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Comment from Sound Transit

Posted by the **Federal Highway Administration** on Jun 26, 2024

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Comment

Jazmyne Lewis
Information Collection Officer
Department of Transportation
Federal Highway Administration
Docket Management Facility
U.S. Department of Transportation
West Building Ground Floor, Room W12-140
1200 New Jersey Avenue, SE
Washington, DC 20590-0001

RE: [Docket No. FHWA-2024-0037], Annual Value Engineering Call for Data

Dear Ms. Lewis:

The FHWA recently issued a request for comments regarding the requirement for state Departments of Transportation (DOTs) to submit annual reports regarding the performance of their federally mandated Value Engineering (VE) programs.

In response to the Federal Register request for comments, I will focus primarily on:

- (1) Whether the proposed collection is necessary for the FHWA's performance; and
- (2) ways for the FHWA to enhance the quality, usefulness, and clarity of the collected information.

As a taxpayer and user of VE at local government agency here at Sound Transit, I am concerned about the effective use of taxpayer funds across the board. Government VE requirements align with long-standing private sector practices of using VE to not only show cost effectiveness, but also to support finding the best solution to whatever challenge it is applied against. The performance of VE tells us that federal funds are

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being spent with value in mind, with consideration given beyond cost and including quality, reliability, maintainability, and other factors that show that funds are not being spent just for the sake of budget execution.

I argue that the proposed collection is not only necessary for FHWA's performance, but necessary for public image and transparency. I cannot speak to the burden of the data collection, but I advocate that FHWA expand the collected information to include information on quality and other measures of effectiveness to serve as a more comprehensive and thoughtful assessment to ensure taxpayers are getting the best value from government.

If you can, please ask the OMB to reinstate ALL federal agencies' reporting associated with Circular A-131. The public needs to know that government at all levels is working hard to ensure taxpayer value. VE is one of the best ways to do this.

Sincerely,

Rahul Nagalkar
Value Management Lead at Sound Transit
Seattle, WA

Comment ID

FHWA-2024-0037-0005



Tracking Number

lxw-519h-nmv8

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Received Date

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