requires a 20% match from participating State respondents. Based on information provided by the SEDC grantees as part of the required 20% match from each grantee with the exception of American Samoa, NHTSA estimates the annual average per State burden cost for the SEDC program (beyond the labor costs discussed in question 12) will be about $569,293.73 for the non-labor burdens, which includes contracts, equipment, IT cost and other miscellaneous burdens. For the eleven states under implementation, the total burden cost is $6,262,231.02.

NHTSA does not expect respondents to incur in any additional costs for non-SEDC States using EDT Protocol (beyond labor costs as discussed in question 12).

14. Provide estimates of annualized costs to the Federal government. Provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

The total annual cost to the Federal government for the State Data System (SDS) is estimated to be **$41,280,237** (rounded from $41,280,236.78). This total comprises internal Federal staff salaries and benefits, external technical support contracts, and discretionary grant funding to support data transmission to NHTSA.

The specific cost breakdown is detailed below:

1. Internal Federal Staff Costs: $1,778,422

The annual cost for Federal employee time devoted to the management, development, implementation, and monitoring of the Non-SEDC EDT and SEDC EDT protocols including contract oversight is estimated at **$1,778,421.64**.

- **Labor Allocation:** A total of 29 Federal employees (ranging from GS-13 to GS-15) support the SDS, dedicating between 1.5% and 100% of their annual work hours to the program. Individual staff commitments range from a minimum of 35 hours to a maximum of 2,087 hours per year. In total, NHTSA estimates that Federal staff devote **16,141 work hours** annually to the SDS.
- **Wage and Compensation Basis:** Hourly base wages range from $55.13 to $81.33, based on the Office of Personnel Management (OPM) 2026 Locality Pay Schedule for the Washington-Baltimore-Arlington, DC-MD-VA-WV-PA area (Step 1).[1]
- **Fully Loaded Wage Rate:** To account for benefits, NHTSA utilized the Bureau of Labor Statistics (BLS) March 2026 Employer Costs for Employee Compensation report, which estimates that wages represent 61.7% of total compensation for public

sector workers.[2] Dividing the base hourly wages by 61.7% yields fully loaded hourly compensation rates of **$89.15** (GS-13), **$111.88** (GS-14), and **$131.60** (GS-15).

The estimated Federal staff cost include labor hours required to manage the SEDC grant. The costs include labor hours associated with COR and ACOR duties, and two (2) highway safety analysts dedicated one hundred (100) percent to the SEDC program. These costs also account for the coordination, implementation, and maintenance of the Non-SEDC EDT States. There are additional staff that participate in data processing, access, publication, quality assurance and control, traffic records and analysis that support the development and implementation efforts associated with the SDS.

Additional Federal staff cost estimates associated with the management of the supporting contracts are accounted for in this overall Federal staff cost estimate and broken down in Table 4. Summary of Federal Cost Components.

2. Contractual Support Costs: $6,614,499

Because participating States supply data in varying formats and layouts, external IT and infrastructure support is required to process the information into a standardized, usable form. Federal contracting support will be needed to implement and maintain the electronic data transfer process for EDT to ensure NHTSA receives the data securely and accurately. The annual contractual cost to provide quality assurance and control support services, IT infrastructure, data processing, and technical support for the SDS is **$6,614,499**. The contract costs are based on an estimated percentage of time and resources devoted by federal staff (COR, ACOR, support staff) and an estimated burden percentage of the overall contractual cost for the Quality Assurance and Control, Crash Data Acquisition Network (CDAN) development, operation, and maintenance contracts.

3. Grant Program Transmission Costs: $32,887,316

NHTSA estimates the total annual Federal cost to support the SEDC States to be **$32,887,315.95**. This sum represents the annual discretionary grant funding awarded to the 18 SEDC grantees to develop and update statewide crash repositories, increase participation in electronic data transfer by local law enforcement, and achieve the agreed upon alignment to MMUCC 6. The SEDC grants were awarded to States based on the grant application, evaluation, and award process conducted by NHTSA. The cost is an annualized accounting of federal discretionary grant funds awarded to 18 States.

Table 4. Summary of Federal Cost Components

Cost Component	Calculation / Description	Annual Cost to Federal Government
Federal Staff (Internal)	16,141 total hours across 29 GS 13–15 staff (fully loaded)	$1,778,421.64
Contractual Support	IT infrastructure and data standardization processing	$6,614,499.19
SEDC Grant	Discretionary grant funding for 18 SEDC grantees	$32,887,315.95
TOTAL		**$41,280,236.78**

Therefore, NHTSA estimates the total burden hours for federal staff to manage the SDT will be 16,141. The total annual Federal cost for SDT is estimated to be $41,280,236.78 ($1,778,421.64 for Federal employees + $6,614,499.19 for contractual services and management + $32,887,315.95 for SEDC discretionary funds for 18 grantees).

15. Explain the reasons for any program changes or adjustments reported on the burden worksheet. If this is a new collection, the program change will be entire burden cost and number of burden hours reported in response to questions 12 and 13. If this is a renewal or reinstatement, the change is the difference between the new burden estimates and the burden estimates from the last OMB approval.

The current approved annual burdens for this ICR is 312,663 hours and $5,000,000 in cost burden. In this collection, the annual burden estimate was revised and is estimated to be 14,389 hours and $6,262,231.02 in total cost. This represents a decrease of 298,277 hours and an increase of $1,262,231.02 in cost burden. These adjustments are driven by more updated data from the SEDC grant program. Estimate from the previous ICR cycle relies on preliminary, high-level data points before the SEDC grants were awarded. Under the current SEDC grant requirement, participating States commit a 20 percent match, which some States calculated as a flat percentage of personnel costs. While the SEDC grant program increases the number of States participating in SDT, it will increase the burden on the states for the implementation and maintenance of the EDT protocol because the SEDC States will be required to increase their alignment to MMUCC and transmit standardized data.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used.

Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions as applicable.

SDT data received through non-SEDC States using EDT protocol is not directly published or made available to analysts outside of DOT because of current MOU. However, the data collected via the SDT EDT protocol for non-SEDC States is used to pre-populate NHTSA's FARS, CRSS, and CISS programs, in addition, a sanitized (i.e., PII removed), SDT dataset is used by NHTSA and DOT modal partners for analytical purposes. The quality-controlled datasets produced by the FARS, CRSS, and CISS programs are publicly released for analytical use to the broader highway safety community annually for the previous calendar year. The FARS, CRSS, and CISS datasets provide the basis for numerous NHTSA and other DOT operating administrations' publications; behavioral and vehicle safety research; rulemaking; focused analyses; defects investigations; annual departmental and modal target setting; lives saved; regulatory analysis and research; and various data tools like the Fatality and Injury Reporting System Tool (FIRST), the FARS Encyclopedia, the Annual Report portal, the State Traffic Safety Information (STSI) website, the Crash Viewer tool, and others. The sanitized SDT dataset will be used for ad hoc analyses and to support novel programs at the agency and Departmental levels. The SDT aggregated data may also be published in reports where the SDT data was analyzed.

As required by IIJA, SDT data received from SEDC States using EDT protocol will be published after the PII information is removed.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

NHTSA will display the expiration date for OMB approval.

18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions." The required certifications can be found at 5 CFR 1320.9.[10]

There are no exceptions. The expiration date for the OMB approval for the SDT information collection will be displayed on the MOU (agreement with participating States), SEDC grant award document or emails sent to the State's point of contact for the SDT data. As an

[10]Specifically explain how the agency display the OMB control number and expiration date and will inform potential respondents of the information required under 5 CFR 1320.8(b)(3): the reasons the information is planned to be and/or has been collected; the way such information is planned to be and/or has been used to further the proper performance of the functions of the agency; an estimate, to the extent practicable, of the average burden of the collection (together with a request that the public direct to the agency any comments concerning the accuracy of this burden estimate and any suggestions for reducing this burden); whether responses to the collection of information are voluntary, required to obtain or retain a benefit (citing authority), or mandatory (citing authority);the nature and extent of confidentiality to be provided, if any (citing authority); and the fact that an agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

example, the following statement will be provided on the Memoranda of Understanding for non-SEDC EDT States:

OMB Control Numbers Assigned Pursuant to the Paperwork Reduction Act: 2127-0753, Expiration December 31, 2026.

A federal agency may not conduct or sponsor, and a person is not required to respond to, nor shall a person be subject to a penalty for failure to comply with, a collection of information subject to the requirements of the Paperwork Reduction Act unless that collection of information displays a current valid OMB Control Number. The OMB Control Number for this information collection is 2127-0753. This information is being collected to identify existing and emerging highway safety trends and assess the effectiveness of motor vehicle safety standards and new and emerging technologies. We estimate that participation in the State Data Transfer (SDT) will involve approximately 5-150 hours per year. However, your burden is dependent on your level of voluntary participation and how frequently you choose to submit information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to: Information Collection Clearance Officer, National Highway Traffic Safety Administration, 1200 New Jersey Ave, S.E., Room W45-205, Washington, DC, 20590.