

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

**Information Collection Clearance**

**Supporting Statement B  
Request for Reinstated Renewal of Commercial Driver’s License (CDL) Skills Testing  
Delays Annual Survey**

**Part B: Collections of Information Employing Statistical Methods**

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

The respondent universe is a representative from the Drivers License Authority for each of the 50 States and the District of Columbia, for a total of 51 entities. While States cannot be required to respond, the initial 2017 survey<sup>1</sup> resulted in 46 responses. Thus, the potential respondent universe is representative enough for this study to be inclusive of the entire universe and no sampling or selection methodology is required.

To reach similar response results, FMCSA will continue to partner with industry stakeholders such as Commercial Vehicle Training Association (CVTA) and American Association of Motor Vehicle Administrators (AAMVA) for joint outreach. FMCSA will also reach out to the State Driver’s License Agencies (SDLAs) to discuss the importance of the survey. Furthermore, given that this is an annual congressionally mandated study, States continue to show willingness to provide responses to fulfill the FAST Act requirement.

**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 continue to be no stratification or sample selection for this annual survey, as the entire respondent universe of 51 entities will be surveyed. The study will survey each of the 51 entities annually. No estimation procedures will be used, as this report is intended to gather data from States and report out on findings. The degree of accuracy will depend on the accuracy of data received from the States themselves; however, questions have been included to inform the accuracy level of the data provided. Limitations regarding data accuracy will be included in the annual reports. Section 5506 of the Fixing America’s Surface Transportation Act, 2015 (FAST Act) requires FMCSA to conduct this survey annually.

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<sup>1</sup> United States Federal Motor Carrier Safety Administration. (2018). Commercial Driver’s License Skills Test Delays Report to Congress – Calendar Year 2016: Commercial Driver’s License Skills Test Delays: Pursuant to Section 5506 of the Fixing America’s Surface Transportation Act, 2015 (P.L. 114-94) September 2018 (Report No. 1). Retrieved from <https://www.fmcsa.dot.gov/mission/policy/commercial-drivers-license-skills-test-delays-report-congress-cy-2016>

The purpose of this study is to gather data that over time will 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 continue to 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.

This Congressional study was requested following a 2015 Government Accountability Office (GAO) report to Congress<sup>(2)</sup> which found that the delays experienced by applicants varied greatly between States. Some applicants experienced high delays (up to 7 weeks, in some cases) between the time they initially requested a CDL test and the first available opportunity for the applicant to complete their test. The report posited there were several possible causes of these delays, however there was little being done at the federal level to monitor or track these delays.

This information collection is meant to fill this informational gap and monitor and track these delays as directed in Section 5506 of the FAST Act. The FAST Act specifies that FMCSA must provide an annual report detailing the average CDL skills test delays in each State. This requires the entire respondent universe to participate in the study on an annual basis. The continued primary data collection method 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 will continue to collaborate 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. For the initial 2017 survey, FMCSA presented the plan for information collection at the 2016 CDL Coordinators / IT Managers Workshop (April 26-28, 2016) conference hosted by AAMCA to receive feedback from the SDLAs. FMCSA will continue to do so at upcoming conferences and will continue to communicate survey timeframe and previous year results at these annual conferences. The goal of the continued joint outreach is to ensure a continued high survey completion rate.
- **Survey Administration.** FMCSA plans to distribute the second iteration of this survey on January 4, 2021, 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 February 5, 2021. FMCSA will continue to administer the survey in January, until otherwise directed by Congress, to determine what the trends are for applicant skills test delays and capture the availability

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<sup>2</sup> United States Government Accountability Office. (2015). Report to Congressional Requesters: Commercial Driver's Licensing: Federal Oversight of State Programs Could be Improved (Report No. 15-607). Retrieved from <http://www.gao.gov/assets/680/671429.pdf>

of testing resources over time<sup>3</sup>. AAMVA also continues to participate in survey outreach by encouraging responses by reiterating to their members the importance of the survey.

Section 5506 of the FAST Act requires FMCSA to administer the survey annually. The data will continue to inform Congress on the changes in skill test delays on an annual basis.

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

FMCSA previously collaborated with AAMVA, as well as the SDLAs during a CDL Coordinator's Meeting, on the initial 2017 survey as a means of maximizing response rates. For future surveys, FMCSA will continue the collaboration. The FAST Act requires FMCSA to report on every State; however, FMCSA has no legal course to require States to participate in data collection. Given that 46 States responded to the 2017 survey, FMCSA continues to expect between a 90 to 100 percent response rate.

In addition, FMCSA continues to offer 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 Qualtrics, 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 90 to 100 percent response rate, the resulting analysis and report to Congress will note this. FMCSA 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 in their attempts to reach out to the State and include this 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 2016 CDL Coordinators / IT Managers Workshop (April 26-28, 2016) to gain feedback from that community. This allowed FMCSA to ensure the wording and length of the survey administered between September 1, 2017 and October 31, 2017 was appropriate.

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<sup>3</sup> Note the annual survey gap between first iteration (2017) and second iteration (2020) is greater than one year. This is because FMCSA's first iteration of the survey resulted in the analysis that many states did not face delays in CDL skills testing as the GAO report 15-607. As a result, FMCSA asked congress if an annual survey was need. FMCSA received instruction to continue survey. Thus, the second iteration on survey is expected July 2020.

**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.**

**Project Lead for this information collection request:**

**Nicole Michel**  
**USDOT Project Manager**  
**Federal Motor Carrier Safety Administration**  
1200 New Jersey Avenue, SE  
Washington, DC 20590-0001  
(202) 366-4354  
[nicole.michel@dot.gov](mailto:nicole.michel@dot.gov)

## REFERENCES