

DataQs State Implementation Plan



Michigan

**For Compliance with Federal Motor Carrier Safety Administration (FMCSA) Revised
Motor Carrier Safety Assistance Program (MCSAP) Grant Requirements**

Date: September 2026

Purpose

In April 2026, FMCSA announced updated requirements for State participation in the DataQs system as a condition of receiving MCSAP grant funding. To comply with those requirements, each State must submit a DataQs State Implementation Plan. The following pages contain the key elements of the plan approved by FMCSA for Michigan.

DataQs State Implementation Plan

State: Michigan

MCSAP Lead Agency: Michigan State Police

Initial Review Process

Roles and Responsibilities

- Persons responsible for managing DataQs for the organization
 - **Responsible Party:**
Crash – Department Technician or Analyst
Inspection - Department Technician or Analyst
 - **Supervisor(s):**
Crash – Michigan State Police Manager
Inspection – Motor Carrier Lieutenant
 - **Backups:**
Crash – Department Technician or Analyst
Inspection – Motor Carrier Sergeant
 - **Interactions:**
Crash - The Data Q Administrator (DQA) routinely interacts with:
Michigan State Police Sergeant, Michigan State Police Commercial Vehicle Enforcement Division, FMCSA Office, Numerous County and local law enforcement agencies

Inspection - The Data Q Administrator (DQA) routinely interacts with:
FMCSA, Michigan State Police personnel, local law enforcement agencies, and motor carriers while monitoring, distributing, and tracking Requests for Data Review (RDRs) to ensure compliance with established timelines and procedures.
- Person(s) responsible for decision-making for the Initial Review process
 - **Responsible Party:**
Crash – Department Technician or Analyst
Inspection - Department Technician or Analyst
 - **Supervisor(s):**
Crash – Crash Section Departmental Manager
Inspection – Motor Carrier Lieutenant

- **Backups:**
 - Crash – Department Technician or Analyst
 - Inspection – Motor Carrier Sergeant
- **Interactions:**
 - Crash - The DQA coordinates with state and allied law enforcement agencies, Federal Motor Carrier Safety Administration (FMCSA) offices, tow companies, crash records personnel, and other appropriate entities. The DQA reviews available information to determine whether the crash and associated data fall within applicable federal and state reporting requirements and identifies any additional information necessary to complete the review.
 - Inspection – The DQA coordinates with inspectors, motor carriers, agency personnel, CVSA instructors, and FMCSA offices when reviewing Requests for Data Review (RDRs) to ensure compliance with applicable laws, regulations, and policies.
- Person(s) consulted for additional information or evidence
 - **Responsible Party:**
 - Crash - Michigan State Police Sergeant, FMCSA, tow truck companies involved with the crash, and local agencies.
 - Inspection – Motor Carrier Officer, Officer’s Sergeant, Michigan State Police personnel, CVSA instructors, FMCSA personnel.
 - **Supervisor(s):**
 - <intentionally left blank>
 - **Backups:**
 - <intentionally left blank>
 - **Interactions:**
 - Crash - The DQA routinely communicates and coordinates with FMCSA personnel, Michigan State Police personnel, allied law enforcement agencies, motor carriers, and other appropriate parties regarding Requests for Data Review (RDRs). The DQA monitors, distributes, tracks, and processes RDRs to ensure requests are addressed in accordance with established FMCSA DataQs requirements, applicable policies and procedures, and required processing timelines.
 - Inspection – Reviewing personnel may consult inspectors, supervisors, local agency representatives, FMCSA personnel, motor carrier representatives, and other subject matter experts (SMEs) when gathering evidence or obtaining clarification necessary to resolve a Request for Data Review (RDR).

Consultations may include review of inspection documentation, photographs, statements, regulatory guidance, video and applicable laws and policies.

Process Description

- Receipt of RDR
 - **Responsible Party:**
Crash – Department Technician or Analyst
Inspection - Department Technician or Analyst
 - **Process:**
The DQA monitors the FMCSA DataQs system for notification of newly submitted Requests for Data Review (RDRs). Upon receipt of a new RDR, the DQA accesses the DataQs portal, opens the applicable record, and conducts an initial review of the case information.
The DQA confirms that the RDR has been successfully submitted and assigned a unique identification number; verifies the submission date and submitter information; and confirms that the request is properly visible, accessible, and available for review within the DataQs system.

The DQA reviews the RDR to determine whether required crash-related elements are present, including as applicable: Fatality, injury, or tow-away criteria; qualifying commercial motor vehicle involvement; hazardous materials (HAZMAT) involvement; supporting documentation submitted with the request; and complete and accurate submitter contact information. The DQA identifies missing, unclear, inconsistent, or incomplete information that may affect the ability to properly evaluate the request.

The DQA monitors the FMCSA DataQ Portal, receives and opens requests for data review (RDR), obtains associated inspection records and supporting documentation. The DQA identifies missing, unclear, inconsistent, or incomplete information that may affect the ability to properly evaluate the request. The DQA tracks the request and monitors established review timelines.

- Review of RDR
 - **Responsible Party:**
Crash – Department Technician or Analyst
Inspection - Department Technician or Analyst
 - **Process:**

Crash - Preliminary Review

The DQA conducts a preliminary review of each RDR to determine whether the requestor provided sufficient information to evaluate the request.

When information or documentation necessary to complete the review is missing, incomplete, or unclear, the DQA documents the deficiency and requests additional information from the submitter through the FMCSA DataQs system.

The DQA categorizes the request according to the type of crash data being challenged. This may include, but is not limited to, registration information, motor carrier information, qualifying crash criteria, or other crash-related data elements such as carrier-submitted video as well as leasing agreements.

Inspection – The DQA shall examine the Request for Data Review (RDR), inspection report, and any supporting documentation submitted by the requester. The reviewer may consult inspection personnel, photographs, statements, applicable laws, regulations, guidance, video and relevant policies. After evaluating all available evidence, the reviewer shall render a written decision approving or denying the request. If approved, the DQA shall ensure any necessary corrections are made to the inspection report.

- Outcome of RDR

- **Responsible Party:**

- Crash – Department Technician or Analyst

- Inspection - Department Technician or Analyst

- **Process:**

- Crash - The DQA conducts a detailed evaluation of the information submitted with the RDR, including supporting documentation, available crash records, and other applicable evidence.

- The DQA compares disputed information against authoritative source documents, including traffic crash reports, investigative records, agency records, carrier information, supporting documentation, and applicable federal and state regulations, policies, and reporting requirements.

- Based upon this review, the DQA determines whether the challenged data:

- Is accurate and should remain unchanged;

- Is inaccurate and requires correction;

- Is incomplete and requires modification; or

- Is unsupported and should be denied when authorized by applicable policy under FMCSA Rules and Regulations.

The DQA prepares and maintains documentation supporting the review and determination. Documentation may include the RDR identification number, data elements reviewed, evidence and records considered, findings, rationale, and recommended or completed action.

When an RDR is accepted, the DQA identifies and processes the appropriate data correction, modification, or removal.

When an RDR is rejected, the DQA documents why the available evidence does not support the requested change and why the existing data should remain unchanged.

Inspection - Evaluate all submitted documentation, supporting evidence, and applicable records. Compare the disputed information against source documents, investigation records, and applicable regulations. Determine whether the challenged data is accurate and should remain unchanged, inaccurate and requires correction, incomplete and requires modification and/or unsupported and requires removal. Prepare a written summary of the review Including: RDR number, records reviewed, evidence considered, findings and rationale, and recommended action.

When an RDR is accepted, the DQA identifies and processes the appropriate data correction, modification, or removal.

When an RDR is rejected, the DQA documents why the available evidence does not support the requested change and why the existing data should remain unchanged.

- Closure of RDR
 - **Responsible Party:**
Crash – Department Technician or Analyst
Inspection - Department Technician or Analyst
 - **Process:**
Crash - Prior to closing an RDR, the DQA verifies that all relevant supporting documentation and available evidence have been reviewed and appropriately retained within the case record. The DQA ensures that the final determination is supported by documented findings and evidence. When a correction, modification, or removal has been approved, the DQA verifies that the appropriate changes have been completed and entered into applicable systems, i.e., Michigan State Police's Traffic Crash Records System, FMCSA's databases. When applicable, changes to the Traffic Crash Reporting System are documented through an audit entry identifying the correction or update that was made. The DQA verifies that the final determination has been communicated to the requester through the FMCSA

DataQs system. The response includes, as appropriate:

A summary of the findings;

An explanation of the determination;

Relevant information obtained from the reporting agency, tow company, or other authoritative sources;

A description of corrective action taken;

The final disposition of the request; and

Following completion of all required actions, the DQA changes the RDR status to Closed within the DataQs system and verifies that no additional action remains pending.

Inspection - Prior to closing an RDR, the DQA verifies that all relevant supporting documentation and available evidence have been reviewed and appropriately retained within the case record. The DQA ensures that the final determination is supported by documented findings and evidence. When a correction, modification, or removal has been approved, the DQA verifies that the appropriate changes have been completed and entered into applicable systems and FMCSA's databases. The DQA verifies that the final determination has been communicated to the requester through the FMCSA DataQs system. The response includes, as appropriate:

A summary of the findings;

An explanation of the determination;

Relevant information obtained

A description of corrective action taken;

The final disposition of the request; and

Following completion of all required actions, the DQA changes the RDR status to Closed within the DataQs system and verifies that no additional action remains pending.

- **Timeliness:**

The following timetable is the best practice as outlined and described in the Department of Transportation Federal Register Volume 90. No 124 dated July 1, 2025.

MSP staff will open an RDR within seven days (7) of submission. The status of the RDR would then change from "New" to "Open—In Review."

Expected Outcomes for RDR Closures:

Crash - Closed — No Data Correction Made

The RDR is closed without changes to the existing data when the review determines that a correction is not warranted. In these cases, no audit entry is made in the Traffic Crash

Reporting System because no crash-record data was modified. The review and disposition are documented within the FMCSA DataQs system.

Factors supporting this determination may include:

Submitted evidence does not support the requested correction;

Existing data is verified as accurate and consistent with the authoritative source;

Insufficient documentation or supporting information is available to validate the requested change; or

The requested change is outside the scope or authority of the RDR process such as the Crash Preventability Program.

Closed — Data Correction Made

The RDR is closed with a data correction when the review confirms that an error, omission, or other data issue exists and modification of the affected data is warranted.

The DQA ensures that the approved correction is implemented in the applicable system or systems, including the FMCSA DataQs process and, when applicable, and the Traffic Crash Reporting System. The DQA verifies the correction before closing the request.

Factors supporting this determination may include:

Evidence confirms that reported data is inaccurate, incomplete, outdated, or inconsistent;

Supporting documentation validates the requested correction;

Review of the source data establishes that an update is necessary;

The correction has been successfully implemented and verified; and

No outstanding actions remain.

Closed — No Requester Response

The RDR may be closed when the requester fails to provide information, clarification, documentation, or confirmation necessary to continue processing the request within the established timeframe.

Factors supporting this determination may include:

Failure to respond to follow-up questions;

Failure to submit required supporting documentation;

Failure to clarify incomplete information;

No response following appropriate outreach attempts; or

Expiration of established response deadlines.

Inspection - Closed – No Data Correction Made: The review determined that the inspection data was accurate and supported by the available evidence, applicable regulations, and policies. No changes were made to the inspection report.

Closed – Data Correction Made: The review determined that the inspection report contained an error or required modification. Appropriate corrections were made to the inspection report and submitted prior to closure of the RDR.

Closed – Citation Results Entered: The outcome of a related citation, court disposition, or

adjudicative proceeding required the inspection record to be updated to reflect the final disposition.

Closed – Report Not Sent: The requested inspection report was unavailable, could not be located, or could not be provided through the DataQs process.

Closed – Report Sent: The requested inspection report or supporting documentation was provided to the requester through DataQs, electronic mail, or other authorized means.

Closed – No Requestor Response: The requester failed to provide additional information or respond to requests necessary to continue processing the RDR. No data correction made

Communication:

Crash - The DQA maintains clear, timely, accurate, and consistent communication with RDR submitters throughout the review process in accordance with FMCSA's requirements. Receipt of RDR submissions is acknowledged within five business days as required by applicable procedures.

Communications are conducted through approved channels (FMCSA DATAQ portal) and must be professional, respectful, courteous, accurate, fact-based, clear, understandable, and compliant with applicable privacy, confidentiality, record management, and data-protection requirements.

When additional information is required to evaluate an RDR, the DQA communicates:

The specific information or documentation required;

The approved method for submitting the requested information;

Applicable response deadlines; and

Notice that review activities may be suspended or the request may be closed if the required information is not received.

Upon completion of the review, the DQA provides written notification of the final determination through the appropriate system. The notification includes the outcome of the request, the basis for the determination when appropriate, corrective actions taken when applicable, and information regarding reconsideration, appeal, or escalation procedures when such options are available.

Inspection - Requests for Data Review (RDRs) are submitted and tracked through the FMCSA DataQs system. The DQA serves as the primary point of contact throughout the review process. Review decisions are documented in writing and include the evidence reviewed, decision rendered, and rationale supporting the outcome. Upon completion of the review, the DQA provides written notification of the final determination through the appropriate system. The notification includes the outcome of the request, the basis for the determination when appropriate, corrective actions taken when applicable, and information regarding reconsideration, appeal, or escalation procedures when such

options are available. When additional time is required to complete a review, the request may be extended in accordance with established procedures.

All responses are professional, courteous, and include sufficient detail to explain the basis for the decision and any corrective action taken.

Next Steps:

Crash - Following completion of the Initial Review of an FMCSA DataQs Request for Data Review, the DQA closes the request with an appropriate determination and ensures that the submitter receives notification of the outcome and the supporting explanation provided by the reviewing organization.

Closure at the Initial Review stage does not necessarily mean that all available review options have been exhausted. Depending upon applicable FMCSA procedures, additional review or reconsideration may be available.

Upon closure, the submitter is provided with:

Notification that the Initial Review has been completed;

The review determination and supporting rationale;

Information regarding actions taken as a result of the review, when applicable; and

Information regarding available options if the submitter disagrees with the determination.

Inspection – Upon completion of the Initial Review, the requestor will receive a written response through the FMCSA DataQs system detailing the decision, evidence reviewed, and rationale for the outcome. Submitter is advised that the response has been successfully submitted and if data is corrected federal systems will require time to update.

If the requestor disagrees with the Initial Review decision, they are advised that they may submit a request for Secondary Review through the DataQs process and provide any additional supporting information for consideration. Contact information for the DQA is available through the Michigan State Lead Agency for questions regarding the review process.

Reconsideration Review Process

Roles and Responsibilities

- Person(s) responsible for decision-making for the Reconsideration Review process
 - **Responsible Party:**
 - Crash – Crash Section Sergeant
 - Inspection - CVED Supervisor of member who completed report
 - **Supervisor(s):**

Crash - Traffic Crash Reporting Manager

Inspection – CVED Inspector

- **Backups:**

Crash – N/A

Inspection – N/A

- **Interactions:**

Crash - The Reconsideration Review Process may coordinate with various agencies and offices to verify information, establish jurisdiction, obtain supporting documentation. The initial review requires coordination with state enforcement agencies, FMCSA offices, crash records offices, licensing agencies, and ensure accurate routing.

Inspection - personnel may consult inspectors, supervisors, motor carrier representatives, FMCSA personnel, CVSA-certified instructors, subject matter experts, applicable regulatory guidance, and CVSA operational policies while conducting an independent review of the Request for Data Review (RDR). Personnel assigned to the reconsideration review shall not have participated in the original inspection or initial review

- Person(s) consulted for additional information or evidence

- **Responsible Party:**

Crash - Michigan State Police, FMCSA Lansing Office; Several county and local enforcement agencies

Inspection –FMCSA personnel, CVSA-certified instructors, Subject Matter Experts (SME), Inspector, Supervisors, Motor Carrier Representatives, Local Agency POC, and the Motor Carrier.

- **Supervisor(s):**

Crash – N/A

Inspection – N/A

- **Backups:**

Crash – N/A

Inspection – N/A

- **Interactions:**

Crash - The Sergeant coordinates and consults with appropriate supervisory, administrative, and program personnel when reviewing Requests for Data Review to ensure that determinations are consistent with applicable laws, regulations, FMCSA requirements, Michigan State Police policies, and established procedures.

Inspection - personnel may consult inspectors, motor carrier representatives, FMCSA personnel, CVSA-certified instructors, subject matter experts, applicable regulatory guidance, and CVSA operational policies while conducting an independent review of the Request for Data Review (RDR). Personnel assigned to the reconsideration review shall not have participated in the original inspection or initial review

- Person(s) convening a panel or committee
 - **Responsible Party:**
N/A
 - **Supervisor(s):**
N/A
 - **Backups:**
N/A
 - **Interactions:**
N/A
 - **Panel members' titles and associations:**
N/A

Escalation Procedures:

Crash - Following closure of a Request for Data Review (RDR), the State will evaluate any subsequent submission or request for further review to determine whether it should be processed as a Reconsideration Review or whether the original RDR should be reopened under the Initial Review process. An RDR will be escalated to the Reconsideration Review process when the Initial Review has been formally closed, and the submitter disagrees with the Initial Review determination. The submitter provides additional information, supporting documentation, or justification that was not adequately considered or available during the Initial Review. The Reconsideration Review serves as a secondary and independent review of the Initial Review determination and is intended to evaluate whether the original decision was appropriate based on the information available and any newly submitted evidence. The State may reopen a previously closed RDR under the Initial Review process rather than initiating a Reconsideration Review when: the closure resulted from an administrative error, processing error, or technical issue. The request was closed before a substantive review could be completed and required information or documentation was inadvertently omitted from the original submission but is subsequently provided. The submitter identifies factual inaccuracies, clerical errors, or misunderstandings that materially affected the review. The reviewing office determines that additional analysis is needed to complete the original review. The request was closed without action due to missing information, and the submitter subsequently provides the requested information

within the allowable timeframe. In these situations, reopening the Initial Review allows the State to complete or correct the original review process without requiring the submitter to pursue a formal Reconsideration Review. The State will evaluate each post-closure submission on a case-by-case basis to determine the appropriate review path. Factors considered may include: the status and disposition of the original RDR whether the original review was completed on its merits, the availability of new information or evidence and whether procedural, administrative, or technical issues affected the original review. Inspection - Requests for Reconsideration Review are accepted when a requester disagrees with the outcome of an Initial Review and seeks further review through the DataQs process. Reconsideration Reviews are conducted by the CVED Supervisor of the member involved, who were not involved in the original inspection or Initial Review. If, during the Initial Review process, the reviewing authority determines additional information or documentation is required before a decision can be rendered, the request may remain open and continue under the Initial Review process pending receipt of the requested information. Once an Initial Review decision has been issued, subsequent requests for review are elevated to the Reconsideration Review process and are not returned to Initial Review.

Process Description

- Review of RDR
 - **Responsible Party:**
Crash – Sergeant
Inspection - CVED Supervisor of member who completed report
 - **Process:**
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- Outcome of RDR
 - **Responsible Party:**
Crash – Sergeant
Inspection - CVED Supervisor of member who completed report
 - **Process:**
Crash - After the Reconsideration Review has been completed, the following steps shall be followed based on the outcome of the review. The Reconsideration Reviewer documents the findings, conclusions, and recommended determination. The final determination is classified as one of the following: initial review determination upheld, initial review determination modified, initial review determination reversed. Additional review or corrective action required. If the determination results in changes to the data, the appropriate corrective actions may include updating data

records, correcting inaccurate information revising associated documentation removing erroneous data, updating reporting systems or databases. If the determination upholds the Initial Review decision, no data changes are required. All findings, determinations, supporting analyses, corrective actions, and implementation activities are documented in the RDR case file. The submitter is provided with written notification of the final determination. The notification includes: the outcome of the Reconsideration Review, the rationale supporting the decision, any corrective actions taken or planned, notice that the Reconsideration Review determination constitutes the State's final decision. Once all required actions have been completed and the submitter has been notified, the RDR record is updated to reflect the final disposition and closed.

Inspection - Review of initial DataQ and all previous review steps prior to reconsideration phase. Review all related documents and evidence used in each of the review steps and analyze what data sources were not utilized in the initial review process. Document and research any unused data source and cross reference initial RDR closure.

- Closure of RDR
 - **Responsible Party:**
Crash – Departmental Technician or Analyst
Inspection – Departmental Technician or Analyst
 - **Process:**
Crash and Inspection - Confirm that the Initial Review or Reconsideration Review has been completed and a final determination has been approved. Verify that all required corrective actions identified in the determination have been completed or initiated, as applicable. Document the final determination, supporting rationale, evidence reviewed, and any corrective actions taken. Prepare and issue written notification to the submitter communicating the final outcome, rationale, and any actions taken.
- Timeliness:
The RDR Reconsideration process is applicable to requests that received a full review and a decision during the Initial Review phase, and the requestor is seeking an additional level of review. It would not include requests that are closed due to lack of information, or those reopened without a valid reason. MSP must open an RDR Reconsideration request within seven (7) days of the request. As in the Initial Review process, if MSP requests additional information from the requestor during the RDR Reconsideration, the requestor has fourteen (14) days to provide the

information. These fourteen (14) days do not impact the timeline for the MSP review. The clock will stop while the requestor gathers additional information and will restart if the requestor responds to MSP. If the requestor does not respond, the system will close the request with the status “Closed—No Requestor Response.”

MSP must reach a decision and communicate it to the submitter within twenty-one (21) days. The RDR Reconsideration must be reviewed and decided by a person or panel with appropriate subject matter expertise within the MCSAP Lead Agency. The RDR Reconsideration must not be reviewed or decided by the issuing officer or inspector, nor a direct supervisor of the issuing officer or inspector. Legal review should be incorporated, where applicable.

Each RDR Reconsideration closed with the status “Closed—No Data Correction Made” will adequately explain the facts and analysis supporting the decision. Responses will contain the following information: Decision-maker (name and title); Description of evidence reviewed; Decision; Specific reason(s) for decision; and Next steps/directions for more information Final Review process.

RDR Reconsideration Requests the burden of proof remains with the requester. Requests to remove or modify information that negatively impacts the requestor, or others will not be successful without factual and/or legal justification of why the information is incorrect or incomplete by providing documentation supporting the request when necessary.

Unsubstantiated requests may be returned to the requester for more information or closed with no action taken. Requests that are closed for no response from the requester will not be deemed a substantive decision by the State and may be reopened once a sufficient response is received.

Requesters must address MSP’s factual and/or legal basis for the decision and explain why the requestor believes the decision to be incorrect, with submission of additional documentation supporting the request when necessary.

Expected Outcomes for RDR Closures:

Crash - No Data Correction Made: The RDR has been reviewed and closed without any changes being made to the data. The existing data remains unchanged because the review determined that a correction was not warranted.

Decision Drivers:

The submitted evidence did not support the requested correction.

The data was verified as accurate and consistent with the authoritative source.

Insufficient documentation or supporting information was provided to validate the requested change.

The request was determined to be outside the scope of the RDR.

Closed—Data Correction Made: The request has been closed, and the data will be corrected: The RDR has been completed and closed because the review confirmed that a data issue existed, and a correction was made to the affected data. The requested update has been implemented in the FMCSA Portal My DataQ system, and no further action is required unless additional discrepancies are identified.

Decision Drivers:

Evidence confirmed that the reported data was inaccurate, incomplete, outdated or inconsistent.

Supporting documentation validated the requested correction.

The root cause analysis determined that a data update was necessary to resolve the issue.

The correction was successfully implemented and verified.

No outstanding dependencies or follow-up actions remained after validation.

Closed Citation Results Entered– N/A

Closed Report not sent – N/A

Closed Report sent– N/A

Closed—No Requestor Response: The request was closed because the requestor did not respond: The RDR was closed because the requestor did not provide the information, clarification, documentation, or confirmation required to continue processing the request within the specified timeframe.

Inspection - Closed – No Data Correction Made: The review determined that the inspection data was accurate and supported by the available evidence, applicable regulations, and policies. No changes were made to the inspection report.

Closed – Data Correction Made: The review determined that the inspection report contained an error or required modification. Appropriate corrections were made to the inspection report and submitted prior to closure of the RDR.

Closed – Citation Results Entered: The outcome of a related citation, court disposition, or adjudicative proceeding required the inspection record to be updated to reflect the final disposition.

Closed – Report Not Sent: The requested inspection report was unavailable, could not be located, or could not be provided through the DataQs process.

Closed – Report Sent: The requested inspection report or supporting documentation was provided to the requester through DataQs, electronic mail, or other authorized means.

Closed – No Requestor Response: The requester failed to provide additional information or respond to requests necessary to continue processing the RDR.

Communication:

Crash - The DQA shall maintain clear, timely, and consistent communication with all RDR submitters throughout the request review process. Communication may be conducted through approved channels. All communications shall be: Professional, respectful, courteous, accurate and fact-based clear and understandable to the intended audience compliant with applicable privacy, confidentiality, and data protection requirements. If additional information is necessary to evaluate the RDR, the request shall include the information required, method for submitting the information, any applicable deadlines and the notice that the review activities may be suspended until the requested information is received. Upon completion of the review, the submitter shall receive written notification of the final determination including the outcome of the request, a summary of the basis for the decision, when appropriate, and information regarding appeal, reconsideration, or escalation procedures, if available.

Inspection - Requests for Reconsideration Review are submitted and tracked through the FMCSA DataQs system. Reconsideration Review decisions are documented in writing and include the evidence reviewed, findings, and rationale supporting the outcome. Responses are submitted through the DataQs system, providing notification to the requester. Standardized response formats are utilized to promote consistency, transparency, and thorough communication throughout the review process. When additional time or information is required to complete a review, the requester may be contacted through the DataQs process to obtain clarification or supporting documentation.

Next Steps:

Crash - Upon completion of the Reconsideration Review, the State will issue a final determination regarding the Request for Data Review (RDR). The Reconsideration Review represents the final level of administrative review under the State's Data Quality Guidelines. Following closure of the RDR after Reconsideration Review, submitters can expect to receive notification of the final determination, an explanation of the basis for the decision, and information regarding any corrective actions that will be taken, if applicable. The Reconsideration Review determined that the Initial Review decision was appropriate and supported by the available evidence. No changes will be made to the challenged data. The Initial Review determination remains in effect. The RDR will be closed as a final agency action. Review the final determination and supporting rationale. No further review is available through the State's Data Quality process. The Reconsideration Review determined that the Initial Review decision was incorrect and that corrective action is

warranted. The challenged data will be corrected, updated, removed, or otherwise modified as appropriate. The Initial Review determination will be superseded by the Reconsideration Review determination. The RDR will be closed after corrective actions have been initiated or completed. Review the final determination and description of corrective actions. Allow time for approved changes to be implemented. Verify that corrective actions have been reflected in the applicable records or systems. Once the final determination has been issued and any required actions have been completed or initiated, the State will officially close the RDR case. The submitter will be notified when the review process has concluded, and the case has been closed.

Inspection - Following completion of the Reconsideration Review, the requester will receive a written response through the FMCSA DataQs system detailing the evidence reviewed, findings, and rationale supporting the decision. If the Reconsideration Review results in a correction, the appropriate inspection modifications will be completed prior to closure of the request. If the requester disagrees with the Reconsideration Review decision, they may submit a Request for Final Review in accordance with established procedures. Final Review requests must provide a factual and/or legal basis explaining why the prior decision is believed to be incorrect.

Final Review Process

Roles and Responsibilities

- Person(s) responsible for decision-making for the Final Review process
 - **Responsible Party:**
Crash – Crash Manager
Inspections - CVED Special Programs Section Lieutenant + CVED/CVSA
Training Panel
 - **Supervisor(s):**
Crash – N/A
Inspection – N/A
 - **Backups:**
Crash – N/A
Inspection – N/A
 - **Interactions:**
CRASH - The manager routinely interacts with FMCSA, Maryland State Police personnel, allied law enforcement agencies, and motor carriers while monitoring, distributing, and tracking Requests for Data Review (RDRs) to ensure compliance with established timelines and procedures.

INSPECTION - Final Review panel members may consult inspectors, motor carrier representatives, FMCSA personnel, allied agency representatives, CVSA-certified instructors, and subject matter experts when gathering additional information or technical expertise relevant to the request. Panel members shall not have participated in the original inspection, Initial Review, or Reconsideration Review, ensuring an independent and impartial review process.

- Person(s) consulted for additional information or evidence
 - **Responsible Party:**
CRASH - Inspectors, Facility Supervisor, Special Programs Personnel, Agency POC, Motor Carrier, FMCSA personnel
Inspection – Inspector, Motor Carrier Representative, Subject Matter Expert (SME), FMCSA Personnel, CVSA-Certified Instructor, Local Agency Point of Contact (POC)
 - **Supervisor(s):**
Crash – N/A
Inspection – N/A
 - **Backups:**
Crash – N/A
Inspection – N/A
 - **Interactions:**
Crash - The manager as the Final Reviewer may consult inspectors, supervisors, Special Programs Unit personnel, allied agency representatives, FMCSA personnel, motor carrier representatives, and other subject matter experts when gathering evidence or obtaining clarification necessary to resolve a Request for Data Review (RDR).
Inspection - Final Review panel members may consult inspectors, motor carrier representatives, FMCSA personnel, allied agency representatives, CVSA-certified instructors, and subject matter experts when gathering additional information or technical expertise relevant to the request. Panel members shall not have participated in the original inspection, Initial Review, or Reconsideration Review, ensuring an independent and impartial review process.
- Person(s) convening a panel or committee
 - **Responsible Party:**
Crash – N/A
Inspection - CVED Special Programs Section Lieutenant + CVED/CVSA Training Panel

- **Supervisor(s):**
Crash – N/A
Inspection – N/A
- **Backups:**
Crash – N/A
Inspection – N/A
- **Interactions:**
Crash – N/A
Inspection - The Training Unit First Sergeant coordinates with the Data Q Administrator (DQA), Special Programs Unit personnel, CVSA-certified instructors, subject matter experts, and other appropriate personnel when assembling a Final Review panel.
- **Panel members' titles and associations:**
Crash – N/A
Inspection - CVED Special Programs Section Lieutenant + CVED/CVSA Training Panel

Escalation Procedures:

Crash - Following completion of a Reconsideration Review, the State will evaluate the outcome and any additional information submitted to determine whether the Request for Data Review (RDR) should proceed to a Final Review or be reopened under the Initial Review process.

The decision will be based on the nature of the issues raised, the completeness of the previous reviews, the availability of new information, and whether procedural or administrative deficiencies affected the prior review. An RDR may be escalated to the Final Review process when: The submitter timely requests a Final Review following the Reconsideration Review determination. The submitter identifies specific deficiencies in the Reconsideration Review determination. The request raises significant issues involving data quality, objectivity, utility, integrity, or accuracy that warrant further review. New evidence has been submitted that could materially affect the outcome of the Reconsideration Review. The matter involves substantial policy, programmatic, technical, or legal considerations. The State determines that an additional level of review is necessary to ensure consistency, fairness, or compliance with applicable requirements. An RDR may be reopened under the Initial Review process rather than escalated to Final Review when: Administrative, clerical, or technical errors affected the original Initial Review. The Initial Review was closed before a complete evaluation of the merits could be conducted. Required information was unavailable during the Initial Review but has subsequently been provided. The State determines that additional fact-finding is necessary before a Final

Review can be conducted. The matter involves issues that were not addressed during the Initial Review and require evaluation at the program level. Documentation necessary to support a complete review was inadvertently omitted from the original review record. The Reconsideration Reviewer determines that deficiencies in the Initial Review process prevented a full and fair review of the request. When deciding whether to escalate an RDR to Final Review or reopen the Initial Review, the State may consider: Whether the Initial Review and Reconsideration Review were completed on the merits. Whether all relevant facts and evidence were considered. The significance and materiality of any newly submitted information. The existence of procedural, factual, analytical, or administrative errors. Whether further fact-finding is required. The complexity of the issues involved. The State will notify the submitter of its determination regarding the appropriate review path. The notification will specify whether: The RDR has been accepted for Final Review; The RDR has been reopened under the Initial Review process; or the request does not qualify for further review under the Data Quality Guidelines.

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Process Description

- Review of RDR
 - **Responsible Party:**
Crash – Crash Manager
Inspections - CVED Special Programs Section Lieutenant + CVED/CVSA Training Panel
 - **Process:**
Crash - Closed – No Data Correction Made: The RDR has been reviewed and closed without any changes being made to the data. The existing data remains unchanged because the review determined that a correction was not warranted. Decision Drivers: The submitted evidence did not support the requested correction. The data was verified as accurate and consistent with the authoritative source. Insufficient documentation or supporting information was provided to validate the requested change. The request was determined to be outside the scope of the RDR. Closed—Data Correction Made: The request has been closed, and the data will be corrected: The RDR has been completed and closed because the review confirmed that a data issue existed, and a correction was made to the affected data. The requested update has been implemented in the DataQ system, and no further action is required unless additional discrepancies are identified. Decision Drivers: Evidence confirmed that the reported data was inaccurate, incomplete, outdated or inconsistent. Supporting documentation validated the requested correction. The root cause analysis determined that a data update was necessary to resolve the issue. The correction was successfully implemented and verified. No outstanding dependencies or follow-up actions remained after validation. Closed—No Requestor Response: The request was closed because the requestor did not respond: The RDR was closed because the requestor did not provide the information, clarification,

documentation, or confirmation required to continue processing the request within the specified timeframe. Decision Drivers: Requestor failed to respond to follow-up questions. Required supporting documentation was not submitted. Requestor did not clarify ambiguous or incomplete information. Multiple outreach attempts received no response. Response deadlines or timelines expired.

Inspection - Upon receipt of a Request for Final Review, the DQA shall review the request to determine whether it complies with applicable FMCSA guidance and contains a sufficient factual and/or legal basis explaining why the prior decision is believed to be incorrect. Requests that fail to meet this threshold shall be denied and administratively closed, and the requestor shall be notified in writing by the DQA. The panel shall conduct an independent review of the request, prior review decisions, supporting documentation, applicable laws, regulations, guidance, and policies. Panel members shall not have participated in the original inspection, Initial Review, or Reconsideration Review.

- Outcome of RDR

- **Responsible Party:**

- Crash – Crash Manager

- Inspections - CVED Special Programs Section Lieutenant + CVED/CVSA Training Panel

- **Process:**

- Crash - The Final Review serves as the highest level of administrative review under the State's Data Quality Guidelines. Upon completion of the Final Review, the State will issue a final determination and implement the appropriate actions based on the outcome of the review and the type of Request for Data Review (RDR) submitted.

- The Final Reviewer evaluates the complete administrative record, including the original RDR, Initial Review determination, Reconsideration Review determination, supporting documentation, and any additional evidence accepted for review. The Final Reviewer documents findings, conclusions, and a recommended determination for approval by the designated authority. The Final Review determination is classified into one of the following outcomes: Prior determination upheld, Prior determination modified, Prior determination reversed. The actions taken following the Final Review may vary depending on the type of data quality concern raised.

Inspection - Upon completion of the review, the Final Review panel shall

issue a written decision detailing the evidence reviewed, findings, and rationale supporting the outcome. The panel may uphold, modify, or overturn prior decisions based upon the available evidence, applicable laws, regulations, guidance, and policies. If the panel determines corrections are warranted, the appropriate inspection report modifications shall be completed prior to submission of the final decision.

- Closure of RDR

- **Responsible Party:**

- Crash – Crash Manager

- Inspections - CVED Special Programs Section Lieutenant + CVED/CVSA

- Training Panel

- **Process:**

- Crash - The closure process ensures that all review activities, determinations, notifications, and corrective actions have been completed and properly documented before the RDR is formally closed. Confirm that the Initial Review or Reconsideration Review has been completed and a final determination has been approved. Verify that all required corrective actions identified in the determination have been completed or initiated, as applicable. Document the final determination, supporting rationale, evidence reviewed, and any corrective actions taken. Prepare and issue written notification to the submitter communicating the final outcome, rationale, and any actions taken. Notify the requestor that there will be no additional review

- Inspection - Upon receipt of the Final Review decision, the DQA shall process the outcome through the FMCSA DataQs system, document the final disposition, and maintain all associated records. Requesters shall be notified in writing of the decision. Final Review decisions constitute the final administrative review available through the Commercial Vehicle Enforcement Division (CVED), and no further internal review requests will be accepted.

- Timeliness:

MSP must reach a decision on the Final Review and communicate it to the submitter within thirty (30) days. The Final Review must be escalated for review by a responsible decisionmaker identified by MSP who is outside the chain of command for the issuing officer or inspector. The review may be delegated to a panel that provides a recommendation to the decision-maker.

Expected Outcomes for RDR Closures:

Crash – Following completion of the review and evaluation of all available information, supporting documentation, authoritative source records, and applicable requirements, a determination is made whether the challenged data should remain unchanged or whether a correction, modification, removal, or replacement is warranted. The basis for the determination is documented and assigned the appropriate RDR closure disposition within the FMCSA DataQs system. Closed — No Data Correction Made - The RDR is closed with a No Data Correction Made disposition when the review determines that the challenged information is accurate, adequately supported, or otherwise does not warrant modification based upon the available evidence and applicable requirements. In making this determination, the reviewer may consider whether:

Accuracy and Supporting Documentation

The original record is accurate and consistent with authoritative source information;
Inspection, crash, enforcement, or audit data is supported by official documentation;
The officer's narrative and other available records support the violation, crash information, or event recorded; and
No factual discrepancy requiring correction has been identified.

Sufficiency of Submitted Evidence

The submitter has provided sufficient evidence to establish that the existing data is inaccurate;
Supporting materials, such as logs, photographs, repair records, reports, or other documentation, directly contradict the authoritative record;
The evidence is relevant, verifiable, and sufficient to support the requested change; and
Any conflicting evidence materially affects the accuracy of the challenged data.
When the submitter fails to provide adequate supporting documentation, or the documentation provided does not establish that the existing record is inaccurate, the reviewer may determine that a correction is not warranted.

Regulatory and Enforcement Review

The recorded violation or data element was properly applied under applicable FMCSA regulations, requirements, and guidance;
The available documentation establishes that applicable regulatory criteria or thresholds were met; and
The enforcement action and associated data are consistent with applicable standards and reporting requirements.

Procedural and Data-Entry Review

The information was entered and reported in accordance with applicable procedures;
The appropriate reporting and coding requirements were followed; and

No clerical, administrative, processing, or system error affected the accuracy of the record.

Result

When the evidence supports the existing record, no correction is made to the challenged data. The applicable information remains unchanged in the relevant FMCSA and/or state systems, and the RDR is closed using the appropriate Closed — No Data Correction Made disposition.

The DQA documents the findings and rationale supporting the decision and communicates the determination to the submitter through the appropriate DataQs process.

Closed — Data Correction Made

The DQA closes an RDR with a Data Correction Made disposition when the review identifies and verifies an error, omission, unsupported data element, or other discrepancy requiring modification, removal, replacement, or correction of the original information.

In making this determination, the reviewer may consider whether:

Verified Factual or Data Error

The original record contains a verified factual error;

An incorrect vehicle or unit number was recorded;

An incorrect motor carrier or driver was associated with the record;

Information was omitted, duplicated, or otherwise inaccurately reported; or

A clerical, administrative, processing, or system error affected the record.

Inspection - Closed – No Data Correction Made: The Final Review panel determined that the inspection data was accurate and supported by the available evidence, applicable laws, regulations, guidance, and policies. No changes were made to the inspection report.

Closed – Data Correction Made: The Final Review panel determined that the inspection report contained an error or required modification. Appropriate corrections were made to the inspection report and submitted prior to closure of the RDR.

Closed – Citation Results Entered: The outcome of a related citation, court disposition, or adjudicative proceeding required the inspection record to be updated to reflect the final disposition.

Closed – Report Not Sent: The requested inspection report was unavailable, could not be located, or could not be provided through the DataQs process.

Closed – Report Sent: The requested inspection report or supporting documentation was provided to the requester through DataQs, electronic mail, or other authorized means.

Closed – No Requestor Response: The requester failed to provide additional information or respond to requests necessary to continue processing the RDR.

Communication:

Crash - Requests for Final Review are tracked through the FMCSA DataQs system. The Data Q Administrator (DQA) serves as the primary administrative point of contact throughout the

Final Review process. Final Review decisions are documented in writing and include the evidence reviewed, findings, rationale supporting the decision, and references to applicable laws, regulations, policies, guidance, or CVSA operational policies when relevant. Responses are submitted through the DataQs system, providing notification to the requester. Standardized response formats are utilized to promote consistency, transparency, and thorough communication throughout the Final Review process.

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Next Steps:

Crash – Following completion of the Final Review, the requester will receive a written response through the FMCSA DataQs system detailing the evidence reviewed, findings, and rationale supporting the decision. If the Final Review results in a correction, the appropriate modifications will be completed prior to closure of the request. Final Review decisions constitute the final administrative review available. Upon notification of the Final Review decision, the request shall be considered administratively closed and no further internal review requests will be accepted.

Inspection - Following completion of the Final Review, the requester will receive a written response through the FMCSA DataQs system detailing the evidence reviewed, findings, and rationale supporting the decision. If the Final Review results in a correction, the appropriate inspection modifications will be completed prior to closure of the request. Final Review decisions constitute the final administrative review available through the Commercial Vehicle Enforcement Division (CVED). Upon notification of the Final Review decision, the request shall be considered administratively closed and no further internal review requests will be accepted.