

**Department of Transportation**  
**Federal Motor Carrier Safety Administration**  
**SUPPORTING STATEMENT – Part A**

**Safe Driver Apprenticeship Pilot Program**  
**OMB Number 2126-0075**

**SUMMARY**

- The Federal Motor Carrier Administration (FMCSA) is seeking an emergency review from the Office of Management and Budget (OMB) for revisions to the Safe Driver Apprenticeship Pilot (SDAP) Program, Information Collection Request (ICR) Control Number 2126-0075.
- There are changes in the information collection tools associated with this ICR. Information collection tools consist of (1) applications from motor carriers interested in participating in the SDAP program, (2) driver information and consent forms for apprentice drivers, (3) driver information and consent forms for experienced drivers, (4) safety benchmark certifications participating carriers complete for each apprentice, (5a) monthly data submissions, and (5b) miscellaneous monthly data submissions from participating motor carriers. IC-1, IC-2, and IC-5a have changes to reflect two previously required fields now being optional.
- IC-1, *Motor Carrier Application*, has been revised to provide an optional field for motor carriers who have a registered apprenticeship with the Department of Labor and choose to provide this number to FMCSA. Motor carriers were previously required to establish a registered apprenticeship with the Department of Labor prior to participating in the pilot program, but this has now become optional.
- IC-2, *Apprentice Driver Application*, has been revised so the apprentice certifies they understand that they must operate a CMV with a “forward-facing video event capture system”. The application previously required acknowledgement that they must operate a CMV with a “forward-facing and in-cab video event capture system”. The words “and in-cab” have been deleted from this question.
- IC-5a, *Monthly Data Submission*, has been revised to identify inward (driver-facing) cameras as optional. Motor carriers are asked whether they are using this technology to identify potential differences in data sets, but apprentice drivers are no longer required to operate a vehicle with this technology, nor are motor carriers required to submit data from these systems.
- There is no change in the estimated burden for this ICR. The estimated annual burden for all respondents is 56,448 hours at a cost of \$2,352,675.70.

## **INTRODUCTION**

In accordance with the Paperwork Reduction Act (PRA) of 1995, FMCSA is requesting OMB grant approval on an emergency revision to the information collection entitled *Safe Driver Apprenticeship Pilot Program* (Control Number 2126-0075). The collection of information is associated with the Infrastructure Investment and Jobs Act (IIJA) Section 23022 requirement to provide Congress a recommendation regarding whether the level of safety achieved by the SDAP program is equivalent to, or greater than, the level of safety for equivalent commercial motor vehicle (CMV) drivers aged 21 years or older. These changes are required due to the Consolidated Appropriations Act of 2024 (Pub. L. 118-42), which states that FMCSA may not require the use of inward facing cameras or require a motor carrier to register an apprenticeship program with the Department of Labor as a condition for participation in the SDAP program. As such, the application and monthly report forms have been revised to remove those two elements as mandatory requirements. The current approval for this collection expires October 31, 2025.

### **Part A. Justification**

#### **1. CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY**

Current regulations on driver qualifications (49 CFR part 391.11(b)(1)) (Attachment A) state that a driver must be 21 years of age or older to operate a CMV in interstate commerce. Currently, drivers under the age of 21 may operate CMVs only in intrastate commerce subject to State laws and regulations.

Section 23022 of the IIJA (Attachment B), requires the Secretary of Transportation to conduct a commercial driver apprenticeship pilot program. An “apprentice” is defined as a person under the age of 21 who holds a commercial driver’s license (CDL). Under this program, these apprentices will complete two probationary periods, during which they may operate in interstate commerce only under the supervision of an experienced driver in the passenger seat. An experienced driver is defined in Section 23022 as a driver who is not younger than 26 years old, who has held a CDL and been employed for at least the past 2 years, and who has at least 5 years of interstate CMV experience and meets the other safety criteria defined in the IIJA.

The first probationary period must include at least 120 hours of on-duty time, of which at least 80 hours are driving time in a CMV. To complete this probationary period, the employer must determine competency in:

- (1) Interstate, city traffic, rural 2-lane, and evening driving;
- (2) Safety awareness;
- (3) Speed and space management;
- (4) Lane control;
- (5) Mirror Scanning;
- (6) Right and left turns; and
- (7) Logging and complying with rules relating to hours of service.

The second probationary period must include at least 280 hours of on-duty time, including

not less than 160 hours driving time in a CMV. To complete this probationary period, the employer must determine competency in:

- (1) Backing and maneuvering in close quarters;
- (2) Pre-trip inspections;
- (3) Fueling procedures;
- (4) Weighing loads, weight distribution, and sliding tandems;
- (5) Coupling and uncoupling procedures; and
- (6) Trip planning, truck routes, map reading, navigation, and permits.

After completion of the second probationary period the apprentice may begin operating CMVs in interstate commerce unaccompanied by an experienced driver.

In addition to data regarding successful completion of the probationary periods, the IJJA requires collection of data relating to any incident in which a participating apprentice is involved, as well as other data relating to the safety of apprentices. Additional data will include crash data (incident reports, police reports, insurance reports), inspection data, citation data, safety event data (as recorded by all safety systems installed on vehicles, to include advanced driver assistance systems, automatic emergency braking systems, onboard monitoring systems, and required forward-facing video systems) as well as exposure data (record of duty status logs, on-duty time, driving time, and time spent away from home terminal). These data will be submitted on a monthly basis through participating motor carriers.

The data collected will be used to report on the following items, as required by Section 23022:

- (1) The findings and conclusions on the ability of technologies or training provided to apprentices as part of the pilot program to successfully improve safety;
- (2) An analysis of the safety record of participating apprentices as compared to other CMV drivers;
- (3) The number of drivers that discontinued participation in the apprenticeship program before completion;
- (4) A comparison of the safety records of participating drivers before, during, and after each probationary period; and
- (5) A comparison of each participating driver's average on-duty time, driving time, and time spent away from home terminal before, during, and after each probationary period.

FMCSA will monitor the monthly data being reported by the motor carriers and will identify drivers or carriers that may pose a risk to public safety. While removing unsafe drivers or carriers may bias the dataset, it is a necessary feature for FMCSA to comply with 49 CFR 381.505 (Attachment C), which requires development of a monitoring plan to ensure adequate safeguards to protect the health and safety of pilot program participants and the general public. Knowing that a driver or carrier was removed from the SDAP program for

safety reasons will help FMCSA minimize bias in the final data analysis.

The statutory mandate for this pilot program is contained in Section 23022 of the IIJA (Attachment B). FMCSA’s regulatory authority for initiation of a pilot program is 49 CFR 381.400 (Attachment E). The Consolidated Appropriations Act of 2024 (Pub. L. 118-42) (Attachment D) revised FMCSA’s authority regarding the SDAP Program. Section 422 of that Act states that FMCSA may not require the use of inward facing cameras or require a motor carrier to register an apprenticeship program with the Department of Labor as a condition for participation in the SDAP program. The SDAP program supports the U.S. Department of Transportation’s (DOT) strategic goal of economic strength while maintaining DOT and FMCSA’s commitment to safety.

## **2. HOW, BY WHOM, AND FOR WHAT PURPOSE IS THE INFORMATION USED**

### **a. HOW INFORMATION WILL BE COLLECTED**

Data will be collected from participating motor carriers and drivers via the following tools:

- 1) Each carrier will complete a one-time application form and attach proof of insurance coverage for apprentice drivers to their application.
- 2) Each apprentice driver will complete a one-time application and informed consent form.
- 3) Each experienced driver will complete a one-time application and informed consent form.
- 4) Each carrier will submit a pair of one-time certifications for each of its apprentice drivers—one certification for each successfully completed probationary period.
- 5) Each carrier will submit monthly driving and safety data for each of its apprentice drivers.

All information collection will be electronic. The information or data to be collected via each tool is outlined in detail in the following sections.

#### **i. Motor Carrier Application**

In the application, motor carriers will be asked to provide company contact information, which includes the motor carrier name, DOT number, place of business address, and phone number. Additionally, motor carriers will be asked to provide the name and email address of a representative who will serve as the primary point of contact for the SDAP program. This information will also be used to examine the safety records of the motor carrier applicants.

Motor carriers will then be asked to provide information on the scope and scale of their operations. This includes whether they are an interstate and/or intrastate carrier, their fleet size, the number of drivers they employ, how many apprentice drivers could be hired, how many intrastate drivers could be provided if they currently conduct intrastate operations, whether their trucks use onboard monitoring systems (OBMSs), how many apprentice drivers

could be provided for the control group, and how many experienced drivers they have available. While the ideal pilot program would contain a variety of carrier sizes and operation types, there may be limitations on the carriers that are able to participate due to insurance costs for hiring young drivers, or other business decisions. FMCSA will be conducting outreach with various carrier types and sizes, but the final sample population will depend largely on which qualifying carriers choose to volunteer.

Carriers will also be asked to identify any safety technologies being used by their drivers, including OBMS or Advanced Driver Assistance Systems (ADAS). This will ensure compliance with technology and vehicle requirements during the probationary periods and streamline monthly data collection and identify potential differences in employed technologies among participating carriers. The research team will require participating carriers to provide Electronic Logging Device (ELD) logs and OBMS and/or ADAS recorded safety events on participating drivers. Carriers will be required to certify that they understand the requirements for drivers participating in the SDAP program. Finally, motor carriers will be required to attach proof of insurance coverage for apprentice drivers before submitting their application to FMCSA for review.

FMCSA will evaluate the motor carrier applications and approve participation based on safety records and, as applications permit, securing a diverse set of carriers. While participation in the study is voluntary, FMCSA will aim to have adequate representation from large, medium, and small carriers, as well as adequate representation from all four service centers (Eastern, Midwestern, Southern, and Western). While FMCSA anticipates an estimated 1,000 carriers will be needed to supply the driver population necessary, in the event that an abundance of carrier applications are received, FMCSA may use additional data points, such as carrier size, to select which carriers to approve. It will be necessary to limit the number of participating carriers to logistically achieve data collection and ensure compliance with the program can be adequately monitored.

FMCSA will not require motor carriers to install/use inward facing cameras or require a motor carrier to register an apprenticeship program with the Department of Labor as a condition for participation in the SDAP program. However, motor carriers will be asked whether they already have/use inward facing cameras, and whether they have an approved registered apprenticeship program. Responses to these questions will be voluntary.

Once approved by FMCSA for participation in the SDAP program, the research team will work with those carriers to identify drivers who will be participating in the SDAP program and ensure the necessary information and consent forms are received prior to beginning monthly data collection. To minimize burden on motor carriers, the research team will allow them to submit data in any file format that can be converted into a .csv file (e.g., Microsoft Excel, SQL) and any file format (.pdf, .doc, etc.) for text-based records, such as investigation reports or insurance reports. This may vary depending on what records the carrier already collects and the size of the carrier. All carriers will submit data electronically via a secure file-transfer site hosted by the performing contractor.

## **ii. Driver Information Form**

To ensure eligibility, motor carriers will be required to submit information on experienced

drivers. The experienced driver information form will collect the following information:

- Driver's name
- Driver's CDL number
- Driver's CDL State of issuance
- Driver's date of birth (to calculate age)
- Driver's gender
- Driver's qualifications (e.g., manual or automatic transmission)
- Driver's experience (years working as a CMV driver)
- Driver's start date with the motor carrier and, if necessary, proof of employment at a previous motor carrier to cover the prior two-year period.

To ensure eligibility, motor carriers will be required to submit information on apprentice drivers. The apprentice driver information form will collect the following information:

- Driver's name
- Driver's CDL number
- Driver's CDL State of issuance
- Driver's date of birth (to calculate age)
- Driver's gender
- Driver's qualifications (e.g., manual or automatic transmission)
- Driver's experience operating intrastate (if applicable)
- Driver's prior training experience
- Driver's hire date
- Driver's current weekly averages, if applicable, for:
  - a. On-duty time
  - b. Driving time
  - c. Time spent away from home terminal

As part of every application, both experienced and apprentice drivers must sign an informed consent form, approved by an Institutional Review Board (IRB), to participate in the SDAP program. Personally identifiable information (PII) will be kept confidential and will not be included in the final analysis, final report, or any published document.

### **iii. Probation Period Certification**

Carriers must submit logs demonstrating each apprentice has met the on-duty and driving hour requirements for each probationary period, as well as certification that apprentices have met the required benchmarks. Carriers must report on a monthly basis each driver's progress towards completing their set of probationary periods.

### **iv. Driver Activity and Safety Data**

As part of the SDAP program, motor carriers will be asked to submit information on participating driver's safety and exposure data on a monthly basis. This data will be collected from the point a driver enrolls in the SDAP program until the driver turns 21 or chooses to leave the SDAP program. These data will include, for each driver, miles and hours driven, time on duty, time away from home terminal, along with any safety critical events or other relevant information captured by the ELD and/or OBMS. While the research team requests the right to review video data for OBMS if necessary, carriers will only need to provide summary data (participating driver ID, date, time, and type of event for each event) for monthly data collection purposes. While apprentices are required to utilize forward (roadway) facing camera technology, inward (driver-facing) cameras are optional. Carriers will be asked whether they are utilizing inward (driver-facing) cameras to properly address data differences. Participating carriers may voluntarily choose to submit data on events captured by inward (driver-facing) cameras, however it is not a requirement for participation in the pilot program.

Carriers will also report DOT-reportable crashes, moving violations, motorist incident reports, total number of inspections, inspection violations (e.g., hours-of-service violations, unsecured load violations), and, when possible, near-crashes and safety critical events (SCEs) that occurred during the reporting period.

Carriers will be asked to report information on any drivers receiving additional training past the probationary periods, or remedial training as required by IJIA in the event of a crash.

In the event of a crash, motor carriers will be asked to include in their submittal the findings of their post-crash investigations and post-crash drug and alcohol tests, as required by the Title 49 U.S.C. Section 382.303, and the police accident report. The carrier will submit these documents in addition to the monthly data upload when applicable.

### **b. WHO WILL COLLECT THE INFORMATION**

A qualified research team from M. Davis and Company (MDAC) has been contracted by FMCSA. MDAC will collect the motor carrier applications, driver information and informed consent forms, and monthly data submissions throughout the 3-year SDAP program. The contractor will host and maintain a secure file-transfer site to receive data, as well as all any necessary databases to store files containing received data, analyses, and other items pertaining to the SDAP program. Access to this data will be given to the authorized research team members and FMCSA research team members. The research team will work with a designated point of contact at each participating motor carrier to ensure all data are delivered

in a timely manner throughout the study period.

### **c. PURPOSE OF THE INFORMATION COLLECTION EFFORT**

The purpose of the data collection and the overall SDAP program is to determine the potential impact of age, specialized apprentice training, safety technologies, and experience on driver safety. In particular, this program will provide insight into whether or not apprentice training can compensate for age-related influences on safety. It will also provide insight into whether 18- to 20-year-old individuals can operate CMVs at acceptable levels of safety after participating in supervised probationary periods. The information collected will be used to compare the safety outcomes of apprentices before, during, and after their probationary periods as well as a comparison of apprentices to carrier safety records prior to participating in the SDAP program and the national crash and safety rates as calculated by existing FMCSA data, such as the Motor Carrier Management Information System (MCMIS).

As mandated by the IIJA, the information collected during the SDAP program and the results will be submitted in a report to Congress. The program will also publish a report documenting the study and its findings.

In addition, the data collected may influence recommendations on what training and other requirements should be considered prior to any possible regulatory changes to driver qualifications, such as entry-level driver training or minimum age. This could have important implications for the motor carrier industry, as a driver shortage is often cited as a limiting factor in the ability of the motor carrier industry to meet demand.

### **3. EXTENT OF AUTOMATED INFORMATION COLLECTION**

All data will be collected using a secure online file-transfer site. The carrier application, driver information form, and driver consent form will be one-time submissions. The probation period certification and monthly activity and safety data items will require the carrier to upload files every time they are submitted but will involve data already being collected via carriers' OBMSs and ELDs.

### **4. EFFORTS TO IDENTIFY DUPLICATION**

FMCSA conducted a review of previously conducted studies, related studies and surveys, and reports of Federal and non-Federal sources to minimize duplication of efforts, identify best practices of completed projects, identify statistical information that can be reused for the current SDAP program, and minimize cost to the Government and taxpayers. None of the reviewed studies collected data on the safety performance of apprentice drivers as part of a SDAP program, as is mandated by section 23022 the IIJA.

### **5. EFFORTS TO MINIMIZE THE BURDEN ON SMALL BUSINESSES**

Participation in the SDAP program by carriers is voluntary. Thus, only those carriers (large or small) that can safely and reasonably employ apprentice drivers in their operations will apply. The data collection plan is designed to minimize the level of data processing on behalf of carriers, which benefits smaller carriers that lack staff resources to support these tasks. By making OBMS (with a forward road-way facing camera mandatory and inward driver-facing camera optional) and ELD data mandatory for participation, the program will use infrastructure and tools that qualifying carriers already possess. The burden for both large and small carriers has been minimized by requiring data that carriers already collect. The program has made an effort to minimize burden on small businesses by not requiring carriers to submit a minimum number of apprentices to participate in the SDAP program and has not imposed requirements for safety technology above and beyond what is required by IIJA.

## **6. IMPACT OF LESS FREQUENT COLLECTION OF INFORMATION**

Not collecting the requested data would result in the failure of FMCSA to fulfill the congressional mandate to conduct the SDAP program as required in Section 23022 of the IIJA.

Less frequent data collection throughout the SDAP program would increase the opportunity for errors in data collection and hinder the ability of FMCSA to monitor and manage the operations of the participating motor carriers and drivers. FMCSA must specifically monitor the apprentice driver group over the course of the SDAP program to determine whether their safety performance is significantly inferior to the control group and whether they pose a risk to public safety. If specific drivers pose a danger to public safety, FMCSA will remove them from the SDAP program. Additionally, FMCSA will monitor carriers to determine if they are not submitting data or have a higher safety risk than other participating carriers. If that occurs with specific carriers, FMCSA will remove them from the SDAP program. Reducing the frequency of data collection would degrade FMCSA's ability to take these correction actions to protect the public.

## **7. SPECIAL CIRCUMSTANCES**

None.

## **8. COMPLIANCE WITH 5 CFR 1320.8**

FMCSA requests emergency approval of this revision in accordance with 5 CFR 1320.13, and does not request an extension in the expiration date for the collection.

## **9. PAYMENTS OR GIFTS TO RESPONDENTS**

No payments or gifts will be made to respondents.

## **10. ASSURANCE OF CONFIDENTIALITY**

Consent forms provided to drivers will explain the ways in which their data will be used and which data will be anonymized. PII will be kept private to the extent possible under law. Data will be treated in a secure manner and will not be disclosed unless FMCSA is compelled by law. The contractor(s) that support the SDAP program will sign nondisclosure agreements to ensure confidentiality. Participants' PII will not be included in SDAP program documents. All analysis will be conducted using de-identified data sets and no PII will be contained in the final report.

In accordance with DOT's policy on research involving human subjects, this SDAP program will be reviewed and approved by an IRB prior to beginning data collection. This document will be updated with the date of approval once IRB review has been completed. The designated points of contact for the approved motor carriers who will recruit control group and apprentice drivers will receive IRB ethics training to ensure that the rights of the research subjects are protected.

## **11. JUSTIFICATION FOR THE COLLECTION OF SENSITIVE INFORMATION**

Sensitive information is required to maintain safety throughout the SDAP program. One of the requirements of a pilot program is to ensure measures for maintaining safety throughout the program. This will be done by identifying participating drivers (using PII, such as a driver's name and address) and recording information related to safety-related incidents. Participating drivers whose performance benchmarks poses a risk to public safety will be removed from the program. Furthermore, these sensitive data are required for analysis to enable FMCSA to identify and control possible confounding variables, ensuring the analysis is meaningful and the program's results useful to promoting public safety.

## **12. ESTIMATE OF BURDEN HOURS FOR INFORMATION REQUESTED**

The burden hours associated with this information collection are incurred by three groups: motor carriers, apprentice drivers, and experienced drivers. Motor carriers will incur the largest burden while submitting data monthly. Apprentice and experienced drivers will only need to submit the application forms. Subsequent data on participating apprentice drivers will be submitted by the motor carrier on their behalf.

FMCSA estimates that up to 1,000 motor carriers will be participating in the SDAP program at any given time. The motor carrier burden is associated with completing the application to participate in the SDAP program (IC-1), certifying safety benchmark performance for apprentice drivers (IC-4), and submitting the monthly driver activity and safety data

information (IC-5), including OBMS and ELD logs, ADAS data, and post-crash investigations when applicable (IC-5a). Motor carriers will also need to interact with the research team to notify them within 24 hours of any injury or fatality crashes, if a driver chooses to leave the SDAP program (or has left the carrier), if a participant receives an alcohol-related citation (such as driving under the influence or driving while intoxicated), or if a participating driver fails a random or post-crash drug/alcohol test (IC-5b).

It is assumed that for motor carriers, first line supervisors of drivers, or an equivalent position, will be submitting data. The mean hourly wage of first line supervisors of transportation and material-moving workers for the truck transportation industry (North American Industry Classification System [NAICS] code 484000), \$29.79, is taken from the Bureau of Labor and Statistics (BLS) May 2021 National Industry-Specific Occupational Employment and Wage Estimates.<sup>1</sup>

To arrive at a loaded wage, we first calculate the load factor by dividing the total cost of compensation for private industry workers of the trade, transportation, and utilities industry by the average cost of hourly wages and salaries as reported by the BLS in its Employer Costs for Employee Compensation for June 2021 (\$31.32 total compensation cost / \$22.24 wage and salary = 1.408).<sup>(2)</sup> Multiplying median hourly wage for first-line supervisors of transportation and material-moving workers by the load factor results in a loaded wage hourly cost of \$41.94 (\$29.79 x 1.408 = \$41.94), as shown in Table 1.

**Table 1. Estimated wage and compensation of first-line supervisors.**

Occupation	BLS Occupation Code	NAICS Occupational Designation	Mean Hourly Wage	Load Factor	Hourly Compensation Cost
First Line Supervisors of Transportation and Material-Moving Workers	53-1040	Truck Transportation (484000)	\$29.79	1.408	\$41.94

It is assumed that both apprentice and experienced drivers correspond to heavy and tractor-trailer truck drivers from the BLS Occupational Employment Statistics. This occupation has a mean hourly wage of \$23.42 for the truck transportation industry (NAICS code 484000) according to the June 2021 National Industry-Specific Occupational Employment and Wage Estimates.<sup>(3)</sup> Multiplying mean hourly wage for heavy and tractor-trailer truck drivers in the truck transportation industry by the previously calculated load factor results in a loaded hourly wage of \$31.91, as shown in Table 2.

<sup>1</sup> Bureau of Labor Statistics. Occupational Employment Statistics, May 2021 National Industry-Specific Occupational Employment and Wage Estimates: NAICS 484000 – Truck Transportation, [https://www.bls.gov/oes/2020/may/naics3\\_484000.htm](https://www.bls.gov/oes/2020/may/naics3_484000.htm) , Accessed December 13, 2021.

<sup>2</sup> Bureau of Labor Statistics. “Employer costs per hour worked for employee compensation of private industry workers, by industry, June 2021.” <https://www.bls.gov/news.release/pdf/ecec.pdf> . Accessed December 13, 20201.

<sup>3</sup> Bureau of Labor Statistics. Occupational Employment Statistics, Occupational Employment and Wages – May 2019, 53-3032 Heavy and Tractor-Trailer Truck Drivers, <https://www.bls.gov/oes/current/oes533032.htm>, Accessed August 28, 2020.

**Table 2. Estimated wage and compensation of participating truck drivers.**

<b>Occupation</b>	<b>BLS Occupation Code</b>	<b>NAICS Occupational Designation</b>	<b>Mean Hourly Wage</b>	<b>Load Factor</b>	<b>Hourly Compensation Cost</b>
Heavy and Tractor-Trailer Truck Drivers	53-3032	Truck Transportation (484000)	\$22.66	1.408	\$31.91

The estimated number of respondents varies by the individual Information Collection (IC) piece, as carriers and drivers will apply for participation (IC-1, IC-2, and IC-3) but some will ultimately not be accepted into the program. IC-4 and IC-5 will only be collected on those accepted into the SDAP program. The number of anticipated respondents per IC are shown in Table 3.

**Table 3. Number of respondents by type of IC and year of collection.**

<b>IC Item</b>	<b>Respondent Type</b>	<b>Year 1</b>	<b>Year 2</b>	<b>Year 3</b>	<b>Total</b>	<b>Annual Average</b>
IC-1: Motor Carrier Application	Motor Carriers	1,200	200	200	1,600	533
IC-2: Apprentice Driver Application	Apprentice Drivers	3,780	630	630	5,040	1,680
IC-3: Experienced Driver Application	Experienced Drivers	6,300	945	945	8,190	2,730
IC-4: Safety Performance Benchmarks	Motor Carriers	1,000	1,000	1,000	3,000	1,000
IC-5a: Recurring Monthly Data Submissions	Motor Carriers	1,000	1,000	1,000	3,000	1,000
IC-5b: Miscellaneous Monthly Data Submissions	Motor Carriers	1,000	1,000	1,000	3,000	1,000

The burden hours associated with each IC are shown in Table 4.

**Table 4. Burden hours associated with each IC by respondent type.**

<b>IC Item</b>	<b>Motor Carriers</b>	<b>Apprentice Drivers</b>	<b>Experienced Drivers</b>	<b>Total</b>	<b>Annual Average</b>
IC-1: Motor Carrier Application	533 hours	n/a	n/a	533 hours	178 hours
IC-2: Apprentice Driver Application	n/a	1,680 hours	n/a	1,680 hours	560 hours
IC-3: Experienced Driver Application	n/a	n/a	2,730 hours	2,730 hours	910 hours
IC-4: Safety Performance Benchmarks	2,400 hours	n/a	n/a	2,400hours	800 hours
IC-5a: Recurring Monthly Data Submissions	108,000 hours	n/a	n/a	108,000 hours	36,000 hours

IC-5b: Miscellaneous Monthly Data Submissions	54,000 hours	n/a	n/a	54,000 hours	18,000 hours
<b>Total</b>	<b>164,933 hours</b>	<b>1,680 hours</b>	<b>2,730 hours</b>	<b>169,343 hours</b>	<b>56,448 hours</b>
<b>Annual Average</b>	<b>54,978 hours</b>	<b>560 hours</b>	<b>910 hours</b>	<b>56,448 hours</b>	

Utilizing the loaded wage rates show in Table 1 and Table 2, the calculated costs to respondents are shown in Table 5.

**Table 5. Costs to respondents associated with each IC in the SDAP program.**

IC Item	Motor Carrier	Apprentice Drivers	Experienced Drivers	Total Burden	Average Annual Burden
IC-1: Motor Carrier Application	\$22,368.00	n/a	n/a	\$22,368.00	\$7,456.00
IC-2: Apprentice Driver Application	n/a	\$53,608.80	n/a	\$53,608.80	\$17,869.60
IC-3: Experienced Driver Application	n/a	n/a	\$ 87,114.30	\$ 87,114.30	\$ 29,038.10
IC-4: Safety Performance Benchmarks	\$100,656.00	n/a	n/a	\$100,656.00	\$33,552.00
IC-5a: Recurring Monthly Data Submissions	\$4,529,520.00	n/a	n/a	\$4,529,520.00	\$1,509,840.00
IC-5b: Miscellaneous Monthly Data Submissions	\$2,264,760.00	n/a	n/a	\$2,264,760.00	\$754,920.00
<b>Total</b>	<b>\$6,917,304.00</b>	<b>\$53,608.80</b>	<b>\$87,114.30</b>	<b>\$7,058,027.10</b>	<b>\$2,352,675.70</b>
<b>Annual Average</b>	<b>\$2,305,768.00</b>	<b>\$17,869.60</b>	<b>\$29,038.10</b>	<b>\$2,352,675.70</b>	

**Estimated Total Annual Burden by Respondent:**

- **Carriers:** The average annual burden for all participating motor carriers is 54,978 hours, or 55 hours per carrier.
- **Apprentice Drivers:** The average annual burden for all apprentice drivers is 3,689 hours, or 0.33 hours per driver.
- **Experienced Drivers:** The average annual burden for all experienced drivers is 910 hours, or 0.33 hours per driver.

**Estimated Annualized Cost of Burden Hours by Respondent:**

- **Carriers:** The average annual cost for all participating motor carriers is \$2,305,768.00, or \$2,305.77 per carrier.

- **Apprentice Drivers:** The average annual cost for all apprentice drivers is \$17,869.60, or \$10.64 per driver.
- **Experienced Drivers:** The average annual cost for all experienced drivers is \$29,038.10, or \$10.64 per driver.

The average annual burden for all respondents is 56,448 hours at a cost of \$2,352,675.70.

**a. IC-1: Motor Carrier Application**

It is anticipated that not all motor carriers who apply for the program will be accepted into the program. Furthermore, it is expected that the majority of carriers will apply during year 1, however, additional carriers may be added during years 2 and 3 due to carriers leaving the SDAP program or being removed. Therefore, during the first year, FMCSA expects 1,200 motor carriers to spend approximately 20 minutes completing the one-time motor carrier application, resulting in a total of 1,000 carriers being accepted into the program. FMCSA is estimated that an additional 200 carriers will apply in year two and in year three. No more than 1,000 carriers are expected to participate at any given time during the program due to considerations with monitoring and data collection.

The burden for a motor carrier to complete the application is a one-time response of 20 minutes per respondent. Every motor carrier that applies will incur this one-time cost, estimated to be \$13.97 (\$41.94 hourly compensation x 20 minutes to complete application = \$13.97). The total cost for 1,600 carriers to apply is estimated to be \$22,368.00, or \$7,456.00 annually over the 3-year SDAP program, as shown in Table 6.

**Table 6. IC-1: Motor carrier burden hours and cost for motor carrier application; one response per respondent, 20 minutes per response, with an average loaded hourly wage rate of \$41.94.**

	<b>Number of Respondents</b>	<b>Total Number of Responses</b>	<b>Total Burden Hours (0.33 hours per response)</b>	<b>Total Respondent Labor Cost (average loaded hourly rate of \$41.94)</b>
<b>Year</b>	<b>(a)</b>	<b>(b) = (a) x 1</b>	<b>(c) = (b) x 0.33 hours</b>	<b>(d) = (c) x \$41.94</b>
Year 1	1,200	1,200	400	\$16,776.00
Year 2	200	200	67	\$2,796.00
Year 3	200	200	67	\$2,796.00
<b>Total</b>	<b>1,600</b>	<b>1,600</b>	<b>533</b>	<b>\$22,368.00</b>
<i>Annual Average</i>	<i>533</i>	<i>533</i>	<i>178</i>	<i>\$7,456</i>

**b. IC-2: Apprentice Driver Application and Informed Consent Form**

FMCSA anticipates 3,200 apprentice drivers will apply for the SDAP program in the first three months, with 3,000 being approved to participate. As drivers turn 21, drop out of the program, or are removed from the program due to safety concerns, additional drivers will be added to the SDAP program, such that no more than 3,000 apprentices are participating in the SDAP program at any given time.

FMCSA is estimating a 15 percent turnover rate in drivers choosing to leave the program, and assuming that 5 percent of drivers will age out of the program every year, resulting in approximately 600 drivers being added to the program each year, as shown in Error: Reference source not found. Additionally, FMCSA is estimating 5 percent of drivers who apply will not be accepted into the program. It is estimated that a total of 5,040 drivers will apply to participate as apprentices over the 3-year program, or 1,680 annually.

The burden for a participating apprentice driver to complete the application and sign an informed consent form is a one-time response of 20 minutes per respondent. Every apprentice driver that applies will incur this one-time cost, estimated to be \$10.64 (\$31.91 hourly compensation x 20 minutes to complete application = \$10.64). The total cost for 5,040 apprentice drivers to apply is estimated to be \$53,608.80, or \$17,869.60 annually over the 3-year SDAP program, as shown in Table 7.

**Table 7. IC-2: Apprentice drivers’ burden hours and cost for driver application and informed consent form; one response per respondent, 20 minutes per response, with an average loaded hourly wage rate of \$31.91.**

	<b>Number of Respondents</b>	<b>Total Number of Responses</b>	<b>Total Burden Hours (0.33 hours per response)</b>	<b>Total Respondent Labor Cost (average loaded hourly rate of \$31.91)</b>
<b>Year</b>	<b>(a)</b>	<b>(b) = (a) x 1</b>	<b>(c) = (b) x 0.33 hours</b>	<b>(d) = (c) x \$31.91</b>
Year 1	3,780	3,780	1,260	\$40,206.60
Year 2	750	750	210	\$6,701.10
Year 3	750	750	210	\$6,701.10
<b>Total</b>	<b>5,040</b>	<b>5,040</b>	<b>1,680</b>	<b>\$53,608.80</b>
<b>Annual Average</b>	<b>1,680</b>	<b>1,680</b>	<b>560</b>	<b>\$17,869.60</b>

**c. IC-3: Apprentice Driver Application and Informed Consent Form**

FMCSA will need at least one experienced driver enrolled for every apprentice operating under a probationary period. FMCSA is estimating two experienced drivers per apprentice driver in the event that carriers choose to have multiple experienced drivers available to accommodate schedule conflicts, sick time, personal time off, etc. These drivers will accompany apprentice drivers from the passenger seat until an apprentice has satisfactorily demonstrated their second set of performance benchmarks. FMCSA anticipates needing 6,000 experienced drivers to participate throughout each year, as not all experienced drivers will be participating at the same time due to their own schedule limitations. FMCSA is anticipating a turnover rate of 15% for experienced drivers who may leave the company or become ineligible to participate. Additionally, FMCSA anticipates 5% of experienced drivers who apply may not be qualified to serve as an experienced driver. Therefore, FMCSA expects 6,300 experienced drivers to apply in year 1, and 945 experienced drivers to apply in years 2 and 3.

The burden for an experienced driver to complete the application is a one-time response of 20 minutes per respondent. Every experienced driver that applies will incur this one-time cost, estimated to be \$10.64 (\$31.91 hourly compensation x 20 minutes to complete

application = \$10.64). The total cost for 2,730 experienced drivers to apply is estimated to be \$87,114.30, or \$29,038.10 annually over the 3-year SDAP program, as shown in Table 8.

**Table 8. IC-3: Experienced drivers' burden hours and cost for experienced driver application; one response per respondent, 20 minutes per response, with an average loaded hourly wage rate of \$31.91.**

<b>Year</b>	<b>Number of Respondents (a)</b>	<b>Total Number of Responses (b) = (a) x 1</b>	<b>Total Burden Hours (0.33 hours per response) (c) = (b) x 0.33 hours</b>	<b>Total Respondent Labor Cost (average loaded hourly rate of \$31.91) (d) = (c) x \$31.91</b>
Year 1	6,300	6,300	2,100	\$67,011.00
Year 2	945	945	315	\$10,051.65
Year 3	945	945	315	\$10,051.65
<b>Total</b>	<b>8,190</b>	<b>8,190</b>	<b>2,730</b>	<b>\$87,114.30</b>
<b>Annual Average</b>	<b>2,730</b>	<b>2,730</b>	<b>910</b>	<b>\$29,038.10</b>

**d. IC-4: Performance Benchmark Certifications**

Participating motor carriers will need to submit a performance benchmark certification twice for each participating apprentice drivers. These forms will certify that an apprentice has successfully demonstrated the performance benchmarks required by the IJA after each probationary period. It is anticipated that each form will take no more than 15 minutes to complete.

Every motor carrier will experience a different cost depending upon the number of apprentices employed by each driver. Two responses must be submitted per driver, for an estimated cost of \$20.97 per driver (\$41.94 hourly compensation x 15 minutes x 2 = \$20.97). The cost across all participating motor carriers is estimated to be \$100,656.00 or \$33,552.00 annually over the 3-year SDAP program, as shown in Table 9.

**Table 9. IC-4: Motor carriers' burden hours and cost for submitting performance benchmark certifications; two responses per driver, 15 minutes per response, with an average loaded hourly wage rate of \$41.94.**

<b>Year</b>	<b>Number of Respondents (all participating motor carriers) (a)</b>	<b>Total Number of Responses (2x per driver) (b)</b>	<b>Total Burden Hours (0.25 hours per response) (c) = (b) x 0.25 hours</b>	<b>Total Respondent Labor Cost (average loaded hourly rate of \$41.94) (d) = (c) x \$41.94</b>
Year 1	,1,000	7,200	1,800	\$75,492.00
Year 2	1,000	1,200	300	\$12,582.00
Year 3	1,000	1,200	300	\$12,582.00
<b>Total</b>	<b>3,000</b>	<b>9,600</b>	<b>2,400</b>	<b>\$100,656.00</b>

<i>Annual Average</i>	<b>1,000</b>	<b>3,200</b>	<b>800</b>	<b>\$33,552.00</b>
-----------------------	--------------	--------------	------------	--------------------

**e. IC-5: Monthly Driving and Safety Data**

Participating motor carriers will need to submit monthly data on all apprentice drivers throughout their participation in the SDAP program. Carriers will submit monthly data on apprentice drivers until they turn 21 years of age, leave the carrier, are removed from, or choose to leave the SDAP program (in which case they can no longer operate in interstate commerce).

There are two components to IC-5, which are IC-5a: recurring monthly data and IC-5b: miscellaneous monthly data submissions. For both of these submissions, motor carriers will need to compile data from their existing records and submit the data via a secure upload to the research team.

IC-5a, recurring monthly data, will contain the required driver activity and safety data, as described in Section 2(a)(iv). It is expected that the regular, recurring monthly data will take 60 minutes (1 hour) per participating apprentice driver. Every motor carrier will experience a different cost depending upon the number of apprentices employed by each driver. Monthly data must be submitted per driver, for an estimated cost of \$41.94 per driver (\$41.94 hourly compensation x 1 hour = \$41.94). The cost across all participating motor carriers is estimated to be \$4,529,520.00 or \$1,509,840.00 annually over the 3-year SDAP program, as shown in Table 10.

**Table 10. IC-5a: Motor carriers’ burden hours and cost for submitting monthly driver activity and safety data on apprentices; one response per apprentice per month, 1 hour per response, with an average loaded hourly wage rate of \$41.94.**

<b>Year</b>	<b>Number of Respondents (all participating motor carriers)</b>	<b>Total Number of Responses (12x per driver)</b>	<b>Total Burden Hours (1 hour per response)</b>	<b>Total Respondent Labor Cost (average loaded hourly rate of \$41.94)</b>
<b>(a)</b>	<b>(b)</b>	<b>(c) = (b) x 1 hours</b>	<b>(d) = (c) x \$41.94</b>	
Year 1	1,000	36,000	36,000	\$1,509,840
Year 2	1,000	36,000	36,000	\$1,509,840.00
Year 3	1,000	36,000	36,000	\$1,509,840.00
<b>Total</b>	<b>3,000</b>	<b>108,000</b>	<b>108,000</b>	<b>\$4,529,520.00</b>
<i>Annual Average</i>	<i>1,000</i>	<i>36,000</i>	<i>36,000</i>	<i>\$1,509,840.00</i>

IC-5b, miscellaneous monthly submissions will cover the need for carriers to report certain items to the research team within 24 hours of being made aware of the event, which may include events such as an apprentice being involved in an injury or fatality crash, an apprentice leaving the carrier or the program, or an apprentice receiving a drug or alcohol

related citation (among others). Additionally, carriers may be asked to provide supplemental or clarifying data on the previous month's activities if there are gaps or missing data. It is expected that each carrier will incur no more than 1.5 additional hours per month on these miscellaneous items. Every motor carrier is expected to incur this maximum additional cost once per month, estimated at \$754.92 per year per carrier (\$41.94 hourly compensation x 1.5 hours x 12 months = \$754.92). The cost across all participating motor carriers is estimated to be \$2,264,760.00 or \$754,920.00 annually over the 3-year SDAP program, as shown in Table 11.

**Table 11. IC-5b: Motor carriers' burden hours and cost for submitting additional miscellaneous monthly data; one response per carrier, per month, 1.5 hours per response, with an average loaded hourly wage rate of \$41.94.**

<b>Year</b>	<b>Number of Respondents (all participating motor carriers)</b> <b>(a)</b>	<b>Total Number of Responses</b> <b>(b) = (a) x 12</b>	<b>Total Burden Hours (1.5 hours per response)</b> <b>(c) = (b) x 1.5 hours</b>	<b>Total Respondent Labor Cost (average loaded hourly rate of \$41.94)</b> <b>(d) = (c) x \$41.94</b>
Year 1	1,000	12,000	18,000	\$754,920.00
Year 2	1,000	12,000	18,000	\$754,920.00
Year 3	1,000	12,000	18,000	\$754,920.00
<b>Total</b>	<b>3,000</b>	<b>36,000</b>	<b>54,000</b>	<b>\$2,264,760.00</b>
<i>Annual Average</i>	<i>1,000</i>	<i>12,000</i>	<i>18,000</i>	<i>\$754,920.00</i>

**Estimated Number of Respondents:**

IC-1: 1,600 motor carriers over the course of the study

IC-2: 5,040 apprentice drivers over the course of the study

IC-3: 8,190 experienced drivers over the course of the study

IC-4: 1,000 motor carriers (at any given time) responding for 4,800 apprentice drivers over the course of the study

IC-5a: 1,000 motor carriers (at any given time) responding for 4,800 experienced drivers over the course of the study (3,000 participating drivers at any given time)

IC-5b: 1,000 motor carriers (at any given time) over the course of the study

**Estimated Total Annual Burden by Respondent:**

**Carriers:** The average annual burden for all participating motor carriers is **54,978 hours** per year, or **55 hours** per carrier per year.

**Apprentice Drivers:** The average annual burden for all participating apprentice drivers is **1,680 hours** per year, or **0.33 hours** per apprentice **total** (apprentices complete their paperwork only once).

**Experienced Drivers:** The average annual burden for all participating experienced drivers is **2,730 hours** per year, or **0.33 hours** per experienced driver **total** (experienced drivers complete their paperwork only once).

### **Estimated Annualized Cost of Burden Hours by Respondent:**

**Carriers:** The average annual cost for all participating motor carriers is **\$2,305,768.00** per year, or **\$2,305.77** per carrier per year.

**Apprentice Drivers:** The average annual cost for all participating apprentice drivers is **\$17,869.60** per year, or **\$10.64** per apprentice **total** (apprentices complete their paperwork only once).

**Experienced Drivers:** The average annual cost for all participating experienced drivers is **\$29,038.10** per year or **\$10.64** per experienced driver **total** (experienced drivers complete their paperwork only once).

## **13. ESTIMATE OF TOTAL ANNUAL COSTS TO RESPONDENTS**

Participating motor carriers will incur additional burden under the approved information collection for the Department of Labor's RA program.

## **14. ESTIMATE OF COST TO THE FEDERAL GOVERNMENT**

The Government has procured a research contract with MDAC for this effort to collect and analyze the data, as the Government lacks the personnel resources and expertise required to complete this study without contract support. This contract has been awarded for a total value of \$1,599,878.77, including optional tasks.

Staff costs to the Government will include 15 percent of full-time hours for two GS-14s and one GS-13. Assuming mid-level steps within grade and the Washington, D.C. adjustments, this represents a yearly cost of \$59,287.20 [15 percent x (\$117,516 + \$138,866 + \$138,866) = \$59,287.20].

As Government staff support will be required for 4 years, this adds up to a total program cost to the Government of \$237,148.80.

There are no additional costs to the Government, as all employees working on this program are within their normal position duties and there is no anticipated travel or overtime associated with this program.

#### **15. EXPLANATION OF PROGRAM CHANGES OR ADJUSTMENTS**

This is a request for emergency review and approval of key programmatic revisions to a collection that currently has an approval which expires on October 31, 2025. Specifically, FMCSA has removed the requirement for motor carriers to establish a registered apprenticeship with the Department of Labor and has removed the requirement for apprentices to operate a vehicle equipped with an inward (driver-facing) camera.

#### **16. PUBLICATION OF RESULTS OF DATA COLLECTION**

Safety performance data (and the limited demographic data required for context) will be analyzed and integrated into the SDAP program report. Data collection will be completed within 120 days of the end of the SDAP program period, followed by a statistical analysis and a final report detailing the analysis. Both descriptive and analytical methods will be employed during the data analysis. Statistical methods, such as regression and hypothesis testing, will be adopted when appropriate. The results of the SDAP program will be documented in a technical report that will be delivered to and maintained by FMCSA. This report will be made available to the public on the FMCSA Web site, at [www.fmcsa.dot.gov](http://www.fmcsa.dot.gov). The contents of the technical report will contribute to the report that FMCSA is required to provide to Congress pursuant to Section 23022 of the IIJA.

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

FMCSA is not seeking an exemption from displaying the expiration date on the information collection forms.

#### **18. EXCEPTIONS TO CERTIFICATION STATEMENT**

None.

#### **19. ATTACHMENTS**

- A. 49 CFR part 391.11(b)(1)
- B. IIJA, Section 23022
- C. 49 CFR 381.505

- D. Consolidated Appropriations Act of 2024 (Pub. L. 118-42)
- E. 49 CFR 381.400
- F. IC-1: Motor Carrier Application.
- G. IC-2: Experienced Driver Application.
- H. IC-3: Apprentice Driver Application.
- I. IC-4: Safety Performance Benchmarks .
- J. IC-5a: Monthly Safety Data.
- K. IC-5b: Miscellaneous Safety Data.

## **20. REFERENCES**

Costello, B., and Suarez, R. (2020). Truck Driver Shortage Analysis. American Trucking Associations.

Massie, D. et al. 1995. Traffic Accident Involvement Rates by Driver Age and Gender. *Accident Analysis and Prevention* 27(1), pp. 73-87.

Knipling, R. et al. 2004. Individual Differences and the “High-Risk” Commercial Driver Transportation Research Board, Washington, DC.

Federal Motor Carrier Safety Administration. (1975). Minimum Age Requirements of the Federal Motor Carrier Safety Regulations.

National Transportation Safety Board. (2002). Safety Report: Analysis of Intrastate Trucking Operations.

Blower, D.F. (1996). The Accident Experience of Younger Truck Drivers. University of Michigan Transportation Research Institute.

Campbell, K.L. (1991). Fatal Accident Involvement Rates by Driver Age for Large Trucks. *Accident Analysis and Prevention* 23 (4), pp. 287-295.