

**Department of Transportation Office of the
Chief Information Officer**

**Supporting Statement B
Commercial Driver's License (CDL) Skills Testing Delays**

Part B: Collections of Information Employing Statistical Methods

1. DESCRIBE POTENTIAL RESPONDENT UNIVERSE AND ANY SAMPLING SELECTION METHOD TO BE USED.

The potential respondent universe is all 50 States and the District of Columbia. The potential respondent universe is small enough (51) for this study to be inclusive of the entire universe. Therefore, no sampling or selection methodology is required. The Government Accountability Office (GAO) conducted a similar study and received responses from all 51 entities (100 percent response rate); however, the Federal Motor Carrier Safety Administration (FMCSA) has not yet conducted a study of this nature.

2. DESCRIBE PROCEDURES FOR COLLECTING INFORMATION, INCLUDING STATISTICAL METHODOLOGY FOR STRATIFICATION AND SAMPLE SELECTION, ESTIMATION PROCEDURES, DEGREE OF ACCURACY NEEDED, AND LESS THAN ANNUAL PERIODIC DATA CYCLES.

There will be no stratification or sample selection for this study, as the entire respondent universe is only 51 entities. The study will survey each of the 51 entities, so the entire universe is covered. Section 5506 of the Fixing America's Surface Transportation Act, 2015 (FAST Act) requires FMCSA to conduct this study.

The purpose of this study is to identify, in each State, the average wait time from the date an applicant requests to take a skills test (or retest) to the date the applicant has the opportunity to complete such test (or retest). The study will also identify the resources available for skills testing, such as the number of examiners and test sites, as well as what is being done to address skills testing delays in States that have average skills test or retest wait times of more than 7 days.

A 2015 Government Accountability Office (GAO) report to Congress⁽¹⁾ revealed that skills test delays varied greatly between States, and some States experienced high delays (up to 7 weeks, in some cases) between the time a CDL applicant initially requested to take the skills test and the first available opportunity for the applicant to complete the skills test. The report found there were several possible causes of these delays, but there was little being done to monitor or track these delays.

Possible impacts of CDL skills testing delays include:

¹ <http://www.gao.gov/assets/680/671429.pdf>

- The expiration of an applicant’s commercial learner’s permit (CLP), forcing the applicant to renew the permit.
- Financial hardship due to training costs and the wait time before acquiring a paying job with a CDL.
- A loss of potential CDL holders who do not wish to wait to obtain a CDL and then find employment.

The FAST Act specifies that FMCSA must provide a report detailing average CDL skills test delays in each State. This requires the entire respondent universe to participate in the study. The primary method of data collection for this study is a survey, which will be available via an online tool; however, respondents will also have the option to provide survey responses via email, if preferred.

Data collection procedures are as follows:

- **Participant Outreach.** FMCSA is partnering with the American Association of Motor Vehicle Administrators (AAMVA) and the State Driver Licensing Agencies (SDLAs) to reach out to contacts from each State prior to survey administration. FMCSA has already presented the plan for information collection at the CDL Coordinator’s conference to receive feedback from the SDLAs. The goal of the participant outreach is to ensure a high survey completion rate.
- **Survey Administration.** FMCSA plans to distribute the survey in January 2017 to the State CDL coordinator (for completion) and the chief licensing official (courtesy copied) from each State and the District of Columbia. FMCSA will require the respondents to complete the survey no later than January 31, 2017. FMCSA will administer the survey on an annual basis, to determine trends in skills test delays and availability of testing resources over time. AAMVA has agreed to participate in the survey administration by reiterating the importance of the survey to each State and encouraging responses.

Section 5506 of the FAST Act requires FMCSA to repeat this study on an annual basis. Every year data will be collected from the respondent universe for FMCSA to summarize and analyze in a report to Congress.

3. DESCRIBE METHODS TO MAXIMIZE RESPONSE RATES AND TO DEAL WITH THE ISSUES OF NON-RESPONSE.

FMCSA has already collaborated with AAMVA, as well as the SDLAs during a CDL Coordinator’s Meeting, on this study as a means of maximizing response rates. The FAST Act requires FMCSA to report on every State; however, FMCSA has no legal course to force States to participate in data collection. Given that all States responded to the 2015 GAO report, FMCSA and AAMVA expect to achieve a 100 percent response rate.

In addition, FMCSA is offering each State the option to respond in whichever method is most convenient for them (i.e., online or via e-mail). The survey will be distributed via email, with a link to an online survey using Survey Monkey®, if the respondent chooses to use that method.

Respondents will also be given the option to email their responses back, if they prefer. The preferred method is for each State to respond via the online tool.

In the event that FMCSA fails to attain a 100 percent response rate, the resulting analysis and report to Congress will note this. FMCSA and AAMVA will reach out to States that are non-responsive in an effort to secure responses from all 51 respondents; however, after several attempts to reach out, FMCSA may accept that a response is unlikely. In the event of a non-responsive State, FMCSA will document efforts and attempts to reach out to the State in the report to Congress.

4. DESCRIBE TESTS OF PROCEDURES OR METHODS TO BE UNDERTAKEN.

There are no specific tests planned for this study; however, several subject matter experts from FMCSA reviewed and provided feedback on the survey during development. Furthermore, FMCSA invited AAMVA and the Commercial Vehicle Training Association (CVTA) to review and provide feedback on the survey prior to publishing the 60-day Federal Register Notice. The topic was also briefed at the CDL Coordinator’s Meeting in late April to gain feedback from that community. This allowed FMCSA to ensure the wording and length of the survey is appropriate.

5. PROVIDE NAME AND TELEPHONE NUMBER OF INDIVIDUALS WHO WERE CONSULTED ON STATISTICAL ASPECTS OF THE INFORMATION COLLECTION AND WHO WILL ACTUALLY COLLECT AND/OR ANALYZE THE INFORMATION.

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REFERENCES