Stage 1 Business Analysis

California Department of Technology, SIMM 19A.2 (Rev. 2.4), Revised 4/2/2018

1.1 General Information

Agency or State Entity Name:	California Air Resources Board (CARB)
Organization Code:	3900
Proposal Name:	SB-210 Heavy-Duty Inspection and Maintenance (HD I/M) Program Database
Proposal Description:	CARB proposes to create a compliance database for the upcoming HD I/M program to house and store vehicle inspection data and determine compliance with the program.
When do you want to start this project?:	2/1/2020
Department of Technology Project Number:	0000-000 3900-074

1.2 Submittal Information

Contact Information:

Contact First Name	Contact Last Name
Arman	Lal
Contact Email	**Contact Phone Number**
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Submission Date:	1/2/2020
Version Number:	1.0

Project Approval Executive Transmittal

Attachment: Include the Project Approval Executive Transmittal as an attachment to your email submission.

1.3 Business Sponsorship

Executive Sponsors

Title	First Name	Last Name	Business Program Area
Division Chief	Jack	Kitowski	Mobile Source Control Division
Assistant Division Chief	Sydney	Vergis	Mobile Source Control Division

Select + to add additional Executive Sponsors

Business Owners

Title	First Name	Last Name	Business Program Area
Chief - Mobile Source Regulatory Development Branch	Kim	Heroy-Rogalski	CARB Mobile Source Control Division
Manager - Strategic Planning and Development Section	Jason	Hill-Falkenthal	CARB Mobile Source Control Division

Select + to add additional Business Owners

Program Background and Context

Statewide, approximately 12 million Californians currently live in communities that exceed the federal standard for ozone and fine particulate matter (PM2.5). Two areas of the State that have the most critical air quality challenges include the South Coast and the San Joaquin Valley (SJV) air basins. Achieving federal air quality standards in these

regions, as well as across the State, will provide essential public health protection by reducing hospitalizations for heart and lung related causes, decreasing emergency room visits, and reducing incidences of asthma. Most critically, exposure to PM2.5 and ozone is also associated with increased risk of premature mortality and have been estimated to contribute to 7,500 premature deaths each year in California. In addition, toxic diesel particulate matter accounts for approximately 75 percent of air pollution-related cancer risk in the State. Mobile source cars, trucks, and myriad off-road equipment – are the largest contributors to the formation of ozone, PM2.5, toxic diesel particulate matter (PM) in California. In addition, the transportation sector - and the fossil fuels that power them – contributes the largest share of California's greenhouse gas emissions, and thus is California's greatest contributor to climate change. CARB's role in State government has included providing safe, clean air to all Californians; reducing California's emissions of greenhouse gases; and providing innovative approaches for complying with air pollution rules and regulations.

Heavy-duty (HD) diesel vehicles with 14,000+ pounds gross vehicle weight rating (GVWR) account for nearly 20% of statewide diesel PM emissions and over 25% of total statewide NOx emissions. These emissions are largely emitted by vehicles that operate with malfunctioning emissions control systems as they can release substantially more emissions relative to a properly operating vehicle. For example, vehicles operating with a malfunctioning diesel particulate filter (DPF), which is essential for reducing PM emissions from diesel vehicles, can emit upwards of 5200% more diesel PM emissions than a vehicle operating with a properly functioning DPF. Ensuring malfunctioning vehicles get repaired in a timely manner is critical to reducing the emissions impact of this vehicle sector. Without substantial PM 2.5 and nitrous oxide (NOx) reductions from on-road vehicles, achieving upcoming federal attainment requirements and ambient air quality goals will be extremely difficult if not impossible, especially in the South Coast and San Joaquin Valley regions of California.

CARB's existing HD inspection programs consist of the Heavy-Duty Vehicle Inspection Program (HDVIP) and the Periodic Smoke Inspection Program (PSIP). HDVIP relies on random field inspections by CARB staff to test a small percentage of vehicles per year, and PSIP requires self-inspections by California fleets of two or more vehicles whereby the fleets keep test records in case of an audit. Neither of these programs rely on the submission of vehicle test data to a state operated database. Additionally, neither of these programs subject all vehicles operating in the state of California to annual testing requirements. These programs were established in the 1990's before the application of modern day after treatment emission control systems which can dramatically reduce PM and NOx emissions if operating properly. Both HDVIP and PSIP rely on smoke opacity inspections to determine vehicle compliance, however, do not adequately monitor the full range of emissions control components on modern day vehicles, especially those controlling NOx emissions. CARB research, testing, and modeling indicates substantial levels of in-use emissions beyond that expected from heavy-duty vehicles based on current engine and vehicle standards. Emission controls on vehicles have become more effective, but also more complex, and the opacity-based test procedures included as part of HDVIP and PSIP to detect malfunctions have not kept pace with current technology. The current HDVIP and PSIP opacity testing requirements are no longer sufficient indicators of whether the complete emissions control system on a modern day vehicle is operating as designed, and thus, new HD vehicle inspection requirements must be established to ensure HD vehicle emissions control systems operate properly and maintain low emissions while operating in California.

Due to these pressing issues and the need to reduce emissions from the HD vehicle sector, the California legislature recently passed and Governor Newson signed Senate Bill (SB) 210 which directs CARB and relevant agencies to develop an inspection and maintenance (IM) program for HD vehicles. Since the 1980s, passenger cars and trucks have been subject to an IM program (Smog Check Program) in California that requires vehicles to have regular on-board diagnostics (OBD) inspections to ensure working emissions controls systems are properly functioning in order to register with the Department of Motor Vehicles (DMV). Exhaust after treatment emission control systems have long been in use in passenger vehicles, but these types of systems have only come in to use in HD diesel vehicles relatively recently. Now that HD vehicles are equipped with after treatment systems, an I/M program that ensures all of these emissions control systems are functioning properly is needed.

SB 210 was signed by Governor Newsom on September 20, 2019 and requires CARB to develop and implement a HD I/M Program for non-gasoline heavy-duty trucks above 14,000 pounds GVWR. CARB will be developing a HD I/M program to comply with SB 210 which will utilize periodic submission of heavy-duty - vehicle OBD data and real time emissions monitoring through remote sensing technology to ensure vehicles emission control systems are operating properly. SB 210 also requires the development of an information technology database to collect and track vehicle test data, assess the data to determine compliance, and generate lists of compliant vehicles for DMV registration purposes. Currently, a database to collect and track submitted HD vehicle emissions control test data to determine vehicle compliance for all vehicles operating in California does not exist. Additionally, SB 210 requires all vehicles to carry a valid HD I/M compliance certificate in order to legally operate in the state. Staff envisions the utilization of an outside contractor to facilitate the collection of vehicle test data to a CARB owned and operated database where program compliance would be determined. As recent studies have concluded, including a 2018 study by the Center for Environmental Research and Technology at UC Riverside, an OBD-based HD I/M program would be a reliable, relatively low-cost way to help ensure vehicles and their emissions control systems are properly maintained to reduce harmful emissions and health impacts. Thus, a HD I/M program relying on periodic tests of OBD tests for vehicles so equipped is needed compared to the current reliance on smoke opacity testing of the current HDVIP and PSIP regulations.

Successful implementation of a HD I/M program is expected to reduce statewide PM2.5 and NOx emissions by approximately 25 and 20 percent, respectively, beyond the emissions reductions that will be achieved through existing regulations. This level of NOx emissions reduction is equivalent to taking 145,000 California in-state trucks off the road between years 2023 and 2031. The PM2.5 emissions reduction benefits of a HD I/M program are even bigger, equal to replacing almost 375,000 trucks between years 2023 and 2031. Staff estimates that the cumulative emissions benefits of the HD I/M program will be approximately 93,000 tons of NOx and 1,600 tons of PM2.5 between 2023 and 2031. Such emission reductions are needed to meet upcoming federal attainment standards in the SJV and South Coast Air Basins. The SJV State Implementation Plan (SIP) and the statewide Mobile Source Strategy both include a HD I/M program as a critical measure to meeting the upcoming federal attainment standards. If CA doesn't meet these SIP commitments, individuals living within these regions will not only be at a greater risk of harmful pollutant exposure, but the state is also subject to potential federal sanctions, including the loss of highway funds if the state fails to meet the attainment standards by the scheduled deadlines.

1.4 Stakeholders

Key Stakeholders

Org. Name	Name
Department of Motor Vehicles (DMV)	Steve Gordon
Internal or External?	☐ Internal ☒ External

When is the Stakeholder impacted?

Input to Business Process	During the Business Process	Output of the Business Process
☐	☒	☒

How are Stakeholders impacted?

DMV will not register a vehicle if the vehicle is not in compliance with the HD I/M program.

How will the Stakeholders participate in the project?

DMV will receive a list of vehicle VINs daily that identify the compliant vehicles in the HD I/M program which DMV would allow registration for.

Org. Name	Name
CARB Enforcement Division (ED) staff	Todd Sax
Internal or External?	☒ Internal ☐ External

When is the Stakeholder impacted?

Input to Business Process	During the Business Process	Output of the Business Process
☐	☒	☐

How are Stakeholders impacted?

ED staff is responsible for enforcing the HD I/M program including issuing citations and collecting monetary penalties from non-compliant fleets.

How will the Stakeholders participate in the project?

ED staff will use the database during enforcement audits and field campaigns to look up vehicle and fleet information to determine whether a vehicle in question is complaint with the HD I/M program and/or has any outstanding violations assoicated with the program..

Org. Name	Name
CARB Office of Information Services (OIS) staff	Steve Grogan
Internal or External?	☒ Internal ☐ External

When is the Stakeholder impacted?

Input to Business Process	During the Business Process	Output of the Business Process
☐	☒	☐

How are Stakeholders impacted?

OIS staff will support the development and maintenance of the HD I/M program database.

How will the Stakeholders participate in the project?

OIS staff will help develop and maintain the HD I/M program database, including development tasks such as writing and reviewing programming code and also protecting against any potential security threats throughout the implementation of the program.

Select + to add additional Stakeholders

1.5 Business Program

Org. Name	**Name**
California Air Resources Board	Mobile Source Control Divison

When is the unit impacted?

Input to the Business Process	During the Business Process	Output of the Business Process
☒	☒	☒

How is the business program unit impacted?

Mobile Source Control Division (MSCD) staff will test and provided the necessary resources during planning, testing and implementaion phases of the project. In addition, buisness program unit would have staff analyzing incoming vehicle data to determine compliance with the HD I/M program.

How will the business program participate in the project?

Staff will analyze incoming vehicle data to determine complaince and then develop a daily good list of complaint vehicles withthe HD I/M program. CARB will send the list of VINs to DMV for vehicle registration purposes.

Select + to add additional Business Programs

1.6 Business Alignment

Business Driver(s)

Financial Benefit

Increased Revenue	Cost Savings	Cost Avoidance	Cost Recovery
☒	☐	☐	☐

Mandate(s)

State	Federal

Stage 1 Business Analysis

☒	☐

Improvement			
Better Services to Citizens	Efficiencies to Program Operations	Improved Health and/or Human Safety	Technology Refresh
☒	☒	☒	☐

Security			
Improved Information Security	Improved Business Continuity	Improved Technology Recovery	Technology End of Life
☐	☐	☐	☐

Strategic Business Alignment	
Strategic Plan Last Updated? N/A	Date PickerDate Picker
Strategic Business Goal	Alignment
N/A	N/A
Select + to add additional Business Goals and Alignment	

Executive Summary of the Business Problem or Opportunity

Under the Clean Air Act, CARB is responsible for developing statewide programs and strategies to reduce smog-forming and toxic pollutants emitted from mobile sources. Heavy-duty diesel vehicles (14,000+ lbs.) are major contributors to California's air quality challenges. These vehicles still contribute the majority of on-road NO_x and PM 2.5 emissions, despite significant efforts by CARB over the last 40 years to reduce NO_x and PM emissions from this sector.

CARB's existing programs do not adequately ensure HD vehicle emissions control systems are operating properly for the life of the vehicle as opacity testing required in the current HDVIP and PSIP regulations is not effective at measuring the breadth of emissions control components on modern day vehicles. CARB is developing a more comprehensive HD I/M program, which would result in more robust vehicle testing to help ensure all vehicle emissions control systems are adequately maintained throughout the vehicles' operating lives. Such testing will include the submission of OBD data, which monitors all emissions related components in a vehicle, and real time remote sensing emissions data from vehicles operating throughout California. Such data will be sent to a comprehensive HD I/M program database where vehicle data will be analyzed to verify that emissions control components on the vehicle are operating properly to determine whether the vehicle complies with the program requirements or not. Only vehicles in compliance with the HD I/M program will be allowed to reregister with the DMV and issued the certificate of compliance, thus, ensuring a much more robust and enforceable program compared to the current HDVIP and PSIP regulations. This will result in substantial emissions reductions from the HD vehicle sector and reduce the risk of harmful criteria pollutant exposure to all individuals living in California.

Business Problem or Opportunity and Objectives Table

Problem ID	Problems/Opportunities
1	Reduce criteria pollutants from the HD vehicle sector by ensuring all heavy-duty non-gasoline vehicles with a GVWR above 14,000 pounds operating in California have properly functioning emissions control systems.
Objective ID	1A
Objectives	Implement periodic testing requirements: Collect OBD data from heavy-duty non-gasoline vehicles equipped with OBD systems and require vehicles with faulty emission

	control systems to make repairs. The HD I/M program requires the vehicle owner to fix any emissions control components if the collected vehicle testing data indicates there is a problem. For non-OBD equipped vehicles, require an alternative periodic vehicle emissions test such as an opacity test. Vehicles failing the test must make necessary repairs.
Metric	Reduce statewide PM2.5 and NOx caused by HD vehicles as measured in program reports. This metric will be measured through year by year historical analysis of vehicle testing data submitted to the HD I/M database by determining the frequency of malfunctioning vehicle emissions control systems from the submitted data. This analysis will determine the rate of change in malfunctioning vehicles as the program is implemented and used to update CARB's vehicle emissions model to assess the redcution in vehicle emissions as a result of the HD I/M program.
Baseline	Emissions reductions forecasted to be achieved through existing regulations
Target	Reduction of PM2.5 and NOx emissions
Measurement Method	Program reports of PM2.5 and NOx emissions
Objective ID	1B
Objectives	Establish a remote sensing monitoring network throughout the state to monitor for real-time high emitting and non-compliant vehicles. Such vehicles would be subjected to an emissions test to verify the functionality of their emissions control system.
Metric	Reduce statewide PM2.5 and NOx caused by HD vehicles. Same approach to measuring metric 1A will be used for metric 1B.
Baseline	Emissions reductions forecasted to be achieved through existing regulations
Target	Reduction of PM2.5 and NOx emissions
Measurement Method	Program reports
Select + to add additional Objectives	
2	**Improve enforcement mechanisms for a newly developed HD I/M Program to ensure strong complaince**
Objective ID	2A
Objectives	Develop of a certificate of complaince all vehicles must carry to operate in Califonria that must be presented upon request during a CARB or CHP inspection
Metric	Reduce statewide PM2.5 and NOx emissions caused by HD vehicles by ensuring strong compliance with the HD I/M program requirements. Data submitted to the HD I/M database will be used to determine whether the vehicle in question is in compliance with the HD I/M program requriements. Only vehicles in compliance with the program, thus proving their emissions control componenets are operating proerly, will be awarded a certification of compliance.
Baseline	Compliance rates with CARB's current HDVIP/PSIP inspection programs
Target	Reduction in PM2.5 and NOx emissions through improved compliance rates
Measurement Method	Program reports
Objective ID	2B
Objectives	Tie compliance with the HD I/M program to annual DMV registration
Metric	Reduce statewide PM2.5 and NOx emissions caused by HD vehicles by connecting compliance with the HD I/M program to DMV registration
Baseline	Compliance rates with CARB's current HDVIP/PSIP inspection programs
Target	Reduction in PM2.5 and NOx emissions
Measurement Method	Program reports
Select + to add additional Objectives	

3	**Meet upcoming federal attainment deadlines**
Objective ID	3A
Objectives	Meet SIP and Mobile Source Strategy commitments by developing a HD I/M program to reduce the risk of health affects to Californians, especially in the South Coast and San Joaquin Valley air basins.
Metric	Meeting SIP and Mobile Source Strategy goals. Ensure vehicles operate with properly functioning emissions controls components by requiring vehicles to prove compliance through submission of vehicle testing data through the HD I/M database.
Baseline	Current compliance with air quality standards
Target	Improvement of air quality be ensuring vehicles are operating with fully functional emission control systems
Baseline	Current statewide air quality measurements
Target	No change
Measurement Method	Program Reports

4	**Technology support**
Objective ID	4A
Objectives	Develop a Database Management System that maintains the needed data elements; calculators/tools, reports, user administration, collection, and reporting, workflow management for certification and inspection management.
Metric	Ability for Program and staff to administer the new Program requirements
Baseline	Staff would have to manually implement and administer the new programmatic requirements which is infeasible to accomplish in a manner that meets the public's health and safety needs, or State regulatory requirements.
Target	A cost-effective application meeting State and ARB technology and business standards, including architectural, security, cost, reliability, and extensibility functional and non-functional requirements.
Measurement Method	Project management

4	**Technology support**
Objective ID	4B
Objectives	Develop a Database Management System that incorporates needed data elements such as periodic vehicle OBD/opacity testing submissions, remote sensing emission and license plate data, applicable HD I/M enforcement citations and/or violations, as well as a web public interface for HD truck owners to input information, pay any applicable fees, and obtain their certificate of complaince.
Metric	Ability for Program and staff to administer the new Program requirements
Baseline	Staff would have to manually implement and administer the new programmatic requirements which is infeasible to accomplish in a manner that meets the public's health and safety needs, or State regulatory requirements.
Target	A cost-effective application meeting State and ARB technology and business standards, including architectural, security, cost, reliability, and extensibility functional and non-functional requirements.
Measurement Method	Project management

4	**Technology support**
Objective ID	4C
Objectives	Develop a Database Management System with the ability to create a list of HD I/M program compliant and non-compliant vehicles to be sent to DMV for registration purposes on a daily basis.
Metric	Ability for Program and staff to administer the new Program requirements
Baseline	Staff would have to manually implement and administer the new programmatic requirements which is infeasible to accomplish in a manner that meets the public's health and safety needs, or State regulatory requirements.
Target	A cost-effective application meeting State and ARB technology and business standards, including architectural, security, cost, reliability, and extensibility functional and non-functional requirements.
Measurement Method	Project management

1.7 Project Management

Technical Complexity Risk Score:	2.8

Stage 1 Business Analysis

Attach completed Statewide Information Management Manual (SIMM) Section 45 Appendix A:	Include the completed SIMM 45 Appendix A as an attachment to your email submission.

Existing Data Governance and Data

1. Does the Agency/state entity have an established data governance body with well-defined roles and responsibilities to support data governance activities? If an existing data governance org chart is used, please attach.	○ Unknown ◉ Yes ○ No ○ Clear	If applicable, include the data governance org chart as an attachment to your email submission.
2. Does the Agency/state entity have data governance policies (data policies, data standards, etc.) formally defined, documented, and implemented? If yes, please attach the existing data governance plan, policies or IT standards used.	○ Unknown ◉ Yes ○ No ○ Clear	If applicable, include the data governance policies as an attachment to your email submission.
3. Does the Agency/state entity have data security policies, standards, controls, and procedures formally defined, documented, and implemented? If yes, please attach the existing documented security policies, standards, and controls used. N/A	○ Unknown ◉ Yes ○ No ○ Clear	If applicable, include the documented security policies, standards, and controls as an attachment to your email submission.
4. Does the Agency/state entity have user accessibility policies, standards, controls, and procedures formally defined, documented, and implemented? If yes, please attach the existing documented policies, accessibility governance plan, and standards used, or provide additional information below.	○ Unknown ◉ Yes ○ No ○ Clear	If applicable, include the documented accessibility policies, standards, and controls as an attachment to your email submission.
5. Do you have existing data that you are going to want to access in your new solution?	○ Unknown ◉ Yes ○ No ○ Clear	If applicable, include the data migration plan as an attachment to your email submission.
6. If data migration is required, please rate the quality of the data.	Not applicable	

1.8 Criticality Assessment

Business Criticality

Legislative Mandates:	N/A ☐	
Bill Number(s)/Code(s):	SB-210	
Language that includes system relevant requirements:	As part of the program, the state board shall develop a Heavy-Duty Vehicle Inspection and Maintenance Compliance Certificate. The state board shall issue the certificate to the	

		legal owner, registered owner, or designee of a vehicle that, at the discretion of the state board, meets the requirements of the program so that vehicle owners and operators may easily demonstrate proof of compliance, as required pursuant to Sections 27158.1 and 27158.2 of the Vehicle Code.
Business Complexity Score	2.5	Include the completed SIMM 45 Appendix C as an attachment to your email submission.

Noncompliance Issues

Indicate if your current operations include noncompliance issues and provide a narrative explaining the how the business process is noncompliant.

Programmatic Regulations	HIPPA/CJIS/FTI/PII/PCI	Security	ADA	Other	N/A
☐	☐	☐	☐	☐	☒

1. What is the proposed project start date?	6/6/2022
2. Is this proposal anticipated to have high public visibility?	◉ Yes ○ No ○ Clear

If "Yes," please identify the dynamics of the anticipated high visibility below:

This HD I/M program will affect all HD trucking fleets that operate in California, including both in-state and out-of-state fleets that operate in the state.

3. If there is an existing Privacy Information Assessment, include as an attachment to your email submission.
   N/A

4. Does this proposal affect business program staff located in multiple geographic locations?	○ Yes ◉ No ○ Clear

If "Yes," provide an overview of the geographic dynamics below and enter the specific information in the space provided.

N/A

City	State	Number of Locations	Approximate Number of Staff

Select + to add Locations

1.9 Funding

1. Does the Agency/state entity anticipate requesting additional resources through a budget action to complete the project approval lifecycle?	◉ Yes ○ No ○ Clear
2. Will the state possibly incur a financial sanction or penalty if this proposal is not implemented? If yes, please identify the financial impact to the state below: Federal Highway Funds to the State of California may be adversely impacted.	◉ Yes ○ No ○ Clear
3. Has the funding source(s) been identified for this proposal?	◉ Yes ○ No ○ Clear

FUNDING SOURCE		FUND AVAILABILITY DATE
General Fund	☐	Date PickerDate Picker
Special Fund	☐	Date PickerDate Picker
Federal Fund	☐	Date PickerDate Picker

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Reimbursement	☐	Date PickerDate Picker
Bond Fund	☐	Date PickerDate Picker
Other Fund	☒	2/1/2020
If "Other Fund" is checked, specify the funding:	Air Pollution Control Fund	

1.10 Reportability Assessment

1. Does the Agency/state entity's IT activity meet the definition of an IT Project found in the State administrative Manual (SAM) Section 4819.2? If "No," this initiative is not an IT project and is not required to complete the Project Approval Lifecycle.	◉ Yes ○ No ○ Clear
2. Does the activity meet the definition of Maintenance or Operations found in SAM Section 4819.2? If "Yes," this initiative is not required to complete the Project Approval Lifecycle. Please report this workload on the Agency Portfolio Report. And provide an explanation below.	○ Yes ◉ No ○ Clear
3. Has the project/effort been previously approved and considered an ongoing IT activity identified in SAM Section 4819.2, 4819.40? If "Yes," this initiative is not required to complete the Project Approval Lifecycle. Please report this workload on the Agency Portfolio Report.	○ Yes ◉ No ○ Clear
4. Is the project directly associated with any of the following as defined by SAM Section 4812.32? Single-function process-control systems; analog data collection devices, or telemetry systems; telecommunications equipment used exclusively for voice communications; Voice Over Internet Protocol (VOIP) phone systems; acquisition of printers, scanners and copiers. If "Yes," this initiative is not required to complete the Project Approval Lifecycle. Please report this workload on the Agency Portfolio Report.	○ Yes ◉ No ○ Clear
5. Is the primary objective of the project to acquire desktop and mobile computing commodities as defined by SAM Section 4819.34, 4989? If "Yes," this initiative is a non-reportable project. Approval of the Project Approval Lifecycle is delegated to the head of the state entity. Submit a copy of the completed, approved Stage 1 Business Analysis to the CDT and track the initiative on the Agency Portfolio Report.	○ Yes ◉ No ○ Clear
6. Does the project meet all of the criteria for Commercial-off-the-Shelf (COTS) Software and Cloud Software-as-a-Services (SaaS) delegation as defined in SAM 4819.34, 4989.2 and SIMM 22	○ Yes ◉ No ○ Clear

If "Yes," this initiative is a non-reportable project. Approval of the Project Approval Lifecycle is delegated to the head of the state entity; however, submit an approved SIMM Section 22 form to CDT.	
7. Will the project require a Budget Action to be completed?	◉ Yes ○ No ○ Clear
8. Is it anticipated that the project will exceed the delegated cost threshold assigned by CDT as identified in SIMM 10?	◉ Yes ○ No ○ Clear
9. Are there any previously imposed conditions place on the state entity or this project by the CDT (e.g., Corrective Action Plan)? If "Yes," provide the details regarding the conditions below.	○ Yes ◉ No ○ Clear
10. Is the system specifically mandated by legislation? As a function of implementing a HD I/M Inspection and Maintenance Compliance Certificate as required in SB-210.	◉ Yes ○ No ○ Clear

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Original "New Submission" Date	02/24/2020	
Form Received Date	02/24/2020	
Form Accepted Date	02/24/2020	
Form Status	Completed	
Form Status Date	02/24/2020	
Form Disposition	Approved	If "Other," specify:
Form Disposition Date	02/24/2020	