October 21, 2026

The Honorable Sean McMaster
Administrator
Federal Highway Administration
1200 New Jersey Avenue SE
Washington, DC 20590

Subject: Agency Information Collection Activities: Notice of Request for Renewal of a Currently Approved Information Collection (Docket No. FHWA-2026-0892)

Dear Administrator McMaster:

The American Association of State Highway and Transportation Officials (AASHTO) appreciates the opportunity to provide input on the Federal Highway Administration's (FHWA) Notice of Request for Renewal of Information Collection for the Transportation Performance Management Biennial Report as published in the Federal Register on August 26, 2026.

AASHTO is a nonprofit, nonpartisan association representing the state transportation departments (state DOTs) in the 50 states, the District of Columbia, and Puerto Rico, with the mission to support state DOTs in connecting America with the transportation system of today and tomorrow. Given the state DOTs' role as primary stewards of the federally supported, state-administered federal transportation program, AASHTO is pleased to provide the following input for consideration.

AASHTO and the state DOTs understand and appreciate that what we measure matters. State DOTs have served as stewards of the federal performance management framework that was enacted in 2012 in the Moving Ahead for Progress in the 21st Century (MAP-21) Act. Since initial implementation began in 2013, with the full effect of the federal law and subsequent iterations of regulations being in place since 2018, the state DOTs have delivered on the congressional intent of the performance management provisions, which is to provide a consistent framework to measure the performance of the transportation system. Under state DOTs' leadership, the national performance management framework has been implemented in a manner that advances a safer and more efficient transportation system without imposing significant undue regulatory burdens on states.

While AASHTO generally supports the use of meaningful performance information to evaluate the effectiveness of the Federal-aid Highway Program and inform transportation investment decisions, the value of national performance information must be balanced against the cost and administrative burden imposed on state DOTs. Under my "Back to Basics" emphasis as AASHTO President, we encourage FHWA to use this renewal as an opportunity to streamline reporting requirements, eliminate unnecessary duplication, and ensure that the information collected serves a clear federal purpose by offering the following recommendations:

- **Necessity and usefulness of the information collection:** Nationally consistent performance information can help FHWA assess system condition, monitor performance trends, and understand progress toward national transportation goals. However, not every reporting element provides equal value to federal decision makers. FHWA should periodically assess whether each required data element and narrative submission is necessary to support a specific federal decision or program

objective. Requirements that provide limited additional value should be eliminated or substantially simplified. State DOTs should retain appropriate flexibility to manage their transportation systems in response to their individual needs and circumstances.

- **Accuracy of the estimated reporting burden:** FHWA estimates an average burden of 2,040 hours per state DOT response. AASHTO encourages FHWA to reassess and clearly document the methodology underlying this estimate. The full burden extends beyond entering information into the Performance Management Form and may include data acquisition, target development, analysis, validation, coordination with metropolitan planning organizations, narrative preparation, contractor support, and reconciliation with other reporting requirements. A transparent accounting of these activities is necessary to establish a credible baseline for evaluating future burden-reduction efforts.

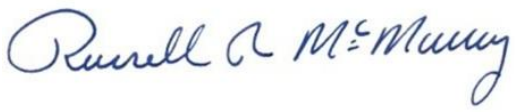
- **Improving the quality, usefulness, and clarity of information:** FHWA should prioritize concise, decision-useful information that supports national performance assessment while reducing repetitive reporting. Reporting should emphasize meaningful trends, material changes, and relevant context rather than requiring states to repeatedly provide information already available to the federal government. FHWA should also seek greater consistency and coordination across its information collections to reduce conflicting definitions, duplicative requests, and unnecessary reconciliation.

- **Minimizing burden through coordination and technology:** AASHTO encourages FHWA to adopt a "collect once, use many times" approach across federal transportation programs. When authoritative information is already available through existing federal reporting systems or submissions, FHWA should use that information rather than require state DOTs to reproduce it. For information that remains necessary, FHWA should expand opportunities for automated data transfers, pre-populated reporting fields, and electronic validation. These improvements should complement—not substitute for—eliminating requirements that do not provide sufficient value to justify their cost.

AASHTO recommends that FHWA use the renewal process to establish a more disciplined approach to federal performance reporting: retain information necessary for national assessment, eliminate duplication, reduce repetitive narrative requirements, and provide states with greater flexibility in how they manage and communicate performance. The objective should be a reporting framework that preserves the quality and comparability of essential national information while reducing the resources required to produce it.

AASHTO appreciates FHWA's consideration of these comments and looks forward to continued collaboration on a transportation performance management framework that is effective, efficient, and focused on meaningful results. If you would like to discuss the issues raised in this letter, please contact Anna McLaughlin, AASHTO Program Director for Transportation Program Management at amclaughlin@aashto.org or (202) 624-3625.

Sincerely,



Russell R. McMurry, P.E.
President, American Association of State Highway and Transportation Officials
Commissioner, Georgia Department of Transportation