



August 2, 2021

Chou-Lin Chen
Associate Administrator, National Center for Statistics and Analysis
National Highway Traffic Safety Administration
U.S. Department of Transportation
Room W12-140
1200 New Jersey Ave., S.E.
Washington DC 20590

RE: Docket No. NHTSA-2021-0039 Agency Information Collection Activities; Notice and Request for Comment; State Data Transfer for Vehicle Crash Information

Dear Associate Administrator Chen:

Thank you for the opportunity to again review and provide input on NHTSA's collection of information in relation to State Data Transfer for Vehicle Crash Information.

The Governors Highway Safety Association (GHSA) is a national nonprofit association representing the State and territorial State Highway Safety Offices (SHSOs). The SHSOs implement programs to collect, aggregate, and publish Statewide crash data and share crash-related information with NHTSA.

GHSA continues to share NHTSA's goal in providing more timely, complete, and high-quality data on motor vehicle crashes. The electronic transfer of State crash data to NHTSA provides new opportunities to achieve this objective, as well as reduce time and cost for State data management activities. We further support NHTSA's request for emergency clearance to expedite this effort.

As noted in this notice, GHSA submitted [comments](#) in response to the previous 2018 request for public input. That statement, along with these comments, summarize GHSA's perspective.

GHSA appreciates NHTSA's pledges of flexibility and confidentiality for state participants and a commitment that the program will continue to be voluntary. NHTSA and GHSA agree that several States will likely continue to face participation barriers.

GHSA looks forward to ongoing partnership with NHTSA to put in place the tools and systems that will enable more states to participate: a fully electronic system, a unified Statewide crash database, expedient data submission, and mechanisms to electronically share

crash data with other groups. GHSA also supports the use of NHTSA grants to help states prepare its data system for program participation.

NHTSA staff has communicated to GHSA regularly about its efforts to expand electronic data transfer, and we welcome the continuation of our mutual efforts to maximize state engagement and increase the success of the program.

GHSA appreciates the opportunity to submit comments and looks forward to working with NHTSA to streamline the State and Federal safety data management process.

Regards,

A handwritten signature in blue ink that reads "Charles R. DeWeese".

Chuck DeWeese
Chair, Governors Highway Safety Association
Deputy Commissioner, New York Governors Traffic Safety Committee