

Department of Transportation Office of the Chief Information Officer

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

INTRODUCTION

This is to request the Office of Management and Budget's (OMB's) review and approval of a new Federal Motor Carrier Safety Administration (FMCSA) annual information collection request (ICR) entitled "Study on Commercial Driver's License (CDL) Skills Test Delays."

Part A. Justification

1. CIRCUMSTANCES THAT MAKE COLLECTION OF INFORMATION NECESSARY

The described information collection is necessary to support a study on CDL skills test delays, as mandated in Section 5506 of the Fixing America's Surface Transportation Act, 2015 (FAST Act) (Pub. L. 114-94, Dec 4, 2015, 49 USC31305 note).

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.

On October 27, 1986, the Commercial Motor Vehicle Safety Act of 1986 (CMVSA) was signed into law^(a) This act required regulatory action to establish minimum testing standards for those applicants wishing to obtain a CDL. As a result, on July 21, 1988, the Federal Highway Administration (FHWA) issued a final rule establishing minimum standards for State testing and licensing of commercial motor vehicle (CMV) drivers; knowledge, skills, and abilities which drivers of different types of CMVs must possess (including specific requirements for receiving endorsements); and the information to be contained on State-issued CDLs.^(b) Subsequent congressional action required FMCSA to issue rules on entry level driver training (see 81 FR 88732, December 8, 2016 and 82 FR 8903, February 1, 2017).

^a Pub. L. 99-570, 100 Stat. 3207-170, October 27, 1986.

^b 49 CFR, 380.501 – 380.513, July 21, 1988.

49 CFR 383.25 requires all CDL applicants to obtain a Commercial Learner's Permit (CLP), which must be held for a minimum of 14 days before the applicant may take the CDL skills test. ^(c) To obtain a CLP, applicants must pass a general knowledge test that meets Federal standards for the particular CMV that the applicant expects to operate (as well as more specific knowledge tests for any endorsements being sought). This regulation aims to encourage behind-the wheel training for CLP holders (who must be accompanied by a valid CDL holder when operating a CMV) before completing the CDL skills test. While some States had already established minimum waiting periods of varying lengths, this regulation established a minimum of 14 days.

A 2015 Government Accountability Office (GAO) report to Congress^(d) revealed that skills test delays varied greatly between States, and some States experienced long delays (up to 7 weeks) 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 at the State level to monitor or track the delays.

Possible impacts of CDL skills testing delays include:

- The expiration of an applicant's CLP, forcing the applicant to renew the permit.
- Financial hardship due to training costs and the wait time before acquiring a paying job of driving with a CDL.
- A loss of potential CMV drivers who find alternate employment before obtaining a CDL.

2. HOW, BY WHOM, AND FOR WHAT PURPOSE THE INFORMATION IS TO BE USED

FMCSA's primary mission is to reduce crashes, injuries, and fatalities involving large trucks and buses. Under 49 U.S.C. 31305, the Secretary of Transportation has delegated to FMCSA the responsibility to prescribe regulations that ensure applicant CDL drivers are properly trained to operate a CMV safely before they are issued a CDL. The operation of CMVs by drivers who are not properly trained is a serious safety problem that justifies training and testing requirements; however, training or testing delays should not cause an unnecessary burden on the applicant.

The Agency is undertaking several studies to gather data required by the FAST Act^(e), which requires the FMCSA Administrator to submit several reports pertaining to improvements in motor carrier safety. This ICR for a survey on CDL skills test delays experienced in each State is essential for gathering the data necessary to provide Congress with a report on this topic. The report will provide detailed information on skills test delays in each State and what is being done to mitigate the delays in States with delays greater than 7 days.

This document presents a plan for conducting a study on CDL skills test delays experienced in each State, as related to the number of available examiners and test sites. To better understand

^c 49 CFR, 383.21 – 383.25, July 21, 1988.

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

^e For more information on the studies FMCSA is undertaking pursuant to the FAST Act requirements, visit <https://www.fmcsa.dot.gov/regulations/fixing-americas-surface-transportation-act-fast-act>.

the nature of the problem, the Agency will examine the relationship between the elements causing the delays (e.g., available test examiners, available test sites) and the average delays experienced by applicants.

2.1 Data Collection Methodology

The required data will be collected annually from a survey distributed to a licensing official in each of the 50 States and the District of Columbia. This survey will encompass the entire population of States, so no sample is required. While States are not required to respond, FMCSA is hopeful that through outreach and follow-up, the Agency will receive responses from every State. The survey will be distributed via e-mail, with a link to an online survey via Survey Monkey®, if the respondent chooses to use that method. Respondents will also be given the option to e-mail their responses back to the FMCSA project manager if that is easier for them. The preferred method is for each State to respond via the online tool.

FMCSA has conducted initial research using State licensing websites and publically available information on CDL skills testing to better understand the delays experienced by CDL applicants when applying to take their skills test. Gathering this data is necessary because there is no national database of the wait times experienced by CDL applicants (between the date they apply to take a skills test and the earliest date they have the opportunity to complete the skills test). There is also no national database of the available assets for administering skills tests (i.e., examiners and test sites) by State. This information on delays and assets will be collected by an annual survey of licensing official representatives from each State and the District of Columbia (one licensing official per State). The data will be analyzed to determine the details of reported skills test delays.

After completion of the survey, FMCSA will use the data from the information collection to analyze the relationship between CDL skills test delays and the available assets for administering skills tests. FMCSA will use this data to prepare a report to Congress on the delays States are experiencing and which States are struggling to administer CDL skills tests within a reasonable amount of time. Subsequent annual reports will provide information on whether delays and resources are improving or degrading from the previous year(s).

2.2 How the Information Will Be Collected

FMCSA will be collecting the information via a survey. This survey will be e-mailed to a licensing official representative from each State and the District of Columbia. The e-mail will include a link to the Web-based survey, as well as details on how to respond via e-mail if that method is preferred by the licensing official. The e-mail will also contain a short summary of the research project and why State responses are necessary, as well as how the research could benefit the States by identifying delays, resource shortages, or other areas of concern for CDL applicants. The variety of methods for survey response will reduce the burden on respondents by allowing them to provide answers in a method of their choosing (i.e., the most convenient method for them).

2.3 Sampling Frame

Section 5506 of the FAST Act requires FMCSA to collect data from all 50 States and the District of Columbia. Therefore, the sampling frame for this study consists of the entire population, and a sampling plan is not necessary. While States cannot be compelled to respond, FMCSA is hopeful that by partnering with CVTA and AAMVA and using active outreach, a majority, if not all, States will respond. FMCSA also reached out to the SDLAs to discuss the importance of the upcoming survey and prepare each State for the types of questions that will be asked. Furthermore, given that this is a congressionally mandated study, States may be more willing to provide responses to fulfill the FAST Act requirement.

2.4 Justification of Survey Questions

Given that this survey is to be used annually, some of the words in the questions have been redacted below and replaced with generic terms, such as *[previous year]* and *[survey date]*. These terms are defined as follows.

- *[previous year]*—This term refers to the entire year preceding the date of the survey. For drafting purposes, “January 1, 2016 through December 31, 2016” has been used. This date will need to change incrementally each year with the re-administration of the survey.
- *[survey date]*—This term refers to January 1, 2017 for the first survey. This date will need to change incrementally each year with the re-administration of the survey.
- *[baseline date]*—This term refers to January 1, 2016, and it will only be used in the first year that the survey is administered. These questions are necessary to answer the FAST Act requirement for comparing the number of examiners and facilities available in one year to the number of examiners and facilities available in the previous year. After the first year of the survey, the previous year’s results will be used, negating the need for this question.

The survey contains a section for instructions and definitions, which is intended as a reference for respondents to ensure they understand what is being asked of them. Following the instructions and definitions, the survey is broken down into five distinct sections: State Laws and Information, CDL Skills Testing Delays, CDL Skills Testing Volume and Demand, CDL Skills Testing Resources, and General Comments and Feedback (Optional). The sections provide structure for the survey and allow the respondent to understand the intent behind the questions being asked.

The sections are broken down as follows:

- **Section I. State Laws & Policies:** Questions 1-10
- **Section II. CDL Skills Testing Delays:** Questions 11-14
- **Section III. CDL Skills Testing Volume and Demand:** Questions 15-22
- **Section IV. CDL Skills Testing Resources:** Questions 23-25
- **Section V. General Comments and Feedback (Optional):** Questions 26-28

2.4.1 Question 1: Which State are you responding for?

This question identifies the State. It will be auto-populated in the e-mailed version of the survey, and if possible, will be auto-populated by using a unique access code or link for the survey. This question is necessary to be able to assign the subsequent responses to the corresponding State they represent.

2.4.2 Question 2: What resources can an applicant use to schedule a CDL skills test in your State? (Choose all that apply.)

This question is multiple-choice, allowing the respondent to choose more than one selection based on what is appropriate. The choices are “Walk-in exams allowed,” “Phone scheduling,” “Online scheduling,” “In-person scheduling,” and “Other (please specify).” This question is necessary for FMCSA to analyze whether there is a possible correlation between the method of test scheduling and the delays experienced when scheduling a CDL skills test.

2.4.3 Question 3: As of [survey date], what is your State’s mandatory wait period from when an applicant obtains a CLP to the date an applicant is eligible to take the CDL skills test? (Choose one.)

This question is a multiple-choice style, and allows the respondent to choose either “14 Days” (the federally mandated minimum) or “Other (please specify).” If the respondent selects “Other (please specify),” they are prompted to input the actual number of days. Initial research shows the majority of States follow the Federal mandate, but not all. This question is necessary for determining the impact of delays on the applicant.

2.4.4 Question 4: As of [survey date], what is your State’s mandatory wait period from when an applicant fails a skills test once until the applicant is eligible to retake the skills test? (Choose one.)

This question is a multiple-choice style, allowing the respondent to choose either “No mandatory wait period,” “14 Days,” or “Other (please specify).” If the respondent chooses “Other (please specify),” they are prompted to enter the actual number of days. This question is necessary for determining the impact of delays on applicants requiring a retest, because delays will be accrued in addition to any mandatory waiting period, and they may affect the amount of time applicants have to retest before their CLP expires.

2.4.5 Question 5: As of [survey date], what is your State’s mandatory wait period from when an applicant fails a skills test for the second time until the applicant is eligible to retake the skills test for a third time? (Choose one.)

This question is a multiple-choice style with the same options as question 4. This question is required because initial background research indicates that some States do not institute waiting periods for retests until the applicant has failed the test multiple times. This will help characterize the impacts of delays on an applicant’s ability to pass the CDL skills test in a timely manner.

2.4.6 Question 6: Does your State require an applicant to retake the knowledge test and apply for a new CLP after failing the skills a certain number of times? (Choose one.)

This question is a multiple-choice style question, with the options to select “Yes (please specify),” or “No.” If the respondent chooses “Yes (please specify),” they are prompted to enter the State’s requirement. This question is necessary to determine how failing a skills test may impact the time it takes for an applicant to receive a CDL. Initial research indicates that some States implement a threshold for the number of times an applicant can fail a CDL skills test before needing to reapply for a permit. This will also impact the number of retests occurring in that State.

2.4.7 Question 7: Does your State allow “banking” of portions of CDL skills tests? (i.e., does an applicant only have to retake the portion of the CDL skills test which they failed?)

This question is a “yes” or “no” question with optional comment blocks for rationale or limitations that they respondent would like to add. Feedback from the 60-day notice indicated States felt this question was important, and FMCSA finds this question to be necessary, as banking portions of CDL skills tests may increase or decrease delays in States.

2.4.8 Question 8: What, if any, types of Third-party testing does your State utilize? (Choose all that apply.)

This question is a multiple-choice style question, allowing the respondent to choose all answers that are applicable for their State. Available options are “No Third-party resources are used,” “Community Colleges,” “Motor Carriers can test their current employees,” “Private driver training schools,” “Private, non-school third-party testing organizations,” “Local Government,” or “Other (Please Specify).” This question is necessary for categorizing States by the resources they use and identifying if there is a relationship between the types of Third-party testing used and delays encountered in that State. This answer will provide the basis for skip logic to allow the respondent to only answer future questions which are applicable to their State.

2.4.9 Question 9: Does your State utilize State facilities and examiners for CDL skills testing? (Choose one.)

This question is a “Yes” or “No” question and the respondent must choose one of those options. This question is necessary for categorizing States by the resources they use for administering CDL skills tests. This answer will provide the basis for skip logic to allow the respondent to only answer future questions which are applicable to their State.

2.4.10 Question 10: From [previous year], what was the average delay (in days) that applicants faced when scheduling their first CDL skills test at:

- a) State exam sites?
- b) Third-party exam sites?

This question will directly address the FAST Act requirement to describe, by State, “the average wait time from the date an applicant requests to take a skills test to the date the applicant has the opportunity to complete such test.”

2.4.11 Question 11: From [previous year], what was the average delay (in days) that an applicant faced when scheduling a CDL skills retest (i.e., applicant had previously failed the skills test at least once) at:

- a) State exam sites?
- b) Third-party exam sites?

This question will directly address the FAST Act requirement to describe, by State, “the average wait time from the date an applicant, upon failure of a skills tests, requests a retest to the date the applicant has the opportunity to complete such retest.”

2.4.12 Question 12: What data source(s) was used to calculate the average CDL skills test delay?

- a) Choose all that apply
- b) (Optional) Are there any known limitations to the data source(s)?

This question is included as a recommendation from the 60-day notice comment period. This is a multiple choice option, where the respondent can select from: “Best guess of ‘usual or ordinary’ delay time”, “Current delays at all test locations”, “Random sample of current delays at some test locations”, “Current delay at the largest/busiest test location”, “CSTIMS database”, “Other (Please Specify)”. This question is necessary for FMCSA to be able to identify limitations in comparing delays across the States. Furthermore, this question will allow FMCSA to determine which States provided quantitative analysis versus qualitative. The optional part (b) allows respondents to identify any limitations, such as a database only tracking the past 30 days of skills tests.

2.4.13 Question 13: For future reporting, would your State be interested in reporting the next available test at each location on a quarterly (once every 3 months) basis? (Note that if you choose to report delay times quarterly, the next time the annual survey is conducted you will not be required to complete section II, as FMCSA will calculate the average for your State using quarterly survey data, unless you choose to voluntarily provide additional data)

During the 60-day public comment period for the proposed information collection, it was suggested that FMCSA offer a “quarterly survey” instead of an annual survey to track wait times and minimize burden on States who do not have this information readily available but desire to provide an accurate measure to FMCSA. In response, FMCSA will make this an option to any respondent who determines that their burden would be less, or information more accurate, by

reporting delays throughout the year as opposed to calculating a yearly average for FMCSA. More information on this mini-survey can be found in Section 2.5.

2.4.14 Question 14: From [previous year], how many of the following CDLs did your State issue? (Note: report only those CDLs requiring the driver to take at least a portion of the CDL skills test)

- a) New CDLs (driver has never previously held a CDL)?
- b) Reinstated CDLs?
- c) Upgraded CDLs (driver received a new CDL for a higher class than previously designated)?
- d) CDLs where one of the following restrictions was lifted: pintle hook, air brake, air over hydraulic brake, or automatic transmission?

This question determines the approximate sample size of applicants throughout the year in each State for various subcategories. Each of these subcategories requires an applicant to take at least a portion of the CDL skills test. This question allows FMCSA to analyze the demand for CDL skills tests in each State by seeing how many applicants the State had within a year. Starting with the second iteration of the survey, in 2018, FMCSA will also determine whether the demand has increased, remained steady, or decreased from the previous year.

2.4.15 Question 15: From [previous year], how many of the following skills tests were administered:

- a) Initial tests (first skills test attempt) at State exam sites?
- b) Initial tests at third-party sites?
- c) Retests (applicant had failed one or more times previously) at State exam sites?
- d) Retests at third-party sites?

This question is necessary for FMCSA to analyze the volume of testing as it relates to the average delay period. FMCSA will examine whether there is a possible correlation between the number of tests administered and the average delay times in each State. Furthermore, this question gives FMCSA data to analyze the failure rates by State as well as the possibility that the need to retest applicants may lead to a longer delay in scheduling tests.

2.4.16 Question 16: From [previous year], how many of the following skills tests were administered:

- a) Out-of-State applicants at State exam sites?
- b) Out-of-State applicants at third-party exam sites?

This question is necessary to determine if out-of-State applicants are possibly causing increased delays for CDL skills testing in some States. If an unusually large number of out-of-State residents are taking the CDL skills tests in a State, it may be taxing that State's resources for scheduling and conducting CDL skills testing.

2.4.17 Question 17: From [previous year], how many CDLs did your State issue where the CDL skills test was taken in a different State?

This question allows FMCSA to determine whether applicants are seeking to complete their CDL skills test in a different State. This question is necessary to see if there is a trend of residents completing tests outside of the State which could impact the other State's delay times.

2.4.18 Question 18: From [previous year], how many CDL skills test cancellations did your State have at:

- a) State exam sites?
- b) Third-party exam sites?

This question will be used to analyze whether or not there is a correlation between the number of cancellations and the scheduling delays in each State. While last minute cancellations result in the appointment slot being less likely to be rescheduled, cancellations overall may cause an increase in delays throughout the scheduling process.

2.4.19 Question 19: (Optional) From [previous year], how many applicants did not show up, or showed up late (missed their scheduled time), and were therefore unable to take their scheduled CDL skills test (i.e., the examinee was a no-show) at:

- a) State exam sites?
- b) Third-party exam sites?

This question will be used by FMCSA to analyze the number of additional tests each State could have conducted in the previous year if applicants had gone to their scheduled exam or arrive on time. When an applicant does not show up for an exam, the entire testing slot cannot be used (unless walk-in testing is allowed), since a new applicant cannot be immediately brought in for testing. This question is optional due to feedback from States that indicated some States do not collect data on cancellation reasons.

2.4.20 Question 20: (Optional) From [previous year], how many applicants were not able to take a scheduled CDL skills test due to vehicle problems (e.g., vehicle was out of service) at:

- a) State exam sites?
- b) Third-party exam sites?

This question will be used by FMCSA to analyze the number of additional tests each State could have conducted in the previous year if applicants had arrive with a vehicle capable of completing the CDL skills test. When an applicant arrives with a vehicle that has an out of service violation, the applicant cannot take the test and that scheduled exam slot cannot be used for another applicant (unless walk-in testing is allowed). This question is optional due to feedback from States that indicated some States do not collect data on cancellation reasons.

2.4.21 Question 21: From *[previous year]*, how many failed CDL skills tests did your State have at:

- c) State exam sites?
- d) Third-party exam sites?

This question will allow FMCSA, using additional data from question 11, to determine if there are applicants failing the skills test and then not reapplying to take the skills test (i.e., applicant chooses to no longer pursue a CDL after failing the skills test). This metric may also impact skills test delay periods in each State.

The following instructions are given for questions 22-24:

“For the following questions (22-24), we prefer that you break out the number of test sites and examiners by class, if that information is available. If you choose to break out resources by class, when test sites cover multiple classes, they are counted in both responses. For example, if there are 10 Class A test sites that also perform Class B skills tests and 10 additional Class B-only test sites, the response would read 20 Total sites, 10 Class A sites, and 20 Class B sites. Therefore, the sub-parts of the question do not necessarily have to add up to the total number.”

2.4.22 Question 22: As of *[baseline date]*, how many of the following CDL skills testing locations did your State have?

- a) Total number of State locations for CDL skills testing?
 - i. (Optional) Number of State class A skills test locations?
 - ii. (Optional) Number of State class B skills test locations?
 - iii. (Optional) Number of State class C skills test locations ?
 - iv. (Optional) Number of State passenger bus skills test locations?
 - v. (Optional) Number of State school bus skills test locations?
- b) Total number of third-party locations for CDL skills testing?
 - i. (Optional) Number of third-party class A skills test locations?
 - ii. (Optional) Number of third-party class B skills test locations?

- iii. (Optional) Number of third-party class C skills test locations?
- iv. (Optional) Number of third-party passenger bus skills test locations?
- v. (Optional) Number of third-party school bus skills test locations?

This question will directly satisfy answering “the number of testing sites available through the State department of motor vehicles and whether this number has increased or decreased from the previous year,” as required by Section 5506 of the FAST Act. This question is a short-answer style question, allowing the respondent to clarify by vehicle class type if desired. During initial research, several States noted that the resources varied by vehicle class. This question is a baseline question and will only be asked the first year of the survey, as subsequent surveys will already have the previous year’s data available.

2.4.23 Question 23: As of [survey date], how many of the following CDL skills testing locations does your State have?

- a) Total number of State locations for CDL skills testing?
 - i. (Optional) Number of State class A skills test locations?
 - ii. (Optional) Number of State class B skills test locations?
 - iii. (Optional) Number of State class C skills test locations?
 - iv. (Optional) Number of State passenger bus skills test locations?
 - v. (Optional) Number of State school bus skills test locations?
- b) Total number of third-party locations for CDL skills testing?
 - i. (Optional) Number of third-party class A skills test locations?
 - ii. (Optional) Number of third-party class B skills test locations?
 - iii. (Optional) Number of third-party class C skills test locations?
 - iv. (Optional) Number of third-party passenger bus skills test locations?
 - v. (Optional) Number of third-party school bus skills test locations?

This question will directly answer “the number of testing sites available through the State department of motor vehicles and whether this number has increased or decreased from the previous year,” as required by Section 5506 of the FAST Act. This question is a short-answer style question, allowing the respondent to clarify by vehicle class type if necessary. During initial research, several States noted that the resources varied by vehicle class.

2.4.24 Question 24: As of [survey date], how many of the following CDL skills test licensed examiners does your State have?

- a) Total number of State employed CDL skills test examiners?
 - i. (Optional) Number of State examiners for class A skills tests?
 - ii. (Optional) Number of State examiners for class B skills tests?
 - iii. (Optional) Number of State examiners for class C skills tests?
 - iv. (Optional) Number of State examiners for passenger bus skills tests?
 - v. (Optional) Number of State examiners for school bus skills tests?

- b) Total number of third-party employed CDL skills test examiners?
 - i. (Optional) Number of third-party examiners for class A skills tests?
 - ii. (Optional) Number of third-party examiners for class B skills tests?
 - iii. (Optional) Number of third-party examiners for class C skills tests?
 - iv. (Optional) Number of third-party examiners for passenger bus skills tests?
 - v. (Optional) Number of third-party examiners for school bus skills tests?

This question will directly answer “the actual number of qualified commercial driver’s license examiners available to test applicants,” as required by section 5506 of the FAST Act.

The questions on the following page(s) are optional, but they provide the respondents with the opportunity to voice circumstances that may be unique to their States, or factors not covered by this survey that they feel impact skills testing delays. These questions were based on feedback from a conference FMCSA had with the SDLAs in April 2016.

2.4.25 Question 25: (Optional) What factors did your State consider when deciding whether or not to use third party testing?

This question is a short-answer style question that allows the respondent to provide feedback on why their State does or does not use third-party testing. This could provide insightful feedback from States for consideration when determining potential solutions (e.g., adding third-party testing facilities) for those States experiencing extended CDL skills testing delays.

2.4.26 Question 26: (Optional) What is the maximum delay in scheduling a CDL skills test that your State feels would be reasonable to both the State and the applicants? Please provide information on possible impacts of delays to both the State and the applicant.

This question is a short-answer style question that can help to determine how the States view skills test delays and whether or not the States perceives the delays as problematic.

2.4.27 Question 27: (Optional) What steps would your State have to take to ensure the average delay time for scheduling a CDL skills test was 7 days or less? Would this be reasonable for your State to achieve?

This question is a short-answer style question and will provide FMCSA with insight as to whether or not the States feel equipped to maintain a 7-day (or less) delay period, which is the benchmark noted in Section 5506 of the FAST Act.

2.5 Optional Reporting of Quarterly Wait Times

States indicated that they would prefer the option to, instead of calculating an average wait time, provide current wait times throughout the year. This recommendation has been implemented as a *voluntary option* to submit wait times on a quarterly basis. This data will be collected using a table, tailored to the number of test locations in each State, similar to Table 1.

Table 1. Example of alternate data collection table for State wait times.

Testing Location	Current Delay for Applicant Scheduling an Initial CDL Skills Test	Current Delay for Applicant Scheduling a CDL Skills Re-Test
Location A		
Location B		
Location C		
Location D		
Location E		
Location F		
Location G		

This data collection will be tailored for each State wishing to participate in this study using details from the annual survey (such as the number of locations and whether the State uses State facilities or Third-party facilities). This will replace questions 11 and 12 on the annual survey so that States do not have to calculate an average wait time. Furthermore, this will allow FMCSA to report on seasonality and the variation between test location delays. This option will be distributed as a word document with a link to an online reporting tool, so the respondent can provide the information using their preferred method.

2.6 For What Purpose

FMCSA will use the information collected to provide an annual report on CDL skills test delays, by State, to determine if delays are:

- A reasonable length of time for applicants.
- Increasing or decreasing from previous years.

The information will also be used to look at State and third-party resources available in each State to determine if there is evidence that States with longer delays require more resources. FMCSA will work to determine if there is any course of action that can be taken to assist States in decreasing test delays to an acceptable time frame. This information collection and the subsequent reporting of data and analysis will directly fulfill the requirements of Section 5506 of the FAST Act.

2.7 Analysis and Summary of the Data

Data will be analyzed for reporting and displayed using various visual aids (e.g., tables and graphs) throughout the report. Some samples of the products expected to be developed are shown here.

Changes for each State will be summarized by year, and the size of the table and the amount of data displayed will depend on the year of the report. An example of this is shown in Table 2. (Note: numbers displayed in the following sample tables and figures are included for visualization purposes only).

Table 2. Example of State A's CDL skills testing resources, by year.

Year	State Examiners	Third-Party Examiners	State Test Sites	Third-Party Test Sites
2016	20	20	20	20
2017	30	30	30	30
2018	40	40	40	40

Table 3 shows an example of how the delays across all States will be shown by year.

Table 3. Example of State CDL skills testing delays, by year.

State	2017	2018	2019
State A	7 days	14 days	7 days
State B	2 days	1 day	2 days
State C	10 days	5 days	10 days
State D	1 day	14 days	1 day

Figure 1 shows an example of how delays across the States may be shown. Similar to the other examples, the amount of data will depend on the year of the report and how many previous years of data have been collected.

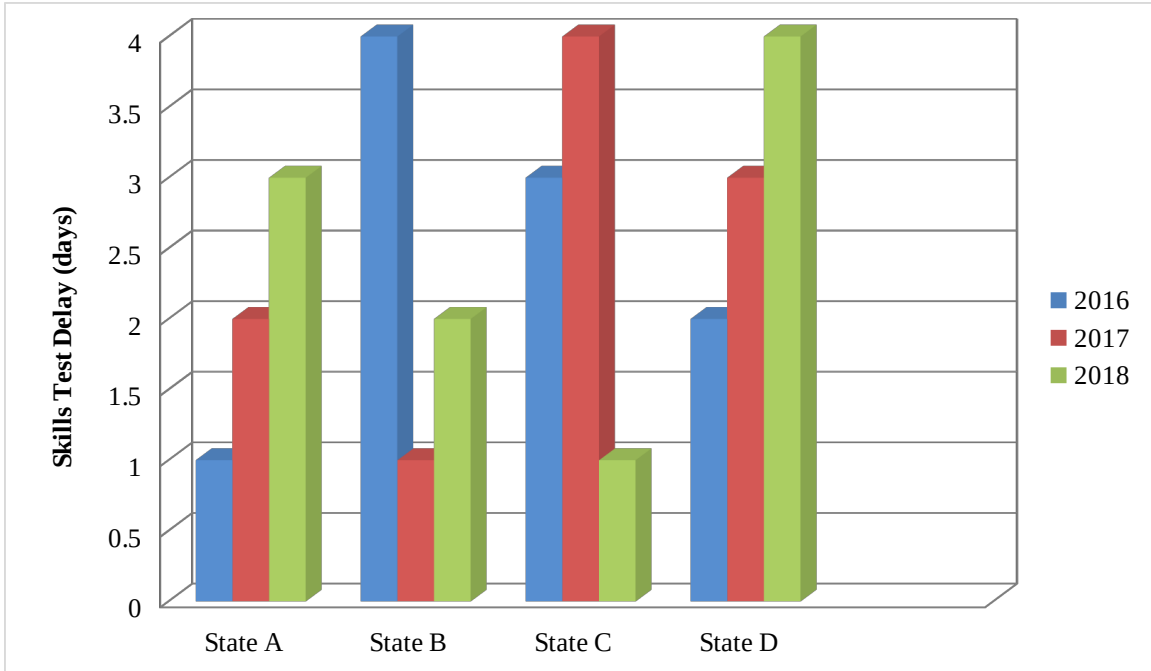


Figure 1. Year-over-year average CDL skills testing delays across States, by year.

Finally, for each State there will be a section displaying the changes for that State based on the data received. An example of this is shown in Figure 2.

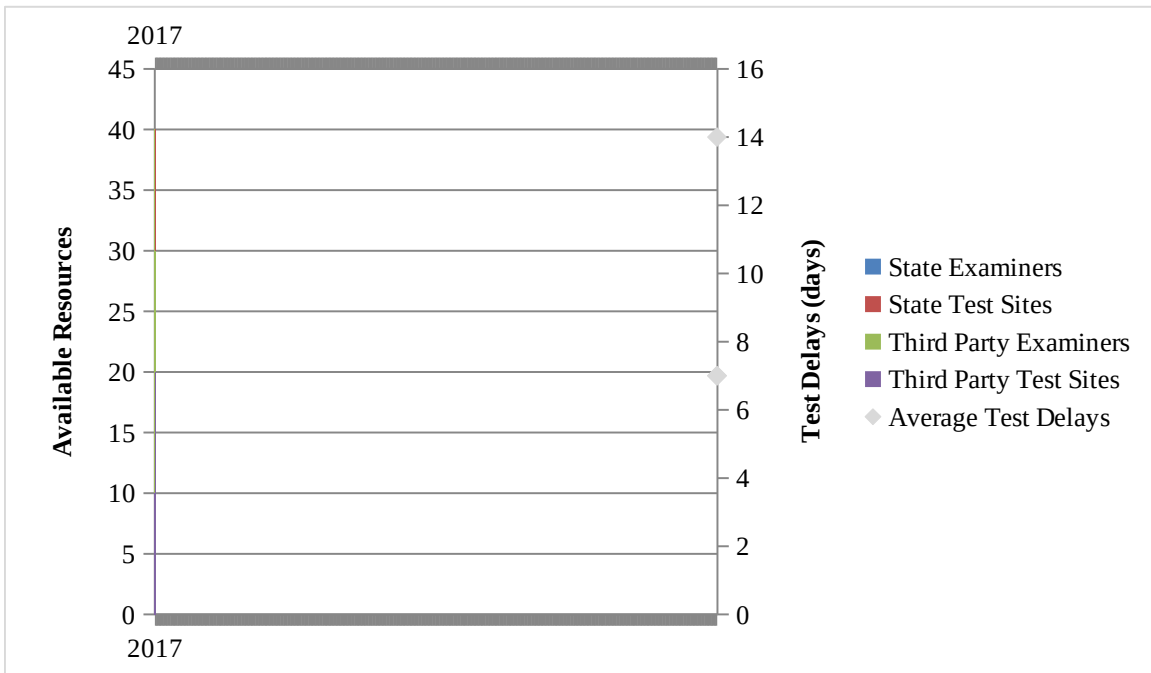


Figure 2. State A's resources and test delays, by year.

3. EXTENT OF AUTOMATED INFORMATION COLLECTION

FMCSA will administer the survey via e-mail, including a link for the State to respond via an online survey hosted by Survey Monkey®. The e-mail will note that using the online survey is the preferred method for response, but the State may respond via e-mail if they prefer. The goal of providing each State with multiple methods for responding is to increase the likelihood of receiving a response without causing unnecessary burden to the respondent. The online survey and e-mail would both satisfy the Government Paperwork Elimination Act (GPEA) requirements because they result in no paper waste. The online survey will export responses directly into Microsoft Excel (or other analytical software) for analysis and will reduce the possibility for human error in transposing responses.

4. EFFORTS TO IDENTIFY DUPLICATION

There is currently no uniform method for tracking this data across States. While some States have their own methodology for tracking the data, other States use the Commercial Skills Test Information Management System (CSTIMS), and others have no current processes in place. No other method for obtaining data from every State has been identified. Furthermore, during initial research, the information currently available on third-party resources versus State-run resources can vary significantly. Despite significant initial research for this project, none of the questions being asked could be sufficiently answered. Discussions were held with AAMVA to ensure that the information being requested in the survey could not be produced via CSTIMS, and to ensure that there was no other way of collecting the necessary information.

5. EFFORTS TO MINIMIZE THE BURDEN ON SMALL BUSINESSES

This data collection does not impact small businesses or small entities.

6. IMPACT OF LESS FREQUENT COLLECTION OF INFORMATION

If this collection is not conducted, or is conducted less frequently than on an annual basis, FMCSA will be unable to fulfill the requirements of Section 5506 of the FAST Act. If States are not given the option for a quarterly survey, States indicated the burden to calculate an accurate average wait time would be unreasonable. Therefore, FMCSA is requesting to conduct this survey annually with the option of collecting wait times on a quarterly basis if States choose that option. This will provide data for FMCSA's annual report to congress.

7. SPECIAL CIRCUMSTANCES

This study has identified no special circumstances.

8. COMPLIANCE WITH 5 CFR 1320.8

FMCSA published a notice in the Federal Register (81 FR 69184) with a 60-day public comment period to announce this proposed information collection on October 5, 2016 (Attachment D). The agency received eight comments in response to this notice.

The eight comments received in response to the 60-day notice were from the following persons and organizations:

1. American Trucking Associations (ATA)
2. Commercial Vehicle Training Association (CVTA)
3. Idaho Transportation Department
4. Joel Holcomb, West Virginia
5. Kentucky State Police
6. Michigan Department of State (MDOS)
7. Oklahoma Department of State
8. Washington State Department of Licensing (DOL)

8.1 Comments Received from ATA

The proposed information collection received positive feedback from ATA, who supports this research effort that FMCSA intends to conduct. ATA also answered the four questions posed in the ICR, which were:

- a) **Is the proposed collection necessary for the performance of FMCSA functions?** ATA indicated they believe the information collection is necessary and can provide useful insights into delays when scheduling CDL skills tests. FMCSA appreciates ATA's support for this proposed research study.
- b) **Is the burden estimate accurate?** ATA indicated that they believe the burden estimate seems reasonable. While FMCSA appreciates this feedback and made every attempt to calculate an accurate burden estimate, some States have indicated that the burden estimate should be reviewed and revised. FMCSA will be reviewing and revising the burden estimate prior to publishing the 30 day notice.
- c) **Are there ways for FMCSA to enhance the quality, usefulness, and clarity of the collected information?** ATA indicated FMCSA should ensure the data is as granular as possible and should inquire as to the source of how States reported estimates. FMCSA will be including questions to inquire about how States reported the delays and what data sources were used to calculate these delays. FMCSA believes the data will become more accurate after the first year, as States will be able to better prepare for the annual survey. ATA also indicated that FMCSA should inquire about mandatory waiting periods for skills testing. FMCSA has covered this area in multiple questions in the survey to ensure mandatory waiting periods are accurately understood in addition to skills testing delays, as both contribute to the time it takes an applicant to receive their CDL.
- d) **Are there ways that the burden could be minimized without reducing the quality of the collected information?** ATA indicated that they believe the burden is minimal and not overwhelming as it stands. FMCSA appreciates this feedback and agrees with ATA that the burden is currently reasonable for the amount of data being collected.

8.2 Comments Received from CVTA

The proposed information collection received positive feedback from CVTA, who supports this research effort that FMCSA intends to conduct. CVTA also answered the four questions posed in the ICR, which were:

- a) **Is the proposed collection necessary for the performance of FMCSA functions?** CVTA indicated they believe the information collection is necessary and useful. FMCSA appreciates CVTA's support for this important research project and appreciates their interest in this topic.
- b) **Is the burden estimate accurate?** FMCSA appreciates CVTA's feedback that the burden estimate is reasonable, and due to other feedback has revised the annual burden estimate to indicate other entities that may be impacted by the data collection request to ensure the burden estimate is as accurate as possible.
- c) **Are there ways for FMCSA to enhance the quality, usefulness, and clarity of the collected information?** FMCSA understands CVTA's concerns that there may not be enough space for providing feedback on how the estimates were developed, thereby introducing error in the analysis portion of this study. FMCSA has revised the survey to incorporate these concerns and allow for more meaningful analysis and more meaningful future data collection after the first year, in the event that States change how they report on the data from year to year. CVTA also asked FMCSA to include three additional questions, two of which FMCSA accepts completely and one which FMCSA will incorporate to the best of their ability. FMCSA has included questions pertaining to how the data was collected or calculated, and whether their database imposes time restrictions on reporting data. FMCSA has included a question pertaining to shortest and longest times, but has included an option for States to indicate they cannot collect this information. FMCSA understands that some States will not be able to produce information pertaining to this data.
- d) **Are there ways that the burden could be minimized without reducing the quality of the collected information?** FMCSA is in agreement with CVTA that believe burden can be minimized without reducing quality of the collected information and that after the first year, as States will be notified that this is annual data collection, States will be able to collect this data in a timelier manner if they put into place a system for tracking this information. FMCSA looks forward to hearing from States on ideas as to how to minimize the burden of this data collection.

8.3 Comments Received from the Idaho Transportation Department

The Idaho Transportation Department provided insights into Idaho's current CDL skills testing delays. FMCSA appreciates this information, and encourages Idaho to fill out the complete survey when it is administered to provide additional data. FMCSA is encouraged that Idaho is already aware of much of the information that is asked on the survey, and believes Idaho will have a minimal burden in filling out the survey. The feedback received was:

- a) The average wait time in Idaho is one to two days. CDL Recipients are sent out a survey asking, in part, whether they encountered problems when getting their CDL.
- b) Idaho has a mandatory three-day wait period for applicants who fail a CDL skills test. After the mandatory wait period, applicants can usually test within one day.
- c) Idaho currently has 61 certified CDL examiners.
- d) Third parties conduct all CDL skills testing.

8.4 Comments Received from Joel Holcomb

Joel Holcomb, from West Virginia, submitted comments providing an initial look into West Virginia’s current CDL skills testing delays. FMCSA appreciates this initial feedback and encourages West Virginia to submit the annual CDL skills testing delays when it is sent out. Initial feedback received was:

- a) West Virginia has no additional delays other than the mandatory 14 day period where the applicant must hold a CLP and a two day advance notice for scheduling purposes.
- b) West Virginia has a seven day waiting period for applicants who fail their CDL skills test.
- c) There are currently 23 Third Party examiners and 39 testing locations. The previous year had 26 Third Party examiners at 38 testing locations.

8.5 Comments Received from the Kentucky State Police Department

The Kentucky State Police Department provided initial insights into their current CDL skills wait times and testing processes. FMCSA appreciates this information and encourages Kentucky State to participate in the full survey once it is sent out. The comments received from Kentucky State Police Department were:

- a) The average wait time for CDL skills test delays is 7 days.
- b) Kentucky State does not mandate an additional waiting period for failed CDL skills tests.
- c) Kentucky has 38 certified CDL skills test examiners, 25 of whom are dedicated to school bus testing only.
- d) Kentucky currently has 9 testing locations for CDL skills tests.

8.6 Comments Received from MDOS

Michigan provided positive support as well as considerations for improving this proposed information collection. FMCSA is pleased to have State support for this research study endeavor. MDOS also provided comments concerning the four questions posed in the information collection:

- a) **Is the proposed collection necessary for the performance of FMCSA functions?** MDOS noted that FMCSA’s primary mission is to reduce crashes, injuries, and fatalities involving large trucks and buses. MDOS does not feel this survey advances this mission. FMCSA would like to acknowledge that proper training and licensing is essential to increasing safety and reducing crashes, injuries, and fatalities on the road. Long delays in scheduling CDL skills testing could make training less effective and produce less safe drivers than those who are able to test immediately after the 14 day waiting period. While FMCSA agrees that the correlation between CDL skills test and increased safety is not immediately apparent, FMCSA believes skills testing is an integral part of truck and bus safety.
- b) **Is the burden estimate accurate?** MDOS strongly disagrees with the burden estimate given by FMCSA and believes that annually the burden would be between 200 and 270 hours because they do not currently track this information. FMCSA has re-evaluated the burden estimate based on this feedback and feels that the new burden estimate accurately reflects Michigan’s concerns. FMCSA also believes MDOS was accounting for a much more in depth analysis, which FMCSA appreciates but does not plan on requiring. FMCSA has revised the instructions and definitions accordingly to ensure States do not feel unduly burdened by the information collection.
- c) **Are there ways for FMCSA to enhance the quality, usefulness, and clarity of the collected information?** MDOS suggests that FMCSA distribute a quarterly “snapshot” survey to collect wait times across different seasons and different locales, or to work with AAMVA to readily produce this information in CSTIMs. FMCSA has considered the suggestion for a quarterly snapshot survey, and will include a voluntary quarterly reporting of current delay times at test sites after the first annual survey. This has been accurately updated in burden estimates and in the information collection package.
- d) **Are there ways that the burden could be minimized without reducing the quality of the collected information?** MDOS indicated the burden could be minimized by not requiring a year’s worth of data to be accumulated and calculated. FMCSA did not intend for every CDL skills test to be included in the average and has provided more concrete instructions for States to collect data that is meaningful while not being overly burdensome. FMCSA has also incorporated the idea of reporting wait times at test sites on a quarterly basis.

MDOS also provided the following questions for consideration by FMCSA:

- a) **How is “average wait time” defined by FMCSA?** MDOS is questioning whether FMCSA is looking for a pure average (i.e., gathering data from every skills test performed in the State), a sample average, or a best guess average. FMCSA will provide in depth instructions when the survey is sent out indicating each State should provide what they have available. FMCSA is looking at the “usual and ordinary” average wait time in the State. FMCSA has included an additional survey question to capture this information for analysis purposes and has worked to clarify the instructions.

- b) **What is meant by “opportunity to complete such test”?** When known, States should report the earliest possible test time for that applicant. While FMCSA understands some applicants may choose a later test date for personal reasons, a delay incurred by the applicant’s personal reasons is not something the State has control over and should not be reflected in this study, to the best ability of the State. FMCSA understands some States may not be able to separate the two, in which case personal delays may be grouped together with test scheduling delays.
- c) **How to handle unique business practices?** FMCSA has attempted to increase the areas for comments on the survey to allow States to address these unique situations.
- d) **When does FMCSA want the ‘average wait time’ to be calculated?** FMCSA has included instructions in the survey to address this question. Additionally, FMCSA is providing an option for seasonal surveys tailored to each State to minimize burden, as MDOS suggested by using a quarterly snapshot survey.
- e) **The “average wait time” will vary by region, or by testing location.** FMCSA is aware that this is a large discrepancy across States, especially the larger States. FMCSA has provided the *option* for States to either provide wait times for all testing locations, or to provide a minimum wait time (i.e. the wait time at a rural, non-popular test site), the maximum (the wait time at the busiest test site), and the average wait time for medium-density test sites.

8.7 Comments Received from the Oklahoma Department of State

The Oklahoma Department of State provided initial insights into their current CDL skills wait times and testing processes. FMCSA appreciates this information and encourages Oklahoma State to participate in the full survey once it is sent out. The comments received from the Oklahoma Department of State were:

- a) Applicants are able to schedule a test within seven days on average, and walk in appointments are usually available due to no-show or canceled tests.
- b) Applicants are required to wait 24 hours before retaking the skills tests after a failure. The wait time for retests is the same for initial tests. If an applicant fails the skills test three times, they are required to wait 30 days between each test.
- c) Oklahoma has 21 AAMVA certified examiners and 10 third party examiners.
- d) Oklahoma has 19 state test sites and 10 third party test sites.

8.8 Comments Received from the Washington State DOL

The Washington State DOL provided comments concerning the information collection request, which FMCSA has considered thoroughly.

- a) Washington State DOL recommends AAMVA adds the required information to additional reports in CSTIMS to satisfy the information collection request. An additional

field would be required to determine if the delay is due to a customer request or an actual delay at the testing site. DOT has previously spoken to AAMVA and determined that this would require funding and time that is not currently available. Furthermore, given that not all States currently use CSTIMs, FMCSA cannot justify pursuing this route at this time, but will continue discussions with AAMVA for future efforts, as appropriate.

- b) Washington State DOL encourages FMCSA to consider delays excluding mandatory wait periods. FMCSA has ensured that mandatory wait times are collected separately from delay periods throughout the ICR.
- c) Washington State DOL informed FMCSA that if they are required to modify their systems to provide information, grant funding would be necessary and it would require a long time period to complete these efforts. FMCSA does not intend for Washington State DOL to be required to modify their existing systems, and believes most of the information required should be readily available to a certain granularity. FMCSA is not expecting an exact average of wait times if that information is not readily available and has clarified both the instructions and the questions to ensure this is clear to the respondent.

FMCSA will publish a notice in the Federal Register with a 30-day public comment period that announces this information will be sent to OMB for approval.

9. PAYMENT OR GIFTS TO RESPONDENTS

There will be no payment or gift for respondents.

10. ASSURANCES OF CONFIDENTIALITY

There is no personal information being collected from respondents, and all answers are State-wide, therefore there are no concerns with confidentiality regarding individual applicants for CDL testing. Respondents will be assured within the outreach e-mail that their answers do not reflect upon themselves and will not be associated with the respondent as an individual person. All responses will be associated with a respective State, only. The contact list containing e-mail addresses for the identified licensing officials will not be kept with, or associated with, the responses garnered from the survey.

11. JUSTIFICATION FOR COLLECTION OF SENSITIVE INFORMATION

None of the questions in this information collection are of a sensitive nature.

12. ESTIMATES OF BURDEN HOURS INFORMATION REQUESTED

FMCSA assumes work associated with the annual survey will be completed by First-Line Supervisors of Office and Administrative Support Workers, BSL Occupation Code 43-1011. The labor cost to the employer is estimated to be \$51.73 per hour, including hourly wages, fringe benefits, and overhead, as shown in Table 4.

Table 4. Estimate of hourly SDLA compensation.^{f g}

Occupation	BLS Occupation Code	NAICS Occupational Designation	Median Hourly Wage	Fringe Benefits	Overhead	Hourly Cost
First-Line Supervisors of Office and Administrative Support Workers Office and Administrative Support	43-1011	State Government (999200)	\$26.54	68%	27%	\$51.73

Additional burden may be placed on test locations, at the discretion of the SDLA (also referred to as the respondent). It is estimated that the test location responses would be given by personnel equivalent to an Office Clerk, General. The Bureau of Labor Statistics estimates an hourly cost to the employer of \$31.18 for this position, as shown in Table 5.

Table 5. Estimate of hourly compensation for test sites.^{h i}

Occupation	BLS Occupation Code	NAICS Occupational Designation	Median Hourly Wage	Fringe Benefits	Overhead	Hourly Cost
Office Clerk, General	43-9061	State Government (999200)	\$15.99	68%	27%	\$31.18

Based on discussions with FMCSA’s Enforcement Division and AAMVA, as well as feedback from the States, it is likely that respondents will need to gather some of the information from State information systems. FMCSA estimates that gathering data for the annual survey will take respondents, at a maximum, 2 hours.

The burden hour estimate for completing the annual survey was determined using Versta Research’s methodology^(j) for calculating an estimate of survey length. The survey length was calculated assuming every State uses both State and third-party sites and examiners because this option requires the maximum number of responses. The maximum response burden will occur

^f Bureau of Labor Statistics, “Occupational Employment Survey,” May 2015. https://www.bls.gov/oes/current/naics4_999200.htm#43-0000 (accessed January 25, 2017). NAICS 999200 - State Government, excluding schools and hospitals (OES Designation).

^g Bureau of Labor Statistics, “Employer Costs for Employee Compensation,” September 2016. <https://www.bls.gov/news.release/pdf/ecec.pdf> (accessed January 25, 2017).

^h Bureau of Labor Statistics, “Occupational Employment Survey,” May 2015. https://www.bls.gov/oes/current/naics4_999200.htm#43-0000 (accessed January 25, 2017). NAICS 999200 - State Government, excluding schools and hospitals (OES Designation).

ⁱ Bureau of Labor Statistics, “Employer Costs for Employee Compensation,” September 2016. <https://www.bls.gov/news.release/pdf/ecec.pdf> (accessed January 25, 2017).

^j VerstaResearch, “How to Estimate the Length of a Survey,” December 2011. <http://www.verstaresearch.com/newsletters/how-to-estimate-the-length-of-a-survey.html> (accessed January 26, 2017).

for States using both State and third-party sites and examiners, which FMCSA estimates to be 17.5 minutes, assuming the respondent has all of the needed information. Therefore, the maximum estimated time for a respondent to gather data and complete the survey is 137.5 minutes (120 minutes + 17.5 minutes = 137.5 minutes). There are 51 respondents and the survey will be conducted once annually, resulting in an annual burden of approximately 7,013 minutes (137.5 minutes × 51 respondents = 7,012.5 minutes). These estimates are shown in Table 6.

Table 6. Estimate of annual burden for survey.

Category	Time Required to Gather Data (minutes)	Time Required to Respond to Survey (minutes)	Number of Responses per Year	Total Annual Burden (minutes)	Total Annual Burden (hours)	Annual Cost to Respondent (rate = \$51.73/hr)
Maximum Estimated Burden per Individual Respondent	120	17.5	1	137.5	2.3	\$118.55
Maximum Estimated Burden per Universe (51 Respondents)	6,120	892.5	1	7,012.5	116.9	\$6,045.94

In addition, if a State opts to report delay time at each of its test sites on a quarterly basis, it is estimated that it will take each SDLA approximately 30 minutes to gather the information from each test locale. This estimate is based on feedback received from MDOS. FMCSA assumes this work will be performed by First-Line Supervisors of Office and Administrative Support Workers Office and Administrative Support. The time required will vary between states, based on the number of test locations in a State. The average number of testing locations per state is 23, so 30 minutes provides an accurate average burden across the states.

Additionally, one person from each test location will have to report the current delay in scheduling at their test site, which is estimated to take one minute based on feedback received during the 60-day comment period. FMCSA assumes this work will be completed by an Office Clerk, General (BLS Occupation Code 43-9061). The 50 States and D.C. have a combined total of 1,179 test sites, ranging from States with a single test site to a maximum of 91 test sites. Therefore, the maximum burden incurred by test sites would be one minute per 1,179 test sites, for a total of 1,179 minutes.

The estimated burden to optionally provide quarterly wait times at test locations, if all states choose to participate, is 30 minutes per SDLA, for a total of 1,530 minutes quarterly (30 minutes × 51 respondents = 1,530 minutes) plus 1,179 minutes quarterly for all test sites. Thus, the maximum annual burden for reporting wait times quarterly would be 10,836 minutes (4 × 1,530 minutes + 4 × 1,179 minutes = 10,836 minutes). These estimates are shown in Table 7.

Table 7. Estimate of annual burden for reporting delay times quarterly.

Category	Time Required to Gather Data and Report Data per respondent (minutes)	Number of Respondents in universe	Number of Responses per Year	Total Annual Burden (minutes)	Total Annual Burden (hours)	Loaded Hourly Wage Rate	Annual Cost to Respondent
SDLAs	30	51	4	6,120	102.0	\$51.73	\$5,276.46
Skills Test Sites	1	1,179	4	4,716	78.6	\$31.18	\$2,450.75
Total estimated burden	-	-	-	10,836	180.6	-	\$7,727.21

The estimated annual cost for the survey is \$6,045.94, and the estimated annual cost of reporting skills test delay times on a quarterly basis is \$7,727.21. Thus, the maximum estimated annual cost for this study is \$13,773.15.

13. ESTIMATES OF TOTAL ANNUAL COSTS TO RESPONDENTS

The only burden placed upon the respondent has been identified in question (12).

14. ESTIMATE OF COST TO THE FEDERAL GOVERNMENT

The estimated cost to the Government is \$300 annually for an online survey tool that contains the necessary features. FMCSA will be using SurveyMonkey® to host the survey online.

Additionally, an analyst from FMCSA Research will be required to send the survey out, analyze the data, and draft the report. This is expected to take a maximum of 250 hours per year, depending on how much outreach is required, and how many States prefer a quarterly survey on wait times, to ensure maximum participation by States. The analyst will be a GS-13 Mathematical Statistician working in the DC area. Hourly employee compensation will be \$50.04 per hour, for a total cost of \$12,510.00 as shown in Table 7. It should be noted that this is consistent with the employee’s normal duties, and does not require funding other than the employee’s salary.

Table 7. Estimate of hourly employee compensation (Federal Government).^k

Occupation	Federal Wage Series	General Schedule Designation	Hourly Wage	Locality Benefit	Hourly Cost	Project Cost (250 hours)
Mathematical Statistician	1529	13 Step 5	\$40.10	24.78%	\$50.04	\$12,510.00

^k Office of Personnel Management, “2017 General Schedule (GS) Locality Pay Tables,” January 2017. <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2017/general-schedule> (accessed January 25, 2017).

Therefore, the total cost to the Government on an annual basis for this survey is estimated at \$12,510.00.

15. EXPLANATION OF PROGRAM CHANGES OR ADJUSTMENTS

This ICR is a new collection and therefore is a program change.

16. PUBLICATION OF RESULTS OF DATA COLLECTION

The results of this information collection will be published by FMCSA in accordance with Section 5506 of the FAST Act. Information collection will occur in 2017 and on an annual basis, until it has been determined that the requirements of the FAST Act have been satisfied. Responses to the survey will be tabulated, and trends will be displayed as to States offering only State testing, States offering only third-party testing, and States offering both types of testing, with the average delays associated with each grouping. Summary statistics will be displayed, as well as trends from previous years. A timeline for the project is shown in Table 8.

Table 8. FMCSA project timeline for the CDL skills tests delays study.

Task	Target Start Date	Target Completion Date	Duration
Phase 1: Data Collection			
Publish Federal Register 60-day Notice	10/03/2016	12/05/2016	2 months
Submit ICR Package to OMB	01/20/2017	02/28/2017	2 months
Publish Federal Register 30-day Notice	01/20/2017	02/20/2017	1 month
Conduct Survey	03/01/2017 (annually thereafter)	04/01/2017 (annually thereafter)	1 month
Phase 2: Data Analysis and Reporting			
Analyze Survey Results	03/15/2017	05/01/2017	2 months
Draft Report	05/01/2017	06/01/2017	2 months
Publish Final Report	08/01/2017	08/04/2017	0 months

17. APPROVAL FOR NOT DISPLAYING THE EXPIRATION DATE OF OMB APPROVAL

Approval for this is not being requested. The expiration date will be displayed on the information collection form.

18. EXCEPTIONS TO THE CERTIFICATION STATEMENT

No exceptions are being requested.

ATTACHMENTS

- A. FAST Act Section 5506 Excerpt
- B. Draft CDL Skills Test Delays Survey

C. Draft Survey Welcome Letter

D. 60-day Federal Register Notice, October 5, 2016 (81 FR 69184)

E. 30-day Federal Register Notice, March 21, 2017 (82 FR 14597)