



## Office of Traffic Safety

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Docket Management Facility

U.S Department of Transportation

1200 New Jersey Avenue SE

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Washington, DC 20590-0001

RE: Docket No. NHTSA-2022-0036

RIN-2127-AM45

National Highway Traffic Safety Administration (NHTSA)

To whom it may concern:

On behalf of the Minnesota Department of Public Safety Office of Traffic Safety we thank you for this opportunity to offer comments regarding the Uniform Procedures for State Highway Safety Grant programs administered by the National Highway Traffic Safety Administration. Minnesota DPS-OTS is grateful to the United States Congress and to NHTSA for the continuing support of traffic safety initiatives and look forward to continuing this important work with our NHTSA partners.

The Minnesota DPS-Office of Traffic Safety offers the following comments:

1) Our primary request for our NHTSA partners is to minimize the administrative burdens and to allow the maximum amount of flexibility in all of the program and project areas made possible by the Infrastructure Investment and Jobs Act. By allowing flexibility, state highway safety offices can and will respond quickly and appropriately to emerging safety threats without undue delay. The flexibility will also allow and encourage innovation and creativity to solve current and future traffic safety challenges. Minimizing the administrative burdens will improve the return on investment by allowing the federal resources to be put to use to prevent fatal and serious injury crashes.

2) Minnesota OTS encourage NHTSA to ensure a streamlined and non-duplicative implementation plan for the newly created Triennial Highway Safety

Plan, the newly created Annual Application, and the Annual Report. The administrative burden required to prepare these three documents should be minimized and follow the legislative language.

- 3) Minnesota OTS recommends that NHTSA allows for the maximum amount of flexibility in the goal setting and data collection process for the now required public participation and data driven enforcement programs and projects.
- 4) Minnesota OTS requests that NHTSA convene a working group of relevant stakeholders to review the language addressing the new performance measure determination requirement. The new language regarding the “constant improved performance” may be difficult to quantify and may not always be supported by data. Having the appropriate stakeholders at the table will facilitate the development of a process that both NHTSA and FHWA will accept as compliant.
- 5) Minnesota fully supports the detailed suggested actions laid out in the Governor’s Highway Safety Association response to this request for comments.

The Infrastructure and Job Act is a monumental step forward in the mission to keep all users of our transportation system safe in their daily travels. There are numerous opportunities contained in the legislation that can and will make a positive difference. In order to take full advantage of those opportunities a strong partnership between NHTSA and each State Highway Safety Office will be key. It is possible to reach a goal of zero fatalities if we work together and in support of each other. IJA gives us a great opportunity to just that.

With a Safe System model and the expansion of the cadre of involved stakeholders, the resources made possible by I.I.J.A. will bring us much closer to our goal of zero deaths. Flexibility, innovation, creativity, new approaches, and outside the box thinking will be the drivers of that Safe System. We look forward to working in partnership with NHTSA as the planning and implementation for I.I.J.A. moves forward

The Minnesota DPS Office of Traffic Safety thanks NHTSA for this opportunity to partner and work together on these exciting opportunities.

Respectfully Submitted,

*Michael J. Hanson*

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Director