



COMMONWEALTH of VIRGINIA

DEPARTMENT OF TRANSPORTATION

Stephen C. Brich, P.E.
Commissioner

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June 5, 2024

The Honorable Shailen P. Bhatt
Administrator
Federal Highway Administration
Department of Transportation

Submitted electronically at: www.regulations.gov

Subject: Annual Value Engineering Call for Data
Docket No.: FHWA-2024-0037

Dear Administrator Bhatt:

The Virginia Department of Transportation (VDOT) appreciates the opportunity to provide comments to the Federal Highway Administration (FHWA) in response to its intention to request the Office of Management and Budget's (OMB) approval for a new information collection in the form of an Annual Value Engineering (VE) Call for Data published on May 9, 2024.

Below are VDOT's responses to the requests for comments from FHWA:

1) *Whether the proposed collection is necessary for the FHWA's performance.*

VDOT supports FHWA's collection of data related to the VE program. Collecting data on VE allows FHWA to assess the efficacy and success of the VE program. The proposed collection will allow FHWA to ensure compliance with the VE requirements and assist State Departments of Transportation (State DOTs) as needed.

2) *The accuracy of the estimated burdens.*

FHWA estimates that completing the Annual VE Call for Data will take each participant 2 hours per year. The FHWA estimate is accurate. VDOT already gathers most of the information requested by FHWA for its own tracking and internal reporting purposes. The only additional burden for VDOT, which would be minimal, is tracking the information requested by FHWA by the federal fiscal year which differs from the Commonwealth of Virginia's fiscal year.

3) *Ways for the FHWA to enhance the quality, usefulness, and clarity of the collected information.*

VDOT would appreciate having access to the data reported by other State DOTs. Receiving this information would help VDOT assess the success of its VE program and ultimately improve its program. This will allow VDOT to draw comparisons between its program and those administered by other State

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DOTs. It will also enable VDOT to see where other State DOTs are being successful and adapt what others are doing for use in Virginia.

- 4) *Ways the burden could be minimized, including the use of electronic technology, without reducing the quality of the collected information.*

VDOT suggests that FHWA develop an electronic database that allows for the entry of the requested information. The electronic database should allow State DOTs to review the information they submitted and view their submissions from previous years. VDOT would also like for the electronic database to allow view only access to the data submitted by other State DOTs. This will allow VDOT to compare its data with that of other State DOTs and engage in data analytics without additional burden.

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Thank you for providing VDOT the opportunity to submit comments on FHWA's intention to request the Office of Management and Budget's (OMB) approval for a new information collection in the form of an Annual Value Engineering (VE) Call for Data. If you have any questions concerning VDOT's comments, please do not hesitate to contact Kerry A. Bates, P.E., Construction Division Administrator, at (804) 371-4310.

Sincerely,



Barton A. Thrasher, P.E.
Chief Engineer
Virginia Department of Transportation