Department of Transportation (DOT)

Federal Highway Administration

The Supporting Statement A

Transportation Performance Management Biennial Reports

OMB Control No. 2125-0656

Introduction: This supporting statement represents a request for the renewal of the Transportation Performance Management (TPM) Biennial Reports to be collected by the Department of Transportation according to 23 U.S.C. 150(e) and 23 CFR 490.107. These reports are to be collected every two years from State DOTs.

Part A. Justification.

1. Circumstances that make collection of information necessary:

The MAP-21 (Pub. L. 112-141) and FAST Act (Pub. L. 114-94) transformed the Federal-aid highway program by establishing new requirements for transportation performance management (TPM) to ensure the most efficient investment of Federal transportation funds. Prior to MAP-21, there were no explicit requirements for State DOTs to demonstrate how their transportation program supported national performance outcomes. State DOTs were not required to measure condition or performance, establish targets, assess progress toward targets, or report on condition or performance in a nationally consistent manner that FHWA could use to assess the entire system. Without States reporting on these factors, it was difficult for FHWA to examine the effectiveness of the Federal-aid highway program to address surface transportation performance at a national level.

The TPM regulations changed this paradigm. The specific statutory and regulatory mandates for this collection are 23 U.S.C. 150(e) and 23 CFR 490.107, which require State DOTs to measure condition or performance, establish targets, assess progress towards targets, and report on condition or performance biennially to the FHWA.

This information collection supports the DOT Strategic Goal of Infrastructure, specifically Objective 2.3: Improve system condition and reliability. By requiring consistent biennial reporting on transportation condition and performance, this collection ensures transparency, accountability, and the most efficient investment of Federal transportation funds to improve system performance nationwide.

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

How the Information is Collected and Used: State DOTs, representing 52 respondents including Washington, DC and Puerto Rico, submit these biennial performance reports electronically through an online data form called the Performance Management Form (PMF). The FHWA synthesizes and analyzes this data to conduct mandated assessments on system performance and target achievement across the country.

By Whom the Information is Used: The information collected is used primarily by the Federal Highway Administration (FHWA) and the U.S. Department of Transportation (USDOT). Additionally, the aggregated data and resulting performance assessments are made available to the public and can be utilized by Congress, State Departments of Transportation (State DOTs), Metropolitan Planning Organizations (MPOs), transportation stakeholders, and the general public to evaluate the condition and performance of the transportation system.

For What Purpose the Information is Used: The data is used to fulfill the statutory requirements of 23 U.S.C. 150(e) and 23 CFR 490.107, which mandate that State DOTs measure condition or performance, establish targets, and assess progress towards those targets. Furthermore, FHWA uses the submitted information to officially determine if State DOTs have achieved significant progress toward meeting their performance targets, as required by 23 CFR 490.109. If significant progress is not achieved, it triggers statutory requirements for States to outline corrective actions.

Actual Use of the Current Collection: Under the current clearance (OMB Control No. 2125-0656), FHWA has actively used the data submitted in previous biennial reporting cycles (Baseline, Mid Performance Period, and Full Performance Period reports) to perform statutory Significant Progress determinations for State DOTs. This information has allowed FHWA to successfully track transportation trends across the nation, such as pavement and bridge conditions, reliability, and freight bottlenecks. The collection of consistent data allows the performance story for each State to be reported in a nationally consistent manner, and supports the evaluation of the overall performance and condition of the system.

3. Extent of automated information collection:

This collection will be distributed electronically, and 100% of the responses will be provided to the DOT-FHWA in an electronic format through an online data form called the Performance Management Form (PMF), which has been incorporated into the UPACS system. Providing this fully electronic reporting option ensures the agency complies with the Government Paperwork Elimination Act (GPEA). Utilizing this electronic information technology significantly reduces the reporting burden on State DOTs by streamlining the data entry process and eliminating the need for paper submissions.

4. Efforts to identify duplication:
The Transportation Performance Management Biennial Report is the only report of its kind. There is no similar information already available that can be used or modified for these purposes, as this collection uniquely consolidates the specific performance target-setting and progress assessments explicitly mandated for State DOTs under 23 U.S.C. 150(e) and 23 CFR 490.107.

5. Efforts to minimize the burden on small businesses:

Small businesses or other small entities are not impacted by this data collection. The respondents for this collection are strictly limited to the 52 State DOTs (including the District of Columbia and Puerto Rico).

6. Impact of less frequent collection of information:

Collection of this information is legally mandated to occur biennially under 23 U.S.C. 150(e) and 23 CFR 490.107; therefore, a less frequent collection is not permissible by law. If this collection were not conducted or conducted less frequently, FHWA would be unable to carry out its statutory requirement to assess whether State DOTs have achieved significant progress toward meeting their performance targets under 23 CFR 490.109.

7. Special circumstances:

No special circumstances apply to this information collection.

8. Compliance with 5 CFR 1320.8:

The 60-day Federal Register notice intended to solicit comments from the public on this information collection was published on August 26, 2026, at [91 FR 55157]. There were 5 comments received.

A comment was submitted by “W.D.M. (USA) Limited” suggesting changes to how the TPM safety metric is calculated, which is outside the scope of this renewal.

The Transportation Departments of Idaho, Montana, North Dakota, South Dakota, and Wyoming submitted a joint comment (Joint Comment Letter). Additionally, individual comments were submitted by the Missouri Department of Transportation (MoDOT), the Oklahoma Department of Transportation (ODOT) and the American Association of State Highway and Transportation Officials (AASHTO).

The joint comment letter recommended conditioning OMB clearance on FHWA initiating an Advance Notice of Proposed Rulemaking (ANPRM) to revise 23 CFR Part 490 to reduce the data collection and associated reporting requirements in 23 CFR Part 490. They suggested reducing the NHS routes in rural areas that would be subject to the travel time and congestion elements of the regulation. The request for an ANPRM and this feedback has been noted. Modifications to 23 CFR Part 490 regulations are outside the legal scope of this administrative Paperwork Reduction Act (PRA) clearance docket and cannot be made through this notice.

Regarding the necessity and usefulness of the information collection, the letters from AASHTO, MoDOT, and ODOT said that FHWA should periodically assess whether the required reporting is necessary to support a specific federal decision or program objective, and those requirements that provide limited additional value should be eliminated or simplified. FHWA is responsible for collecting the information required by Congress in 23 USC 119 and 150 and codified in 23 USC Part 490. The TPM Biennial Reports, the subject of this collection, align with and are limited to the reporting requirements detailed in 23 CFR Part 490. Any change to the scope of the statute or regulation is outside of the scope of the PRA clearance docket and cannot be made through this notice.

Regarding the accuracy of the estimated reporting burden, the letters from AASHTO, MoDOT, ODOT and the joint comment letter stated that the burden of 2,040 hours per response is underestimated, with some stating FHWA’s estimate needs to provide greater detail. The submissions provided no empirical data, alternative workload calculations, or evidence upon which FHWA could re-evaluate or adjust its burden estimates. FHWA has provided detailed analysis of the burden assumptions in the Regulatory Impact Assessments (RIA) for the 3 related rulemakings, published on the Docket for each rule, and the costs in this notice are based on BLS wage data as detailed in this document.

Regarding improving the quality, usefulness, and clarity of information, the letters from AASHTO, MoDOT, and ODOT stated the priority should be concise, decision-useful information that reduces repetitive reporting of information already available to the federal government. Additionally, MoDOT noted that the data collected has a lag that can create inconsistencies, which is one reason it does not use the data reported to FHWA in its decision making. FHWA has limited the reporting to the requirements of 23 CFR Part 490. Changes to those requirements, including the timing of the data used, are outside the scope of this notice. The commenters did not provide any information on what elements of the data collection they have identified as

already available to the federal government. FHWA believes that the required information reported is specific to the requirements of 23 CFR Part 490, and therefore not duplicative of other programs. Finally, commenters stated that FHWA should reduce conflicting definitions across federal data collections. Any changes to definitions are outside of the scope of this notice.

Regarding minimizing burden through coordination and technology, the letters from AASHTO, MoDOT, and ODOT encouraged FHWA to use a “collect once, use many times” approach, and use information available to FHWA, rather than requiring State DOTs to reproduce that data for this reporting. The reporting of data used by 23 CFR 490 to establish actual condition and performance, such as the CMAQ Public Access System or the National Bridge Inventory System (NBIS), are federal data collections that serve many different programs, and implement collecting data once and using it many different ways. Within the PMF, FHWA uses data available to it to prepopulate baseline and actual condition and performance, and any State data submitted in previous reports that may be relevant to the current report. One example is how FHWA prepopulates the targets developed by the State DOT that are submitted in the Baseline Performance Report in the Mid Performance Period Report and the Full Performance Period Report, so State DOTs only need to submit these values once. Finally, MoDOT stated that the lag in the time between when data is collected and used for the required reporting limits the value of the outputs, and that the timing of the PMF submittal is not aligned with the timing of the CMAQ reporting, causing undue burden. The timing of the collection and reporting of the data that is an input to the TPM program, such as NBIS data or pavement condition data, is not governed by 23 CFR Part 490 and therefore outside the scope of this notice.

While many of the comments are not part of the subject notice, FHWA will consider them when evaluating the relevant programs, processes, and regulations.

The 30-day Federal Register notice intended to notify the public this information collection was submitted to OMB for review and approval was published on November 5, 2026, at [91 FR 69907].”

9. Payments or gifts to respondents

This information collection does not involve providing any payments or gifts to respondents.

10. Assurance of confidentiality:

The Transportation Performance Management Biennial Reports are intended for public consumption and review. Therefore, no assurance of confidentiality is provided to respondents.

11. Justification for collection of sensitive information:

No sensitive information is collected under this statement.

12. Estimate of burden hours for information requested:

Respondents: 52 State DOTs including Washington DC and Puerto Rico.

Frequency: Biennially (once every two years).

Per State DOT
Estimated Average Burden HOURS per respondent: 2,040 hours per State DOT per biennial report.

Estimated Average Burden COST per respondent: $148,649 per State DOT per biennial report.

The labor is assumed to be completed by "General and Operations Manager – BLS occupation code 11-1021" and "Statistician – BLS occupational code 15-2041". The loaded wage rate for each position was calculated as follows[1]:

- *General and operations Manager Loaded Wage: $53.34 (BLS base hourly wage) * 1.4 (benefit load) = $74.68 loaded hourly wage.*
- *Statistician Loaded Wage: $33.15 (BLS base hourly wage) * 1.4 (benefit load) = $46.41 loaded hourly wage.*

*Labor Mix & Blended Rate: The estimated workload is allocated 93.6% to "General and Operations Manager" ($74.68/hr loaded) and 6.4% to "Statistician" ($46.41/hr loaded). This yields a blended loaded hourly wage rate of $72.87. Estimated Average Burden COST per State DOT calculation: 2,040 hours * $72.867 (blended loaded wage per hour) = $148,649.*

All States
Estimated Total Burden HOURS for all respondents: 106,080 hours for all 52 State DOTs per biennial report instance. (2,040 hrs per State DOT x 52).

Estimated Total Burden COST for all respondents: $7,729,729 for all 52 State DOTs for each biennial report instance. ($148,648.63 per State DOT x 52 States)

Annualized Values
Estimated Annualized Burden HOURS per respondent: 1,020 hours per State DOT (2,040 hrs / 2)

Estimated Annualized COST per respondent: $74,324 per State DOT ($148,649 / 2)

Estimated Annualized Total Burden HOURS for all respondents: 53,040 hours for all 52 State DOTs. (106,080 hrs / 2)

Estimated Annualized Total COST for all respondents: $3,864,864 for all 52 State DOTs. ($7,729,729 / 2)

Respondent	Annualized Burden Hours per Respondent	Annualized Total Burden Hours for all Respondents	Annualized Cost Per Respondent	Annualized Total Cost for all Respondents
52 State DOTs	1,020 hours	53,040 hours	$74,324	$3,864,864

For ROCIS input purposes, the annual numbers will be the biennial burden hours divided by 2 for the total annual burden hours.

13. Estimate of total annual costs to respondents:

Capital/Start-up Costs= $0 Total Operation and Maintenance Costs: $0 State DOTs can use existing software for compiling reports internally and the electronic template provided by FHWA for submitting the report.

14. Estimate of cost to the Federal government:

The estimated cost to the Federal Government to assess if State DOTs have achieved significant progress toward meeting their targets is $112,469 per biennial report instance (every two years).

[1] https://www.bls.gov/oes/2023/may/naics4_999200.htm

When annualized, the average cost to the Federal Government is $56,235 annually. ($112,469 / 2)

*On average, FHWA spends approximately 21.47 hours on all the elements of the assessment for each of the 52 State DOTs (1,116.21 total hours per reporting instance / 52 State DOTs = 21.465 hours per DOT). A diverse number of employees are involved in gathering data, making the assessments, preparing notification information, clearing the results, transmitting notifications and responding to follow-up statements or questions, archiving the assessments, and publishing the final results. We estimate that the average grade level of staff involved is GS-13/step 8[2], paid approximately $71.97 per hour base pay for the Washington-Baltimore-Arlington area. Applying a 1.4 multiplier to account for benefits and overhead results in a loaded average hourly rate of $100.76 per hour. This results in a total estimated cost of $112,469 (1,116.21 hours * $100.76 loaded wage rate)*

15. Explanation of program changes or adjustments:

This information collection request includes a program change that results in a decrease in the total estimated burden hours. The reduction in burden is due to the rescission of the previous Greenhouse Gas (GHG) performance measure and corresponding changes to 23 CFR 490 subpart A and subpart E.

16. Publication of results of data collection:

The results of this data collection will be published by the DOT-FHWA on an external web page on a biennial basis. There are no complex analytical techniques used for the tabulation and publication of this collection.

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

The FHWA is not seeking approval to not display the expiration date for OMB approval of the information collection. There is no justifiable reason for not displaying the expiration date.

18. Exceptions to certification statement:

DOT-FHWA is not seeking an exception to this certification statement.

[2] U.S. Department of Personnel Management. Salary Table 2026-GS, Accessed September 28, 2026: https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2026/DCB_h.pdf