MoDOT

Missouri Department of Transportation
Ed Hassinger, P.E., Director

105 West Capitol Avenue
P.O. Box 270
Jefferson City, Missouri 65102

1.888.ASK MODOT (275.6636)

October 26, 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 Missouri Department of Transportation (MoDOT) appreciates the opportunity to provide input on the Federal Highway Administration's (FHWA) Notice of Request for Renewal Information Collection for the Transportation Performance Management Biennial Report as published in the Federal Register on August 26, 2026.

While MoDOT understands FHWA needs to measure performance of the National Highway System (NHS) and evaluate the effectiveness of the Federal-aid Highway Program and inform transportation investment decisions for Federal funding, Missouri does not use the information from Transportation Performance Management Biennial Report. MoDOT measures the entire statewide system, which is significantly more than the NHS.

We ask 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 and offer the following comments to each question:

- **Necessity and usefulness of the information collection**: Nationally consistent performance information can help FHWA assess system conditions, monitor performance trends, and understand progress toward national transportation goals. The data collected through the Performance Management Form (PMF) by FHWA has several limitations including data lag, data that only consider the NHS, and short-term targets. This limits the usefulness to Missouri. MoDOT has over two decades of system data for the entire state system, of which the NHS is a small percent of the statewide system. Therefore, MoDOT uses internal historical data for decision making, and does not consider only NHS when making decisions. MoDOT finds limited value at the state level.

- **Accuracy of the estimated reporting burden**: FHWA estimates an average burden of 2,040 hours per state DOT response. Missouri spends significantly more time, as the number of people who have input on the PMF are from multiple divisions, and include staff from Pavement, Bridge, Transportation Planning, Highway Safety and Traffic, Freight, and a Metropolitan Planning Organization (MPO). The time each staff member dedicates to data acquisition, target development, analysis, validation, narrative preparation, contractor support, and reconciliation with other reporting requirements is

extensive. Additional staff time is spent coordinating between staff, coordinating with a MPO and another state DOT, and entering the PMF.

- **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 information collections to reduce conflicting definitions, duplicative requests and unnecessary reconciliation. MoDOT believes the use of the data provided by FHWA in the PMF is limited in its usefulness due to the data lag and the limited relevance to Missouri's entire transportation system, which extends beyond the NHS. MoDOT does not use PMF data for decision making partially due to the data lag and the inconsistency of data.

- **Minimizing burden through coordination and technology:** MoDOT encourages FHWA to use a "collect once, use many times" approach across federal transportation programs. Requiring DOTs to spend limited resources on federal data such as National Performance Management Research Data Set (NPMRDS) to derive information that is often over a year old when it is obtained for reporting is limiting. Additionally, the timing of the PMF submittal is not conducive with the timing of CMAQ reporting and causes undue hardship on both the MPO and MoDOT staff.

MoDOT recommends FHWA use the renewal process to establish a more streamlined process for federal performance reporting: retaining information necessary for national assessment, eliminating duplication, and providing states with greater flexibility in how they manage and communicate performance. FHWA's Objective should be a reporting framework that preserves the quality and comparability of essential national information, while reducing the resources required to produce reporting.

MoDOT appreciates FHWA's consideration of these comments and respectfully requests that further actions on this subject be consistent with the comments provided.

Sincerely,



Llans Taylor, P.E.
Transportation Planning Director