Department of Transportation (DOT)
Federal Highway Administration (FHWA)
Supporting Statement A
Highway Performance Monitoring System (HPMS)
OMB Control Number 2125-0028

INTRODUCTION: This is to request the Office of Management and Budget's (OMB) reinstatement of a three-year previously approved clearance for the Highway Performance Monitoring System (HPMS) information collection, OMB No. 2125-0028.

A. Justification

1. Circumstances that make the collection of information necessary.

The HPMS program collects data necessary for fulfilling FHWA's responsibilities to Congress and the public. HPMS data is a key data source used to develop the biennial estimate of future highway investment needs as mandated by Congress under 23 U.S.C. 503(b)(8). HPMS data is used to assess highway system performance under FHWA's strategic planning and performance reporting as required by the Government Performance and Results Act. HPMS data is used for the apportionment of Federal-aid highway funds. And finally, HPMS data support the calculation of the National Performance Management Measures, as required under 23 CFR 490.

2. How, by whom, and for what purpose is the information used.

The HPMS data is used by FHWA to assess the performance of the Nation's highway transportation system as well as identify future highway system needs. HPMS data are extensively used by various agencies of the Federal, State, and local governments, institutions of higher learning, industry, consultants, professional organizations, and the public for a host of purposes. Data are used for assessing highway system performance under FHWA's strategic planning and performance reporting process developed in accordance with requirements of the Government Performance and Results Act and for apportioning Federal-aid highway funds under MAP-21 and the FAST Act. The HPMS data collected are essential to FHWA and Congress in evaluating effectiveness of the Federal-aid highway program providing miles, lane-miles, and travel components of apportionment formulae. The information is used by FHWA to develop and implement legislation and by State and Federal transportation officials to adequately plan, design, and administer effective, safe, and efficient transportation systems.

The vehicle-miles of travel data, which represent annual travel on the Nation's highways, serve as the basis for FHWA estimation of annual travel (use) by vehicle type and for highway allocation among the various vehicle classes. Estimates of travel by vehicle type and vehicular weight are the basis for the estimation of pavement loadings (equivalent axle loadings) and are the fundamental input to pavement design, pavement management and administration of vehicular weight enforcement laws.

HPMS full extent data are essential to comprehensive evaluations of the National Highway System (NHS) and are needed for the entire Principal Arterial System (PAS) to enable tracking of the system to determine whether it is providing service to all areas warranting NHS service. This is a necessity because of changing demographics, industrialization, market places, and other strategic activities.

The sample data collected via the HPMS are essential to the Highway Economic Requirement System (HERS) model, which is extensively used for the development of the legislatively mandated biennial report to Congress, *Status of the Nation's Surface Transportation System: Condition and Performance*. In general, the HERS model is used to:

-- Estimate backlog and future accruing highway system deficiencies (needs).
-- Estimate the cost of overcoming deficiencies.
-- Test alternative investment levels and strategies.
-- Establish highway investment/performance relationships.
-- Calculate related impacts.

Analytical tools, such as HERS, which rely upon the HPMS data base as input, are essential to sound prudent policymaking practices and are paramount to efficient and effective program evaluation and development activities. In addition, HPMS sample data serve as the basic input to the Highway Economic Requirement System-State version (HERS-ST) model, which selects and prioritizes simulated highway improvements (needs) on the basis of benefit-cost relationships for use by individual States.

Information received from the current collection have been used for:

(1) Measuring performance (including Transportation Performance Management subsequent rule-making outcomes) /FHWA and DOT programs
(2) FHWA apportionment purposes.
(3) *Status of the Nation's Surface Transportation System: Condition and Performance*; used for appropriations.
(4) *Highway Statistics* (5,000+ recipients): used for planning, programming, budgeting, etc.
(5) State/private sector/academic/general public analysis purposes.
(6) *Our Nation's Highways, Selected Facts and Figures.*
(7) Cost Allocation Study.
(8) Truck size and weight study

3. <u>Extent of automated information collection</u>.

All information for the HPMS is submitted electronically via the Internet to the FHWA by the State highway agencies. Reliance on electronic reporting of data was adopted in order to extend the power of dwindling staff resources at both the State and Federal levels. With the large data file requirements of the HPMS, electronic submission has become unavoidable. The HPMS enhancements also include the use of additional, up-to-date information technology including the ability to append HPMS data with Geographical Information System (GIS) Linear Reference

System (LRS) information to operate in the GIS environment.

All data summarization, processing, modeling, etc., are fully automated via state-of-the-art personal computers and file servers. An HPMS specific software package has been developed and is occasionally modified and updated for use by State highway agencies, MPO, FHWA field offices, and Headquarters to accommodate the data requested in the *HPMS Field Manual*.

The HPMS is a dynamic system that undergoes periodic reassessment to assure that each data element collected continues to be needed and that the data collected is sensitive to emerging agency needs, goals and issues. This is sometimes a result of legislative action such as passage of a new highway authorization bill, for example.

4. Describe efforts to identify duplication.

The identification and elimination of duplication are two critical goals in managing the HPMS. Continued HPMS coordination throughout the transportation community has ensured that duplication does not exist with other datasets or data collection efforts. Over time, several HPMS Working Groups have been used to address various HPMS data issues, including avoidance of duplication, urban congestion, HPMS redevelopment, pavement data needs, etc. The Working Groups included representatives of State highway agencies, MPOs, AASHTO, the National Association of Regional Councils (NARC), FHWA field offices, and other Federal agencies and professional organizations. Current activities are directed at improving data partnerships between States, MPOs, and other local governments to implement a "collect it once, use it often" philosophy.

5. Efforts to minimize the impact on small businesses.

There is no impact on small businesses since the HPMS data is collected only from State and local governments.

6. Impact of less frequent collection of information.

It is essential that the HPMS data continue to be collected on an annual basis rather than less frequently. The annual collection of HPMS data is required to facilitate the FHWA's continuous addressing of issues regarding the preservation of the Nation's highway transportation infrastructure, air quality, and EPA's requirements for National Ambient Air Quality Standards (NAAQS) non-attainment areas to annually measure travel via HPMS. Less frequent data collection would fail to keep FHWA and EPA abreast of the continuing changes taking place on the Nation's streets and highways on a timely basis. The results of current Federal-aid highway program projects and actions, including activities designed to improve air quality, cannot be properly evaluated based on data that is collected less frequently. The determination of the consequence of future alternative changes in policies or programs would be made with out-of-date information.

Further, legal mandates for Transportation Performance data, annual System length, lane-mile

and travel data for the apportionment of Federal-Aid Highway Program funds, Clean Air Act requirements for travel tracking and conformity; fund transferability issues, etc., necessitate the continuation of annual HPMS data collection.

Highway conditions, travel, urban congestion, pavement deterioration, air quality, and many other highway use, and performance indicators and statistics are constantly changing. Consequently, it is imperative that we continually monitor change to determine the effectiveness of Federal-aid highway programs. Urban highway congestion is an important national issue, and its alleviation is of critical concern because of the economic costs of delay and the additional harmful emissions that are produced.

7. Special circumstances.

There are no special circumstances related to this information collection.

8. Compliance with 5 CFR 1320.8

The FHWA published a 60-day Federal Register Notice on May 10, 2024 at [89 FR 40528]. There were no comments received.

The FHWA published a 30-day Federal Register Notice on July 15, 2024 at [89 FR 57499].

9. **Payment or gifts to respondents**.

There will be no payments or gifts to the State and local government respondents.

10. Assurance of confidentiality.

The information to be collected is not confidential in nature; there is no need for an assurance of confidentiality.

11. Justification for collection of sensitive information.

The information to be collected is not sensitive in nature.

12. Estimate of burden hours for information requested.

Respondent	No. of Respondents	Frequency of Responses	Annual Hour Burden Per Respondent	Total Annual Hour Burden
State Transportation Agencies, Wash., DC & Puerto Rico (Includes MPOs)	52	Annually	2,010	104,520

The estimated total annual burden hours on the 52 responding agencies for the collection of HPMS data is 104,520 hours. This respondent burden is based on the average annual activities necessary for the 50 States, Washington, DC, and Puerto Rico to comply with the HPMS data requirements. These estimates are based on past OMB clearance submissions, which were based on informal surveying with State Departments of Transportation to estimate burden hours.

13. Estimate of total annual costs to respondents.

Respondent	No. of Respondents	Frequency of Responses	Mean Hourly Wage Costs	Annual Costs
State Transportation Agencies, Wash., DC & Puerto Rico (Includes MPOs)	52	Annually	$41.32 per respondent *or* $2,149 for all respondents	$41.32/hr * 2,010 hrs = **$83,053 per respondent** *or* $2,149/hr * 2,010 hrs = **$4,319,490 for all respondents**

The estimated cost is based off the mean hourly wage for Urban and Regional Planners as indicated in this Bureau of Labor Statistics published table May 2023 National Occupational Employment and Wage Estimates (bls.gov). Otherwise, there are no additional cost burdens to the responding agencies since the HPMS data are obtained from the normal business records maintained by the State and local governments that are a basic part of their day-to-day business activities.

14. Estimate of annualized cost to the Federal Government.

The estimated annual cost to the Federal Government for this HPMS information collection is $1,161,249 which is calculated as follows:

7 FHWA Headquarters staff x 2,000 hours each @ $57.23 per hour = $ 801,220

60 FHWA field office staff x 48 hours each @ $57.23 per hour = $ 164,822
$ 966,042 (subtotal)
plus overhead @ 20% = $ 195,207
$ 1,161,249 (total)

The estimated cost to the Federal Government is based off the mean hourly wage for Data Scientists as indicated in this Bureau of Labor Statistics published table May 2023 National Occupational Employment and Wage Estimates (bls.gov).

15. Explanation of program changes or adjustments.

The estimated cost to the Federal Government have increased per the updating of the average hourly salary. The HPMS program has undergone some revisions since the last clearance request. These changes are included in the updated HPMS Field Manual.

16. Publication of results of data collection.

The results of the data collected are published in the reports to Congress and are also published in the *Highway Statistics*; and are posted on the Internet. The data to be submitted on April 15 and June 15 of each year is assembled and/or collected by the States and MPOs to reflect data as of December 31 of the previous year. The data received is processed by FHWA from the time the data are submitted with final data tables, charts, and graphs being readied for publication and release by the end of the calendar year. The publication is generally received from the printer and distributed/posted on the Internet by December 1. This is an annual activity.

17. Approval for not displaying the expiration date for OMB approval.

No such approval is being requested for this information collection.

18. Exceptions to the certification statement.

No exceptions to the certification statement are being requested.