

693JJ924R000025 State Electronic Data Collection (SEDC) NOFO

Question & Answer

Q#	Question	Answer
1	<p>NHTSA has stated that crash data received from states must be published. In a presentation via Zoom on 2/15/2024, NHTSA presented what variables it requires states to provide and also stated that PII and data items that can be used to identify PII/individuals will not be published. Two questions related to this: Can you please re-list all the data elements that states are expected to provide as part of the NOFO and which of these elements will be published? The second question relates to the first. NHTSA chief counsel has previously stated that NHTSA can only protect PII information. Can NHTSA legally protect under FOIA the data items that can be used to identify PII/individuals that are not officially deemed PII elements?</p>	<p>Recipients must electronically transfer all data elements in the statewide crash data repository. The data contained in each state crash data repository varies so NHTSA cannot provide a list of all data elements expected.</p> <p>However, in addition to submitting all data in the statewide crash data repository, each recipient is also required to align to the SEDC required elements and attributes. See NOFO, appendix B.</p> <p>Consistent with US DOT privacy policy, and subject to the Freedom of Information Act (FOIA), NHTSA intends to withhold from disclosure Personally Identifiable Information (PII). The US DOT defines “PII” to mean information that can be used to distinguish or trace an individual’s identity, such as their name, Social Security number, biometric records, etc., alone or when combined with other personal or identifying information that is linked or linkable to a specific individual, such as date and place of birth, mother’s maiden name, etc.</p> <p>NHTSA cannot identify discrete data elements that it would consider PII until it has an opportunity to review the information it receives.</p> <p>The FOIA requires NHTSA to disclose agency records upon request unless the records are exempt from the statutory requirement to disclose them. Records submitted to NHTSA through EDT may be within the scope of the personal privacy exemption to the FOIA. This exemption requires NHTSA to withhold PII from public disclosure the disclosure of which would constitute a clearly unwarranted invasion of personal privacy. <u>See</u> 5 U.S.C. § 552(b)(6). NHTSA has a long history of identifying discrete elements of PII within a crash report</p>

		and routinely withholds data from disclosure consistent with US DOT privacy policy and the FOIA. Examples of publicly available crash reports may be found here: https://crashviewer.nhtsa.dot.gov/ .
2	<p>For the annual Highway Safety Improvement Program (HSIP) report, there is a disclaimer to protect the data (See below). Will the data provided through this grant also be protected? Will a disclaimer be provided whenever reports, surveys, schedules, lists, or data compiled or collected is released? Has any other State expressed concern with data release?</p> <p>Disclaimer</p> <p>Protection of Data from Discovery Admission into Evidence</p> <p>23 U.S.C. 148(h)(4) states “Notwithstanding any other provision of law, reports, surveys, schedules, lists, or data compiled or collected for any purpose relating to this section[HSIP], shall not be subject to discovery or admitted into evidence in a Federal or State court proceeding or considered for other purposes in any action for damages arising from any occurrence at a location identified or addressed in the reports, surveys, schedules, lists, or other data.”</p> <p>23 U.S.C. 407 states “Notwithstanding any other provision of law, reports, surveys, schedules, lists, or data compiled or collected for the purpose of identifying, evaluating, or planning the safety enhancement of potential accident sites, hazardous roadway conditions, or railway-highway crossings, pursuant to sections 130, 144, and 148 of this title or for the purpose of developing any highway safety construction improvement project which may be implemented utilizing Federal-aid highway funds shall not be subject to discovery or admitted into evidence in a Federal or State court proceeding or considered for other purposes in any action for damages arising from any occurrence at a location mentioned or addressed in such reports, surveys, schedules, lists, or data.”</p>	The statutory evidentiary exclusion applicable to the Highway Safety Improvement Program is not applicable to SEDC data.
3	<p>Section B8 – Have you already identified the data elements that you are considering Personally Identifiable Information? If so, how you make the determination? We are working to align our redactions in our NC CRIS modernization project with the standards as set by the grant for the public Data. (i.e. - Would VIN, narrative, citation number, etc.)</p>	The US DOT defines “PII” as information that can be used to distinguish or trace an individual’s identity, such as their name, Social Security number, biometric records, etc., alone or when combined with other personal or identifying information that is linked or linkable to a specific individual, such as date and place of birth, mother’s maiden name, etc.

		<p>The analysis of PII requires a case-by-case assessment whether an individual can be identified by one element or a combination of elements. NHTSA cannot identify discrete data elements that it would consider PII until it has an opportunity to review the information it receives. However, NHTSA routinely withholds portions of the VIN that identify the specific vehicle.</p>
4	<p>I understand that the program is designed for states but I'm wondering if there are any flexibilities especially considering the Equity statement in the NOFO and the Executive Order 14112 from December 11, 2023. Ideally Tribes would coordinate with and report through their State DOT because of the established data systems maintained by States. However, we know there are many barriers to that model becoming reality including the federal commitment to promoting Tribal sovereignty and self-governance. Here are some specific scenarios I'm wondering about:</p> <ol style="list-style-type: none"> 1. If a Tribe wants to start electronic crash data collection but doesn't have leadership support to share the data outside the Tribe, would that application be considered? 2. If a Tribe wants to establish a direct data transfer to NHTSA, not going through the state or BIA, would that be feasible? 3. Would each Tribe apply to SEDC via BIA with a separate application/plan or would NHTSA be expecting one application from BIA containing all Tribal requests? 	<p>A State or Tribe is ineligible for an SEDC grant if the State or Tribe does not intend to transfer data electronically to NHTSA.</p> <p>Tribal data can be transferred directly to NHTSA without involving a State or Secretary of the interior.</p> <p>Based upon the program's purpose to update and modernize statewide crash data systems, and the requirement to implement a plan to enable electronic data transfer to NHTSA, NHTSA anticipates that each interested tribe would submit sufficient detail to BIA for NHTSA adequately identify the level of support needed for each Tribe. If BIA provides one application, each Tribes' individual plan must be included with the application for NHTSA to evaluate the application.</p>
5	<p>Should tasks change/evolve over the 5-year length of the grant, can modifications be submitted to adjust how the obligated funds will be spent? For example, switching from funding equipment to funding training or quality control efforts?</p>	<p>Any revisions of budget plans or work plans must comply with 2 C.F.R. § 308. Typically, any changes to scope or objective, or the transfer of funds budgeted for support costs to other categories of expense requires prior approval.</p>
6	<p>According to BIL section 24108(d) and throughout SEDC documentation, the language refers to intrastate data sharing (sharing data WITHIN a single state), however when NHTSA representatives talk about this part of SEDC, they keep talking about interstate data sharing (sharing data BETWEEN states). It is our understanding based on the published materials and the language in BIL that the intent is INTRASTATE (within a state) crash data sharing (between the state and law enforcement agencies, and</p>	<p>The SEDC program's primary goal is to increase State participation in electronic data transfer to NHTSA, with support for States to centralize and standardize the data to enable intrastate sharing. In NHTSA's view, the program's requirements to standardize crash data and make data available to the public encourage interstate sharing of data to address common traffic safety issues.</p>

	between LEAs within a single state) and not the way NHTSA representatives continue to interpret this requirement as interstate data sharing. Please clarify.	
7	The NOFO indicates that state crash data submitted pursuant to the SEDC program be made accessible to the public. Currently, we know that FARS data is available to the public as record-level, downloadable files. Would NHTSA please provide additional information regarding how it will make NON-fatal crash data provided through EDT accessible to the public? For example, how will the information be accessible to the public, how often, and in what format?	NHTSA envisions making the data publicly available similar to FARS, where record level and aggregate level data is available. NHTSA anticipates releasing the SEDC data more frequently than FARS such as quarterly or semi-annually.
8	The program guidelines mention that a pre-application webinar will be held for this program. My question is, will that webinar be optional or mandatory?	The February 15, 2024, webinar was optional. The recording of the webinar and the presentation can be found at grants.gov under this Notice for Funding Opportunity (NOFO). Here is the link to the NOFO announcement: https://grants.gov/search-results-detail/352123 . The webinar recording is Amendment 3 under “RELATED DOCUMENTS” tab.
9	Will the application deadline be extended?	NHTSA has extended the application period by 2 weeks. Applications are now due on May 15, 2024.
10	Due to the complexity of the objectives, availability of resources, and the number of parties to include in the work planning, is it possible to get an extension to the grant application deadline? Page 25-26 SEDC	NHTSA has extended the application period by 2 weeks. Applications are now due on May 15, 2024.
11	If the states wanted to request an extension to the NOFO application deadline, what would be the process, is that something the agency would consider, and what kind of rationale would be necessary?	NHTSA has extended the application period by 2 weeks. Applications are now due on May 15, 2024.
12	The webinar noted that in order for states to be eligible, we must agree to be fully in alignment with the 26 MMUCC Elements, AND all 118 of the Attributes for those 26 elements. Does this mean that we must not only have all 26 elements, but fully align with all 118 attributes (including all subfields) as well?	Yes, States are required to fully align to the 26 “SEDC Required” MMUCC elements and their 118 attributes (including all Subfields), See NOFO, appendix B, before the end of the grant’s period of performance.
13	What specific data elements will we be required to submit through working with the grant? Are there different fields than what we currently send through EDT?	In order to be eligible for an award, the applicant must agree to electronically transfer to NHTSA all data from their statewide crash data repository and must include the minimum an alignment to the 26 “SEDC Required” MMUCC 6 th Edition elements and attributes. See NOFO, appendix B.

14	Why are there blank fields in the Required or Recommended in MMUCC_6th_Edition_and_SEDC_Elements_and_Attributes_20240214.xlsx ?	Column F is blank when the MMUCC 6 edition data element and attribute are not categorized as SEDC Required nor as SEDC Recommended. However, States are encouraged to align to all MMUCC 6 th Edition data elements.
15	What is the desired vision for the recommended fields? Is there a time frame to get them added which differs from the required fields' timeframe? Would adding recommended fields add weight to an application?	NHTSA encourages States to align to all MMUCC 6 th Edition data elements and attributes including the required and recommended elements. NHTSA will prioritize projects with a greater alignment to the MMUCC 6 th Edition; see Evaluation Factor 3: Alignment to MMUCC in the NOFO.
16	Since 2019, well before this funding was in place, and after a GO Team came in and performed MMUCC 5 Mapping evaluation, Missouri began the journey of re-writing our crash report. We are a state that currently receives 97% of our crashes electronically and have worked very hard to stay up to date with MMUCC. Our crash report implemented January 1, 2024 is MMUCC 5 compliant. Ironically, our crash report was implemented close to the same time MMUCC 6 was released and we were eager to turn to our TRCC to officially request a GO Team. At first, we were told if our state did not apply for this funding, we would be put at the back of the line for a MMUCC 6 mapping, but recently we have heard numerous times that all states are receiving a MMUCC 6 mapping in order to help them decide what project they should use the funding for. We would like clarification.	Independent of this grant, NHTSA is measuring the alignment of each State's crash data to the MMUCC 6 th Edition. Applicants will receive a baseline measurement for the purposes of the grant. After the recipients makes changes to be in alignment with the 26 SEDC required elements and any other MMUCC 6 elements prior to submitting EDT data, NHTSA will remeasure the States alignment to MMUCC to evaluate the effectiveness that the SEDC grants had on increasing crash data uniformity.
17	Do we need to have the same verbiage in the data elements in the crash report when describing attributes in MMUCC 6?	See MMUCC Guideline- Chapter 12, Aligning to MMUCC. The State element or attribute name does not need to exactly match the MMUCC element or attribute name. When the concept and application of the State's data element or attribute are the same as MMUCC, then they will align with MMUCC. This is contingent upon definitions, guidance, and other State documents. A State definition that is partially aligned is not considered aligned to MMUCC, because it lacks a component of the MMUCC definition.
18	Does the alignment of data elements listed for MMUCC 6 as required/recommended have to be specific fields or can the information	See MMUCC Guideline- Chapter 12, Aligning to MMUCC. Crash Date is a required data element. Month, Day and Year are required. The

	be derived? (i.e., Requirement asks for year, but we have the full date would that work?)	alignment consideration for this data element note that a State could separate Year, Month, and Day into subfields.
19	How will alignment with the MMUCC 6 th edition be measured?	See MMUCC Guideline- Chapter 12, Aligning to MMUCC.
20	How soon will MMUCC mapping be completed for states that have requested it?	This question is unrelated to the administration of the SEDC grant. NHTSA declines to respond.
21	Will NHTSA provide the baseline assessment of MMUCC 6 compliance of the current crash report? If not, what kind of assessment results will be accepted.	Yes, NHTSA is measuring the baseline alignment of each applicant's crash data to the MMUCC 6th Edition for the purposes of the grant.
22	What are the requirements for the "unique crash identifier"? "MMUCC guide page 11 Section 3 https://crashstats.nhtsa.dot.gov/Api/Public/ViewPublication/813525 Page 14 SEDC Item 2B"	Consistent with MMUCC 6, the state's unique crash identifier shall uniquely identify the crash record in the statewide crash data repository. There is no datatype or naming convention requirement. See MMUCC Guideline Chapter 3, System-Populated Data Elements (p. 11).
23	Are there any issues with supplying more data elements than asked for?	No, the SEDC objective is to enable "full electronic data transfer" from the State to NHTSA. "Full Electronic Data Transfer" is defined in the NOFO at Section A.4 Definitions (p. 6) as "the automated transfer of all crash data from a statewide crash data repository to the National Highway Traffic Safety Administration at a regular, recurring interval."
24	The 1 st requirement states that NHTSA intends to implement full electronic state data transfer without any restrictions or conditions. 1. Can you define 'full data transfer'? 2. This requirement also states that PII Data will be collected but not published; is it mandatory for states to submit unredacted data, or can states submit redacted data?	"Full Electronic Data Transfer" is defined in the NOFO at Section A.4 Definitions (p.6) as "the automated transfer of all crash data from a statewide crash data repository to the National Highway Traffic Safety Administration at a regular, recurring interval." A grant recipient is required to electronically transfer all data elements in the statewide crash data repository without redactions.
25	Required MMUCC elements include Driver License Number and Person Name. Is a State required to send those elements in the data file to NHTSA?	Recipients are required to electronically transfer all data elements in the statewide crash data repository.
26	How is NHTSA currently receiving roadway, citation/adjudication, and injury surveillance data from state agencies?	NHTSA encourages States to integrate their traffic records data systems to reduce the burden and redundancy of several data collection efforts. See MMUCC 6 edition Chapter 10: Traffic Records Data Integration.

27	What states are transferring roadway, citation/adjudication, and injury surveillance data?	This question is unrelated to the administration of the SEDC grant. NHTSA declines to respond.
28	Given that roadway data integration is part of MMUCC 6 th Edition's Chapter 10, is roadway data quality improvement eligible as a grant activity?	All costs must be an authorized expense under the Grant. Congress has authorized expenses for (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. In addition, all costs must adhere to OMB's Cost Principles located at 2 CFR Part 200, Subpart E.
29	Can data synchronization with the National Motor Vehicle Title and Registration System (NMVTIS) be included in the scope of eligible work?	All costs must be an authorized expense under the Grant. Congress has authorized expenses for (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. In addition, all costs must adhere to OMB's Cost Principles located at 2 CFR Part 200, Subpart E.
30	For the 20% match requirement – will the state be required to show a 20% match each year of the grant, or will we need to show a total 20% for the full funding timeframe and amount (5 years)?	When applying for a grant, an applicant must submit a proposed budget that provides sufficient detail of estimated total costs. The total that will exceed the amount to be borne by the federal government should be identified in the proposal. Once NHTSA awards a grant, the recipient is committed to providing the nonfederal share if it wishes to continue with the grant. The annual financial status report (SF 425) includes sections for the recipient to identify matching funds.
31	Are employees (whether state employees or temporary staff) eligible for funding under the grant, if time is dedicated to eligible project work? Can staff time be considered as in-kind contribution for the match requirement?	All costs must adhere to OMB's Cost Principles located at 2 CFR Part 200, Subpart E. Staff may be considered for match purposes consistent with OMB's Uniform Administrative Requirements, Cost Principles and Audit Requirements. <u>See</u> 2 CFR Part 200 (e.g., 2 CFR 200.306).
32	What overhead costs can be considered in kind for the 20% costs to be absorbed by the agency? The previous meeting mentioned time spent to train LEA's but can we use a proportion ratio of salaries for key individuals on this project? DIT and DMV staff, etc.	All matching funds must adhere to OMB's Uniform Administrative Requirements, Cost Principles and Audit Requirements. <u>See</u> 2 CFR Part 200 (e.g., 2 CFR 200.306).
33	Does equipment to upgrade a statewide crash data repository include software? Page 4 SEDC Under the SEDC program, a State is eligible to	All costs must adhere to OMB's Cost Principles located at 2 CFR Part 200, Subpart E. Assuming the costs meet OMB's Cost Principles,

	receive a grant if the State submits an application containing such information as NHTSA may require and includes a plan to implement full electronic data transfer to NHTSA by not later than five (5) years after the date on which the grant is provided. See Section 24108(d)(3)(B). A State may only use the funds provided under this grant for the costs of 1) equipment to upgrade a statewide crash data repository; 2) adoption of electronic crash reporting by law enforcement agencies; and 3) increasing alignment of State crash data with the latest Model Minimum Uniform Crash Criteria (MMUCC)	OMB defines equipment to include information technology systems, which includes software.
34	Can the grant funds pay for contracted, temporary or State limited duration resources to help with the project and/or grant administration? Page 17 section C3 SEDC	All costs must adhere to OMB's Cost Principles located at 2 CFR Part 200, Subpart E. Staff may be considered for match purposes consistent with OMB's Uniform Administrative Requirements, Cost Principles and Audit Requirements. <u>See</u> 2 CFR Part 200 (e.g., 2 CFR 200.306).
35	Regarding the definition of equipment for budget purposes: Are software licenses/subscriptions considered equipment? Are on/off premise data center fees and cloud-based data storage/exchange fees considered equipment?	All costs must adhere to OMB's Cost Principles located at 2 CFR Part 200, Subpart E. Assuming the costs meet OMB's Cost Principles, OMB defines equipment to include information technology systems, which is defined to mean computing devices, ancillary equipment, software, firmware, and similar procedures, services (including support services), and related resources.
36	We are going to be revising our SR1050 crash report form, which will take effect January 1, 2026. We are 94% electronic reporting, with 6% law enforcement agencies reporting in paper form. We are planning to move these agencies over to electronic reporting, but for the time being, we still need to print paper crash report forms. Can IDOT use some of this grant funding to pay for the printing costs of the new SR1050 crash report form?	All costs must be an authorized expense under the Grant. Congress has authorized expenses for (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. NHTSA cannot reimburse for ineligible costs.
37	Eligible activities – Would C.3 (iii) cover programming costs by DMV for implementation of EDT delivery from DMV to NHTSA? C3(i) mentions “equipment” to upgrade a statewide crash data repository and C3(ii) mentions adoption of electronic crash report by law enforcement agencies they don't seem to fit the programming for EDT to NHTSA from DMV.	All costs must adhere to OMB's Cost Principles located at 2 CFR Part 200, Subpart E. Assuming the costs meet OMB's Cost Principles, OMB defines equipment to include information technology systems, which is defined to mean computing devices, ancillary equipment, software, firmware, and similar procedures, services (including support services), and related resources.
38	Would software purchase and/or software development costs be listed under	All costs must adhere to OMB's Cost Principles located at 2 CFR Part 200, Subpart E. Assuming the costs meet OMB's Cost Principles,

	(i) equipment to upgrade a statewide crash data repository or (ii) adoption of electronic crash reporting by law enforcement agencies?	OMB defines equipment to include information technology systems, which is defined to mean computing devices, ancillary equipment, software, firmware, and similar procedures, services (including support services), and related resources.
39	Are data integration efforts highlighted in MMUCC Chapter 10 eligible for funding under (iii) increasing alignment of State crash data with the latest Model Minimum Uniform Crash Criteria?	All costs must be an authorized expense under the grant. Congress has authorized expenses for (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. Costs must adhere to OMB's Cost Principles located at 2 CFR Part 200, Subpart E.
40	C.2. Cost Sharing OR MATCHING. Does the in-kind contributions be accepted from non-State entities, such as the county police departments that would be involved in upgrading their crash reporting system.	All matching funds must adhere to OMB's Uniform Administrative Requirements, Cost Principles and Audit Requirements. <u>See</u> 2 CFR Part 200 (e.g., 2 CFR 200.306).
41	What funding source can we use to pay for data project management/assistance prior to being awarded the SEDC funds? Is this an eligible expense under 405c funds?	Each Federal grant requires the recipient to meet the purposes and requirements of that grant. Any use of 405c funds must meet the use of funds requirements for that grant, <u>see</u> 23 CFR 1300.22(d).
42	How long do the states have to spend the money they will receive? Is it 1-year money, 5-year money, something in between, or will it depend on their application?	The recipient must complete its approved work plan within the period of the performance of the award. Each recipient must implement full electronic data transfer to NHTSA no later than five years after the date of award.
43	There is a 20% state match requirement, what items are eligible to be used to meet this requirement?	Matching funds can be used only for authorized grant purposes and must be allowable under OMB's Cost Principles located at 2 CFR Part 200, Subpart E.
44	Can the work under the grant consist of one or more phases? Page 17 section C3 SEDC	States need to submit their work plan describing the scope of the project and detail the program activities and associated milestones and deliverables for which funding is being requested. The work plan must include all phases for which funding is being requested.
45	Clarify what period the work needs to be completed in, the SEDC NOFO says that all work has to be done within 5 years of grant award, but also says 5 years from money distribution from the grant?	The recipient must complete its approved work plan within the period of the performance of the award. The period of performance can be no longer than 5 years from the date of award.
46	When do you anticipate an award date and is it flexible if our project is expected to start at a later date? We are committed to a Crash modernization project that has already started and aligning to MMUCC 5	NHTSA anticipates awards will be made near the end of 2024. BIL section 24108(d) requires that to be eligible for an award, a recipient must submit a plan to implement full electronic data transfer to

	that is expected to go live January 1, 2026 and trying to see how MMUUC 6 alignment fits in with that project. Could we ask for the award date to start at a specific time to align with current timelines on other project?	NHTSA no later than five (5) years after the date on which the grant is awarded. The plan may identify a timeline that meets the state's needs, but it must complete the requirements of the grant within the period of performance.
47	Will NHTSA provide a list of grant applicants? Page 8 SEDC- A total of up to \$350,000,000 is available to fund grants to States and is subject to the availability of funds. The total number of awards and amount of funds provided to each Recipient will depend on the depth and quality of the plans submitted for consideration and the availabilities of fundings. NHTSA reserves the discretion to alter minimum and maximum award sizes upon receiving the full pool of applications and assessing the needs of the program in relation to the SEDC grant purpose and objectives described in Section A.1.	NHTSA does not routinely release the names of applicants for its discretionary grants.
48	Do you have an anticipated/expected award amount to be made per state, or will it depend on their application?	Under this discretionary grant, the US DOT will determine the total number of awards and amount of funds provided to each Recipient on the scope and quality of the plans submitted for consideration and the availability of funds.
49	Are all states created equal? Small versus big? How will state size and complexity factor into their evaluation and award amounts?	Under this discretionary grant, US DOT will determine the total number of awards and amount of funds provided to each Recipient on the scope and quality of the plans submitted for consideration and the availability of funds.
50	Is there an expectation that states build custom solutions or will they be expected to use COTS solutions? Do they have flexibility to choose their path?	A State must submit as part of its application a work plan that describes in detail how the State will meet the objectives of the grant. A State may choose a method that best fits its needs subject to OMB's Cost Principles located at 2 CFR Part 200, Subpart E.
51	Can NHTSA define/clarify "one crash per API call"? Does this mean one crash per call, or can multiple crash be handled in the same call? Page 14 SEDC Item 2B SEDC	NHTSA's EDT service for data transfer includes data validation using the state's XML or JSON schema with each record's transfer; transmitting one crash record per API call allows for this data validation step to reduce errors and improve data quality.
52	Grant paperwork says at reporting at least weekly. Is there an expectation that it will increase in frequency, or could we aim to start/stay at once weekly?	A condition of the grant is to submit a plan to enable electronic data transfer to NHTSA at a frequency that is at a minimum on a weekly basis. Grantees are not required to increase the frequency once electronic transfer commences.

53	What is the application email size limitation? Page 26 SEDC	The technical application shall not exceed twenty-five pages. E-mail size limitation should be adequate for the application. NHTSA cannot accept zip files.
54	Please clarify that the required forms (SF 424 and SF 424A) should be downloaded from Grants.gov and included with the email submission of the application. The Grants.gov webpage has the following disclaimer "the PDF forms available on this portion of the site are for sample purposes only and cannot be submitted with your application package. If you are applying for a grant, please complete and submit your application using Grants.gov Workspace." "From SF424 instructions https://www.samhsa.gov/sites/default/files/instructionsforsf424.pdf Page 19 SEDC D2"	The required forms are attached.
55	Do the states need to submit their 5-year plans in conjunction with their grant application?	Yes. To be eligible for an award, a State must submit its work plan that describes in detail the scope of the project and the program activities to enable full electronic transfer to NHTSA.
56	Could applications such as "Continuation" or "Revision" be feasible in the future? If so, what conditions would need to be met for their realization? "From SF424 instructions - ""Type of Application: Continuation - An extension for an additional funding/budget period for a project with a projected completion date. This can include renewals. • Revision - Any change in the Federal Government's financial obligation or contingent liability from an existing obligation. If a revision, enter the appropriate letter(s)"" https://www.samhsa.gov/sites/default/files/instructionsforsf424.pdf Page 19 SEDC D2"	Any revisions of budget plans or work plans must comply with 2 C.F.R. § 308. Typically, any changes to scope or objective, or the transfer of funds budgeted for support costs to other categories of expense requires prior approval.
57	Is the \$350 million total for year 1, and will there be the same amounts be available in the out years?	\$350M is the total available funding for SEDC awards.
58	The 2nd requirement of the grant is that once we start transferring the data to NHTSA we must transfer for five years afterwards. 1. Is this data transfer intended to be ongoing after the five-year period or is this a one-time grant intended to retrieve data for five years only, with no expectation to continue?	A recipient's obligation under an SEDC award is to implement full electronic data transfer to NHTSA no later than five (5) years after the date on which the grant is awarded. The Recipient must also agree to transfer its data for at least 5 years after the State starts electronically transferring data. An objective of the SEDC grant program is to encourage data transfer beyond the initial five-year term.

59	Section H.8, NHTSA’s Review of Announcements or Publications, states “The Recipient agrees that neither the Recipient, nor any Sub-Recipient, shall make public releases of information or any matter pertaining to this NOFO and the Grant, including, but not limited to, advertising in any medium, or presentation before technical, scientific, or industry groups, without the prior written approval of the Contracting Officer.” Does the State’s TRCC fall into the category of “technical, scientific, or industry groups” and we would need prior written approval of the Contracting Officer to present information on this NOFO to the group?	Section H.8 concerns public disclosure of information related to the NOFO and Grant activities. NHTSA encourages a State to coordinate with its TRCC (see NOFO Page 13, 22 and 31).
60	Several sections within the NOFO reference that the State should submit items/questions/etc. to the Contracting Officer. Under Section G. Federal Awarding Agency Contacts, the Primary NOFO Point of Contact is listed as Christopher Clarke, Contract Specialist. Should the State submit items to the Contracting Officer by using the Primary NOFO Point of Contact, or is there another person acting as the Contracting Officer?	States should submit items to NHTSAOAM@dot.gov and reference the primary point of contact, Christopher Clark.
61	Section B.7, State Grant Requirements, sub-paragraph 1.h) states “Details on how the State will work with a crash data user group to guide continual improvements, such as collection, management, and use of the crash data system.” What organizations should be a part of the “crash data user group”?	NHTSA has published guidance related to crash user groups. See Guide to Updating State Crash Data Systems (DOT HS 813 217) at https://crashstats.nhtsa.dot.gov/Api/Public/ViewPublication/813217 .
62	Section B.7, <u>State Grant Requirements</u> , sub-paragraph 3.e) states “The State’s crash data alignment to MMUCC shall include data that it collects from the scene of a crash and/or through an interface with another traffic records system.” <i>Does this “data” include every item on the crash report with identification of how it was populated?</i>	Crash data means the data required for the analysis and understanding of motor vehicle crashes. These data typically include the information collected on a police accident report (PAR)/police crash report (PCR) for the crash, vehicles, and persons, and may also include linked and derived data, such as driver information, roadway information, and commercial vehicle supplemental data. See NOFO, Section A.4, p.6. It is not necessary to identify how it was populated (i.e., linked, derived, or collected at the crash).
63	Section F.2, Administrative and National Policy Requirements, sub-paragraph 9. States “Each applicant selected for Federal funding must demonstrate, prior to the signing of the grant agreement, effort to consider and address physical and cyber security risks relevant to the	If a recipient has an existing cybersecurity program in place, it should provide written confirmation that it has an established program meeting State cybersecurity requirement. If a recipient does not have an established cybersecurity program in place, NHTSA may

	<p>transportation mode and type and scale of the project.” May we receive examples of how this requirement can be addressed?</p>	<p>require the recipient to meet any/all of the following requirements prior to making an award:</p> <ul style="list-style-type: none"> • Designate a Cybersecurity Point of Contact: Grantees need to identify an individual whom DOT may contact to answer questions regarding their organization’s implementation of the DOT cybersecurity grant agreement provisions. • Develop a Cybersecurity Incident Response Plan: Grantees need to develop a plan that clearly identifies an incident manager and lists all the necessary steps to both isolate the infected system(s), and fully restore any impaired services or capabilities, should a cyber incident occur. • Develop a Cybersecurity Incident Reporting Plan: Grantees need to develop a plan that outlines the steps the organization will take to report to either the Cybersecurity and Infrastructure Security Agency (CISA) or the Federal Bureau of Investigations (FBI) when it determines a cyber incident has occurred. • Conduct a Cybersecurity Self-Assessment: Within two (2) years of the beginning of the grant agreement’s period of performance, grantees need to complete a cybersecurity self-assessment. There are several publicly available cybersecurity self-assessments, such as the Cybersecurity Assessment Tool for Transit (CATT), CISA’s Cybersecurity Evaluation Tool, and CISA’s Cybersecurity Performance Goals Checklist that may guide this process.
64	<p>Will NHTSA be doing anything to upgrade their own internal systems to accept the data from the states, and if so, what is the timing on that and how will that process work? Will NHTSA put out RFPs for this work or will it be done internally by NHTSA?</p>	<p>This question is unrelated to the administration of the SEDC grant. NHTSA declines to respond.</p>

65	Public website - Is there any requirement for state mapping of crash data for this grant and is nationwide mapping of crash data a goal for this project? (With our new system, crash mapping is planned but will not encompass all crashes.)	To be eligible for an award, a State must submit a plan to implement full electronic data transfer to NHTSA no later than 5 years after award. There is no requirement for the State to present crash data on a map or to perform additional geospatial analysis using their crash data.
66	Many States keep an analysis file of crash data that undergoes additional data cleaning separate from the crash data repository. What are the effects of a State reporting different crash numbers (using their analysis file) than NHTSA?	An award recipient is required to identify and update whether a previously reported crash has been amended, edited, or deleted, using the unique crash identifier for the record. NHTSA anticipates that the crash data a recipient submits through an electronic data transfer to NHTSA and the crash data that a recipient makes publicly available to be identical. Otherwise, a recipient would have inconsistent data in the public domain.
67	What kinds of exchange will be involved on the proposal acceptance process? Will the State be given a limited “approved” or “rejected” response, or will there be exchanges to clarify and modify components of the proposal.	NHTSA may have communications with applicants to enhance Government understanding of applications, allow reasonable interpretation of the application, or facilitate the Government’s evaluation process or address ambiguities in the application or other concerns.
68	<p>After reviewing the SEDC NOFO it appears the details of the application work plan will not allow for the inclusion of a discovery phase that would detail the tasks and explain how the State will establish and/or improve electronic crash data collection. Given the expectations of the Technical Application, Budget Execution Plan and short time frame to develop such a detailed work plan, it would seem most States would not be able to fulfill the work plan details.</p> <p>For example, the Florida Department of Highway Safety and Motor Vehicles (FLHSMV) has an established centralized repository, collects 99% electronic crash reports from approximately 340 law enforcement agencies, and participates in the FARS Electronic Data Transfer (EDT) by submitting crash data to NHTSA on a daily distribution basis. Florida anticipates needing funding to assist with the following efforts:</p> <ul style="list-style-type: none"> • Updating Crash Report (alignment to MMUUC 6th Edition) • Updating outdated Technology – 13-year-old database • Enhancing the Quality Control Program for improving and monitoring data quality 	<p>To be eligible for an award, a State must submit its work plan describing the scope of the project and detail the program activities and associated milestones and deliverables for which funding is being requested. The work plan must describe all phases for which the funding is being requested.</p> <p>All costs must be an authorized expense under the Grant. Congress has authorized expenses for (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. In addition, all costs must adhere to OMB’s Cost Principles located at 2 CFR Part 200, Subpart E.</p> <p>NHTSA has extended the application period by 2 weeks. Applications are now due on May 15, 2024.</p>

<ul style="list-style-type: none"> • FARS Reconciliation of fatal crash data- need visual interface of the CRSCAN (state central repository) and the ability to make limited necessary corrections (i.e., injury severity updates, missing names, county codes and names, etc.) for those crashes that do not meet the federal traffic fatality criteria. • Redaction functions to protect personal identification information. <p>Although Florida is aware of the modernization needs for the crash central repository, Florida does not have a thorough road map of the crash database beginning to end processes which makes it difficult to develop the scope of the project to identify detailed activities and associated milestones/deliverables for the requested funding needs.</p> <p>Other States may face issues with meeting the work plan requirements should they not even have a crash central repository in place. Providing a full work plan with no crash data base foundation in the timeframe from release of the SEDC NOFO to submission date of May 1, 2024, may prove challenging and deter States from applying.</p> <p>The other item that brings concern is the State must conduct a MMUCC 6th Edition mapping to identify the rewrite impact needs of the crash database to include in the application work plan. These MMUCC mapping results not only allow for the scope of work to be further defined (crash schema rewriting) but will also identify resource needs to include in the budget execution plan.</p> <p>Florida would like to ask if the development of a crash data system “roadmap” component (or discovery phase) be part of the SEDC grant funding to help determine gaps and prioritization of the crash database enhancement needs towards MMUCC compliance as well identifying technology and equipment upgrades to improve electronic crash data collection.</p>	
---	--

	<p>Florida is aware this type of funding opportunity is rare, and we are currently partnering with our Highway Safety Office and TRCC to assist us in developing this work plan to meet the criteria NHTSA expects as best as possible. We appreciate all your support, feedback, and any consideration regarding our question.</p>	
69	<p>Arizona is evaluating the NOFO for State Electronic Data Collection (693JJ924R000025) and had several questions before proceeding with the application. All of these questions assume that any application we submit is successful.</p> <p>Currently, 90-95% of crash reports are submitted to the Arizona DOT electronically either on the state supported TraCS reporting software or competitor reporting software. The remaining 5-10% of reports come from agencies that produce less than 4000 reports per year and many of these agencies handle less than 100 crashes per year. The problem Arizona has is that when we update the crash form, some of our larger reporting agencies who are not using TraCS delay converting to the new form (sometimes for many years). These agencies cite the cost of conversion as a barrier. ADOT is considering applying for funds to pay for this conversion.</p> <p>If Arizona applies for money to convert non-TraCS agencies to the new form when it is published:</p> <ol style="list-style-type: none"> 1. Can funds from the SEDC grant be used to pay for the conversion to the new form in these different platforms? 2. Can these funds be transferred from the state to the non-compliant local agencies for this conversion purpose? <p>State Electronic Data Collection Plan (SEDC) - The SEDC plan required to be submitted under this program also appears to be new. Please advise on the following:</p>	<p>All costs must be an authorized expense under the Grant. Congress has authorized expenses for (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. In addition, all costs must adhere to OMB's Cost Principles located at 2 CFR Part 200, Subpart E.</p> <p>NHTSA anticipates that each State will have a unique plan to submit with its application and does not have a model plan to implement full electronic data transfer to NHTSA.</p> <p>An SEDC grant implementation plan is not required if you do not apply for the grant.</p> <p>"Full Electronic Data Transfer" is defined in the NOFO at Section A.4 Definitions (p.6) as "the automated transfer of all crash data from a statewide crash data repository to the National Highway Traffic Safety Administration at a regular, recurring interval." "Statewide crash data repository" is defined in the NOFO at Section A.4 Definition (p.6) as "A single State electronic data repository that contains the crash data for all crashes reported by every law enforcement jurisdiction in the State." This includes all crash severities.</p>

<ol style="list-style-type: none"> 1. Are there examples of other state SEDC plans we could model ours after? 2. If we do not apply for this opportunity or if we apply but are not successful, will the SEDC plan still be required? <p>Sec B.7. - The requirement for "full electronic data transfer to NHTSA" appears to be new. My understanding is that the data being transferred now is only associated with the FARS system but the requirements for this grant will make it mandatory for applicants to submit all crash data to NHTSA regardless of severity. Please advise on the following:</p> <ol style="list-style-type: none"> 1. Please confirm, does full electronic data transfer mean NHTSA expects the state to send a complete crash data set for all reported crashes regardless of severity? 2. Does this full transfer also include personal identifying information on participants to the crash? 3. Does the transfer include copies of the crash reports submitted to the state? 4. If we do not apply or if we apply but are not successful will this data transfer eventually become a requirement of all states? <p>The state is currently planning on updating our crash form this year using internal forces and while we have always assessed the degree of MMUCC compliance following such updates, a minimum MMUCC compliance has never been required.</p> <ol style="list-style-type: none"> 1. Will acceptance of grant funds require some minimum MMUCC compliance? <p>Tribal Electronic Data - Arizona has been working with tribal law enforcement for many years to first consistently report crashes on tribal lands to the state and second to convert to electronic reporting. These efforts have been largely fruitless but not for lack of funding however, if Arizona does apply in an effort to boost tribal use of electronic data:</p>	<p>Full electronic data transfer includes all the data contained in the Statewide crash data repository including personal identifying information.</p> <p>To be eligible for an award, a State must submit a plan to implement full electronic data transfer to NHTSA no later than 5 years after award. If a statewide crash data repository includes copies of the crash reports, then they are required to be transferred electronically to NHTSA would.</p> <p>The SEDC grant program is an opportunity for a State to obtain support to implement a fully electronic crash data base that shares data with NHTSA. A state has the discretion to apply for a grant.</p> <p>To be eligible for an award, a State must submit a plan that transfers data to NHTSA and aligns to the 26 "SEDC Required" MMUCC elements and their 118 attributes (including all Subfields) before the end of the grant period of performance.</p> <p>Tribes are eligible for a grant by submitting an application submitted through the Department of the Interior. Bureau of Indian Affairs. Each Tribe must submit a plan to implement full electronic data transfer to NHTSA no later than 5 years after award.</p> <p>NHTSA has extended the application period by 2 weeks. Applications are now due on May 15, 2024.</p>
--	--

	<p>1. Can tribes use TTP funds to reimburse the state for the 20% match?</p>	
--	--	--

	<p>Also, can an extension be granted for the NOFO?</p>	
--	--	--