2017 Report on Commercial Driver's License (CDL) Skills Testing Delays

FOREWORD

States are required to test commercial driver's license (CDL) applicants for the knowledge, skills, and abilities necessary for the safe operation of the applicant's intended commercial motor vehicle (CMV). As noted by a previous Government Accountability Office (GAO) report, applicants in some States face significant delays in completing skills tests. Such delays can cause serious difficulties for an affected applicant, perhaps even resulting in an applicant's choice to forego employment as a CMV driver.

This report analyzes the results of a national survey to each State, as well as the District of Columbia, regarding their CDL skills testing programs. The survey gathered information from each State on the length of testing delays; any mandatory waiting periods (measured as distinct from a "delay"); third-party versus State resources; number of skills tests administered (including failures); and the number of cancellations. The survey was optional, as were each of its individual questions. Not all States responded, and some States provided minimal information, which did not include enough detail to support full analyses, while others provided detailed responses.

This annual report is mandated by Section 5506 of the Fixing America's Surface Transportation Act, 2015.

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in	inches	25.4 millimeters	mm				
ft	feet	0.305 meters	m				
yd	yards	0.914 meters	m				
mi	miles	1.61 kilometers	km				
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^{*} SI is the symbol for the International System of Units. Appropriate rounding should be made to comply with Section 4 of ASTM E380. (Revised March 2003, Section 508-accessible version September 2009.)

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LIST OF ACRONYMS, ABBREVIATIONS, AND SYMBOLS

Acronym **Definition** BC**Basic Control** CDL commercial driver's license CLP commercial learner's permit commercial motor vehicle **CMV** Washington, District of Columbia D.C. Fixing America's Surface Transportation Act, 2015 FAST Act **FMCSA** Federal Motor Carrier Safety Administration Road Test RT

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VI Vehicle Inspection

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EXECUTIVE SUMMARY

BACKGROUND

On October 27, 1986, the Commercial Motor Vehicle Safety Act of 1986 was signed into law. (1) This act required regulatory action to establish minimum testing standards for those applicants wishing to obtain a commercial driver's license (CDL). As a result, on July 21, 1988, the Federal Highway Administration 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 qualifications for endorsements).
- The information to be contained on State-issued CDLs. (2)

Subsequent congressional action required the Federal Motor Carrier and Safety Administration (FMCSA) to issue rules on entry-level driver training (see 81 FR 88732, December 8, 2016, and 82 FR 8903, February 1, 2017).

A 2015 Government Accountability Office (GAO) report to Congress⁽³⁾ revealed significant variance between States' CDL skills test delays (the time between when a CDL applicant initially requests to take the skills test and the first opportunity offered to them). 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 commercial learner's permit, 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.

Section 5506 of the Fixing America's Surface Transportation Act, 2015 (Pub. L. 114-94, Dec 4, 2015, 49 USC31305 note) required the FMCSA to conduct an annual report of CDL skills testing delays in each State and in the District of Columbia.

¹ Pub. L. 99-570, 100 Stat. 3207-170, October 27, 1986.

^{2 53} FR 27628 (Jul. 21 1988)

³ http://www.gao.gov/assets/680/671429.pdf

PURPOSE

This report's corresponding survey was aimed at determining the following:

- 1. 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).
- 2. The resources available for skills testing, such as the number of examiners and test sites available.
- 3. What is being done to address skills testing delays in States that have average skills test or re-test wait times exceeding 7 days.

This report details the findings from the first annual survey; data collection occurred from September through November 2017.

PROCESS

The survey was developed to cover five broad areas of the CDL skills testing process in each State:

- 1. State laws and policies.
- 2. CDL skills testing delays.
- 3. CDL skills testing volume and demand.
- 4. CDL skills testing resources.
- 5. General comments and feedback.

The survey itself was optional, and each question on the survey was optional; however, States were encouraged to provide as much information as possible. Initial research into State procedures for obtaining a CDL informed the development of the survey by noting the differences between each State in the CDL process. While FMCSA has certain mandatory minimum requirements for obtaining a CDL, States are free to implement their own policies or additional requirements, which could impact the delays experienced when scheduling CDL skills testing. The types of data gathered in each area are discussed more in the respective subsections that follow.

This report covers delays experienced from January 1, 2016 to December 31, 2016, to allow for a full year's collection of data. Future reports will cover concurrent 1-year periods. A few States noted that their CDL skills testing delays have decreased significantly since 2016; this has been noted throughout the report where applicable and any changes will be reflected in subsequent reports.

STUDY FINDINGS

Table 1 provides key findings from the 2017 survey.

Table 1. Key findings from the 2017 CDL Skills Testing Delays Survey.

State	Initial CDL Skills Test Net Delay	CDL Skills Re-Test Net Delay	Number of Qualified Examiners	Number of Testing Sites Available	Increase or Decrease in Number of Sites from Previous Year
Alabama	0 days	13 days	155	23	No Change
Alaska	25 days	32 days	137	43	Increased
Arkansas	1 day	5 days	53	40	Decreased
California	23 days	37 days	514	148	Decreased
Colorado	0 days	0 days	230	90	Decreased
Connecticut	2 days	2 days	25	3	No Change
District of Columbia	0 days	27 days	4	1	No Change
Florida	0 days	0 days	396	200	No Change
Georgia	0 days	7 days	262	94	No Change
Hawaii	0 days	7 days	9	7	No Change
Idaho	0 days	0 days	Not Reported	Not Reported	Not Reported
Illinois	5 days	5 days	Not Reported	Not Reported	Not Reported
Indiana	0 days	8 days	38	11	Decreased
Iowa	4 days	13 days	262	47	Decreased
Kentucky	0 days	2 days	40	34	No Change
Maine	0 days	15 days	24	21	No Change
Maryland	11 days	25 days	145	28	No Change
Massachusetts	16 days	30 days	26	18	No Change
Michigan	0 days	3 days	90	69	Decreased
Minnesota	1 day	1 day	190	80	No Change
Mississippi	3 days	18 days	Not Reported	Not Reported	Not Reported
Missouri	0 days	4 days	84	22	No Change
Montana	6 days	13 days	59	20	No Change
Nebraska	0 days	Not Reported	177	61	Increased
Nevada	0 days	7 days	73	33	Decreased
New Hampshire	0 days	4 days	9	5	No Change
New Jersey	47 days	31 days	110	12	No Change
New Mexico	0 days	2 days	90	64	Increased
North Carolina	0 days	9 days	359	217	No Change
North Dakota	2 days	16 days	40	11	No Change
Ohio	0 days	0 days	49	11	No Change
Oklahoma	0 days	5 days	30	23	Decreased
Oregon	13 days	17 days	128	230	Increased
Pennsylvania	0 days	0 days	451	143	Increased
Rhode Island	0 days	0 days	5	1	No Change
South Carolina	0 days	0 days	65	113	Increased
South Dakota	0 days	1 day	21	40	No Change
Tennessee	0 days	7 days	122	71	No Change
Texas	14 days	27 days	160	Not Reported	Not Reported
Utah	0 days	10 days	201	228	Increased
Virginia	0 days	7 days	197	165	No Change
Washington	0 days	4 days	123	106	No Change
West Virginia	0 days	0 days	26	26	No Change
Wisconsin	0 days	0 days	224	103	Decreased
Wyoming	0 days	4 days	61	78	No Change

The response rate for the 2017 CDL Skills Testing Delays Survey was 90 percent, which provided a wealth of data and insights into each State's CDL skills testing program.

Most States have reasonable delays in scheduling CDL skills tests. There are a few States with unusually long scheduling delays; however, there is no Federal regulation or requirement for States to schedule skills tests within a certain time frame. Therefore, States must monitor and control this. Several States mentioned that they would require additional resources or funding to reduce delays in testing.

While only one State had an average net scheduling delay of greater than 7 days for initial skills tests without any mitigation, there were a total of six States that had average net scheduling delays of greater than 7 days for re-tests without any mitigation. Additional States with longer delays were already working, or had a choice of options, to reduce skills tests delays within their State. There are greater net delays in re-tests; average total wait times are similar for test and re-tests, but mandatory waiting periods are shorter for re-tests. This indicates that delay times for re-tests have a greater effect on applicants than delay times for an initial skills test.

The data showed large numbers of failures and cancellations across all States. If these numbers were reduced, scheduling delays would likely also see reductions, as the demand for re-tests would decrease, and testing slots would not be wasted on canceled appointments.

FUTURE REPORTING

As the first report of an annual reporting requirement, this report serves to establish a baseline for CDL skills testing programs across the United States and will be used for further analysis in future years.

Future iterations of this report would benefit from having all States respond to all portions of the survey. Despite having a high response rate on the survey, there were varying degrees of detail within the responses, with some States not providing detailed answers and several other States simply choosing not to respond. Given that the survey itself and individual questions were optional, there was no way to guarantee that responses contained enough detail to support the intended analyses.

1. INTRODUCTION

Section 5506 of the Fixing America's Surface Transportation Act, 2015 (FAST Act) (Pub. L. 114-94, Dec 4, 2015, 49 USC31305 note) requires the Federal Motor Carrier Safety Administration (FMCSA) to conduct an annual report on commercial driver's license (CDL) skills testing delays in each State and the District of Columbia (D.C.). For this report, FMCSA created a survey to gather information about the following topics:

- 1. The average wait time from the date an applicant asks to take a skills test (or retest) to the date the applicant can complete a test (or retest).
- 2. The resources available for skills testing, such as the number of examiners and test sites available.
- 3. What is being done to address skills testing delays in States with average skills test or retest wait times exceeding 7 days.

This report details the findings from the first annual survey. Data collection occurred from September through November 2017.

On October 27, 1986, the Commercial Motor Vehicle Safety Act of 1986 was signed into law. (4) This act required regulatory action to establish minimum testing standards for CDL applicants. As a result, on July 21, 1988, the Federal Highway Administration issued a final rule establishing minimum standards for State testing and licensing of commercial motor vehicle (CMV) drivers; knowledge, skills, and abilities required to operate different types of CMVs (including specific requirements for receiving endorsements); and the information to be included on State-issued CDLs. (5) 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).

Federal regulations at 49 CFR 383.25 require all CDL applicants to obtain a commercial learner's permit (CLP) and to hold it for at least 14 days before taking the CDL skills test. (6) To obtain a CLP, applicants must pass a general knowledge test that meets Federal standards for the particular CMV type that the applicant expects to operate. Applicants for endorsements must also pass the relevant knowledge tests. 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 various minimum waiting periods, this regulation established a national minimum of 14 days.

A 2015 Government Accountability Office (GAO) report to Congress⁽⁷⁾ 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 applied to take the skills test and the first available opportunity for the applicant to complete the skills test. The report found that there were several

6 49 CFR, 383.21 – 383.25, July 21, 1988.

⁴ Pub. L. 99-570, 100 Stat. 3207-170, October 27, 1986.

^{5 53} FR 27628, July 21, 1988.

⁷ http://www.gao.gov/assets/680/671429.pdf

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 to CDL applicants due to training costs and the wait time before being licensed for employment.
- A loss of potential CMV drivers who find alternate employment before obtaining a CDL.

Each State has different methods of collecting data on CDL testing, and each State has different policies to oversee its CDL testing program. This report seeks to provide an informational, general overview of each State's program. Comparisons among States are limited because some States had access to actual data, and some States could provide only anecdotal information. This is detailed more thoroughly in the analysis section of the report.

This report covers delays experienced from January 1, 2016 to December 31, 2016, to allow for a full year's collection of data. Future reports will cover subsequent 1-year periods. A few States noted that their CDL skills testing delays have decreased significantly since 2016; this has been noted throughout the report where applicable, and any changes will be reflected in subsequent reports.

2. SURVEY OVERVIEW

The survey was developed to cover five broad areas of the CDL skills testing process in each State:

- 1. State laws and policies.
- 2. CDL skills testing delays.
- 3. CDL skills testing volume and demand.
- 4. CDL skills testing resources.
- 5. General comments and feedback.

The survey was optional, and each question on the survey was optional. FMCSA encouraged States to provide as much information as possible. While FMCSA has certain mandatory minimum requirements for obtaining a CDL, States are free to implement their own policies or additional requirements, which could impact the delays experienced when scheduling CDL skills testing. The survey was designed to account for this. The types of data gathered in each area are discussed in the respective subsections that follow.

2.1 STATE LAWS AND POLICIES

This section of the survey covered an overview of the laws and policies in each State regarding CDL skills testing and the overall process of obtaining a CDL. The minimum standards mandated by FMCSA for obtaining a CDL require that each State's CDL skills testing program include three parts: Vehicle Inspection (VI), Basic Control (BC), and a Road Test (RT). FMCSA also requires an applicant to hold a CLP for 14 days before taking the CDL skills test. The CLP can be obtained by passing a written knowledge test.

Some States require additional mandatory waiting time after obtaining a CLP or after failing a skills test (for a retest). Some States allow applicants to benefit from banking of their skills test: that is, if they fail one or two of the three parts, they need to re-take only those parts. This section also studied each State's method for scheduling a test and whether they allowed for third-party testing or used State resources, such as State Police or a State Driver's Licensing Agency to conduct skills testing. For States that have third-party testing, the survey collected information on what types of third-party testing are used (e.g., community colleges, training schools, or companies testing their own employees).

2.2 CDL SKILLS TESTING DELAYS

This section of the survey asked questions about the average delays experienced when scheduling a CDL skills test or re-test and the method used to capture these data. Additionally, States were given the option to provide data on current delays at all testing locations on a quarterly basis in lieu of providing an average on future surveys. A quarterly survey of each testing location would allow more insight into delays at individual testing locations and seasonal changes in the demand for CDL skills testing. The survey did not include mandatory wait times

as part of the delay, because this is a Federal regulation that States must comply with. "Delay" was defined as the amount of lag in scheduling appointments at each test center and was not inclusive of delays caused by personal preference for test dates or an applicant's vehicular needs. While these factors influence delay times, they fall outside State and Federal purview and were not applicable to this study.

The survey aimed to identify delays during an entire calendar year, so States were asked to report on the average delay from January 1, 2016, through December 31, 2016.

2.3 CDL SKILLS TESTING VOLUME AND DEMAND

This survey section asked questions about the number of CDLs issued; the number of tests failed; the number of out-of-State applicants; and the number of CDLs issued to drivers who opted to take a CDL skills test in another State. Several States did not have the data to answer these questions. As a result, while analysis has been done where data availability permitted, it was not possible to conduct an in-depth analysis on how the CDL skills testing volume and demand may influence delays in the States.

2.4 CDL SKILLS TESTING RESOURCES

This section of the survey asked questions about the number of available testing locations and certified examiners. The 2017 survey asked for information as of January 1, 2016, and January 1, 2017, to provide an indication of whether resources within each State are remaining steady, increasing, or decreasing.

FMCSA asked the questions asked in this section to comply with the FAST Act, which requires collection of this information. States were given the option to report only overall numbers or to break the numbers out by individual classes (Class A, Class B, Class C, Passenger Bus, or School Bus). This method was informed by background research, which indicated several States had high variation in available resources depending on the class being tested.

2.5 GENERAL COMMENTS AND FEEDBACK

This section contained five broad questions that allowed States to provide written responses to the survey. Several States completed this section and provided insights into their earlier responses. Additionally, FMCSA asked States what length of delay they thought was acceptable to the applicant and whether they thought that length would be achievable within their State. Several of the responses to these questions helped to inform this report.

2.6 SURVEY RESPONSES

The survey was sent to all 50 States and D.C. Of all parties surveyed, 46 voluntarily responded for a 90 percent response rate. Responses varied in detail: one State provided only general comments, one State provided delay data at only a few test locations, and other States provided

detailed information on each segment of the CDL skills test. Tables summarizing individual State responses can be found in the appendices.

Results from the survey were combined and analyzed in the following three groups: (1) States that use only State resources; (2) States that use only third-party resources; and (3) States that use both State and third-party resources. For the third group, FMCSA analyzed eight State resources and third-party resources separately. This division into groups provides the best context by comparing similar State testing systems. But there are still limitations because this method does not control for the size of the State, the size of each testing center, and other details.

There are 9 States that do not use third-party resources; 9 States that use only third-party resources; and 27 States that use both State and third-party resources. Six States did not respond or provided only general comments and feedback. Table 1 depicts the breakdown of responses received from the survey. Figure 1 shows what types of CDL skills testing resources each State offers.

Table 2. Number of responses received for each category relating to resources used for CDL skills testing.

State-Only Testing	Third-Party-Only	Both State and Third-	No Response or General	
	Testing	Party Testing	Feedback Only	
9	9	27	6	

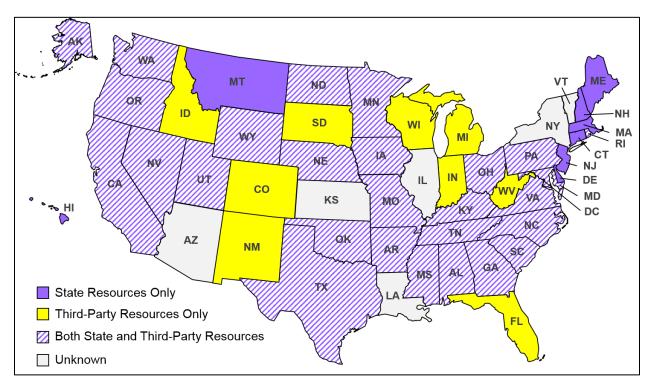


Figure 1. Map. Available CDL skills testing resources by State, as of January 1, 2017.

States cited various reasons for using third-party testing. The majority indicated that State testing alone would not provide enough resources to answer demand for skills tests, or that they wanted to provide applicants with additional testing locations.

States that do not use third-party testing frequently cited fraud as a concern, and some States that use third-party testing had limited options to minimize the possibility of fraud. Some States noted that they lacked the additional resources necessary to properly monitor third-party programs. A few States that do not currently use third-party testing are actively considering implementing third-party testing in the future.

2.7 LIMITATIONS AND ASSUMPTIONS

There were several limitations and assumptions in the analysis, and this is not intended to provide a conclusive rationale behind CDL skills testing delays in each State. Rather, it provides general insights and overviews of each State's unique CDL skills testing program.

The study reached some insights in States that provided enough data to denote trends. Specifically, calculations were done to estimate failure rates and cancellation rates. Failures and cancellations increase the effective demand for scheduling skills tests and, being unpredictable, are likely causes of scheduling delays. The number of tests administered to out-of-State residents was also looked at, but this number did not appear to be high enough to significantly impact skills testing delays.

For States that provided detailed information, the number of scheduled skills tests was estimated as the sum of initial tests, re-tests, and cancelled tests. This value formed the basis for calculating failure and cancellation rates.

If States could not report both the number of initial skills tests and the number of re-tests (or a combined number), the number of scheduled tests was estimated as the sum of CDLs issued, which required a skills test (i.e., "passed" tests); failed tests; and cancelled tests. Some States noted that the number of CDLs issued may include CDLs that did not require taking the skills test, as they could not reach a greater level of detail in the data.

For States where only part of this information was available, the available data were estimate values. There are limitations on using the number of CDLs issued to count the number of tests taken. Specifically, this method of counting omits tests taken but failed, and numbers may cross over different calendar years (e.g., drivers pass the skills test in December and do not get their CDL until January).

For States that could not provide the number of initial tests and re-tests, analyses were mostly done on combined programs, i.e., State and third-party resources, given the limitation of using the number of CDLs issued to estimate the overall number of tests.

For determining cancellation and failure rates in a given State, the ideal dataset would include the number of tests given (initial and re-tests); the number of tests canceled; and the number of failed tests. For States where this information was available, the scheduled tests were approximated as the sum of initial tests, retests, and canceled tests. The cancellation rate was calculated as the number of canceled tests divided by the number of scheduled tests—while the failure rate was calculated as the number of failed tests divided by the number of scheduled tests minus the canceled tests—because these were not actually taken.

No States had a large number of out-of-State applicants taking the CDL skills test, so while this information is provided in the appendices (where responses were received), no further analysis was done on this item.

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3. ANALYSIS OF CDL SKILLS TEST DELAYS

Delays for CDL skills testing were broken out by initial exams as compared to re-tests after a failure. FMCSA considered mandatory wait times separately from scheduling delays, as these periods would frequently overlap (i.e., nothing precludes an applicant from scheduling a skills test once they have received their CLP despite the mandatory 14-day waiting period before they can attempt the skills test). Personal preference on the date for a skills test was not included as part of the "delay." If an applicant chose to wait to take the CDL skills test past the next available appointment, that was considered a personal choice and not an incurred delay.

Most States thought that a 2-week period was a reasonable delay for a CDL skills test, and some States thought that as long as the skills test could be taken within a month after the request date, the wait was not excessive. Some States have internal benchmarks, such as 10 days, for scheduling skills tests. States noted that several factors influence scheduling skills tests, such as seasonality (fewer applicants wish to take the skills test when the weather is poor, so spring and summer see an uptick in requests) and population (urban centers have greater demand and more testing resources than do rural centers).

Some States thought it would be unreasonable to reduce delays to 7 days or less, while others noted that their delays are already less than 7 days. Most States reported that they would require additional resources and funding to reduce overall wait times. States that do not use third-party testing measured a 7-calendar-day delay as a 5-day delay because State employees do not test on weekends.

A few States noted that delays should not be discussed without also discussing an emphasis on proper training and experience. The mandatory 14-day waiting period is designed to allow applicants to gain experience before receiving their CDL, and additional delays in scheduling a CDL skills test also grant an applicant more time to gain experience before attempting to pass the skills test. Two States with high delays in scheduling also had low failure rates, which could indicate that applicants are more likely to pass the skills test if they have more opportunity to gain experience beforehand.

The average delay for scheduling a CDL skills test varied significantly across States. Figure 2 and Figure 3 show the delays for each State that provided information by both type of test (initial or re-test) and type of testing location (State or third-party).

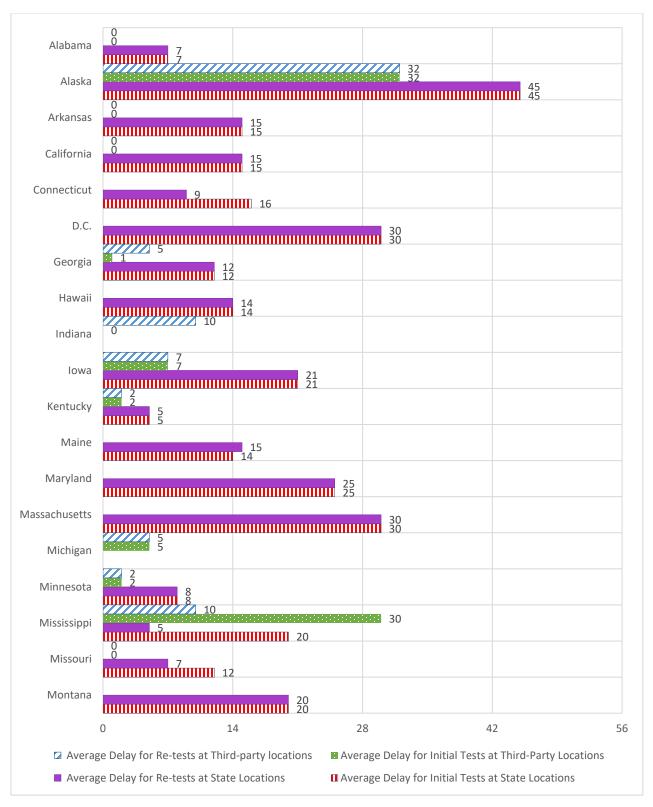


Figure 2. Chart. Average testing delays in calendar year 2016 for States Alabama—Montana, grouped by type of test and type of testing location. Not shown are States that did not respond or did not give delay information (Arizona, Delaware, Illinois, Kansas, and Louisiana) or reported a delay of 0 days (Colorado, Florida, and Idaho).

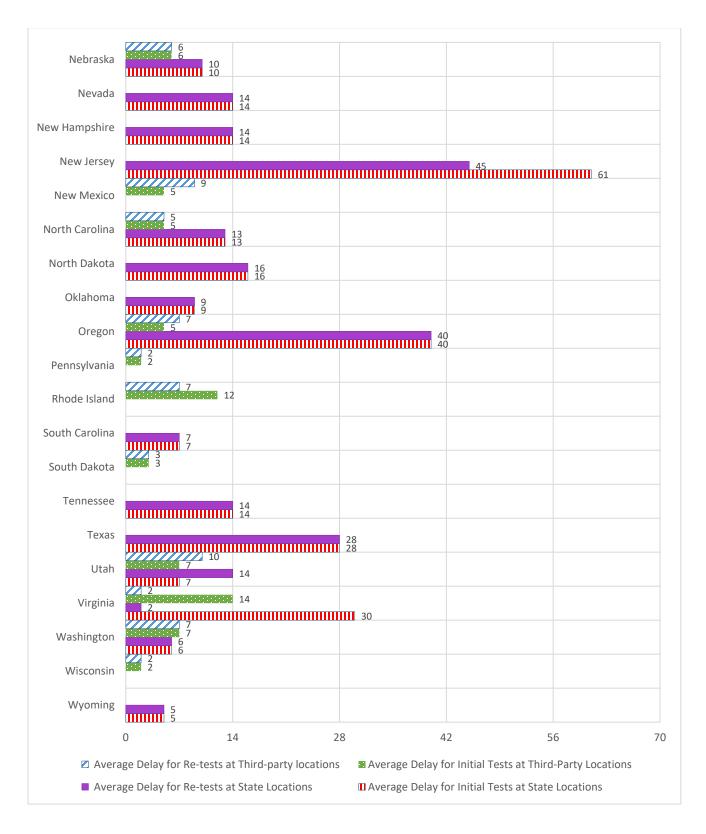


Figure 3. Chart. Average testing delays in calendar year 2016 for States Nebraska—Wyoming, grouped by type of test and type of testing location. Not shown are States that did not respond or did not give delay information (New York, and Vermont) or reported a delay of 0 days (Ohio, and West Virginia).

For States with an initial testing delay of 14 days or less, the mandatory wait time for taking an initial skills test overlapped entirely with the scheduling delay, which would result in no additional delay to the applicant. Several States that responded to the survey fell within or near this threshold.

For re-tests, an applicant may or may not have a mandatory wait depending on the circumstances. There is a Federal requirement for third-party tests to be scheduled no less than 2 days in advance to give adequate notice to the State; this was included as a mandatory wait for third-party re-tests. (8) Several States have their own mandated waiting period for re-tests; however, the delay for scheduling a CDL skills test appears to have a much greater burden for applicants waiting on a re-test than an initial test.

While New Jersey reported unusually lengthy delays in scheduling skills tests at State locations, they also noted that since 2016, they have made several changes in their CDL skills testing program. This has resulted in significantly lower delays in 2017.

3.1 DELAYS FOR INITIAL CDL SKILLS TESTS

Federal regulations require that an applicant hold a CLP for a minimum of 14 days before taking the CDL skills test. Each State decides whether to adhere to this Federal minimum or to impose a longer waiting period. Most responding States adhered to the Federal minimum of 14 days.

The net delay for scheduling a CDL skills test was determined by subtracting the mandatory waiting period from the scheduling delay at testing locations. For example, if a testing location had a scheduling delay of 14 days and a mandatory waiting period of 14 days, the net delay experienced by the applicant was 0 days. Table 3 shows the frequency counts of States' average delays for initial tests grouped by State and third-party locations.

Table 3. Frequency counts of average net delays for initial tests across States, grouped by State and third-party locations.

Testing Resource Type	No Delay	1-7 Days Delay	8-14 Days Delay	15-21 Days Delay	22-28 Days Delay	>28 Days Delay
State	18	7	2	2	1	2
Third-Party	31	0	0	2	0	0

The net delay at State locations ranged from 0 to 47 days, with an average delay of 6 days and a median of 0 days. Including the minimum mandatory waiting period, this results in an applicant having to wait approximately 20 days from receiving their CLP to attempting the CDL skills test at a State-run testing location. In at least half of the States, the applicant would not have to wait any additional time past the mandatory waiting period.

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^{8 49} CFR 383.75 (a) (8) (viii)

⁹ 49 CFR 383.25(e)

The net delay at third-party locations ranged from 0 to 18 days, with an average net delay of 1 day and a median net delay of 0 days. Therefore, an applicant would have to wait approximately 15 days on average from receiving their CLP to attempting the CDL skills test at a third-party location.

Additional analyses were completed on States based on their available resources to identify any discernable differences. Table 4 shows a comparison of the frequency counts by each of these groups, and additional information can be found in the following sections.

Table 4. Frequency counts of average net delays for initial tests in States grouped by location type and available testing resources.

Testing Resource and State Type	No Delay	1-7 Days Delay	8-14 Days Delay	15-21 Days Delay	22-28 Days Delay	>28 Days Delay
States using only State testing locations	4	2	0	1	0	1
States using only third-party testing locations	9	0	0	0	0	0
State locations in States with both State and third-party testing	14	5	2	1	1	1
Third-party locations in States with both State and third-party testing	22	0	0	2	0	0

There is specific concern over net delays of greater than 7 days. There were eight States that had net delays of greater than 7 days for an initial skills test. Of those eight States:

- One State has already taken steps to reduce their net delay to 0 days.
- Four States offer both State and third-party testing. One of these States had a net delay of greater than 7 days.
- Two States have both State and third-party testing but were unable to provide delay values for third-party testing locations, which, based on data from other States, likely have a net delay of less than 7 days.

Allowing for the estimated delays inferred for the two States above, this results leaves one State with a net scheduling delay of 7 days or more for initial skills tests at both State and third-party testing sites.

3.1.1 States with State Resources Only

For States that use only State testing, the average delay ranged from 14 to 61 days, with the net delay ranging from 0 to 47 days. The actual delay time had an average of 25 and a median of 18 days, with the net delays showing an average of 9 days and a median of 1 day. New Jersey had the maximum delay of 47 days, but they noted in their comments that this wait time was significantly reduced in 2017. If New Jersey is excluded from the analysis as an outlier, the average actual delay is 20 days, with an average net delay of 3 days. Table 5 shows a comparison of the actual average delays to the realized net delays at these State testing locations.

Table 5. Actual delays for initial skills tests at State testing locations in States that do not use third-party testing compared to net delays (actual delay minus the mandatory waiting period) at these locations.

Delay Type	No Delay	1-7 Days	8-14 Days	15-21 Days	22-28 Days	>28 Days
Actual	0	0	3	2	0	3
Net	4	2	0	1	0	1

3.1.2 States with Third-party Resources Only

For States that use only third-party testing, the average delay ranged from 0 to 5 days, with net delays of 0 days in all States in this group. The actual delays had an average of 2 days, with a median of 1 day. Table 6 depicts a comparison of the actual delays to the net delays at third-party testing locations in these States.

Table 6. Actual delays for initial skills tests at third-party testing locations in States that do not use State testing compared to net delays (actual delay minus the mandatory waiting period) at these locations.

Delay Type	No Delay	1-7 Days	8-14 Days	15-21 Days	22-28 Days	>28 Days
Actual	4	4	0	0	0	0
Net	8	0	0	0	0	0

3.1.3 States with Both State and Third-party Resources

For States that use both State and third-party testing, analyses were completed individually on each component.

State testing locations in these States had average delays of 0 to 45 days, which resulted in net delays for initial tests ranging from 0 to 31 days. The average actual delay was 17 days, with a median of 14 days. The average net delay was 5 days, with a median of 0 days. Table 7 shows a comparison of the actual delays versus the net delays at State testing locations for States in this group.

Table 7 Actual delays for initial skills tests at State testing locations in States with both State and third-party testing compared to net delays (actual delay minus the mandatory waiting period) at these locations.

Delay Type	No Delay	1-7 Days	8-14 Days	15-21 Days	22-28 Days	>28 Days
Actual	1	5	8	5	2	4
Net	16	5	2	0	2	1

Third-party testing locations had average delays ranging from 0 to 32 days, resulting in net delays for initial tests ranging from 0 to 18 days. The average actual delay was 4 days, with a median of 2 days. The net delays showed an average of 1 day, with a median of 0 days. Table 8 shows a comparison of the actual delays versus the net delays at third-party locations for States in this group.

Table 8. Actual delays for initial skills tests at third-party testing locations in States that do use both State and third-party testing compared to net delays (actual delay minus the mandatory waiting period) at these locations.

Delay Type	No Delay	1-7 Days	8-14 Days	15-21 Days	22-28 Days	>28 Days
Actual	12	13	0	0	0	1
Net	25	0	0	1	0	0

In both instances (State testing sites and third-party testing sites), the largest delays were seen in Alaska. Seasonality likely has a significant impact in Alaska, with applicants not desiring to take their skills test during the winter months. This could increase scheduling delays due to a large influx of testing requests in the spring and summer months, increasing overall delays.

3.2 DELAYS FOR CDL SKILLS RE-TESTS

Mandatory waiting periods for CDL skills re-tests (after experiencing one or more failures) are largely the result of individual State regulations. There is a Federal requirement that third-party tests be scheduled with 48-hours' notice to the State, but all other waiting periods are State imposed and vary between States, which is why the net scheduling delay (delay minus any mandatory waiting period) is used in the following analysis.

The net delay for scheduling a CDL skills test was determined by subtracting the mandatory waiting period from the scheduling delay at testing locations. For example, if a testing location had a scheduling delay of 14 days and a mandatory waiting period of 14 days, the net delay experienced by the applicant was 0 days. Table 9 shows the frequency counts of States' net delays for re-tests, grouped by State and third-party locations.

Table 9. Frequency counts of average net delays for re-tests across States, grouped by State and third-party locations.

Testing Resource Type	No Delay	1-7 Days Delay	8-14 Days Delay	15-21 Days Delay	22-28 Days Delay	>28 Days Delay
State	1	10	8	5	2	4
Third-Party	21	7	3	0	1	0

The net delay at State locations for re-tests ranged from 0 to 38 days, with an average delay of 14 days and a median net delay of 12 days. The data show that applicants often must wait several days before taking a re-test at a State-run testing location. The net delay at third-party locations ranged from 0 to 25 days, with an average net delay of 2 days and a median net delay of 0 days. This means that at least 50 percent of these States can accommodate a re-test at third-party locations with applicants waiting only the mandatory time before returning.

Additional analyses focused on differences between States' resources and impacts on re-testing. Table 10 shows a comparison of the frequency counts by each of these groups, and additional information can be found in the following sections.

Table 10. Frequency counts of average net delays for re-tests in States grouped by location type and available testing resources.

(Re)Testing Resource and State Type	No Delay	1-7 Days Delay	8-14 Days Delay	15-21 Days Delay	22-28 Days Delay	>28 Days Delay
States using only State testing locations	0	3	1	1	1	2
States using only third-party testing locations	5	3	1	0	0	0
State locations in States with both State and third-party testing	2	7	8	4	1	2
Third-party locations in States with both State and third-party testing	16	4	2	0	1	0

Net delays for re-tests were significantly higher than net delays for initial tests. This indicates that the burden of scheduling multiple tests is compounded for CDL applicants. Applicants equipped to pass their skills test on their first attempt will incur significantly shorter delays before receiving their CDLs.

In total, there were 21 States with net delays greater than 7 days for scheduling re-tests. This includes the same eight States with net delays greater than 7 days for scheduling initial skills tests. Of these States:

- One State has already reduced their scheduling delays significantly to less than 7 days.
- Twelve States offer both State and third-party testing, and one of the two options has a net scheduling delay of less than 7 days.
- Two States offer both State and third-party testing but were unable to provide delays for third-party locations.

For the remaining six States with net scheduling delays greater than 7 days for re-tests, no mitigation was apparent.

3.2.1 States with State Resources Only

For States that use only State testing, the average actual delay for a re-test ranged from 9 to 45 days. The net delay for a re-test ranged from 2 days to 31 days. The average actual delay was 22 days, with a median of 18 days. The average net delay was 16 days, with a median of 14 days. Table 11 shows a comparison of the actual delays in scheduling a re-test compared to the net delays experienced when scheduling a re-test.

Table 11. Actual delays for re-tests at State testing locations in States that do not use third-party testing compared to net delays (actual delay minus the mandatory waiting period) at these locations.

Delay Type	No Delay	1-7 Days	8-14 Days	15-21 Days	22-28 Days	>28 Days
Actual	0	0	3	2	0	3
Net	0	3	1	1	1	2

3.2.2 States with Third-party Resources Only

For States that use only third-party testing, the average re-test delay ranged from 0 to 10 days, with the net delay for a re-test ranging from 0 to 9 days. The average actual delay was 3 days, with a median of 2 days. The average net delay was 2 days, with a median of 0 days. Table 12 shows a comparison of the actual delays to the net delays at these third-party locations.

Table 12. Actual delays for re-tests at third-party testing locations in States that do not use State testing compared to net delays (actual delay minus the mandatory waiting period) at these locations.

Delay Type	No Delay	1-7 Days	8-14 Days	15-21 Days	22-28 Days	>28 Days
Actual	4	3	2	0	0	0
Net	5	3	1	0	0	0

3.2.3 States with Both State and Third-party Resources

For States that use both State and third-party testing, each component was analyzed individually.

State testing locations in these States had average re-test delays ranging from 0 to 45 days, resulting in net delays for a re-test ranging from 0 to 38 days. The average actual delay was 16 days, with a median of 14 days. The average net delay was 14 days, with a median of 12 days. Table 13 shows a comparison of actual delays to net delays at State testing locations for this group.

Table 13. Actual delays for re-tests at State testing locations in States that use both State and third-party testing compared to net delays (actual delay minus the mandatory waiting period) at these locations.

Delay Type	No Delay	1-7 Days	8-14 Days	15-21 Days	22-28 Days	>28 Days
Actual	2	5	8	4	2	4
Net	3	6	7	3	3	3

Third-party testing locations had average delays ranging from 0 to 32 days, resulting in net delays for re-tests ranging from 0 to 25 days. The average for actual delays was 4 days, with a median of 1 day. The net delays had an average of 3 days and a median of 0 days. Table 14 shows a comparison of the actual delays to the net delays at third-party locations in this group.

Table 14. Actual delays for re-tests at third-party testing locations in States that use both State and third-party testing compared to net delays (actual delay minus the mandatory waiting period) at these locations.

Delay Type	No Delay	1-7 Days	8-14 Days	15-21 Days	22-28 Days	>28 Days
Actual	13	10	2	0	0	1
Net	15	8	2	0	1	0

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4. ANALYSIS OF CDL SKILLS TESTING RESOURCES

States were asked to report the number of qualified examiners as of January 1, 2017. States were also asked to report the number of available testing locations as of both January 1, 2016, and January 1, 2017, to indicate whether the number of testing locations was increasing or decreasing from year to year.

The FAST Act specifically asks for investigation into whether available testing locations have increased or decreased from the previous year. Overall, the number of available testing locations remained more consistent for State facilities than for third-party facilities. The following sections detail the results for each group of States.

4.1.1 States with State Resources Only

Eight States that rely solely on State facilities provided information on their CDL skills testing resources. The number of testing locations ranged from 1 to 21 sites, with an average of 11 test sites for both 2016 and 2017. There was a wider range in the number of qualified examiners: a minimum of 4, a maximum of 110, and an average of 33. These data are shown in Table 15.

Table 15. Statistics on the available resources in States that utilize only State resources (no third-party testing).

Testing Resource	Min	Median	Max	Mean
2016 Test Locations	1	10	21	11
2017 Test Locations	1	10	21	11
2017 Examiners	4	25	59	33

In this group of States, 100 percent of respondents indicated that the number of available testing locations as of January 1, 2017, was the same as the number of testing locations available as of January 1, 2016.

4.1.2 States with Third-party Resources Only

Eight States that rely solely on third-party facilities provided information on their CDL skills testing resources. The number of testing locations in 2016 ranged from 13 to 200, with an average of 77. In 2017, the number of testing locations ranged from 11 to 200, with an average of 75. There was a wider range in the number of qualified examiners, which ranged from 21 to 396, with an average of 140. These data are shown in Table 16.

Table 16. Statistics on the available resources in States that utilize only third-party resources (no State testing).

Testing Resource	Min	Median	Max	Mean
2016 Test Locations	13	65	200	77
2017 Test				
Locations	11	67	200	75
2017 Examiners	21	90	396	140

In this group of States, there were four States that decreased the number of available testing locations between 2016 and 2017, one State that increased the number of available locations, and three States that had the same number of testing locations available in both years. This means that 50 percent of States using only third-party resources saw a decrease in available testing locations, 13 percent saw an increase, and 38 percent saw no change (combined percentages exceed 100 percent due to rounding).

4.1.3 States with both State and Third-party Resources

A total of 26 States use both State and third-party resources. Each component (State and third-party) was analyzed individually. For the overall analysis, if States provided the number of testing locations for only 2016 or 2017, they were excluded from the overall analysis since a comparison between years could not be made. Additionally, Rhode Island has a unique situation: its testing location is at a third-party site (a community college) but its examiners are State resources. Therefore, Rhode Island was excluded from the combined analysis because it could not be compared to other States, and it was unclear which category it should be placed in.

For State resources within this group, the number of testing locations in both 2016 and 2017 ranged from 3 to 119, with an average of 18. The number of qualified examiners in 2017 ranged from 6 to 211, with an average of 69. These data are shown in Table 17.

Testing Resource	Min	Median	Max	Mean
2016 Test Locations	3	12	119	18
2017 Test Locations	3	12	119	18
2017 Examiners	6	41	211	69

Table 17. Statistics on the available State resources in States that have both types of resources.

The number of available testing locations in this group, like those States using only State resources, were similar between 2016 and 2017. Available testing locations remained the same in 19 States, while 2 States had a decrease in the number of testing locations, and 2 States had an increase. This means that 83 percent of these States had no change in the number of available State testing locations, 9 percent had a decrease, and 9 percent had an increase (combined percentages exceed 100 percent due to rounding).

For third-party resources within this group of States, the number of available testing locations in 2016 ranged from 3 to 185 with an average of 58. In 2017, the number of testing locations ranged from 3 to 216 with an average of 59. The number of qualified examiners in 2017 ranged from 3 to 349, with an average of 98. These data are shown in Table 18.

Table 18. Statistics on the available third-party resources in States that have both types of resources.

Testing Resource	Min	Median	Max	Mean
2016 Test Locations	3	46	185	59

Testing Resource	Min	Median	Max	Mean
2017 Test Locations	3	39	220	61
2017 Examiners	3	57	349	98

The number of available third-party testing locations varied between years more than State locations, but not as much as States using only third-party resources. Fifteen States had the same number of third-party testing locations in 2016 and 2017, four States saw a decrease, and 4 saw an increase. The remaining four States with both State and third-party resources did not provide information on this item. Of the States that responded on this issue, 65 percent had no change in the number of third-party testing locations, 17 percent increased the number of third-party testing locations, and 17 percent decreased the number of third-party testing locations.

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5. ANALYSIS OF FAILURE RATES AND CANCELLATION RATES

When an applicant fails or cancels their CDL skills test, the State incurs an additional burden because of the increased demand in scheduling, assuming the applicant will need to schedule a new appointment for a CDL skills test. Cancellations are especially burdensome because a time-slot is lost, unless the State accepts walk-in testing. Of the States that responded, California, Minnesota, Nevada, New Jersey, Ohio, Oklahoma, New Hampshire, and Virginia allow walk-in exams. Michigan permits walk-in testing only at third-party testing locations.

Failures and cancellations can be influenced by several external factors. Some cancellations are caused by applicants arriving in a vehicle that is out-of-service, and some cancellations are due to missed appointments or an applicant showing up too late to take their test. Both failure and cancellation rates could also be influenced by cost (whether an applicant has to pay prior to or after taking the test may influence whether they choose to cancel, and cost may also influence how well an applicant prepares for a test). Additionally, failure rates are likely influenced by external factors such as weather.

5.1 FAILURE RATES ACROSS STATES

Failure rates varied across the different groups of States. State testing locations in States with both State and third-party testing resources had higher failure rates than the other groups, but the available data did not support a clear reason for this finding. Table 19 shows data regarding the failure rates for each type of State, grouped by available testing resources.

Table 19. Failure rate statistics, grouped	d by type of testing	location and avails	able State resources.
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Testing Resource and State Type	Min	Median	Max	Mean
States using only State testing locations	2%	16%	41%	19%
States using only third-party testing locations	11%	21%	31%	21%
State Locations in States with both State and third-party testing	2%	28%	62%	30%
Third-party locations in States with both State and third-party testing	5%	15%	38%	18%

5.2 ANALYSIS OF FAILURES RELATED TO BANKING OF SEGMENTS

Most States that responded allow banking of the CDL skills test segments. Banking occurs when an applicant passes one segment of the skills test (VI, BC, or RT) and does not have to repeat this segment when they return for a re-test. States that did allow banking noted that applicants could not retain passed segments after a CLP renewal (i.e., they had to pass all three segments of the skills test within the period for which their CLP was valid).

Some States commented that they allow banking to reward success in individual segments and to enhance efficiency in scheduling. One State noted that it stopped allowing banking to encourage participants to learn the necessary skills to pass all portions of the test instead of studying for only one portion at a time. This comment prompted additional analysis to analyze failure rates by whether States allow banking of segments. FMCSA conducted this analysis using failure rates from 8 States that do not allow banking and 22 States that do allow banking. States were not included if a failure rate could not be calculated or they did not report whether they allow banking. One State allows applicants to bank only the VI segment but was included in the analysis as a State that allows banking.

The difference in failure rates between States that allowed or did not allow banking was not statistically significant. Still, there was a noticeable trend of lower failure rates for those States that did not allow banking. FMCSA did not divide this analysis into State or third-party locations, as the sample sizes became too small to gather any insights.

For States that do not allow banking, the failure rates range from 2 to 31 percent, with an average of 19 percent; the median was 17 percent. States with banking saw failure rates ranging from 8 percent to 66 percent, with an average of 28 percent; the median was 26 percent. Table 20 compares the failure rates of these two groups.

Table 20. A comparison of failure rates in States with versus without banking of skills test portions.

State Banks Test Skills Test Portions?	Min	Median	Max	Mean
Test portion banking	2%	17%	31%	19%
No test portion banking	8%	26%	51%	28%

FMCSA would need more information and data to determine conclusively if there is a relationship between skills test failure rates and the decision of whether to allow banking of each segment of a skills test.

5.3 CANCELLATION RATES ACROSS STATES

Overall, cancellation rates were higher at State locations than at third-party locations. This may be because some third-party locations test at the end of a training course and work closely with applicants to schedule their exams when they finish the training program. States that relied solely on third-party testing locations had the lowest variability in cancellation rates, and States that relied solely on State testing locations had the lowest median (11 percent). Table 21 shows a comparison of cancellation rates among the various groups of States.

Table 21. A comparison of cancellation rates across States by type of testing location and resources available.

Testing Resource and State Type	Min	Median	Max	Mean
States using only State testing locations	3%	11%	56%	21%
States using only third-party testing locations	7%	11%	28%	17%

Testing Resource and State Type	Min	Median	Max	Mean
State Locations in States with both		/		
State and third-party testing	1%	23%	56	27%
Third-party locations in States with				
both State and third-party testing	1%	20%	38%	18%

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6. CONCLUSIONS

The response rate for the 2017 CDL Skills Testing Delays Survey was high, which provided a wealth of data and insights into each State's CDL skills testing program. While there are Federal CDL skills testing regulations that require State compliance, States retain discretion concerning certain aspects of its CDL skills testing program. Therefore, it is difficult to compare States or develop meaningful analysis to look at trends across States. Nevertheless, it is possible to produce descriptive statistics to create an overall sense of the CDL skills testing program across the United States.

The FAST Act specifically asked what steps FMCSA is taking to address skills testing delays of greater than 7 days.

Most States have reasonable delays in scheduling CDL skills tests. There are a few States with unusually long scheduling delays, but there is no Federal regulation or requirement for States to schedule skills tests within a certain time frame. Therefore, it is up to the States to monitor and control as desired. Several States mentioned that they would require additional resources or funding to reduce delays in testing.

While only one State had an average net scheduling delay of greater than 7 days for initial skills tests without any mitigation, there were a total of six States that had average net scheduling delays of greater than 7 days for re-tests without any mitigation.

Additional States with longer delays were already working to reduce skills tests delays or had an alternate option with shorter delays (i.e., only State or third-party resources had delays greater than 7 days, but not both). There are greater net delays in re-tests due to similar actual delays and shorter minimum mandatory wait times. This indicates that delay times for re-tests have a greater effect on applicants than delay times for an initial skills test.

The data showed large numbers of failures and cancellations across all States. If these numbers were reduced, scheduling delays would likely also see reductions, as the demand for re-tests would decrease, and testing slots would not be wasted on canceled appointments.

As the first report of an annual reporting requirement, this report serves to establish a baseline for CDL skills testing programs across the United States and will be used for further analysis in future years.

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ACKNOWLEDGEMENTS

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Alabama Montana Alaska Nebraska Arkansas Nevada

CaliforniaNew HampshireColoradoNew JerseyConnecticutNew MexicoDelawareNorth CarolinaDistrict of ColumbiaNorth Dakota

Florida Ohio Georgia Oklahoma Hawaii Oregon Pennsylvania Idaho Rhode Island Illinois South Carolina Indiana Iowa South Dakota Tennessee Kentucky Texas Maine Maryland Utah Massachusetts Virginia

Michigan Washington
Minnesota West Virginia
Mississippi Wisconsin
Missouri Wyoming

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APPENDIX A: FAST ACT REPORTING REQUIREMENTS

SECTION 5506(1)(A): AVERAGE WAIT TIME BETWEEN REQUESTING AND COMPLETING AN INITIAL TEST

Table 22 summarizes the States' responses regarding "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."

Table 22. States' average wait times and delays from the date an applicant requests to take a skills test to the date the applicant can complete the test, for State and third-party resources.

	NA 1 / NY 1/	D.I.	D.I.
State	Mandatory Wait (Federal Minimum=14 Days)	Delay: State Resources	Delay: Third-Party Resources
Alabama	14 days	7 days	0 days
Alaska	14 days	45 days	32 days
Arizona	Unknown [†]	Unknown [†]	Unknown [†]
Arkansas	14 days	15 days	0 days
California	14 days	15 days	0 days
Colorado [‡]	14 days	_	0 days
Connecticut§	14 days	16 days	_
Delaware§	14 days	Unknown [†]	_
District of Columbia§	30 days*	30 days	
Florida [‡]	14 days	_	0 days
Georgia	14 days	12 days	1 day
Hawaii [§]	14 days	14 days	
Idaho [‡]	14 days	_	0 days
Illinois [^]	Unknown [†]	Unknown [†]	Unknown [†]
Indiana [‡]	14 days	_	0 days
Iowa	14 days	21 days	7 days
Kansas	Unknown [†]	Unknown [†]	Unknown [†]
Kentucky	14 days	5 days	2 days
Louisiana	Unknown [†]	Unknown [†]	Unknown [†]
Maine§	14 days	14 days	_
Maryland	14 days	25 days	Unknown [†]
Massachusetts§	14 days	30 days	_
Michigan [‡]	14 days	_	5 days
Minnesota	14 days	8 days	2 days
Mississippi	14 days	20 days	5 days
Missouri	14 days	12 days	0 days
Montana [§]	14 days	20 days	_
Nebraska	14 days	10 days	6 days
Nevada	14 days	14 days	0 days
New Hampshire§	14 days	14 days	_
New Jersey§	14 days	61 days	_

State	Mandatory Wait (Federal Minimum=14 Days)	Delay: State Resources	Delay: Third-Party Resources
New Mexico [‡]	14 days	_	5 days
New York	Unknown [†]	Unknown [†]	Unknown [†]
North Carolina	14 days	13 days	5 days
North Dakota	14 days	16 days	0 days
Ohio	14 days	0 days	0 days
Oklahoma	14 days	9 days	0 days
Oregon	14 days	40 days	5 days
Pennsylvania	15 days*	Unknown [†]	2 days
Rhode Island‡	14 days	_	12 days
South Carolina	14 days	7 days	0 days
South Dakota [‡]	14 days	_	3 days
Tennessee	14 days	14 days	0 days
Texas	14 days	28 days	Unknown [†]
Utah	14 days	7 days	7 days
Vermont	Unknown [†]	Unknown [†]	Unknown [†]
Virginia	30 days**	30 days	2 days
Washington	14 days	6 days	7 days
West Virginia [‡]	14 days	_	0 days
Wisconsin [‡]	14 days	_	2 days
Wyoming	14 days	5 days	0 days

^{*} These are State-imposed mandatory waiting periods.

SECTION 5506(1)(B): AVERAGE WAIT TIME BETWEEN REQUESTING AND COMPLETING A RE-TEST

Table 23 summarizes the States' responses regarding "the average wait time from the date an applicant, upon failure of a skills test, requests a re-test to the date the applicant has the opportunity to complete such retest."

Federal regulations require third-party testers to submit a schedule of CDL skills testing appointments to the State no later than 2 business days prior to each test. ¹⁰ As a result, there is a

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^{**} This is a State-imposed mandatory waiting period. If the driver attended an approved training school, their mandatory wait for an initial test is only 14 days (the Federally mandated waiting period).

[†] This information was not provided by the State.

[‡] These States do not use State resources to conduct CDL skills tests.

[§] These States do not use third-party resources to conduct CDL skills tests.

[^] Illinois provided information from three testing locations, which had delays of 1, 1, and 13 days respectively. Assuming this is representative of other locations, this would give Illinois an average delay of 5 days. It is unknown whether these are State facilities or third-party facilities (or a mixture of both).

¹⁰ 49 CFR 383.75 (a) (8) (viii)

Federally mandated minimum wait time of 2 days for all third-party testers, but not for State testers.

Table 23. States' average wait times and delays from the date an applicant requests to take a skills re-test to the date the applicant can complete the re-test, for State and third-party resources.

State	Mandatory Wait: State Resources (No Federal Minimum)	Delay: State Resources	Mandatory Wait: Third-Party Resources (Federal Minimum=2 Days)	Delay: Third-Party Resources
Alabama	None	7 days	2 days	0 days
Alaska	7 days*	45 days	7 days*	32 days
Arkansas	5 days*	15 days	5 days*	0 days
Arizona	Unknown [†]	Unknown [†]	Unknown [†]	Unknown†
California	None	15 days	2 days	0 days
Colorado [‡]	_		2 days	0 days
Connecticut§	7 days*	9 days	_	_
Delaware§	10 days*	Unknown [†]	_	
D.C.§	3 days*	30 days	_	
Florida [‡]	_	_	2 days	0 days
Georgia	2 days*	12 days	2 days	5 days
Hawaii [§]	7 days*	14 days		_
Idaho [‡]	_	_	2 days	0 days
Illinois	Unknown [†]	Unknown [†]	Unknown [†]	Unknown [†]
Indiana [‡]	_	_	2 days	10 days
Iowa	None	21 days	2 days	7 days
Kansas	Unknown [†]	Unknown†	Unknown [†]	Unknown†
Kentucky	1 day*	5 days	2 days	2 days
Louisiana	Unknown [†]	Unknown [†]	Unknown [†]	Unknown†
Maine§	None	15 days		_
Maryland	7 days*	25 days	2 days^	Unknown [†]
Massachusetts§	None	30 days		_
Michigan [‡]	_	_	2 days	5 days
Minnesota	7 days*	8 days	7 days*	2 days
Mississippi	2 days*	30 days	2 days**	10 days
Missouri	None	7 days	2 days	0 days
Montana [§]	7 days*	20 days		_
Nebraska	1 day*	Unknown [†]	2 days	Unknown [†]
Nevada	None	14 days	2 days	0 days
New Hampshire§	10 days*	14 days	-	_
New Jersey§	14 days*	45 days		<u> </u>
New Mexico‡			7 days*	9 days
North Carolina	None	13 days	2 days	5 days
North Dakota	None	16 days	2 days	0 days
Ohio	7 days*	0 days	7 days*	0 days
Oklahoma	None	9 days	2 days	0 days
Oregon	7 days*	40 days	7 days*	7 days

State	Mandatory Wait: State Resources (No Federal Minimum)	Delay: State Resources	Mandatory Wait: Third-Party Resources (Federal Minimum=2 Days)	Delay: Third-Party Resources
Pennsylvania	None	Unknown [†]	2 days*	2 days
Rhode Island [‡]	_	_	7 days*	7 days
South Carolina	7 days*	7 days	7 days*	0 days
South Dakota‡	_	_	2 days	3 days
Tennessee	2 days*	14 days	2 days	0 days
Texas	1 day*	28 days	2 days	Unknown†
Utah	2 days*	14 days	2 days	10 days
Vermont	Unknown [†]	Unknown [†]	Unknown [†]	Unknown [†]
Virginia	1 day*	14 days	2 days	2 days
Washington	3 days*	6 days	3 days*	7 days
West Virginia [‡]	_	_	7 days*	0 days
Wisconsin [‡]	_	_	2 days^^	2 days
Wyoming	1 day*	5 days	2 days	0 days

[†] This information was not provided by the State.

SECTION 5506(1)(C) AND (D): THE NUMBER OF QUALIFIED CDL EXAMINERS, AVAILABLE TESTING SITES, AND WHETHER THE NUMBER OF AVAILABLE TESTING SITES HAS INCREASED OR DECREASED

Table 24 summarizes the States' responses regarding "the actual number of qualified CDL examiners available to test applicants" and "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."

[‡] These States do not use State resources to conduct CDL skills tests.

[§] These States do not use third-party resources to conduct CDL skills tests.

^{*} These are State-imposed mandatory waiting periods.

^{**} This is a State-mandated waiting period. For a second or subsequent failure, an applicant must wait 14 days before re-taking the skills test.

[^] This is the Federally mandated waiting period for a first re-test. For applicants who have failed more than once, the mandatory waiting period is 7 days.

^{^^} These are State-imposed mandatory waiting periods for failing the VI segment. A driver must wait 7 days if they fail the BC segment; a driver must wait at least 2 days and up to 14 days after failing the RT segment, depending on the reason for failure; and there is a 2-day required wait for failing an abbreviated school bus skills test.

Table 24. Number of qualified examiners and number of available testing sites as of January 1, 2017, and whether the number of available testing sites has increased or decreased in the previous year for State and third-party resources.

State	(State) Number of Qualified Examiners	(State) Number of Testing Sites Available	(State) Increase or Decrease in Number of Testing Sites	(Third- party) Number of Qualified Examiners	(Third- Party) Number of Testing Sites Available	(Third-Party) Increase or Decrease in Number of Testing Sites
Alabama	121	12	No Change	34	11	No Change
Alaska	44	15	No Change	93	29	Increased (+1)
Arizona	Unknown [†]	Unknown [†]	Unknown [†]	Unknown [†]	Unknown [†]	Unknown [†]
Arkansas	16	6	No Change	37	34	Decreased (-5)
California	165	23	Decreased (-2)	349	125	No Change
Colorado [‡]	**	_	_	230	90	Decreased (-8)
Connecticut§	25	3	No Change	_	_	_
Delaware§	Unknown†	Unknown [†]	Unknown [†]	_	_	_
D.C.§	4	1	No Change	_	_	_
Florida [‡]	_		_	396	200	No Change
Georgia	101	9	No Change	161	85	No Change
Hawaii [§]	9	7	No Change	_	_	_
Idaho [‡]	_		_	Unknown [†]	Unknown [†]	Unknown [†]
Illinois	Unknown†	Unknown [†]	Unknown [†]	Unknown†	Unknown [†]	Unknown [†]
Indiana [‡]	_		_	38	11	Decreased (-2)
Iowa	211	32	Decreased (-3)	51	15	No Change
Kansas	Unknown†	Unknown [†]	Unknown [†]	Unknown†	Unknown [†]	Unknown [†]
Kentucky	16	10	Increased (+1)	24	24	No Change
Louisiana	Unknown†	Unknown [†]	Unknown [†]	Unknown†	Unknown [†]	Unknown [†]
Maine§	24	21	No Change	_	_	_
Maryland	95	13	No Change	50	15	No Change
Massachusetts§	26	18	No Change	_	_	_
Michigan [‡]	_	_	_	90	69	Decreased (-3)
Minnesota	133	34	No Change	57	46	No Change
Mississippi	Unknown†	12^	Unknown [†]	Unknown†	32^	Unknown [†]
Missouri	75	13	No Change	9	9	No Change
Montana§	59	20	No Change	_	_	_
Nebraska	111	22	No Change	66	39	Increased (+2)
Nevada	16	5	No Change	57	28	Decreased (-20)
New Hampshire§	9	5	No Change	_	_	
New Jersey§	110	12	No Change	_	_	_
New Mexico [‡]				90	64	Increased (+6)
New York	Unknown†	Unknown [†]	Unknown [†]	Unknown†	Unknown†	Unknown [†]
North Carolina	197	119	No Change	162	98	No Change
North Dakota	37	8	No Change	3	3	No Change
Ohio	10	3	No Change	39	8	No Change

State	(State) Number of Qualified Examiners	(State) Number of Testing Sites Available	(State) Increase or Decrease in Number of Testing Sites	(Third- party) Number of Qualified Examiners	(Third- Party) Number of Testing Sites Available	(Third-Party) Increase or Decrease in Number of Testing Sites
Oklahoma	22	15	No Change	8	8	Decreased (-1)
Oregon	18	10	No Change	110	220	Increased (+87)
Pennsylvania	143	27	No Change	308	116	Increased (+4)
Rhode Island*	5	0	No Change	0	1	No Change
South Carolina	65	9	No Change	0	104	Increased (+3)
South Dakota [‡]	_	_	_	21	40	No Change
Tennessee	16	4	No Change	106	67	No Change
Texas	160	27	Unknown	Unknown	Unknown	Unknown
Utah	30	12	Increased (+1)	171	216	Increased (+31)
Vermont	Unknown†	Unknown†	Unknown [†]	Unknown†	Unknown [†]	Unknown [†]
Virginia	32	9	No Change	165	156	No Change
Washington	6	3	No Change	117	103	No Change
West Virginia [‡]	_	_	_	26	26	No Change
Wisconsin [‡]	6^^	_	_	218	103	Decreased (-3)
Wyoming	6	13	No Change	55	65	No Change

[†] This information was not provided by the State.

[‡] These States do not use State resources to conduct CDL skills tests.

[§] These States do not use third-party resources to conduct CDL skills tests.

^{*} Rhode Island utilizes both State and third-party resources for conducting CDL skills tests. Their testing location is a third-party community college, while their examiners are State resources.

^{**} Colorado has three State employees dedicated to oversight and auditing of the third-party testing system.

[^] These numbers are for 2016. The State did not provide numbers for 2017.

^{^^} Wisconsin utilizes only third-party resources for conducting CDL skills tests in conjunction with six State personnel who audit the third-party testing system; conduct medical re-examinations; re-test customers; and conduct Federal skill performance exams (SPEs).

APPENDIX B: ADDITIONAL STATISTICS

Many States provided statistics on the demand for CDL skills testing. Some States provided overall statistics, encompassing both State and third-party resources (with no differentiation between the two; see Table 25). Other States provided detailed statistics for State resources (see Table 26) and third-party resources (see Table 27). Some States provided limited statistics. Alabama, Arizona, Delaware, Idaho, Illinois, Kansas, Louisiana, Massachusetts, Mississippi, New York, Texas, Vermont, and Virginia did not submit any statistics on the demand for CDL skills tests.

Table 25. Statistics on the overall demand for CDL skills testing within each State, for States that provided this information.

State	Number of CDLs Issued Which Required a Skills Test	Number of Initial Skills Tests	Number of Re-tests	Number of Skills Tests Given to Out- of-State Applicants	Number of Canceled Tests or Missed Appointments	Number of Failed Tests	Approximate Number of Scheduled Skills Tests	Approximate Cancellation Rate	Approximate Failure Rate
Alaska	4,576	Unknown	Unknown	Unknown	Unknown	377	4,953	Unknown	8%
Arkansas	7,400	Unknown	Unknown	6	4,050	2,222	13,678	30%	23%
California	5,221	Unknown	Unknown	0	6,762	10,189	22,172	26%	66%
Colorado [‡]	5,215	8,108	1,351	0	2,746	2,937	12,205	22%	31%
Connecticut§	1,489	5,781	1,734	0	315	178	7,830	4%	2%
D.C.§	1,919	Unknown	Unknown	0	231	316	2,466	9%	14%
Florida [‡]	Unknown	26,782	61,934	1,344	33,919	13,853	122,635	28%	16%
Georgia	16,992	16,990	5,950	15	625	5,950	23,565	4%	26%
Hawaii [§]	1,085	Unknown	Unknown	Unknown	Unknown	450	1,535	Unknown	29%
Indiana [‡]	47,972	13,985	Unknown	Unknown	4,000	6,301	57,793	7%	12%
Iowa	Unknown	27,879	3,702	943	14,066	10,471	45,647	31%	33%
Kentucky	5,497	4,804	2,354	130	3,186	2,752	10,344	31%	38%
Maine§	1,235	2,440	1,583	0	141	1,118	4,164	3%	28%
Maryland	10,165	6,605	1,595	1,739	2,337	3,151	10,537	Unknown	Unknown
Michigan [‡]	Unknown	Unknown	Unknown	Unknown	290	5,582	Unknown	Unknown	Unknown
Minnesota	11,246	2,094	Unknown	Unknown	1,466	6,368	19,080	8%	36%
Missouri	Unknown	Unknown	Unknown	Unknown	Unknown	11,685	Unknown	Unknown	Unknown
Montana [§]	5,328	6,453^	Unknown	Unknown	Unknown	1,023	6,453	Unknown	16%
Nebraska	3,140	3,499	3,732	256	480	1,889	7,711	6%	26%
Nevada	Unknown	13,466	1,166	0	5,991	1,363	20,623	29%	9%
New Hampshire§	Unknown	1,967	Unknown	0	2,466	Unknown	Unknown	Unknown	Unknown
New Jersey§	7,582	16,969	5,000	0	9,069	2,300	31,038	29%	10%
New Mexico [‡]	5,966	2,125	565	31	582	773	3,272	18%	29%
North Carolina	34,916	25,760	3,183	0	Unknown	3,307	28,943	Unknown	11%
North Dakota	1,818	2,960	Unknown	Unknown	505	1,091	3,414	15%	38%
Ohio	9,671	Unknown	Unknown	1,806	Unknown	9,951	21,428	Unknown	46%
Oklahoma	14,851	15,058	6,274	0	3	6,274	21,335	0%	29%
Oregon	40,249	4,619	1,004	Unknown	1,731	833	7,354	24%	15%

State	Number of CDLs Issued Which Required a Skills Test	Number of Initial Skills Tests	Number of Re-tests	Number of Skills Tests Given to Out- of-State Applicants	Number of Canceled Tests or Missed Appointments	Number of Failed Tests	Approximate Number of Scheduled Skills Tests	Approximate Cancellation Rate	Approximate Failure Rate
Pennsylvania	Unknown	30,985	12,530	882	14,572	6,580	58,087	25%	15%
Rhode Island*	1,415	1,396	Unknown	0	92	325	1,832	5%	19%
South Carolina	12,299	6,792	Unknown	Unknown	2,048	2,666	17,013	12%	18%
South Dakota [‡]	1,404	1,585	Unknown	31	2,073	550	4,027	28%	51%
Tennessee	Unknown	22,547	5,997	4,716	11,956	3,975	40,500	30%	14%
Utah	6,920	9,304	2,158	Unknown	6,898	3,399	18,360	38%	30%
Washington	9,882	7,786	3,225	0	1,522	3,225	12,533	12%	29%
West Virginia [‡]	11,763	3,271	409	319	397	964	4,077	10%	26%
Wisconsin [‡]	5,173	28,577	7,961	2,866	9,354	4,189	45,892	20%	11%
Wyoming	Unknown	Unknown	Unknown	12	Unknown	1,062	Unknown	Unknown	Unknown

Note: Alabama, Arizona, Delaware, Idaho, Illinois, Kansas, Louisiana, Massachusetts, Mississippi, New York, Texas, Vermont, and Virginia did not submit statistics on the demand for CDL skills tests.

[‡] These States do not use State resources to conduct CDL skills tests.

[§] These States do not use third-party resources to conduct CDL skills tests.

[^] Includes re-tests.

^{*} Rhode Island utilizes both State and third-party resources for conducting CDL skills tests. Their testing location is a third-party community college, while their examiners are State resources.

Table 26. Statistics on the demand for CDL skills testing at State-run testing locations only, for States that provided this level of information.

State	Number of CDLs Issued Which Required a Skills Test	Number of Initial Skills Tests	Number of Re-tests	Number of Skills Tests Given to Out- of-State Applicants	Number of Canceled Tests or Missed Appointments	Number of Failed Tests	Approximate Number of Scheduled Skills Tests	Approximate Cancellation Rate	Approximate Failure Rate
California	5,221	Unknown†	Unknown†	0	6,762	10,189	22,172	26%	66%
Connecticut	1,489	5,781	1,734	0	315	178	7,830	4%	2%
D.C.	1,919	Unknown†	Unknown†	0	231	316	2,466	9%	14%
Georgia	Unknown*	8,405	3,483	0	150	3,483	12,038	1%	29%
Hawaii	1,085	Unknown†	Unknown†	Unknown†	Unknown†	450	1,535	Unknown†	29%
Iowa	Unknown [†]	11,070	2,877	9	11,056	3,725	25,003	44%	27%
Kentucky	Unknown*	4,804	Unknown†	130	2,012	2,752	9,568	21%	29%
Maine	1,235	2,440	1,583	0	141	1,118	4,164	3%	28%
Maryland	Unknown*	5,068	1,595	1,739	2,337	2,825	9,000	26%	42%
Minnesota	Unknown*	Unknown†	Unknown†	Unknown†	1,466	5,785	Unknown*	Unknown*	Unknown*
Missouri	Unknown [†]	Unknown†	Unknown†	Unknown†	Unknown†	9,289	Unknown†	Unknown†	Unknown†
Montana	5,328	6,453‡	Unknown†	Unknown†	Unknown†	1,023	6,453	Unknown†	16%
Nebraska	Unknown*	1,634	1,743	0	276	1,344	3,653	8%	40%
Nevada	Unknown†	4,814	794	0	3,731	684	9,339	40%	12%
New Hampshire	Unknown [†]	1,967	Unknown [†]	0	2,466	Unknown [†]	Unknown [†]	Unknown [†]	Unknown [†]
New Jersey	7,582	16,969	5,000	0	9,069	2,300	31,038	29%	10%
North Carolina	Unknown*	18,018	2,143	0	Unknown [†]	2,198	20,161	Unknown†	11%
Ohio	Unknown*	Unknown†	Unknown†	1,806	Unknown†	2,278	Unknown*	Unknown†	Unknown*
Oklahoma	Unknown*	14,851	6,205	0	0	6,205	21,056	0	29%
Oregon	Unknown*	320	290	Unknown†	Unknown†	160	610	Unknown†	26%
South Carolina	Unknown*	6,792	Unknown†	Unknown†	2,048	2,666	Unknown*	Unknown*	Unknown*
Tennessee	Unknown*	2,150	1,076	2	4,089	712	7,315	56%	22%
Utah	Unknown*	240	145	0	Unknown†	238	385	Unknown†	62%
Washington	Unknown*	2,114	1,530	0	632	1,530	4,276	15%	42%
Wyoming	Unknown [†]	Unknown†	Unknown†	Unknown [†]	Unknown†	1,001	Unknown†	Unknown [†]	Unknown†

[†] This information was not provided by the State.

^{*} The State did not provide a breakdown of these statistics by State versus third-party resources.

[‡] Includes re-tests.

Table 27. Statistics on the demand for CDL skills testing at third-party testing locations only, for States that provided this level of information.

State	Number of CDLs Issued Which Required a Skills Test	Number of Initial Skills Tests	Number of Re-tests	Number of Skills Tests Given to Out- of-State Applicants	Number of Canceled Tests or Missed Appointments	Number of Failed Tests	Approximate Number of Scheduled Skills Tests	Approximate Cancellation Rate	Approximate Failure Rate
Colorado	5,215	8,108	1,351	0	2,746	2,937	12,205	22%	31%
Florida	Unknown†	26,782	61,934	1,344	33,919	13,853	122,635	28%	16%
Georgia	Unknown*	8,585	2,467	15	475	2,467	11,527	4%	22%
Indiana	47,972	13,985	Unknown†	Unknown†	4,000	6,301	57,793	7%	12%
Iowa	Unknown*	16,809	825	934	3,010	6,746	20,644	15%	38%
Kentucky	Unknown*	Unknown†	2,354	Unknown†	1,174	Unknown†	3,528	33%	Unknown†
Maryland	Unknown*	1,537	Unknown†	Unknown†	Unknown†	326	Unknown†	Unknown†	Unknown†
Michigan	Unknown†	Unknown†	Unknown†	Unknown†	290	5,582	Unknown†	Unknown†	Unknown†
Minnesota	Unknown*	2,094	Unknown†	Unknown†	Unknown†	583	Unknown*	Unknown*	Unknown*
Missouri	Unknown†	Unknown†	Unknown†	Unknown†	Unknown†	2,396	Unknown†	Unknown†	Unknown†
Nebraska	Unknown*	1,865	1,989	256	204	545	4,058	5%	14%
Nevada	Unknown†	8,652	372	0	2,260	679	11,284	20%	8%
New Mexico	5,966	2,125	565	31	582	773	3,272	18%	29%
North Carolina	Unknown*	7,742	1,040	0	Unknown [†]	1,109	8,782	Unknown†	13%
Ohio	Unknown*	Unknown [†]	Unknown†	Unknown†	Unknown [†]	7,673	Unknown*	Unknown†	Unknown*
Oklahoma	Unknown*	207	69	0	3	69	279	1%	25%
Oregon	Unknown*	4,299	714	Unknown†	1,731	673	6,744	26%	13%
Pennsylvania	Unknown†	30,985	12,530	882	14,572	6,580	58,087	25%	15%
Rhode Island	1,415	1,396	Unknown†	0	92	325	1,832	5%	19%
South Dakota	1,404	1,585	Unknown†	31	2,073	550	4,027	28%	51%
Tennessee	Unknown*	20,397	4,921	4,714	7,867	3,263	33,185	24%	13%
Utah	Unknown*	9,064	2,013	Unknown†	6,898	3,161	17,975	38%	29%
Washington	Unknown*	5,672	1,695	0	890	1,695	8,257	11%	23%
West Virginia	11,763	3,271	409	319	397	964	4,077	10%	26%
Wisconsin	5,173	28,577	7,961	2,866	9,354	4,189	45,892	20%	11%
Wyoming	Unknown [†]	Unknown†	Unknown†	Unknown†	Unknown†	61	Unknown†	Unknown†	Unknown [†]

[†] This information was not provided by the State.

^{*} The State did not provide a breakdown of these statistics by State versus third-party resources.

ADDITIONAL INFORMATION

Florida and Tennessee provided additional information into each segment of the CDL skills test. In both States, cancellation rates increased for each progressive segment, but failure rates decreased. While there are not enough data to pinpoint a cause with certainty, this trend could be indicative of applicants canceling due to not feeling ready to pass the segment based on prior experiences. It may also be indicative of a portion of applicants choosing not to come back for a re-test after failing a segment. It would be necessary to track the specific applicants who were canceling or failing segments to determine any true reason behind this trend.

Statistics on individual segments of the CDL skills test in Florida are presented in Table 28. Statistics on individual segments of the CDL skills test at State testing locations in Tennessee are presented in Table 29.

Table 28. Statistics on individual segments of the CDL skills test in Florida.

Statistic	Vehicle Inspection Segments	Basic Control Segments	Road Test Segments
Number of initial skills tests for each segment	26,782	22,453	20,691
Number of re-tests for each segment	6,692	6,957	18,790
Number of canceled tests or missed appointments	7,055	11,718	18,146
Number of failed segments	7,024	4,089	2,740
Approximate number of scheduled segments	40,529	41,128	57,627
Approximate cancellation rate	17%	28%	31%
Approximate failure rate	21%	14%	7%

Table 29. Statistics on individual segments at State testing locations in Tennessee.

Statistic	Vehicle Inspection Segments	Basic Control Segments	Road Test Segments
Number of initial skills tests for each segment	1,036	595	519
Number of re-tests for each segment	368	369	339
Number of canceled tests or missed appointments	936	1,499	1,654
Number of failed segments	563	125	24
Approximate number of scheduled segments	2,340	2,463	2,512
Approximate cancellation rate	40%	61%	66%
Approximate failure rate	40%	13%	3%

Table 30 shows the individual statistics for each segment at third-party locations in Tennessee. The same pattern is seen in the cancellation and failure rates as was seen for State locations, where the cancellation rate increased for each progressive segment but failure rate decreased.

Table 30. Statistics on individual segments at third-party testing locations in Tennessee.

Statistic	Vehicle Inspection Segments	Basic Control Segments	Road Test Segments
Number of initial skills tests for each segment	7,657	6,830	5,910
Number of re-tests for each segment	836	2,020	2,065
Number of canceled tests or missed appointments	1,363	2,471	4,033
Number of failed segments	1,012	1,525	726
Approximate number of scheduled segments	9,856	11,321	12,008
Approximate cancellation rate	14%	22%	34%
Approximate failure rate	12%	17%	9%