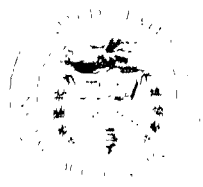


GAO

March 1990

TRUCK SAFETY

States' Progress in Testing and Licensing Commercial Drivers





United States
General Accounting Office
Washington, D.C. 20548

**Resources, Community, and
Economic Development Division**

B-232903

March 12, 1990

The Honorable Ernest F. Hollings,
Chairman
The Honorable John C. Danforth,
Ranking Minority Member
Committee on Commerce, Science,
and Transportation
United States Senate

The Honorable J. James Exon,
Chairman
The Honorable Bob Kasten,
Ranking Minority Member
Subcommittee on Surface Transportation
Committee on Commerce, Science,
and Transportation
United States Senate

In response to your request, this report evaluates federal and state efforts to implement the testing and licensing requirements of the Commercial Motor Vehicle Safety Act of 1986.

We are providing copies of this report to the Secretary of Transportation; the Director, Office of Management and Budget; the Administrator, Federal Highway Administration; and other interested parties.

This work was performed under the direction of Kenneth M. Mead, Director, Transportation Issues, who can be reached at (202) 275-1000. Other major contributors are listed in appendix IV.

J. Dexter Peach
Assistant Comptroller General



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Results in Brief

FHWA issued minimum testing and licensing regulations in July 1988 and established the national driver information system in January 1989. The states then had about 3 years to implement their commercial driver's license (CDL) programs and to test and license all of their drivers.

GAO found that at least 33 states will have a difficult time completing driver testing and licensing by April 1, 1992. Specifically, 13 states, in responding to a GAO questionnaire, indicated that they may not meet the deadline. The 20 other states said they plan the difficult task of testing and licensing one-fourth to one-half of all of their drivers during the 3-month period prior to April 1992. GAO estimates that at least 360,000 drivers in the 13 states may not be tested and licensed on time and therefore could lose their driving privileges. Some states have yet to enact legislation adopting the new federal testing and licensing requirements. Most states are experiencing problems in making computer changes needed to connect to the national driver information system. Once these problems are resolved, most states will have 2 years or less to test and license all drivers. States normally license all drivers over a 4-year period.

FHWA expects that the states can meet the April 1, 1992, testing and licensing deadline. However, as of October 1, 1989, FHWA had not developed specific action plans to ensure that once the states establish CDL programs, the states will be able to test and license all drivers on time. Additional FHWA assistance is needed to ensure that the act's primary intent of removing unsafe commercial drivers from the nation's highways is met. Measures are also needed to ensure that drivers in states that do not meet the deadline are not unduly penalized.

Principal Findings

Limited Time Left to Implement State Programs

The Commercial Motor Vehicle Safety Act and FHWA regulations provided the states about 5-1/2 years to develop and implement their CDL programs and then test and license all of their drivers by April 1, 1992. By January 1989, FHWA had issued the testing and licensing regulations and made available the commercial driver's license information system for state use. Completion of these tasks left the states with about 3 years to enact legislation adopting the federal licensing requirements and setting commercial licensing fees, establish new procedures for testing and licensing, secure the computer capabilities to connect to the

national information system, and administer knowledge and skills tests to their commercial drivers. As of October 1989, only California and Washington were testing and licensing commercial drivers under the new standards.

Thirty-three States Face Problems in Meeting April 1992 Deadline

The results from a GAO-administered questionnaire show that at least 33 states will have problems meeting the April 1992 deadline for testing and licensing drivers. Thirteen of these states indicated that they may not complete driver testing and licensing by April 1, 1992. GAO estimates that at least 360,000 commercial drivers in these states may not be tested and licensed and thus may lose their driving privileges. In addition, GAO believes that 20 of the 33 states will have a particularly hard time meeting the deadline because they plan to test and/or license one-fourth to one-half of their drivers in the 3 months prior to April 1992. For example, Illinois plans to test and license about 200,000 drivers during this 3-month period—a 650 percent increase over its normal rate.

The states must make legislative and computer changes before driver testing and licensing can begin. As of October 1989, 14 states had yet to adopt the legislation needed to establish their programs. In addition, as of April 1989, 43 states had not addressed or were just beginning to address the hardware or software changes needed to connect to the national information system. Most states do not plan to begin testing until they are connected to the information system.

GAO found that most states plan to test and license all of their drivers in 2 years or less rather than over a normal 4-year period. States also face the uncertainty of not knowing how many drivers they must test and license. Current nationwide estimates of the number of commercial drivers range from 5.5 to 9 million.

Additional FHWA Actions Needed to Help States Meet April 1992 Deadline

FHWA and the states have worked successfully to ensure that the administrative framework by which the states could begin developing their CDL programs was completed by January 1, 1989. However, FHWA has not developed specific action plans to ensure that once the states establish CDL programs, the states will complete driver testing and licensing by April 1, 1992. While FHWA officials expect that the states can license all of their commercial drivers by April 1992, GAO believes additional FHWA assistance is needed to help ensure that the act's objective of removing unsafe commercial drivers from the nation's highways is met on schedule. Drivers in states that do not meet the April 1992 deadline

should not be unduly penalized for not having a commercial license on time.

Recommendations

GAO recommends that the Secretary of Transportation direct the Administrator, FHWA, to

- encourage the states to begin their testing programs while they resolve difficulties in connecting to the national information system and
- develop, in cooperation with each state, action plans to help ensure that each state completes testing and licensing by April 1992.

GAO also recommends that the Secretary be prepared to take the steps necessary to protect drivers who may not be licensed because their state does not meet the April 1992 deadline.

Agency Comments

FHWA officials responsible for implementing the CDL program provided comments on a draft of this report. They stated that in October 1989 FHWA established a CDL Implementation Team to assist states in the development of their CDL programs. FHWA officials are optimistic that this new initiative will help the states meet the deadline. GAO agrees that FHWA's recent effort may help states establish their programs more quickly. However, once states accomplish this, the difficult task of testing and licensing all drivers by April 1992 remains. FHWA officials acknowledged that they had not addressed the potential problem of some states' testing and licensing large portions of their commercial drivers in the last 3 months of the program. Detailed state-specific action plans are needed to address this potential problem.

FHWA officials agreed with our recommendation that the Secretary should be prepared to protect drivers in those states that are unable to meet the deadline. FHWA is considering options to allow drivers to be tested and licensed in any state with an active CDL program.

American Association of Motor Vehicle Administrators officials also commented on a draft of this report. The officials said that the report is generally comprehensive and thorough. They agree with FHWA's recent initiative but believe states will need additional federal funding to overcome implementation problems.

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Abbreviations

AAMVA	American Association of Motor Vehicle Administrators
CDL	commercial driver's license
CDLIS	Commercial Driver's License Information System
DOT	Department of Transportation
FHWA	Federal Highway Administration
GAO	General Accounting Office
RCED	Resources, Community, and Economic Development Divison

Introduction

The loss of lives and property resulting from commercial motor vehicle accidents has been a focus of public concern for several years. Between 1981 and 1988, over 4,500 fatalities occurred each year in accidents involving heavy trucks. In 1988 alone, the National Highway Traffic Safety Administration reported that 4,960 fatal accidents involved heavy trucks. Although such accidents represent 10.1 percent of all fatal highway accidents, heavy trucks account for only 4.5 percent of vehicle miles traveled and less than 1 percent of registered vehicles. In addition, Federal Highway Administration (FHWA) statistics show that heavy truck accidents cost about \$6 billion annually.

In 1985 FHWA reported that driver error was the prime factor in almost 95 percent of the preventable commercial motor vehicle accidents. Also, in 1986 the Office of Technology Assessment reported that human error, rather than equipment shortcoming, caused 62 percent of the reported commercial motor vehicle accidents involving the transportation of hazardous materials.

When considering the issue of unsafe commercial drivers, the Congress, the Department of Transportation (DOT), the National Transportation Safety Board, and the motor carrier industry found that state licensing procedures were not uniform and did not adequately test an applicant's qualifications to drive a commercial motor vehicle. For example, in 18 states and the District of Columbia, an individual qualified to operate a passenger car could also drive an 18-wheeled commercial truck or inter-city bus without passing additional tests. In addition, a commercial driver could easily obtain licenses from more than one state and then avoid possible license suspension by spreading traffic violations among several licenses. Accordingly, the Congress saw the need for reform and established national requirements for a single license per driver, knowledge and skills tests, uniform licensing standards, and a nationwide commercial driver's license information system (CDLIS). These requirements are included in the Commercial Motor Vehicle Safety Act of 1986.

Commercial Motor Vehicle Safety Act of 1986

Congress passed the Commercial Motor Vehicle Safety Act of 1986 to remove unsafe and unqualified commercial drivers from the nation's highways. The act focused attention and resources on the transport industry's primary safety concern—the commercial motor vehicle operator. The act prohibits drivers from having more than one license and requires them to demonstrate that they have special skills and knowledge necessary to drive a commercial motor vehicle safely. The act

applies to drivers operating vehicles in interstate and intrastate commerce. It specifically covers drivers operating commercial vehicles weighing over 26,000 pounds (gross vehicle weight rating), hauling hazardous material, or transporting more than 15 passengers. Table 1.1 summarizes the requirements the act and federal regulations impose on DOT, the states,¹ and commercial drivers.

Table 1.1: Commercial Driver Testing and Licensing Requirements

Party	Requirement	Date
DOT	Issue minimum standards for testing commercial drivers ^a	July 1988
	Establish the Commercial Driver's License Information System ^a	Jan. 1989
Drivers	Pass knowledge and skills tests meeting minimum federal standards	Apr. 1992
	Obtain a commercial driver's license, meeting minimum federal standards in state of domicile ^b	Apr. 1992
States	Set up a commercial driver testing and licensing program under federal standards ^c	Oct. 1993

^aRequirement met.

^bEstablished by FHWA regulation.

^cIncludes querying the CDLIS to check an applicant for multiple licenses or a suspended or revoked license.

The act established the framework for a national Commercial Driver's License Program. It directed the Secretary of Transportation to issue regulations defining minimum federal standards for knowledge and skills tests by July 15, 1988, and to establish the CDLIS for housing driver licensing information by January 1, 1989. The act also provides the Secretary with the authority to waive the testing and licensing requirements for certain types of drivers, provided the waiver does not diminish the safe operation of commercial motor vehicles. The Secretary has waived the testing and licensing requirements for firefighters, military personnel, and certain farmers.

The act imposes different deadlines for driver and state compliance with the act's testing requirements. Under the act, drivers may not operate a commercial motor vehicle after April 1, 1992, if they fail to pass knowledge and skills tests that meet minimum federal standards. They are also subject to fines of up to \$5,000. However, the act contains no requirement that the states must test their drivers by this date. Rather, the act requires the states to establish a testing and licensing program

¹References to the states include the 50 states and the District of Columbia.

by October 1, 1993, or risk losing 5-10 percent of their federal-aid highway funds.

While the act specifies that drivers must be tested by April 1, 1992, it does not specify when drivers must be licensed. However, FHWA has issued regulations requiring drivers to obtain a commercial driver's license (CDL) by April 1, 1992. The practical effect of the April 1992 deadline is that the states will be forced to establish testing and licensing programs to ensure that all of their drivers are tested and licensed by April 1, 1992.

Testing and Licensing Requirements

The act specifies that commercial drivers must pass knowledge and skills tests before states can issue them CDLS. FHWA regulations further define the length of the tests. The states can give the knowledge test in written, oral, or automated formats, but the test must be at least 30 questions long. Additional tests are required if the driver requests certain endorsements to the license. For example, drivers transporting hazardous materials must answer additional questions dealing with the safe movement of these materials. To achieve a passing score on the knowledge and endorsement tests, drivers must correctly answer at least 80 percent of the questions on each test.

To pass the skills test, drivers must demonstrate that they can perform successfully all of the required skills. FHWA regulations specify that the states must give the skills test in a vehicle representative of the one the applicant drives or intends to drive. The states can exempt commercial drivers from the skills test if they have good driving records (no serious traffic convictions or accidents in the past 2 years) and have previously passed a test or have operated a commercial vehicle for 2 years.

When a commercial driver passes the required tests, the state must then query the CDLIS before issuing the driver a CDL. The CDLIS, as well as an associated telecommunication network, was created to ensure that commercial drivers do not have multiple licenses or a suspended or revoked license in another state. The CDLIS is a central depository, or data base, that contains names and other identifying information on commercial drivers. The states enter and update driver information as they issue and renew commercial licenses.

To check for previous licensing actions, a state will enter the driver's name and identifying information into the CDLIS. If the system contains a record on the driver, it sends a message to the state that entered the

original data and asks that state to forward the information to the requesting state. The driver's record is transmitted across the telecommunication system, which connects the states to the CDLIS and one another.

Objectives, Scope, and Methodology

The Chairmen and Ranking Minority Members of the Senate Committee on Commerce, Science, and Transportation and its Subcommittee on Surface Transportation requested that we review the implementation of several requirements of the Commercial Motor Vehicle Safety Act of 1986. Our February 1989 report² addressed federal and state actions to carry out the act's single license and notification of violation requirements. This report addresses FHWA and state efforts to implement uniform testing and licensing procedures, including state participation in the CDLIS.

Our objectives were to (1) evaluate federal actions to help the states comply with the testing, licensing, and CDLIS requirements; (2) document what tasks the states must complete before their CDL programs are established; and (3) assess states' progress in testing and licensing all of their commercial drivers by the April 1, 1992, deadline.

To address our objectives, we developed two questionnaires that documented the legislative, financial, and technical obstacles the states must overcome before they can establish CDL programs and test and license their commercial drivers. We pretested the questionnaires with state licensing officials in California, Delaware, the District of Columbia, Illinois, and Maryland. We then distributed the questionnaires to every state's Commercial Driver's License Coordinator and Data Processing Specialist. All 50 states and the District of Columbia completed and returned both questionnaires. We subsequently telephoned the state officials to verify the questionnaire results and to obtain additional information.

In addition, we conducted detailed studies of the CDL programs in California, Illinois, and Kentucky. With the assistance of the American Association of Motor Vehicle Administrators (AAMVA),³ we selected these

²Truck Safety: Implementation of the Single Driver's License and Notification Requirements (GAO/RCED-89-30, Feb. 13, 1989).

³AAMVA is an association of state and provincial officials responsible for the administration and enforcement of motor vehicle and traffic laws in the United States and Canada. AAMVA provides coordination and leadership to assist the states in implementing the requirements of the act.

states because their CDL programs were at different stages of development. California officials were members of most national CDL task forces and have been in the forefront of early state implementation of the act's many provisions. In January 1989, California became the first state to test and license commercial drivers under the new federal standards. Illinois and Kentucky, which plan to begin testing and licensing their commercial drivers by April 1990 and July 1991, respectively, were addressing many obstacles California had overcome.

We also interviewed FHWA officials at the agency's headquarters, in Washington, D.C., and at field offices in 13 states. We selected these field offices because our questionnaire results showed these states may have difficulty testing and licensing all of their drivers by the April 1992 deadline. We documented FHWA's procedures for helping the states develop their CDL programs and complete all driver testing and licensing by April 1, 1992. Through our questionnaire, we also received feedback from the states on what assistance FHWA has provided in establishing their CDL programs. Because FHWA worked with AAMVA to support state CDL programs, we also documented the type of assistance AAMVA has provided the states.

We conducted our review between December 1988 and October 1989 in accordance with generally accepted government auditing standards. We discussed the report's contents with FHWA and AAMVA officials and incorporated their clarifying comments as appropriate. Summaries of their comments appear at the end of chapter 3. However, as requested, we did not obtain official agency comments on a draft of this report.

States Need Additional FHWA Assistance to Help Meet April 1992 Deadline

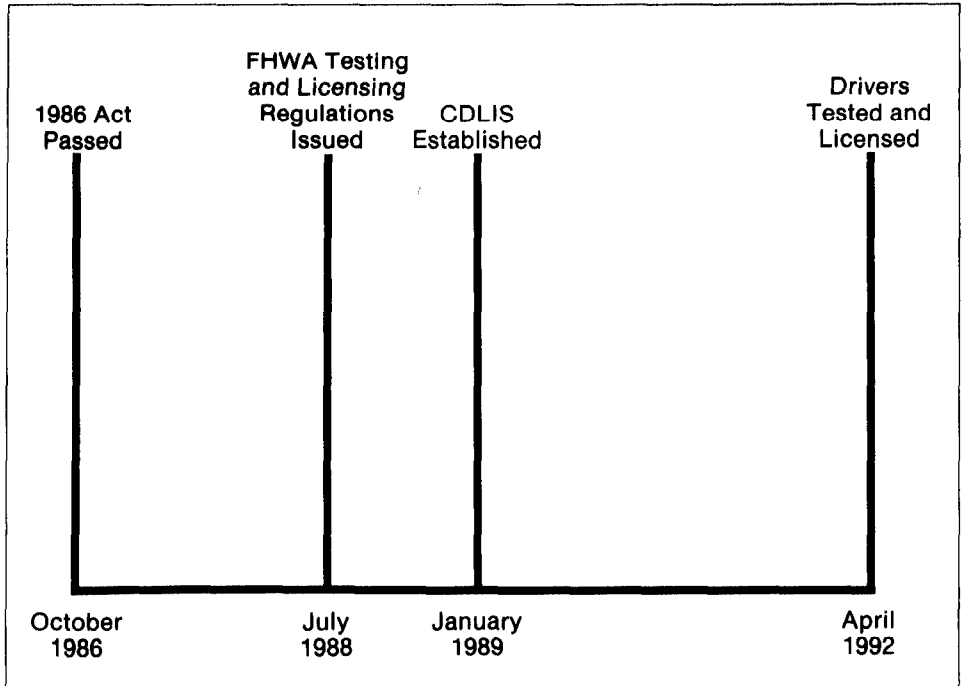
The Commercial Motor Vehicle Safety Act of 1986 provided the Secretary of Transportation and the states about 5-1/2 years to establish and implement the CDL program. FHWA, in association with AAMVA and the states, was successful in ensuring that the administrative framework by which the states could begin developing their CDL programs was completed by January 1, 1989. As a result of this cooperation, FHWA met the act's requirements to issue minimum testing and licensing regulations by July 1988 and establish the CDLIS by January 1989. However, the completion of these requirements left the states with only 3 years to establish their CDL programs and to test and license all of their drivers by April 1, 1992.

FHWA has overall responsibility for ensuring that the states implement the act's requirements. FHWA has relied to a large extent on AAMVA to support state implementation efforts and believes that the states can meet the April 1, 1992, deadline. However, as of October 1, 1989, FHWA had not developed specific action plans to ensure that once states establish CDL programs, the states will be able to complete driver testing and licensing on schedule.

Limited Time Left to Meet the Deadline

While the 5-1/2 years the act provided would appear to be sufficient time for establishing the nationwide and state CDL programs, the states actually have less time because they could not begin substantive program development until FHWA had issued the minimum testing and licensing standards and had established the CDLIS. In accordance with the act, FHWA issued the minimum testing and licensing standards in July 1988 and established the CDLIS in January 1989. Completion of these tasks by FHWA provided the states with the guidance and criteria they needed to develop their CDL programs and to begin driver testing and licensing. However, states then had only about 3 years to establish their CDL programs and to complete driver testing and licensing. Figure 2.1 shows the time frames for implementing the nationwide CDL program.

Figure 2.1: CDL Program Time Frames



In comments requested by FHWA on its proposed testing and licensing regulations, 10 states objected to the April 1, 1992, deadline. They maintained that since the final regulations were not issued until July 1988, the states would need more time to implement the legislative and administrative changes needed to establish their CDL programs. The states also maintained that because most states have 4- or 5-year license renewal cycles, they would find it impossible to handle the new CDL program in the normal course of their renewal activity; they would have to accelerate testing and licensing. The states noted that circumvention of their normal renewal cycle would result in higher overhead costs. Thus, the concerned states argued that FHWA should interpret the April 1, 1992, date as a deadline for beginning program implementation rather than for completing the testing and licensing requirements.

In response to the states' concerns, FHWA stated that the time frames set in the act were important to maintain as an acceptable goal for state compliance. It noted that many states were already moving to adopt and implement their CDL programs based on the dates specified in the act. FHWA also stated that changes to the April 1, 1992, deadline would confuse the drivers, motor carriers, and enforcement entities, who all are

concerned about when and what they need to do to comply with the CDL requirements.

FHWA Efforts to Assist States in Meeting the Deadline

The Secretary of Transportation delegated to FHWA specific responsibility for implementing the act's requirements and ensuring that the act's time frames are met. In 1986, FHWA developed a plan for implementing the act. The plan pointed out that there were serious policy and technical issues that would have to be resolved in order to achieve the ambitious time frames established in the act. The plan also noted that FHWA established a DOT Coordination Group, consisting of several office directors from FHWA, the National Highway Traffic Safety Administration, and the Office of the Secretary of Transportation, to coordinate the development and review of the testing and licensing standards and of the CDLIS, and to involve the states and industry in CDL implementation activities. According to FHWA's implementation plan, the Coordination Group was responsible for resolving critical implementation issues and committing the staff resources needed to meet the legislated deadlines. (A more detailed discussion of FHWA's and AAMVA's CDL roles and responsibilities is contained in app. I.)

We found that the assistance provided by FHWA to the states has focused on providing grants, issuing the minimum federal testing and licensing standards, and ensuring the availability of the CDLIS for state use. These actions provided the states with the administrative framework by which they could begin developing their CDL programs. FHWA officials stated that the agency has remained the focal point for the act's implementation and through oversight of AAMVA and state actions has ensured that the act is being carried out properly. However, we found that as of October 1, 1989, FHWA had not actively helped the states develop plans to ensure that once they establish their CDL programs, the states will test and license all of their commercial drivers by April 1, 1992.

In a survey of FHWA field officials in the 13 states that may not complete testing and licensing on schedule, we found that FHWA field officials lack the technical and licensing expertise needed to help the states implement their programs. Ten of these officials stated that they generally helped the states complete the grant applications, but did not provide the states assistance in implementing their CDL programs or accelerating testing and licensing to meet the April 1, 1992, deadline. One official said he provided the state no assistance, while officials in the two remaining offices noted that they had worked closely with the states to implement their CDL programs. For example, the Nevada planner explained that he

helped the state accelerate its CDL program by encouraging the state to develop and approve its CDL legislation in 1989, rather than wait until 1991 when the legislature would meet next.

FHWA officials told us that FHWA relies to a large extent on AAMVA to coordinate states' efforts to develop their CDL programs and help ensure that drivers are tested and licensed by April 1, 1992. To help the states, AAMVA established several working committees that developed the technical specifications of the CDLIS, the contents of the knowledge and skills tests, and model legislation for the states to follow in developing their own CDL legislation. The committees included officials from state motor vehicle agencies, AAMVA, and FHWA.

AAMVA continues to monitor states' implementation of their CDL programs and periodically issues state progress reports. These reports provide information on when states will pass their CDL legislation, begin testing their commercial drivers, and connect to the CDLIS. AAMVA also advises the states on whether their automation systems are compatible with the CDLIS. Overall, AAMVA has provided information to the states on the federal government's and individual states' progress in implementing CDL programs.

Despite AAMVA's efforts and FHWA's assistance to the states, we found that the problems cited by a few states in 1987 have become problems prevalent among most states in 1989. As discussed in the following chapter, unless FHWA takes a more active role in assisting state CDL efforts, states will have a difficult time completing driver testing and licensing by April 1, 1992.

States Need to Accelerate Testing and Licensing to Meet April 1992 Deadline

States need to accelerate their CDL program implementation if they are to complete driver testing and licensing by April 1, 1992. This date is key to achieving the 1986 act's overall objective of removing unsafe and unqualified commercial drivers from the nation's highways. As of October 1, 1989, 14 states had yet to enact legislation adopting the new federal testing and licensing requirements. In addition, 43 states have experienced problems in making computer changes necessary to connect to the national licensing information system. Once these problems are resolved, many states will then have to test and license all of their drivers in 2 years or less rather than over a normal 4-year period.

Our questionnaire results show that 13 states may not have sufficient time to test and license all of their commercial drivers by the deadline. As a result, we estimate that at least 360,000 commercial drivers in these states may not meet the federal testing and licensing requirements, and therefore could lose their driving privileges and be subject to federal fines. In addition, 20 states propose ambitious schedules under which they intend to test and license between one-fourth to one-half of all of their drivers between January and March 1992. This task will be especially difficult for those states having limited prior testing experience, a high percentage of illiterate drivers, and/or many unprepared drivers who require retesting.

States Must Complete Many Tasks Before Establishing CDL Programs

The states must complete many requirements in a relatively short period of time before they can test and license their commercial drivers. To implement their CDL programs, all states must first enact legislation and regulations adopting the minimum federal standards and develop or modify their automated systems so they can connect to the CDLIS. As of October 1989, 14 states had yet to adopt the legislation needed to establish their programs. In addition, as of April 1989, 43 states had not made or were just beginning to make the hardware or software changes needed to connect to the national information system. Most states must also increase state licensing fees to help pay for their CDL programs, hire additional state examiners, and secure additional testing sites. Figure 3.1 illustrates the numerous tasks that AAMVA officials believe a typical state must complete before it can begin driver testing and licensing. When most states complete these requirements, they will have 2 years or less to test and license all of their commercial drivers to meet the April 1992 deadline.

Figure 3.1: Time Frames for a Typical CDL Program

<u>Time Frame</u>	<u>Task</u>
Before July 1988	Work with AAMVA committees defining CDL program requirements
July 1988	Determine need for additional test sites
August 1988	Review draft versions of the knowledge and skills tests
October 1988	Draft legislation based on AAMVA model legislation
February 1989	Introduce CDL legislation to the legislature
June 1989	Pass CDL legislation; purchase CDLIS equipment
July 1989	Begin examiner training (through July 1991)
September 1989	Draft CDL regulations
January 1990	Program CDLIS software; begin CDLIS testing; revise driver's license format, license application, and manuals
April 1990	Begin driver testing and licensing; finalize CDL regulations

Source: AAMVA.

Fourteen States Have Yet to Pass CDL Legislation

Before 1989, a number of states did not issue commercial licenses that distinguished among the types of vehicles a driver could operate or required commercial driver applicants to demonstrate the skills necessary to operate large trucks. Only 33 states had some form of a classified licensing system that made some distinction among types of vehicles a driver could operate. Of these states, only 13 required state-

conducted, behind-the-wheel testing of all license applicants, including operators of commercial vehicles.

In 1988 three state legislatures adopted CDL legislation that incorporates the federal classification system into state law and establishes minimum testing standards. CDL legislation also provides for state participation in the CDLIS, defines certain serious traffic offenses that would warrant suspension of driving privileges, and adopts a single license law. Most state legislatures did not begin debating proposed CDL legislation until their 1989 sessions. As of October 1989, 37 states had passed CDL legislation, and 14 had not. (See app. II for a list of the 14 states that have yet to pass CDL legislation.)

For various reasons, legislatures in Alaska, New York, Rhode Island, and Vermont did not pass CDL legislation proposed during their 1989 sessions. According to AAMVA officials, Alaska's CDL legislation became less of a priority after the Prince William Sound oil spill in April 1989. The New York legislature did not pass its legislation because unrelated amendments that a majority of legislators opposed were attached to the proposal. Rhode Island's legislators differed on the licensing fees for commercial bus operators, while the proposed CDL legislation in Vermont passed only three of the required six committees before the session ended. An AAMVA official expressed particular concern about New York's failure to pass CDL legislation because the state could have as many as 450,000 commercial drivers whom it will eventually have to test and license.

States Must Increase Licensing Fees to Pay for CDL Programs

In responding to our questionnaire, two-thirds of the states cited concerns about how they will pay for the additional expenses related to the development and operation of their CDL programs. According to information provided by the states, estimated costs (in the first year) for states to set up and maintain new testing and licensing programs range from \$334,500 in South Dakota to \$19.9 million in Texas. In this regard, the states must establish new driver's test sites or contract for third-party testing, hire additional personnel to administer the program, purchase new computer hardware and software, modify existing driver licensing data bases, train state examiners, develop and distribute new driver's test manuals, and pay for using the CDLIS.

Federal grants will offset a part of the states' CDL costs, but the funds available for each state will depend on when the state begins driver testing and licensing. For example, a state that connects to the CDLIS and

begins driver testing and licensing by the end of fiscal year 1989 could receive about \$900,000¹ in federal grants. However, any additional funds will come from the states, including those funds generated by commercial driver licensing fees. With one exception, all states intend to increase these fees. We found that when the states increase their licensing fees to offset part of their program costs, a commercial driver can expect to pay on average an additional \$32 for the new CDL. The increases will vary from state to state, with the resulting price for a CDL ranging from \$10 to \$125.

Difficulties in Connecting to CDLIS May Delay State CDL Programs

AAMVA, state, and FHWA officials told us that the development or modification of state computer systems needed to access the CDLIS is the requirement most likely to delay the start-up of the states' CDL programs. Most states do not plan to begin testing and licensing until connection to the information system is completed. Before a state can issue a CDL, it must have the computer capability to query the CDLIS to determine if a driver has licenses in other states or a suspended or revoked license in another state. It also must be able to respond to other states' requests for driver licensing information and transmit the requested information to them. State officials noted that to access the CDLIS and transmit driver information to it, the states first must identify the equipment and software required to connect to the CDLIS and communicate with other states.

AAMVA officials stated that establishing state connections to the CDLIS has proved particularly difficult because of inadequate coordination among state data processing and driver licensing personnel. A state official responsible for the CDLIS development noted that as the states have learned more about the data processing challenges they confront, they have realized that the CDLIS applications will be more difficult to complete than they had anticipated. In March 1989 AAMVA and the contractor that developed the CDLIS established teams that are available to assist states in overcoming data processing problems.

As of April 1989, over three-fourths of the states either had not begun to identify the technical changes needed in their hardware or software specifications or had only begun to develop a preliminary needs list. AAMVA and state officials cited concerns about the ability of some states

¹California is the only state likely to receive the maximum funding because grants available to the states in fiscal year 1990 are available only to states that have begun testing and licensing.

to complete the technical changes to their computer systems to ensure timely testing and licensing of commercial drivers.

In addition, the states must develop computer software to separate their records on commercial and noncommercial drivers and translate their unique codes for traffic offenses and license status into terms that other states requesting out-of-state driver licensing information will recognize. For example, Illinois officials stated that the task of identifying their commercial drivers will require the state to attach a special three-digit code to about 8 million driver history records.

The states also must expand their driver licensing data bases to include more information. Our questionnaire results show that some states' data bases do not include such information as social security numbers and certain types of driver convictions. In addition, state data bases have to be able to classify drivers in accordance with the federal classification system, which identifies drivers based on the types of vehicles they drive.

About 3 months before a state can begin licensing commercial drivers, its computer system must be tested to ensure that it can communicate successfully with the CDLIS. The test also ensures that the state's system can input and format specified information into the CDLIS without adversely affecting the existing data base. State officials noted that their ability to complete the tasks necessary to connect to the system quickly depends on the manpower and resources available and the degree of existing automation. For example, California officials noted that their state did not have to purchase a new computer for the CDL program but only provide for additional disk space for the CDLIS activities. California's existing automation contributed to its ability to become the first state to use the CDLIS and begin driver testing and licensing.

In October 1988, 22 states estimated that they would connect to the CDLIS by the end of 1989, 24 by the end of 1990, and 5 by the end of 1991. However, by October 1989, the dates some states estimated for connecting to the CDLIS had slipped: Six estimated that they would implement the CDLIS by the end of 1989, 31 by the end of 1990, 13 by the end of 1991, and 1 in 1992. As of October 1989, only California and Washington were using the CDLIS to issue CDLS.

Driver Testing and Licensing May Not Be Completed by April 1992

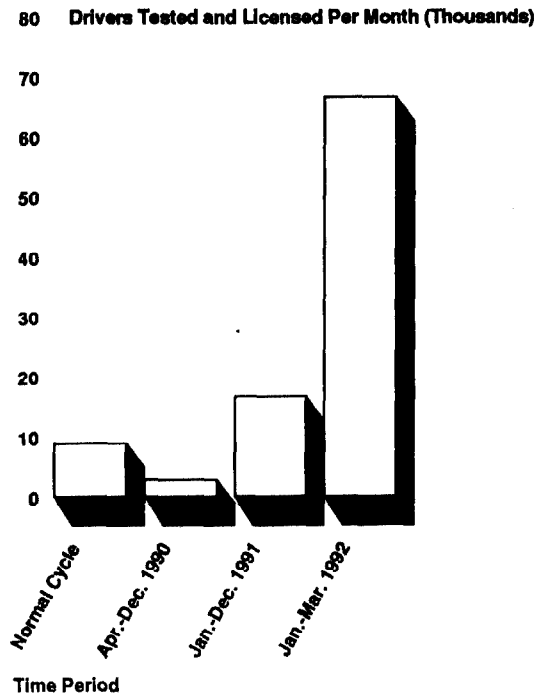
Because of the tight time frames resulting from the Commercial Motor Vehicle Safety Act of 1986 and FHWA regulations, and the numerous legislative, financial, and computer requirements that states have to complete, the time the states have left to complete driver testing and licensing is 2 years or less. The limited time forces states to spend additional resources to circumvent their normal license renewal cycles in order to complete testing and licensing in 2 years rather than 4 years.

For 33 states, 2 years may not be enough time. Thirteen of these states have indicated that they may not be able to meet the April 1, 1992, deadline. According to our analysis, about 360,000 drivers in these states may not be tested and licensed on time. As a result, their ability to earn a living by driving a commercial motor vehicle may be threatened because they would not be qualified to operate a commercial motor vehicle under the act's provisions.

In addition, we identified 20 other states that propose to test and license one-fourth or more of their drivers in the last 3 months before the April 1992 deadline. Three of these 20 states said they will test and license over one-half of their drivers during this period. As discussed later in this chapter, a number of states have indicated that they will begin testing their drivers before they can issue them CDLs through the CDLIS. This practice should help reduce the burden the states face in trying to test and license all of their drivers in the final months prior to April 1992.

To illustrate the task the states are facing, figure 3.2 compares the number of drivers Illinois must test and license by April 1992 and the number that the state would test and license during its normal 4-year renewal cycle. The state expects to test and license about 425,000 commercial drivers. In contrast to its normal renewal cycle, under which Illinois tests and licenses about 8,800 drivers per month, the state's proposed plan nearly doubles the number of drivers tested and licensed in 1991—about 16,600 per month. In addition, in the first 3 months of 1992, the state plans to increase further the number of drivers it will test and license to about 66,600 per month—a 650 percent increase over its normal monthly rate. Illinois officials responsible for the state's CDL program stated that they are trying to develop their CDL program to accommodate what they acknowledge to be an ambitious schedule.

Figure 3.2: Illinois' Accelerated CDL Program



Other Factors Affecting States' Ability to Meet the Deadline

In addition to the limited time the states have to test and license their drivers, other factors will influence their ability to test and license drivers on time. For example, states with limited prior testing experience, high driver's test failure rates, and a commercial driver population larger than expected will have problems testing and licensing all of their drivers. However, states that can begin driver testing before being connected to the CDLIS (after which they will be able to issue CDLs) and that can exempt a large portion of their drivers from the skills test will be in a better position to finish both testing and licensing by the deadline.

Limited State Testing Experience

Before 1989, only 13 states required behind-the-wheel testing of commercial driver applicants. Twenty states waived the state test if the employer or a training school certified the applicant's qualifications, while 18 states required no testing or certifications before issuing a license. Among the 33 states that may have difficulties completing driver testing and licensing by April 1, 1992, only 7 states previously

required behind-the-wheel testing of commercial drivers. The remaining inexperienced states may encounter initial problems as they begin new programs to test their drivers under the new federal requirements.

High Test Failure Rates

The rate at which commercial drivers fail the knowledge and skills tests will also affect how quickly the states can test and license their drivers. High failure rates will require the states to spend additional time and money to retest their drivers. The initial failure rates for knowledge and skills tests in California were 37 and 56 percent, respectively. These compare to failure rates for the superceded knowledge and skills tests of 20 and 14 percent, respectively.² California's driver failure rates declined to 32 percent for the knowledge test and 46 percent for the skills tests after the first 6 months of the program. California officials attribute the decline in the failure rates to improved driver preparation.

In addition, the tests developed in accordance with federal standards are more difficult and will require more time for the states to administer and the drivers to complete. For example, the California knowledge test increased from 25 to up to 80 questions. California officials stated that CDL applicants have needed between 60 and 90 minutes to complete each of the state's knowledge and skills tests. On average, it took drivers 45 to 60 minutes to complete the previous tests. The longer and more difficult knowledge test may pose particular problems for drivers with reading deficiencies. To help drivers with reading problems, FHWA contracted with AAMVA to develop alternative methods for testing these drivers.

Unknown Commercial Driver Population

A state's ability to complete driver testing and licensing also depends on the actual number of drivers who will apply for a CDL. Government and industry studies of the commercial driver population in the nation show estimates ranging from 5.5 to 9 million drivers.

FHWA calculates that approximately 5.5 million commercial drivers are subject to the act's testing and licensing requirements. However, California officials who assisted AAMVA in developing cost estimates for the CDLIS contend that the nation's commercial driver population may be lower than 5.5 million. The officials stated that higher licensing fees and the additional time required to study for and pass the more stringent knowledge and skills tests may dissuade many drivers from obtaining a

²Prior to 1989 California's skills tests did not include pre-trip and road tests. The 14 percent only refers to the failure rate for the basic test.

CDL. They noted that no state knows exactly how many commercial drivers must obtain a CDL because few states have a classified licensing system that meets federal standards. Such a system would allow a state to determine more precisely the number of drivers subject to the act's requirements.

On the other hand, state responses to our questionnaire indicate that the commercial driver population in the nation could be as high as 9 million drivers. Several state representatives indicated that the estimates were based on recent state surveys of the commercial driver populations in their states. Other state representatives noted that their estimates were "best guesses." Not knowing the size of the commercial driver population will affect a state's ability to develop a CDL program as well as complete driver testing and licensing by April 1, 1992.

The three factors discussed above may hinder the states' efforts to complete driver testing and licensing by April 1, 1992. Other factors, such as separating testing from licensing and exempting drivers from the skills test, will help states meet the deadline.

Separating Testing and Licensing Procedures

In an effort to help test and license all drivers by April 1992, some states plan to begin testing commercial drivers before they can issue them licenses through the CDLIS. AAMVA and state officials indicated that testing drivers is more time consuming than checking a driver through the CDLIS and issuing a license. For example, Ohio began testing its drivers in January 1990 but will not issue CDLs until July 1990, when the state plans to connect to the CDLIS. In the interim, Ohio plans to issue the tested driver an Ohio commercial driver's license, which it will replace with an official CDL after the state checks the CDLIS.

Fourteen of the 33 states that may have difficulties completing testing and licensing by April 1, 1992, have indicated they will separate testing from licensing.³ Although the average length of time gained by this action is limited to about 6 months, it may help some of these states complete testing and licensing by the deadline.

Exempting Drivers From the Skills Test

The number of drivers that a state can exempt from the skills test also will affect the state's ability to complete driver testing by April 1, 1992. Federal testing regulations allow states to exempt (or "grandfather")

³Seven other states plan to separate testing from licensing.

from the skills test those commercial drivers with good driving records over the past 2 years. However, all drivers must still take and pass the knowledge test. Between January and July 1989, California exempted 93 percent of existing commercial drivers applying for a CDL from the skills test. A California official stated that by administering the skills tests to fewer drivers, the state will be better able to meet the April 1992 deadline for driver testing and licensing. FHWA and state officials estimate that overall the states will be able to exempt between 80 and 85 percent of their commercial drivers.

Conclusions

At least 33 states will have a difficult time completing driver testing and licensing by April 1, 1992, unless they overcome implementation problems and accelerate program activity. More active FHWA involvement is necessary to help states meet the deadline. The states are confronted with two challenges that affect their abilities to meet the driver compliance requirements. They must (1) establish a CDL program and (2) test and license all commercial drivers by the deadline. To address the first challenge, the states must complete a number of tasks, including conforming their existing commercial motor vehicle statutes and regulations to the minimum federal standards and changing their existing computer systems to connect to the CDLIS.

Once the states meet the first challenge, they will have about 2 years to test and license all of their commercial drivers. We found that 33 states may have difficulties meeting this second challenge in such a short period of time. Specifically, 13 states indicated that they may not meet the April 1992 deadline to test and license commercial drivers; we estimate that 360,000 drivers in these states may then be prohibited from driving their commercial vehicles. In addition, we identified another 20 states that plan to test and license a substantial portion of their commercial drivers in the 3 months prior to the April 1992 deadline. This will require them to test and license many more drivers than they normally do each month.

Most states do not plan to test and license their drivers until they have connected to the CDLIS. However, the development of automation systems compatible with the CDLIS has become the task most likely to delay the start of the states' testing and licensing programs. If states can complete this task earlier, they will have more time to test and license their drivers and meet the deadline.

FHWA should continue to help the states accelerate the implementation of their CDL programs and the testing and licensing of their drivers by identifying the specific computer and other tasks the states have yet to complete. In cooperation with each state, FHWA could then develop plans to ensure that all drivers are tested and licensed by April 1992. The states also could take steps to meet the deadline by beginning their testing programs while they resolve their problems in connecting to the CDLIS. Since testing drivers is more time-consuming than checking a driver's name through the CDLIS and issuing the license, states that are able to take this approach would be in a better position to complete driver testing and licensing on time.

However, some states may still be unable to meet the deadline for driver compliance. Accordingly, the Secretary of Transportation should be prepared to protect drivers in these states who are not tested and licensed by April 1, 1992. Regardless of the Secretary's action in this regard, additional FHWA action is needed to ensure that the act's primary intent of removing unsafe commercial drivers from the nation's highways is met as soon as possible.

Recommendations

We recommend that the Secretary of Transportation direct the Administrator, FHWA, to

- encourage the states to begin their testing programs while they resolve difficulties in connecting to the national information system and
- develop, in cooperation with each state, action plans to help ensure that each state completes testing and licensing by April 1992.

We recommend, in addition to the above, that the Secretary be prepared to protect drivers who may not be tested and licensed because their states do not meet the April 1992 deadline. For example, the Secretary could use the act's waiver authority to protect those drivers from fines and penalties until their states have completed testing and licensing.

Agency Comments

FHWA

FHWA officials responsible for the CDL program provided comments on the draft report in December 1989. Based on their comments, we added

additional information on FHWA activities to assist states in implementing their CDL programs and made other changes as appropriate.

FHWA officials told us that in October 1989 FHWA established a CDL Implementation Team to provide states direct assistance and support in the establishment of state CDL programs. The Team plans, among other things, to review state implementation plans, identify potential problems, and recommend solutions. The Team plans to meet collectively with state CDL officials for each of FHWA's nine regions to accomplish these tasks. We agree with FHWA's recent effort and believe it may help the states establish their CDL programs more quickly. However, once states accomplish this, they face the difficult task of testing and licensing all of their commercial drivers in the limited time remaining. FHWA officials acknowledged that they had not addressed this task, which may be particularly difficult to accomplish in those states that plan to test and license large portions of their commercial drivers in the 3 months prior to the April 1992 deadline. Detailed state-specific action plans are needed to address this potential problem and to help ensure that the states are in a position to complete driver testing and licensing on time.

FHWA officials also stated that our recommendation to encourage states to separate testing from licensing was unnecessary since FHWA had informed the states of this option. However, FHWA officials were unable to furnish any written guidance that they had sent to the states documenting this policy. In fact, state officials have indicated to us that FHWA's policy is unclear since the agency had originally encouraged the states to conduct testing and licensing concurrently and thereby avoid overburdening commercial drivers. We believe that FHWA needs to make a definitive statement encouraging the states to begin their testing programs while they resolve their problems related to the CDLIS.

FHWA officials agreed that the Secretary should be prepared to protect drivers in those states that are unable to meet the deadline. They noted that FHWA is considering options designed to allow drivers in such states to be tested and/or licensed in states that have active CDL programs.

AAMVA

AAMVA officials stated that the report is generally comprehensive and thorough. The officials said that AAMVA supports FHWA's Implementation Team approach and believes continued FHWA involvement will help the states implement their CDL programs more rapidly. However, AAMVA officials stated that for all of the states to resolve remaining problems, and

**Chapter 3
States Need to Accelerate Testing and
Licensing to Meet April 1992 Deadline**

to ensure the testing and licensing of all commercial drivers by April 1, 1992, additional federal funding to the states would be needed.

Commercial Driver's License Roles and Responsibilities

Federal Highway Administration's Roles and Responsibilities

To carry out its oversight responsibilities of the CDL program, the Department of Transportation initially established an internal coordination group. The group consisted of representatives from Department divisions involved with the CDL program and was responsible for coordinating the development and review of the federal testing and licensing standards and of the technical specifications of the CDLIS. It also sought to involve the states and the trucking industry in publicizing the 1986 Commercial Motor Vehicle Safety Act's requirements and ensuring state implementation of their respective CDL programs.

The Secretary of Transportation delegated to FHWA responsibility for implementing the act's testing, licensing, and certain CDLIS requirements; FHWA designated certain offices to serve as focal points. FHWA's Office of Motor Carrier Standards developed the minimum federal testing and licensing regulations and responded to state requests for specific interpretation of the regulations. In addition, this office developed a checklist for assessing state compliance with the testing and licensing requirements and for approving the states' CDL programs. The Office of Motor Carrier Information Management and Analysis was the focal point for the development and establishment of the CDLIS. This office worked with AAMVA and states to select the contractor that designed the CDLIS and now operates and maintains the system.

FHWA's Office of Planning is responsible for issuing and monitoring four types of grants that the act provides to DOT and the states for their efforts in implementing the nationwide and state CDL programs. As explained below, basic, supplemental, clearinghouse, and information system grants have helped FHWA and the states develop and implement different aspects of the CDL programs.

- Basic grants are available for developing and administering a program to test and license commercial drivers. These grants are provided to eligible states and are used for numerous implementation activities, such as hiring a CDL coordinator, developing a test program, and training state licensing examiners. Grants of \$100,000 are made available for each state for fiscal years 1987-91.
- Supplemental grants are available for national and state programs. For fiscal years 1987-89, the grants were used to fund national program activities, such as the development of driver testing materials. For fiscal years 1990-91, these grants will be distributed to the states based on the number of tests administered and licenses issued. A total of \$15 million will be available under these grants.

**Appendix I
Commercial Driver's License Roles
and Responsibilities**

- Clearinghouse grants are available to states that agree to participate in the CDL program. A minimum of \$100,000 per year is available to each state under these grants for fiscal years 1989-91.
- Information system grants are targeted for the development of the CDLIS. Six million dollars from the supplemental grant fund is available to FHWA for fiscal years 1987-89.

FHWA's field office planners were designated as the primary contacts for state officials responsible for obtaining the grants. In addition, the field office planners track state CDL legislation and respond to state questions related to the CDL program. Because field office planners often do not have expertise in testing, licensing, and CDLIS applications, they directed the states' questions in these areas to appropriate FHWA officials in headquarters.

American Association of Motor Vehicle Administrators' Roles and Responsibilities

AAMVA and state officials began work on the CDL program immediately after the act's passage, when they established a committee on testing standards. The committee, established in February 1987, was composed of licensing officials from 12 states, as well as AAMVA and FHWA officials. In general, the committee was responsible for overseeing the development of material the states could use for testing their commercial drivers. Using an FHWA grant, the committee selected and worked with a contractor to develop and validate model CDL tests that the states could use to meet the federal standards. The contractor chosen, Essex Corporation, developed and provided the material states would need to administer their tests, including the actual knowledge and skills tests, examination forms, scoring templates, scoring instructions, test administration manuals, and driver's manuals.

In June 1987 AAMVA established a CDLIS committee, also consisting of 12 state representatives with data processing expertise. The CDLIS committee developed the technical specifications for the nationwide information system, requested proposals, and selected a contractor to design the system. The contractor chosen—EDS Federal Corporation—designed, developed, and implemented the CDLIS and will provide for its ongoing maintenance. FHWA paid for the system's development through its information system grants; state user fees will pay for the ongoing operation. The system was available for the states to enter driver licensing information in January 1989.

AAMVA also established a model law committee consisting of representatives from states' attorney general offices. The committee was charged

**Appendix I
Commercial Driver's License Roles
and Responsibilities**

with developing draft CDL legislation that the states could incorporate readily into state law. The model law that the committee developed, which was finalized in November 1988, details the act's provisions and FHWA implementing regulations. States' adoption of the model law has helped to ensure uniformity among the states' CDL legislation. Although the act established minimum standards for licensing commercial drivers, the model law provides alternative language in several sections to assist states wishing to adopt more stringent licensing standards.

AAMVA encouraged the states to establish a CDL coordinator, who serves as the state's primary focal point for implementing the act's provisions. AAMVA sponsored seminars and workshops to help the CDL coordinators and other state licensing officials better understand the administrative and technical challenges in developing state CDL programs. AAMVA also advises the states on whether their automation systems are compatible with the CDLIS and has established a program to train state examiners on how to administer the new testing and licensing requirements.

Overall, AAMVA monitors the progress of states' implementation of their CDL programs and issues status reports detailing when the states will pass their CDL legislation, begin testing their commercial drivers, and connect to the CDLIS. AAMVA has acted as an important source of information to the states on the federal government's and individual states' progress in implementing CDL programs.

Fourteen States Yet to Enact CDL Legislation (As of October 1989)

Alaska
Connecticut
Delaware
Iowa
Kentucky
Massachusetts
New York
New Jersey
Oklahoma
Pennsylvania
Rhode Island
Vermont
Washington, D.C.
Wisconsin

Planned Dates for State CDL Testing and Licensing (As of October 2, 1989)

	Planned date	
	To begin testing ^a	To issue CDLs ^b
12 States Planning to Begin CDL Program in 1989		
California ^c	Jan. 1989	Jan. 1989
North Dakota ^d	Jul. 1989	Jan. 1990
Tennessee ^d	Jul. 1989	Oct. 1991
New Hampshire ^d	Aug. 1989	Dec. 1989
Maryland ^d	Sep. 1989	Jan. 1990
Georgia ^d	Oct. 1989	Nov. 1989
Montana	Oct. 1989	Jan. 1990
South Dakota	Oct. 1989	Dec. 1989
Utah ^d	Oct. 1989	Nov. 1989
Washington ^c	Oct. 1989	Oct. 1989
West Virginia	Nov. 1989	Jan. 1992
Pennsylvania	Nov. 1989	Apr. 1991
33 States Planning to Begin CDL Program in 1990		
Arizona	Jan. 1990	Jan. 1990
Arkansas	Jan. 1990	Jan. 1990
Connecticut	Jan. 1990	Apr. 1990
Hawaii	Jan. 1990	Jan. 1991
Louisiana	Jan. 1990	Jan. 1990
Maine	Jan. 1990	Jan. 1991
Michigan	Jan. 1990	Jan. 1990
Minnesota	Jan. 1990	Jan. 1990
Mississippi	Jan. 1990	Jan. 1990
Nevada	Jan. 1990	Jan. 1990
New Jersey	Jan. 1990	Apr. 1991
Ohio	Jan. 1990	Jul. 1990
Oklahoma	Jan. 1990	Apr. 1990
Oregon	Jan. 1990	Apr. 1990
Virginia	Jan. 1990	Jan. 1990
Wyoming	Jan. 1990	Jul. 1990
Rhode Island	Mar. 1990	Mar. 1990
Delaware	Apr. 1990	Apr. 1990
Idaho	Apr. 1990	Apr. 1990
Illinois	Apr. 1990	Apr. 1990
South Carolina	Apr. 1990	Jul. 1990
Texas	Apr. 1990	Apr. 1990
Florida	Jul. 1990	Apr. 1991
Indiana	Jul. 1990	Jul. 1990

(continued)

**Appendix III
Planned Dates for State CDL Testing and
Licensing**

	Planned date	
	To begin testing ^a	To issue CDLs ^b
Iowa	Jul. 1990	Jul. 1990
Missouri	Jul. 1990	Jul. 1990
New York	Jul. 1990	Jan. 1990
Vermont	Jul. 1990	Jul. 1990
Nebraska	Sep. 1990	Sep. 1990
New Mexico	Sep. 1990	Sep. 1990
North Carolina	Sep. 1990	Sep. 1990
Washington, D.C.	Sep. 1990	Sep. 1990
Alabama	Oct. 1990	Oct. 1990
6 States Planning to Begin CDL Program in 1991		
Alaska	Jan. 1991	Jan. 1991
Colorado	Jan. 1991	Jan. 1991
Kansas	Jan. 1991	Jan. 1991
Kentucky	Jan. 1991	Jul. 1991
Wisconsin	Jan. 1991	Jan. 1991
Massachusetts	Apr. 1991	Apr. 1991

^aIncludes both knowledge and skills tests.

^bIncludes checking the CDLIS for multiple licenses or a suspended or revoked license.

^cBegan testing and licensing.

^dBegan testing.

Source: AAMVA.

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