

ODOT Coordination Process with MPOs in Setting, Monitoring, and Reporting State Performance Measure Targets¹

July 2020 (Rev. 4)

This process paper provides an overview of the required coordination and collaboration between Oregon Department of Transportation (ODOT) and the Metropolitan Planning Organizations (MPOs) within Oregon in setting federally required performance measure targets. Federally required performance measures are defined in rules approved by the United States Department of Transportation (USDOT). Since federally required performance measures are approved by rule, both the state and the MPO shall continue to coordinate in setting appropriate statewide and MPO specific targets. This process paper contains five sections. Section I describes how ODOT coordinates with MPOs in setting the statewide targets. Section II describes the coordination and roles for ODOT and MPOs in setting MPO performance measure targets if the MPOs elect to do so. Section III outlines the roles and responsibilities for monitoring and reporting on statewide and MPO performance measures and targets. Section IV describes the Public Transportation Agency Safety Plan target setting process. Finally, Section V describes the Transit Asset Management Plan target setting process. This process paper is meant to be a living document and as the State and MPOs gain more experience in setting various targets, it may continue to be modified. The [Oregon Transportation Plan](#) has been amended to acknowledge the role of the group Transportation Asset Management Plan with regards to federal performance management regulations. As per 23 CFR 450.314(h)(2)(ii), this documentation is required and in order to be more responsive to changes MPO target setting decisions, ODOT, working with their applicable stakeholders, decided this process document (group TAM Plan) met this requirement outside of the currently established metropolitan planning / ODOT / Transit agreements.

Section I Coordination and Collaboration Process for Setting Statewide Transportation Performance Measure Targets

1. ODOT will host target setting conversations with the MPOs (only exceptions are for safety and transit measures as there is already a prescribed process – see below). These conversations have previously be in-person meetings, however, other options such as phone or on-line meeting tools may be as effective as well.
 - a. When it is appropriate and responsible, ODOT Staff (as listed below in paragraph 3) will be ready to begin the process for making any revisions to existing performance measure targets, ODOT will hold a preliminary coordination discussions with the MPOs that will cover the following at a minimum:
 - i. What performance measure(s) is/are being addressed
 - ii. Review scope and scale of the proposed measure
 - iii. Review anticipated data sources that may be useful in the development of statewide and/or MPO targets. Gain consensus between ODOT and MPOs on data sources, collection policies, and analytical methods to be used for specific performance measure at both the state and MPO level.

¹ This coordination process was the process used in the development of the initial targets but has been revised to reflect the process for revising any performance targets.

- iv. Review any further federal guidance in setting specific Performance Measure Targets
 - v. Review general timeline for ODOT decision-making
 - vi. Review final Target approval action defining the 180 day clock for MPOs
 - vii. Identify if and how the performance measures and targets will be published in an official government report or plan.
- b. Any material that is available for this early coordination will be shared with the MPOs electronically one week prior to the meeting if possible.
 - c. Regarding the highway Safety performance measures target setting, this process can be found [here](#).
 - d. Regarding the Public Transportation Agency Safety Plan performance measures target setting, this process can be found in Section IV.
 - e. Regarding the Transit Asset Management Plan performance measure target setting, this process can be found in Section V.
2. Target Estimating Discussion
- a. After ODOT has developed a revised target, ODOT will invite the MPOs to participate in the Target Estimating Discussion. Please note that the safety PMs discussion will be part of the highway safety PMs prescribed process
 - i. ODOT will review historical and recent data trends, analysis, and methodologies for setting the specific performance measure(s).
 - ii. ODOT will review general funding trends and assumptions.
 - iii. ODOT will provide draft revised statewide targets to MPOs.
 - iv. Provide time for discussion, review, questions between MPOs and ODOT including the ODOT and MPO subject matter experts (SMEs).
 - v. Discuss how potential statewide targets may relate to each specific MPO.
 - vi. MPOs will have 45 days to provide any recommendations, suggestions, or concerns with proposed ODOT targets (except for Safety PMs)
 - vii. In some situations, state level targets will be incorporated into a report or plan found [here](#). Additional deadlines and public engagement steps will need to be taken in to account in case of overlap or conflict on the calendaring of decisions.
 - b. ODOT will consider any and all feedback from MPOs regarding the proposed target. Subject matter experts from ODOT will make the target recommendations to the ODOT approval authority (described in step 3 below). Feedback from MPOs and how that feedback was incorporated, if applicable, will be considered in the final target approval process.
3. Target Approval
- a. The Transportation Safety Division (TSD) Administrator shall have the authority to approve all federally required transportation safety performance measure targets for ODOT. For Safety measures, the TSD Administrator shall seek concurrence from the Oregon Transportation Safety Committee for all proposed performance measure targets.

- b. The Highway Division Administrator shall have the authority to approve all federally required performance measure targets for transportation system assets (such as pavement and bridge).
 - c. The Transportation Development Division Administrator shall have the authority to approve all federally required performance measure targets for system performance items (such as reliability, freight, etc.).
 - d. The Public Transportation Division Administrator shall have the authority to approve all federally required performance targets for transit program assets addressed in the group Transit Asset Management Plan. Transit agencies who prepare their own TAM Plans obtain approval for their agency transit asset targets from their own governance.
 - e. If any Division Administrator named above believes that a proposed (future) federally required performance measure should be a joint responsibility for the target setting, they have the authority to jointly share the target setting responsibility as appropriate.
 - f. The appropriate division administrator above will be responsible for development of a staff report or equivalent to document the process to establish the proposed target and the final approved target, including feedback received from the MPOs under step 2. The ODOT staff report will include key aspects of the proposed target and any potential impacts the target may have and validation that this coordination process was followed.
4. Communication of Performance Measure Target Adoption
 - a. ODOT will notify each MPO (by letter or e-mail or similar documentable communication) that ODOT has formally approved a specific statewide Performance Measure Target and inform the MPOs that they have 180 days to either adopt the state's target or complete establishment of the MPO's Target if applicable.
 - b. ODOT notification will be sent within one week of the formal Performance Measure Target approval by ODOT, or adjustment of a state-wide target.

Section II Coordination and Collaboration Process For Setting MPO Performance Measure Targets

As per 23 CFR 450.314(h), MPOs, ODOT, and public transportation providers are to develop specific written provisions for cooperatively developing and sharing information related to transportation performance data and the selection of the performance targets. ODOT acknowledges the coordination and collaboration process with each specific MPO² may be slightly different as each MPO has different level of staff expertise and knowledge, analysis capabilities, organizational structures, etc. While the steps below do not contain all the specific steps and requirements, the intent is to ensure coordination and collaboration between each MPO and ODOT to gain a clear agreement and understanding on data to be used and collection

² As bi-state MPO's, the Longview/Kelso/Rainier MPO will align with WA and Milton-Freewater will align with Walla Walla Valley MPO (WA).

policies, analysis methods and responsibilities, thereby assuring compatibility of MPO targets to the statewide target.

1. If a MPO chooses to establish an MPO specific target for any federally required performance measure, they will notify the ODOT Performance Measure Coordinator of their intent. The ODOT Performance Measure Coordinator is responsible for coordinating with the appropriate ODOT staff and subject matter experts. In developing a specific MPO performance target, the MPO is required by federal rule to coordinate with ODOT to ensure consistency to the maximum extent practical.
2. The appropriate ODOT subject matter experts (and data owners) will provide data used by ODOT in setting the statewide targets to the MPOs. This data will be specific to the MPO and will meet the requirements of the specific federal performance measure and will be based on the agreed-to structure, data elements, etc. that match the statewide PM process.
3. The appropriate ODOT subject matter experts will provide expertise as requested by MPOs in evaluating the data and performing any required analysis to help the MPO in setting a specific MPO performance measure target. The SME's role shall be limited to these elements. ODOT's Performance Measure Coordinator will provide a supporting role in facilitating communication.
4. ODOT and the MPO will document in writing the agreed upon data and analysis parameters to be used in setting the MPO specific target and future reporting. ODOT will provide the necessary data set for the MPO specific target as long as the data and parameters do not change those used in the statewide processes. If the MPO chooses to use a different data set or parameters of the data set (as is their option), the MPO may be responsible for all data analysis in setting the specific target as well as reporting. ODOT staff can only provide forecasts of conditions of the state highway system and cannot necessarily forecast the condition of local assets.
5. Prior to the MPO taking any formal action to approve the performance measure target, they will give ODOT the opportunity to review and provide comment on the proposed target value. This written endorsement may be by letter or e-mail and shall copy FHWA and FTA as appropriate.
6. After official approval of an MPO specific target, the MPO shall notify the ODOT Performance Measure Coordinator, and the respective ODOT program manager in writing of the approved target. This notification may also be in letter or e-mail form. Additionally MPOs can change their 4-year targets at the mid-performance period, even if ODOT doesn't adjust theirs.

Section III Monitoring and Reporting

1. ODOT's Performance Measure Coordinator will be responsible for ensuring coordination of the State's submission of all federally required performance measure reports to FHWA and FTA. Additionally, MPOs must report their performance to ODOT as required by Federal Rules listed below.
2. Subject to FHWA and FTA defining the specific reporting process, ODOT program SMEs (described in Section I) are responsible for providing the required reporting

information to the ODOT Performance Measure Coordinator for the statewide performance measures and targets.

3. Where ODOT has agreed with the MPO (in Section II) to calculate the current performance measure results from the statewide and federal data systems, the ODOT Performance Measure Owners /SMEs will complete the appropriate analysis and provide the results to the MPO and the ODOT Performance Measure Coordinator in a timely manner for compliance with federal reporting requirements.
4. The MPO will be responsible for documenting any other federally required Performance Measure reporting information including relationship to the MPO Performance Based Planning and Programming process.
5. ODOT will be responsible for ensuring all federally required performance measure reporting elements are completed for the statewide report, including any relationship to the State Performance Based Planning and Programming process.
6. Based upon the reporting information, any adjustment to a federal performance measure target at either the State or MPO level will follow the appropriate section of this process paper.

NOTE: "MPO reporting requirements are (§490.107(c):

1. The MPO shall report their established targets to their respective State DOT in a manner that is documented and mutually agreed upon by both parties.
2. The MPO shall report base line condition/performance and progress toward the achievement of their targets in the system performance report in the metropolitan transportation plan in accordance with Part 450 of this chapter.
3. Had an MPO declared not to support the state's targets in a performance area they shall report performance to ODOT IAW §490.107(c)
4. The MPO's shall re-declare if the State (ODOT) adjusts the target either at the mid report period or every four years when the State is required to reset their target. If ODOT maintains our respective target thru the mid-reporting period, ODOT will NOT ask the MPO's to re-declare at the mid-report period.
5. MPO response to State DOT target adjustment. If the State DOT adjusts a 4-year target in the State DOT's Mid Performance Period Progress Report and if, for that respective target, the MPO established a target by supporting the State DOT target, then the MPO shall, within 180 days, report to the State DOT whether it will either:
 - (i) Agree to plan a program of projects so that they contribute to the adjusted State DOT target for that performance measure; or
 - (ii) Commit to a new quantifiable target for that performance measure for its metropolitan planning area.
6. Target adjustment. If the MPO establishes its target by committing to a quantifiable target, or establishes target(s) for the Total Emissions Reduction measure, then the MPOs may adjust its target(s) in a manner that is collectively developed, documented, and mutually agreed upon by the State DOT and MPO. Any adjustments made to 4-year targets, established for CMAQ Traffic Congestion measures, shall be collectively developed and agreed upon by all State DOTs and MPOs that include any portion of the NHS in the respective urbanized area applicable to the measure.
7. Reporting. The MPOs shall report targets and progress toward the achievement of their targets as specified in §490.107(c). After the MPOs establish or adjust their

targets, the relevant State DOT(s) must be able to provide these targets to FHWA upon request.”

(Specific Statutory Language)

(c) **MPO Report.** The MPOs shall establish targets in accordance with § 490.105 and report targets and progress toward the achievement of their targets in a manner that is consistent with the following:

(1) The MPOs shall report their established targets to their respective State DOT in a manner that is documented and mutually agreed upon by both parties.

(2) The MPOs shall report baseline condition/performance and progress toward the achievement of their targets in the system performance report in the metropolitan transportation plan in accordance with part 450 of this chapter.

(3) The MPOs serving a TMA and meeting criteria, specified in § 490.105(f)(6)(iii), shall develop a CMAQ performance plan as required by 23 U.S.C. 149(l). The CMAQ performance plan is not required when the MPO meets the criteria specified in § 490.105(f)(6)(vii) or (viii).

(i) The CMAQ performance plan shall be submitted to FHWA by the State DOT, and be updated biennially on the same schedule as the State Biennial Performance Reports.

(ii) For the CMAQ Traffic Congestion and Total Emissions Reduction measures in subparts G and H of this part, the CMAQ performance plan submitted with the State DOT's Baseline Performance Period Report to FHWA shall include:

(A) The 2-year and 4-year targets for the CMAQ Traffic Congestion measures, identical to the relevant State DOT(s) reported target under paragraph (b)(1)(ii)(A) of this section, for each applicable urbanized area;

(B) The 2-year and 4-year targets for the Total Emissions Reduction measure for the performance period;

(C) Baseline condition/performance for each MPO reported CMAQ Traffic Congestion targets, identical to the relevant State DOT(s) reported baseline condition/performance under paragraph (b)(1)(ii)(B) of this section;

(D) Baseline condition/performance derived from the latest estimated cumulative emissions reductions from CMAQ projects for each MPO reported Total Emissions Reduction target; and

(E) A description of projects identified for CMAQ funding and how such projects will contribute to achieving the performance targets for these measures.

(iii) For the CMAQ Traffic Congestion and Total Emissions Reduction measures in subparts G and H of this part, the CMAQ performance plan submitted with the State DOT's Mid Performance Period Progress Report to FHWA shall include:

(A) 2-year condition/performance for the CMAQ Traffic Congestion measures, identical to the relevant State DOT(s) reported condition/performance under paragraph (b)(2)(ii)(A) of this section, for each applicable urbanized area;

(B) 2-year condition/performance derived from the latest estimated cumulative emissions reductions from CMAQ projects for each MPO reported Total Emissions Reduction target;

- (C) An assessment of the progress of the projects identified in the CMAQ performance plan submitted with the Baseline [Performance Period](#) Report toward achieving the 2-year [targets](#) for these measures;
- (D) When applicable, an adjusted 4-year [target](#) to replace an established 4-year [target](#); and
- (E) An update to the description of projects identified for CMAQ funding and how those updates will contribute to achieving the 4-year performance [targets](#) for these measures.
- (iv) For the CMAQ Traffic Congestion and Total Emissions Reduction [measures](#) in subparts G and H of this part, the CMAQ performance plan submitted with the State DOT's Full [Performance Period](#) Progress Report to FHWA shall include:
- (A) 4-year condition/performance for the CMAQ Traffic Congestion measures, identical to the relevant State DOT(s) reported condition/performance reported under [paragraph \(b\)\(3\)\(ii\)\(A\)](#) of this section, for each applicable urbanized area;
- (B) 4-year condition/performance derived from the latest estimated cumulative emissions reductions from CMAQ projects for each [MPO](#) reported Total Emissions Reduction [target](#); and
- (C) An assessment of the progress of the projects identified in both paragraphs (c)(3)(ii)(C) and (c)(3)(iii)(D) of this section toward achieving the 4-year [targets](#) for these measures.

Section IV Public Transportation Agency Safety Plans

The Federal Transit Administration (FTA) Public Transportation Agency Safety Plan (PTASP) Final Rule was published July 19, 2018. The PTASP Final Rule requires certain operators of public transportation systems that receive federal funds under FTA's Urbanized Area Formula Grants to develop safety plans that include the processes and procedures to implement Safety Management Systems (SMS). The PTASP rule became effective on July 19, 2019. The PTASP compliance deadline is December 31, 2020.³

The PTASP must include safety performance targets.⁴ Find additional guidance on planning and target setting on FTA's [Performance Based Planning](#) pages. Transit operators also must certify they have a safety plan in place meeting the requirements of

³ There are eleven transit providers in the state of Oregon that are required to develop a PTASP. Three of those transit providers are writing their own plan. Oregon DOT contracted with RLS and Associates to write each plan in consultation with the remaining transit providers. Five of those safety plans are complete and adopted by their governing bodies. Two other safety plans are complete awaiting governing body approval. The last safety plan is nearing completion and is expected to be adopted on May 28, 2020.

⁴ Some transit providers generated their own safety performance targets in their PTASP following the guidelines provided by FTA on the [Performance Based Planning](#) pages. Some of the larger transit providers have been reporting on these safety performance targets in years past. Oregon DOT and RLS and Associates worked with the remaining transit providers and followed the same guidance while explaining how to gather the data needed. In a couple cases, RLS and Associates developed a spreadsheet wherein they could input the past years data to compute the anticipated safety performance targets based on their historic data. In-depth information and definitions on each safety performance target was also provided.

the rule by December 31, 2020. The plan must be updated and certified by the transit agency annually.

MPOs will have one year from the establishment of the transit agency safety targets to establish performance targets that address the performance measures or standards established under [23 CFR part 490](#) (where applicable), and [49 U.S.C. 5329\(d\)](#) to use in tracking progress toward attainment of critical outcomes for the region of the Metropolitan Planning Organization (49 CFR§450.306(d)).

By statute, the MPO is directed to coordinate to the maximum extent possible with the State DOT and public transportation providers when setting performance targets required under 49 U.S.C. 5326(c) and 5329(d) (49 CFR§450.206(c)(2), 49 CFR§450.306(d)(2)(ii)), and 49 CFR§450.306(d)(3)(iii)).⁵

Section V Transit Asset Management Plans

The Federal Transit Administration (FTA) Transit Asset Management Final Rule was published July 26, 2016 in the Federal Register and will become effective October 1, 2016. The final rule defines the term *state of good repair* and establishes minimum Federal requirements for transit asset management. This applies to all recipients of Federal financial assistance under 49 U.S.C. Chapter 53 who own, operate, or manage public transportation capital assets.

ODOT, through consultation with sub recipient transit partners, decided to prepare a group Transit Asset Management (TAM) Plan, and hired a consultant to collaborate with participating agencies to draft an Oregon group TAM Plan.

To be eligible to participate in a group plan, agencies must own, operate, or manage 100 or fewer vehicles in revenue service during peak regular service across all non-rail fixed route modes or in any one non-fixed route mode; sub recipient under the 5311 Rural Area Formula program; a sub recipient under the 5310 Seniors and Individuals with Disabilities program who operates an open-door service; or any American Indian tribe. Only TriMet and Salem Area Mass Transit District are not participating in ODOT's TAM Plan.

In the summer of 2018, as Oregon was in the process of preparing a group TAM Plan covering 53 transit agencies, ODOT began communication with MPOs around TAM target setting. ODOT presented an overview of the State's group TAM Plan in July of

⁵ MPO distribution information is located in Section 3 of the transit provider safety plan. It conveys the name of their MPO and identifies the month when the transit provider anticipates sharing the targets and any amendments to those targets with the MPO. Each transit provider selected the month based on their meeting schedule, TAM target sharing, end of fiscal year or other reason. RLS and Associates did not advise on when the transit providers should share the targets other than be consistent each year. It was suggested grouping the PTASP targets with TAM targets for efficiency and planning ease. It is the responsibility of each MPO to obtain target data from the transit providers and report on performance against those targets to Oregon DOT.

2018. In September of 2018, ODOT held a conference call with Oregon MPOs to discuss the TAM Plan and MPO roles.

MPO area asset reports, including performance targets were sent to the MPO's in October 2018, and MPO's were provided with a sample resolution to adopt their own transit performance measures and targets for State of Good Repair.

In summary, the Oregon Department of Transportation (ODOT) met with the MPOs prior to the adoption of the group TAM Plan. The MPO's were given an opportunity to ask questions and provide feedback. The final TAM and MPO asset reports with performance measure targets were published on the Public Transportation Division [website](#) in October 2018.

ODOT records all federally funded assets through our OPTIS database. With the implementation of the group TAM Plan, providers were required to enter all non-federally funded assets in OPTIS. Providers report on mileage and condition for all vehicles and facilities on a quarterly basis in OPTIS. Public Transit sends condition assessments to providers who own facilities and equipment (non-revenue vehicles) to be completed and returned after the end of the state fiscal year.

The information submitted in OPTIS and condition assessments is used to prepare the annual TAM reports and targets. This information is included in the annual NTD report and [Key Performance Measures](#) for ODOT. When ODOT completes annual reporting on transit assets, the data is published to the Public Transportation Division [TAM](#) website. A notification will be sent to all transit providers and MPO's providing them with the location and how to access the data, annually.

FTA requires a TAM Plan to forecast projects, targets and activities for at least four years and the plan should be updated every four years coinciding with the Oregon Statewide Transportation Improvement Program cycle, or when significant changes need to be made. ODOT's group Transit Asset Management Plan updates will include, in addition to asset inventory and condition, the current public involvement plan, detail regarding MPO involvement and the process for adding new agencies to the group TAM Plan. Updates will also include information on when and how MPO's receive notifications of updates or results.