Email Subject: NHTSA: Assistance needed - respond to Request for Information
Date received: 4/29/2022
Date Due: 6/3/2022

Docket No. NHTSA-2022-0030

Purpose: NHTSA is seeking input from various stakeholders as it develops the State Electronic Data Collection Grant Program required by the Bipartisan Infrastructure Law (BIL), enacted as the Infrastructure Investment and Jobs Act (IIJA). A Request for Information (RFI); State Electronic Data Collection Grant Program, has been published to encourage interested parties, including State crash data owners, highway safety offices, law enforcement, and other stakeholders to help inform the agency on current and planned electronic data collection processes, suggestions and concerns surrounding electronic data collection and transfer of State crash data to a federal system. Ultimately, the State electronic data collection grant will support State efforts to enhance or adopt a standardized State electronic data collection program, help increase capacity of the National Highway Traffic Safety Administration data system, and make State crash data accessible to the public.

Input obtained from this RFI will be considered during the development of the State Electronic Data Collection Grant Program. NHTSA encourages participants to seek out and collaborate with as many State and local stakeholders as possible to answer the RFI questions. Stakeholder feedback is key to the development of this exciting opportunity to advance crash data collection at the State and Federal level.

Comments must be received on or before **June 3, 2022**. Instructions on how to submit written comments are outlined in the attached Federal Register Notice and here:
https://www.federalregister.gov/documents/2022/04/29/2022-09152/agency-request-for-information-state-electronic-data-collection-grant-program

Data Standardization and Modernization of Information Technology

(1) What are the State's current methodologies for collecting and standardizing statewide crash data electronically in a central repository?

Per Section 316.066, Florida Statutes (FS), the Florida Department of Highway Safety and Motor Vehicles (FLHSMV) is the official custodian of Florida Traffic Crash Report data and all crash data is consolidated into the Department's CRSCAN database. The FLHSMV collects and stores data reported by law enforcement and other crash reporting agencies using the uniform crash report, which includes long form, short form, and supplement forms. F.S. stipulates that FLHSMV will create a uniform crash report to be used by all law enforcement agencies (LEAs) regardless of collection method. This includes the data elements and attributes allowed. Reports submitted by LEAs are validated against a schema to ensure all reports submitted comply with the uniform crash report.

Florida LEAs use one of over a dozen different, independent software vendors for field collection of crash data and each vendor has their own edits but each must attain 100% of the field edits required for submittal as an electronic agency. All data is collected and edited in the field and then once again prior to being loaded into the Florida statewide crash system. The e-crash system validates each submitted crash report against over 200 separate edits and if all the edits pass, then crash report is loaded. If the crash report fails one or more of the established edits, an error report detailing why the crash report was not loaded is returned to the submitting agency so that they can correct and resubmit. Each vendor goes through a validation process which allows the Department to verify that minimum edits are functional and that the data is

complete. During this validation, which can take from weeks to months depending on the software vendor and the remediation levels required, the independent software vendors make changes to their field edits in order to comply with FLHSMV criteria. Additionally, the daily error reports are monitored and if one agency or one software vendor appears to be generating consistent errors of a particular type, FLHSMV contacts them and has them fix the software and even conducts classes to retrain the officers. Each crash report is validated prior to acceptance and a quality improvement process is in place to constantly improve the process as well.

Florida tracks the number of agencies that submit crash reports electronically and by paper and currently maintains a 98.75% electronic submission average. The 1.25% received by paper are key punched by a third party vendor and submitted in an electronic format for consistency.

(2) NHTSA relies on MMUCC to establish a standardized data set. What steps are required for the State to meet this standardization?

Florida Statute 316.027 defines specific reporting requirements and definitions for crashes involving death and personal injury. Pursuant to Sections 316.066(1)(a) and 324.051(1)(a), a Florida Traffic Crash Report must be completed and submitted to the department within ten days from the date of crash. MMUCC recommendations are used as a primary source for identifying crash data elements and attributes collected by the State. The State used MMUCC during the revision of their crash form in 2009 which was implemented in 2011. Efforts continued when FLHSMV conducted a MMUCC 5th edition mapping to review the crash form for revisions to better standardize the data set. This review is conducted in a 5 year timeframe to address any changes identified via MMUCC guidelines or by the State legislature.

(a) Please provide an estimated timeline to implement MMUCC standardization.

MMUCC recommendations are used as a primary source for identifying crash data elements and attributes collected by the State. The State used MMUCC during the revision of their crash form in 2009. A review of the form in 2011 shows that MMUCC standards are used in the majority of the crash data elements. Efforts continued when FLHSMV conducted a MMUCC 5th edition mapping to review the crash form for revisions to better standardize the data set. This review is conducted in a 5 year timeframe to address any changes identified via MMUCC guidelines or by the State legislature or stakeholder needs.

(b) What would it cost the State to move toward this data standardization?

Not applicable.

(3) If the State does not have a centralized statewide crash data repository, describe what the State will need to establish the infrastructure; processes and procedures; information technology requirement; and training, to support this data modernization effort?

Not applicable. Florida Statutes Section 316.066, establishes the FLHSMV as the official custodian of Florida Traffic Crash Report data and all crash data is consolidated into the Department's CRSCAN database.

(4) Explain what the State will need to establish the infrastructure; processes and procedures; information technology requirement; and training to implement an electronic data transfer protocol.

Florida already has already implemented an electronic data transfer protocol

(5) How long would it take for the State to establish a centralized statewide crash data repository and to implement an electronic data transfer protocol?

Florida has already established a centralized statewide crash data repository and electronic data transfer protocol.

(6) What are the State's estimated costs associated with establishing a centralized statewide crash repository to support an electronic data transfer protocol?

Not applicable. Already established.

(7) Explain the challenges associated with establishing a centralized statewide crash repository that supports an electronic data transfer protocol. Elaborate on the State's needs to overcome those challenges.

Not applicable. Already established.

Law Enforcement Electronic Crash Reporting

(8) What percentage or number of the State's law enforcement agencies collect motor vehicle traffic crash information using an electronic crash report/records management system?

Florida tracks the number of agencies that submit crash reports electronically and by paper and currently maintains a 98.75% electronic submission average. The 1.25% received by paper are key punched by a third-party vendor to be submitted in an electronic format to the central repository (CRSCAN) for consistency.

(a) Are all law enforcement agencies in the State collecting motor vehicle traffic crash information via an electronic crash report/records management system using the same application?

There is not a single application but F.S. states FLHSMV will develop a uniform crash report to be used by all LEAs regardless of collection method. Florida LEAs use one of over a dozen different, independent software vendors for field collection of crash data and each vendor has their own edits but each must attain 100% of the field edits required for submittal as an

electronic agency. Each vendor goes through a validation process which allows the Department to verify that minimum edits are functional and that the data is complete. During this validation, the independent software vendors make changes to their field edits in order to comply with FLHSMV criteria.

(b) For law enforcement agencies collecting motor vehicle traffic crash information using an electronic crash report/records management system, what application is used?

There is not a single application. Florida LEAs use one of over a dozen different, independent software vendors for field collection of crash data and each vendor has their own edits but each must attain 100% of the field edits required for submittal as an electronic agency. Each vendor goes through a validation process which allows the Department to verify that minimum edits are functional and that the data is complete. Reports submitted by LEAs are validated against a schema to ensure all reports submitted comply with the uniform crash report.

(9) What percentage or number of law enforcement agencies solely use paper crash reports in the crash reporting process?

Approximately 1.25% of crash reports are received by paper and are key punched by a third-party vendor to be submitted in an electronic format to the CRSCAN for consistency.

(a) If so, are these paper reports coded into the centralized statewide crash repository?

FLHSMV has one crash repository that receives all crash reports. Paper reports must initially be converted to an electronic format and submitted to FLHSMV files.

(b) Describe any law enforcement's reservations for participating in electronic crash reporting to document motor vehicle traffic crash information?

Reservations are usually seen due to lack of funding for technology equipment and costs associated with implementing a vendor’s software.

(c) Specify the needs and costs for law enforcement agencies to adopt electronic-crash reporting to document motor vehicle traffic crash information?

Needs are usually funding for technology equipment and costs associated with implementing a vendor’s software.

Data Management

(10) Does the State have a conceptual or notional design of how the data would flow into a centralized statewide crash data repository? If so, please elaborate.

The State already has a centralized statewide crash data repository. The IT department maintains documentation on the data flow.

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(11) If the State currently participates in NHTSA EDT protocol, does the State have written operating procedures for managing the data flow? If so, please submit the data flow or the operational structure.

The State does participate in NHTSA EDT program. The daily collected data is extracted, after completing the submission validation process, and placed daily on a secure ftp site accessible by NHTSA. This consists of 10 csv files of data (Event, Driver, Vehicle, Motor Carrier, Non-motorist, Passenger, Property Damage, Trailer, Violation, Witness) and crash report images that include a diagram of the crash, as well as the narrative describing the event.

(12) Does the State, in its crash data, distinguish between crash types between self-reported and police reported crashes?

Yes, police reported crashes are separate from self-reported crashes. Data between the two crash types are not intermingled. The separate reports do not reside in the same database.

(13) Does the State include variables to identify State-reportable vs. non-reportable crashes?

Yes, the State collects all crash reports both reportable and non-reportable and classifies each as either "codeable" or "non-codeable", based on crash report variables per Section 316.066, Florida Statutes (FS).

Data Accessibility to the Public

(14) Please provide recommendations on the format types for publicly available State crash data.

The Traffic Records Coordinating Committee funded Signal Four Analytics has a public facing portal for crash data (aggregated). Filters included are: year, geography, law enforcement agency, Strategic Highway Safety Plan Emphasis Areas, types of crashes. Once filters are chosen the user is provided quick statistical charts and heat map to reflect hot spots based off selections of interest. Future plans are to provide integrated datasets dashboards in the next phase.

The FLHSV public facing Tableau dashboard provides aggregated data with filters such as year, crash county, crash types, as well as a statical chart on crash reports submitted by Florida Highway Patrol, police departments, and sheriff's offices.

Publicly available raw crash data is also available through the Bureau of Public Records at FLHSMV. FLHSMV maintains raw crash data for 10 years and customers may request quarterly data for the current year. Availability is subject to public record guidelines. Data is currently copied to discs. While CD may be low-tech, a secure database is of great concern.

(15) What State products and services that include State crash data does the State find are most helpful to the public?

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FLHSMV maintains drivers' records, vehicle records, crash reports and raw crash data all of which are highly sought-after records by the public. Also aggregated data in easily ingestible formatted charts are helpful. Examples include filters for all crashes such as year, regions, law enforcement agencies, heat map, time of day, and age group.

(16) Please advise if the State is interested in modernizing and standardizing its State crash system?
FLHSMV is currently developing a crash system modernization charter to be submitted for approval this year.