OKLAHOMA Transportation

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

RE: **Agency Information Collection Activities: Notice of Request for Renewal of a Currently Approved Information Collection, Docket No. FHWA-2026-0892**

Dear Administrator McMaster:

The Oklahoma Department of Transportation (ODOT) 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.

ODOT is the state agency responsible for the safe, economical and effective transportation network, which includes the planning and operation of the tax-supported designated state highway system in the State of Oklahoma. Title 69, Section 4002 of Oklahoma Statutes outlines ODOT's core functions which include:

- coordinating and developing a comprehensive transportation plan to meet Oklahoma's present and future needs.
- coordinating the development and operation of various transportation facilities, including highways, public transportation, railroads and waterways.
- administering federal and other funds available for transportation purposes.
- cooperating with local governments to plan and develop transportation-related activities.

ODOT is the primary steward of the federally supported, state-administered federal transportation program in Oklahoma, responsible for administering billions of dollars in federal funds in multiyear awards to operate and maintain our nation's multimodal transportation infrastructure. ODOT is committed to be responsible stewards of federal funds to provide safety and mobility for everyone who uses our transportation network and is pleased to provide the following input for your consideration.

ODOT understands and appreciates that what we measure matters. As stewards of the federal performance management that was enacted in 2012 in the Moving Ahead for Progress in the 21st Century (MAP-21) Act, ODOT has been reporting federally required performance measures to provide a consistent framework to measure the performance of the transportation

system. Under each 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 ODOT 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 each state DOT. 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. ODOT 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: We encourage 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 or regurgitate 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.

FHWA should 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.

ODOT 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.

Sincerely,



Tim J. Gatz
Executive Director