

December 30, 2019

TO: Iowa General Assembly  
FROM: Mark Lowe, Director   
RE: Report regarding commercial driver's license study

The attached one-time report is submitted pursuant to House File 418, section 5, Eighty-eighth General Assembly, which directs the department to “conduct a study on access in this state to the driving skills test required for issuance of a commercial driver’s license. The department shall evaluate and may recommend additional testing options to increase access in this state to the driving skills test required for issuance of a commercial driver’s license.”

It further directs the department to submit a report containing the department’s findings, evaluation, and any recommendations to the general assembly on or before December 31, 2019.



**CDL  
SKILLS  
TEST**  
STUDY REPORT

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## INTRODUCTION

During the 2019 legislative session, the legislature directed the Iowa Department of Transportation (Iowa DOT) to conduct a study on access in this state to the driving skills test required for issuance of a commercial driver's license (CDL). The legislature directed the Iowa DOT to evaluate testing options to increase access to the driving skills test required for the issuance of a CDL and also indicated the department may recommend additional testing options to increase access. The following report provides information about the current CDL skills testing demand and the existing options available to CDL customers for testing as well as recommendations to improve and increase access to skills testing throughout the state.

## BACKGROUND

There are a total of 44 locations that currently offer CDL skills testing throughout the state. These 44 locations include skills testing locations operated by the Iowa DOT, county treasurers performing driver's license issuance under Chapter 321M of the Iowa Code, and third-party testers who are authorized to provide CDL skills testing under 49 C.F.R. §383.75 and Iowa Code Section 321.187. There are 16 Iowa DOT locations, 12 county treasurer locations, and 15 third-party locations. There are approximately 2.2 million Iowans with valid driver's licenses in this state, and as of April 2019, there were a total of 180,336 individuals with a valid Iowa CDL. About 8 percent of all Iowa license holders have a valid CDL.

FIGURE 1 | CDL SKILLS TEST LOCATIONS

IOWA DOT LOCATIONS	COUNTY TREASURER LOCATIONS	AUTHORIZED COMMUNITY COLLEGES	AUTHORIZED IOWA MOTOR CARRIERS
Ames	Audubon	Des Moines Area Community College (Ankeny)	CRST International/North America Driver Training Academy (Cedar Rapids)
Ankeny	Allamakee	Eastern Iowa Community College (Davenport)	TMC Transportation - The Mickow Corporation (Ankeny)
Burlington	Cass	Hawkeye Community College (Waterloo)	
Cedar Rapids	Cherokee	Indian Hills Community College (Ottumwa)	
Clinton	Crawford	Iowa Central Community College (Fort Dodge)	
Council Bluffs	Fayette	Kirkwood Community College (Cedar Rapids)	
Davenport	Fremont	Northwest Iowa Community College (Sheldon)	
Dubuque	Kossuth	Western Iowa Tech Community College (Sioux City)	
Fort Dodge	Lyon	North Iowa Area Community College (Mason City)	
Iowa City	Page	Iowa Lakes Community College (Emmetsburg)	
Marshalltown	Shelby	Iowa Valley Community College (Marshalltown)	
Mason City	Winneshiek	Northeast Iowa Community College (Peosta)	
Muscatine		Southwestern Community College (Creston)	
Ottumwa			
Sioux City			
Waterloo			

## CDL SKILLS TESTING REQUIREMENTS

Federal law requires each state to maintain a CDL program that is subject to the approval of the Federal Motor Carrier Safety Administration (FMCSA). CDL programs are required to follow federal regulations for the eligibility, testing, licensing, and sanctions for commercial vehicle operation. Federal funding is contingent upon the state's ability to maintain compliance with the federal requirements. Compliance with FMCSA is critical as Iowa would be at risk of losing approximately \$37 million in federal highway funding if our CDL program was found to be out of compliance with the federal standards and regulations.

Federal regulations, 49 C.F.R. §383.113, require that a CDL applicant first successfully pass the required CDL knowledge testing and obtain a Commercial Learner's Permit (CLP). Once an applicant has passed the required knowledge testing for the type of CDL they are applying for, they are eligible to be issued a CLP. Federal regulations require a CDL applicant to hold a CLP for at least 14 days before they are eligible to take the required CDL skills testing. After the individual has held their CLP for at least 14 days, they are eligible to take the CDL skills test. The CDL skills test is comprised of three separate components which are listed below and per federal regulations must be completed in sequential order.

1. Pre-trip vehicle inspection
2. Basic control skills (off road, controlled course)
3. On the road driving test (road test)

*(See Appendix B for detailed CDL skills test maneuver requirements)*

Applicants are required to supply a commercial vehicle to use for their testing that represents the class and type of commercial vehicle they will use with their CDL. Employers often assist applicants by providing the commercial vehicle for purposes of completing the CDL skills testing.

Each component of the test takes approximately 30 minutes to complete. Accordingly, a full CDL skills test is scheduled as a 90-minute slot with an examiner for each applicant's CDL skills test completion. If a driver fails a component of the test, they will need to schedule a retest to retake that component before moving onto the next component of the test, but they are not required to start all over. For example, if a driver passes the pre-trip inspection but fails the basic control skills component, they only need to retake the basic skills component and when successful, move on to the road test. Under the federal regulations, applicants may only attempt completion of CDL skills testing once each day. Once all three components are successfully passed, the applicant is eligible to be issued their CDL. In addition to applicants who are seeking to obtain a CDL for the first time, CDL knowledge and skills testing is also required to add certain CDL endorsements to an existing CDL or to remove certain restrictions from an existing CDL. For example, a CDL skills test is required to add a school bus endorsement, to upgrade a Class B CDL to a Class A CDL, or to remove a restriction that limits operation to only commercial vehicles equipped with automatic transmission to allow the driver to operate a commercial vehicle with manual transmission.

## CDL SKILLS TEST AUDITING AND OVERSIGHT REQUIREMENTS

As part of the CDL program, the Iowa DOT also has the responsibility of training and certifying all CDL skills test examiners as well as executing a program of oversight and auditing of all examinations statewide. The Federal Motor Carrier Safety Administration (FMCSA) requires all states to train CDL skills test examiners as well as audit and monitor the performance of CDL skills tests by CDL skills test examiners as part of our compliance with the federal CDL program. All CDL skills test examiners are required by 49 CFR § 384.228 to complete a standard course of training before they may be certified by the Iowa DOT to conduct the CDL skills tests. The American Association of Motor Vehicle Administrators (AAMVA), in coordination with FMCSA, has developed training for use by State Driver Licensing Agencies to ensure examiners have met the proper training requirements. This is referred to as the Certified Commercial Examiner (CCE) training. The Iowa DOT utilizes the CCE curriculum which is a week-long course combining classroom instruction and real-time application of the training on a CDL Range, and we administer the training for all examiners, including Iowa DOT, county treasurer, and third-party examiners. Refresher training is required to be successfully completed by all examiners every four years.

Additionally, we are required by 49 CFR § 384.229 to conduct oversight and auditing of all CDL skills testing statewide, and we audit testing conducted by all certified examiners throughout the state (including Iowa DOT, county treasurer, and third-party examiners). To assure both quality and integrity of our CDL program, we implement both overt and covert monitoring of all CDL skills test examiners as well as audit the performance of skills test examiners by collecting and analyzing performance metrics for skills test examiners, as required by 49 CFR § 384.229.

## IOWA DOT AND COUNTY TREASURER CDL SKILLS TESTING

Statewide, there are a total of 18 Iowa DOT driver and identification service center locations and 82 county treasurer locations that issue driver's licenses and state identification cards. Each of those locations provide CDL knowledge testing and can issue a CDL to someone who has passed both their knowledge and CDL skills testing. However, CDL skills testing is currently offered at only 16 Iowa DOT locations and 12 county treasurer locations. The 16 Iowa DOT-operated sites are co-located with, or within very close proximity to, the state's driver and identification service centers (i.e. driver's license station), and the examiners administering CDL skills testing also work in the service centers performing other duties relating to driver's license and identification card issuance.

There is more variance and unpredictability to the availability of CDL skills testing performed by county treasurer personnel. Under Chapter 321M, county treasurers are authorized, but not required to offer CDL skills tests, and many choose not to do so or do so only on limited days and at limited times. This may in part be explained by low demand for skills test services in some counties or a lack of access to the required road and intersectional configurations required to meet federal road testing requirements. Additionally, financial constraints affect a county treasurer's ability to provide staff to provide CDL skills testing. Under Iowa Code section 321M.9, county treasurers retain a portion of the fees they collect for each driver's license or identification card they issue (they receive \$7 per card issued) to reimburse them for the cost of the driver and identification services they provide. Fees collected under this reimbursement process go to the county's general fund. However, there is no additional reimbursement authorized for CDL skills testing. As a result, it is challenging for county treasurers to dedicate resources to CDL skills testing especially considering the minimum time it takes to perform a CDL skills test is 90 minutes. County treasurers who are willing to provide CDL skills testing at their location typically restrict availability to specific days and times of the week and may be subject to unforeseen disruption in availability if only one staff member is certified to administer the testing and that staff member becomes unavailable. Additional data on this topic is explained in the recommendation portion of this report.

## CDL SKILLS TESTING DEMAND

We reviewed the demand for CDL skills tests statewide and found that in calendar years 2016-2018 there was an annual average of 4,837 total CDL applicants<sup>1</sup> (individuals) statewide who performed their CDL skills test in either a state or county facility. Knowing that it may take several attempts for an individual to successfully pass each of the three required components of the skills test, we then compared the number of individuals to the number of tests administered to determine the actual demand for full CDL skills test slots statewide. When factoring in the number of required retests due to test failures, the equivalent of 7,740 full CDL skills test slots were required to meet the demand statewide. For the purposes of the remaining analysis throughout this study, calendar year 2018 data was relied on as it was the most accurate and reliable data source available<sup>2</sup>.

FIGURE 2 | ANNUAL TESTS AND RETESTS

	INITIAL AND FAILED TESTS
Initial CDL skills test applicants in 2018	4,837
Additional retests from pre-trip vehicle inspection failures	1,927
Additional retests from basic control skills failures	350
Additional retests from road test failures	626
<b>Equivalent Total Test Demand (# of full test slots needed)</b>	<b>7,740</b>

Below shows a breakdown of where the CDL skills test failures occurred in the test progression.

FIGURE 3 | CDL SKILL TEST FAIL RATES

	2018 FAIL RATE	2018 FAIL COUNT
Pre-trip vehicle inspection	36%	1927
Basic control skills	10%	350
Road test	16%	626

1 Data retrieved from Iowa DOT Commercial Skills Test Information Management System (CSTIMS). CSTIMS is an Internet-based tool provided by the American Association of Motor Vehicle Administrators (AAMVA) that provides a consistent way for all jurisdictions nationwide to track the scheduling and entry of CDL skills test results conducted by jurisdictions and third-party testers/examiners. Under FMCSA regulations, states are required to use CSTIMS to register testing organizations, record information pertinent to examiners (e.g., sanctions, suspensions, and certifications), schedule CDL applicant skills tests, and record the results of the tests.

2 CSTIMS was not used consistently in all testing locations, including county treasurer locations until calendar year 2018. For this reason, to ensure data integrity and quality analysis, we relied on calendar year 2018 data for this analysis and resulting report.

Further, we found that in the same calendar year (2018) there were 3,965 CDL skills test slots scheduled in which the CDL applicant did not show up for their scheduled testing appointment or canceled without enough advance notice to reschedule someone else into their scheduled appointment time (referred to as a “no-show”). This information is significant as it has a direct impact on the testing capacity for each individual location. A full 90-minute time slot is scheduled for an initial CDL skills test to accommodate all three testing components, and 60 or 30-minute time slots are scheduled for retests, depending on whether the applicant needs to complete one or both remaining components. The data shows that individuals fail the pre-trip most often, requiring a full 90-minute slot to be rescheduled. When an applicant does not show up for their scheduled appointment, it creates wasted time for examiners and adds to the wait time for other CDL skills test applicants. Information regarding these “no-show” numbers are shown in the table below.

**FIGURE 4 | CDL SKILL TEST “NO-SHOW” RATE**

TEST COMPONENT	2018 NO-SHOW COUNT
Pre-trip vehicle inspection	1,650
Basic control skill	1,864
Road test	451
<b>Total appointment slots where individual did not appear (“no-show”)</b>	<b>3,965</b>

Using these numbers, we applied a conversion factor to assess the equivalent number of full CDL skills test slots we need to offer to meet the demand created by the number of CDL skills test applicants. We did this by adding the total number of applicants plus the total number of re-tests and “no shows” that occurred at each level of skills testing and applied a conversion rate to account for whether only one or two skills test components remain. No conversion rate was applied at the initial applicant and pre-trip vehicle inspection levels because each of these levels represent a circumstance in which all three components of the test must be completed, and therefore directly equate to a full CDL skills test slot. A conversion rate of 2/3 was applied at the basic skills control level because only two of the three required components remain to be completed at that level, and a conversion rate of 1/3 was applied at the road test level because only that single component remains at that level.

Based on this approach, the total equivalent demand for full CDL skills test slots at state and county locations in 2018 was 10,249 slots. This equates to a demand factor of 2.12 full CDL skills test slots required for every individual CDL skills test applicant. This means that for each CDL applicant testing in a state or county location, we need to offer just over two full CDL skills test slots to meet the demand created by all applicants. The following table illustrates these calculations:

**FIGURE 5 | TOTAL EQUIVALENT DEMAND FOR FULL CDL SKILL TEST SLOTS**

		PLUS “NO SHOWS”	SUBTOTAL	FULL TEST CONVERSION RATE	TOTAL
Initial CDL skills test applicants (individuals) in 2018	4,837	N/A (counted at the pre-trip vehicle inspection level)	4,837	N/A (all three test components must be scheduled at this level)	4,837
Retests from pre-trip vehicle inspection failures	1,927	1,650	3,577	N/A (all three test components must be rescheduled at this level)	3,577
Retests from basic control skills failures	350	1,864	2,214	2/3 (two test components must be rescheduled at this level)	1,476
Retests from road test failures	626	451	1,077	1/3 (one test component must be rescheduled at this level)	359
<b>Total full CDL skills test slot equivalent demand</b>					<b>10,249</b>

FIGURE 6 | CDL SKILLS TEST SLOT AVAILABILITY

CDL LOCATIONS	MAXIMUM NUMBER OF FULL CDL SKILL TEST SLOTS AVAILABLE PER DAY						MAXIMUM FULL CDL SKILLS TEST SLOTS AVAILABLE PER WEEK
	MONDAY*	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY*	
Iowa DOT - Ames	0	0	3	3	0	0	6
Iowa DOT - Ankeny	0	8	12	12	8	4	44
Iowa DOT - Burlington	0	3	3	3	3	1	13
Iowa DOT - Cedar Rapids	0	3	3	3	3	2	14
Iowa DOT - Clinton	0	2	1	1	2	1	7
Iowa DOT - Council Bluffs	0	2	1	2	0	1	6
Iowa DOT - Davenport	0	3	3	3	3	2	14
Iowa DOT - Dubuque	0	4	4	4	4	2	18
Iowa DOT - Fort Dodge	0	2	2	2	2	0	8
Iowa DOT - Iowa City	0	2	2	2	2	0	8
Iowa DOT - Marshalltown	0	1	2	2	1	0	6
Iowa DOT - Mason City	0	2	2	2	2	0	8
Iowa DOT - Muscatine	0	2	2	2	2	1	9
Iowa DOT - Ottumwa	0	3	3	3	3	2	14
Iowa DOT - Sioux City	0	2	2	2	2	0	8
Iowa DOT - Waterloo	0	4	4	4	4	2	18
Audobon County Treasurer Office	0	7	0	2	0	0	9
Allamakee County Treasurer Office	0	1	1	1	0	0	3
Cass County Treasurer Office	0	3	0	0	0	0	3
Cherokee county Treasurer Office	0	4	0	0	0	0	4
Crawford County Treasurer Office	0	0	0	3	0	0	3
Fayette County Treasurer Office	1	0	1	1	0	0	3
Fremont County Treasurer Office	0	0	1	0	0	0	1
Kossuth County Treasurer Office	2	2	2	2	2	0	10
Lyon County Treasurer Office	0	1	0	0	0	0	1
Page County Treasurer Office	0	0	2	0	0	0	2
Shelby County Treasurer Office	0	0	3	0	0	0	3
Winneshiek County Treasurer Office	2	2	2	2	2	0	10
<b>TOTAL</b>							<b>253</b>

## AVERAGE WAIT TIME FOR CDL SKILLS TESTING

During our study, we found that the number of days an individual CDL applicant may need to wait for their CDL skills test appointment varied considerably by location and fluctuated at each individual location. Availability at county treasurer locations varied the most often as they were more likely to have scheduling impacted by staffing issues or other administrative considerations, but this was also true for many of the Iowa DOT locations as well. Based on the data available on wait times from our CDL appointment scheduling system, we found that the approximate average wait time for a CDL skills test appointment in any location is typically approximately 14 days, or two weeks. However, overall, wait times varied from four to 31 days depending on the week and the location. The longest wait times were generally at the Iowa DOT testing locations in Ankeny, Ames, Marshalltown, Council Bluffs, Sioux City, and Iowa City. No significant trends or additional findings could be determined by the data available for wait times.

## CDL SKILLS TESTING CAPACITY

Each of the state and county CDL skills testing sites offer a certain number of skills test appointments each week commensurate to the number of examiners available. While the precise number of trained and certified CDL skills test examiners fluctuates throughout the year due to turnover, the current number of Iowa DOT examiners is 97, and the current number of county treasurer examiners is 18. The precise number of appointments available annually is an average estimation as the availability is affected by staffing levels which may vary during the year due to turnover, paid time off or sick leave, severe weather, and other administrative demands.

Based on the compilation of all current scheduling availability for CDL skills tests at each state and county location, and factoring in an estimation for paid time off, holidays, and turnover, we found that existing state and county locations can supply approximately 10,576 full CDL skills test appointment slots statewide each year.

FIGURE 7 | CDL SKILLS TEST CAPACITY

STARTING TEST CAPACITY = 253* FULL CDL SKILLS TEST SLOTS PER WEEK	X 52 WEEKS PER YEAR	MAXIMUM 13,156 FULL CDL SKILLS TEST SLOTS PER YEAR
Less holidays	253 test slots per week X 2 weeks	(506) test slots per year
Less PTO (sick and vacation)	253 test slots per week X 3 weeks	(759) test slots per year
13,156 test slots per year	X 10% turnover loss	(1,315) test slots per year
<b>Actual full CDL skills test slots available annually</b>		<b>10,576 test slots per year</b>

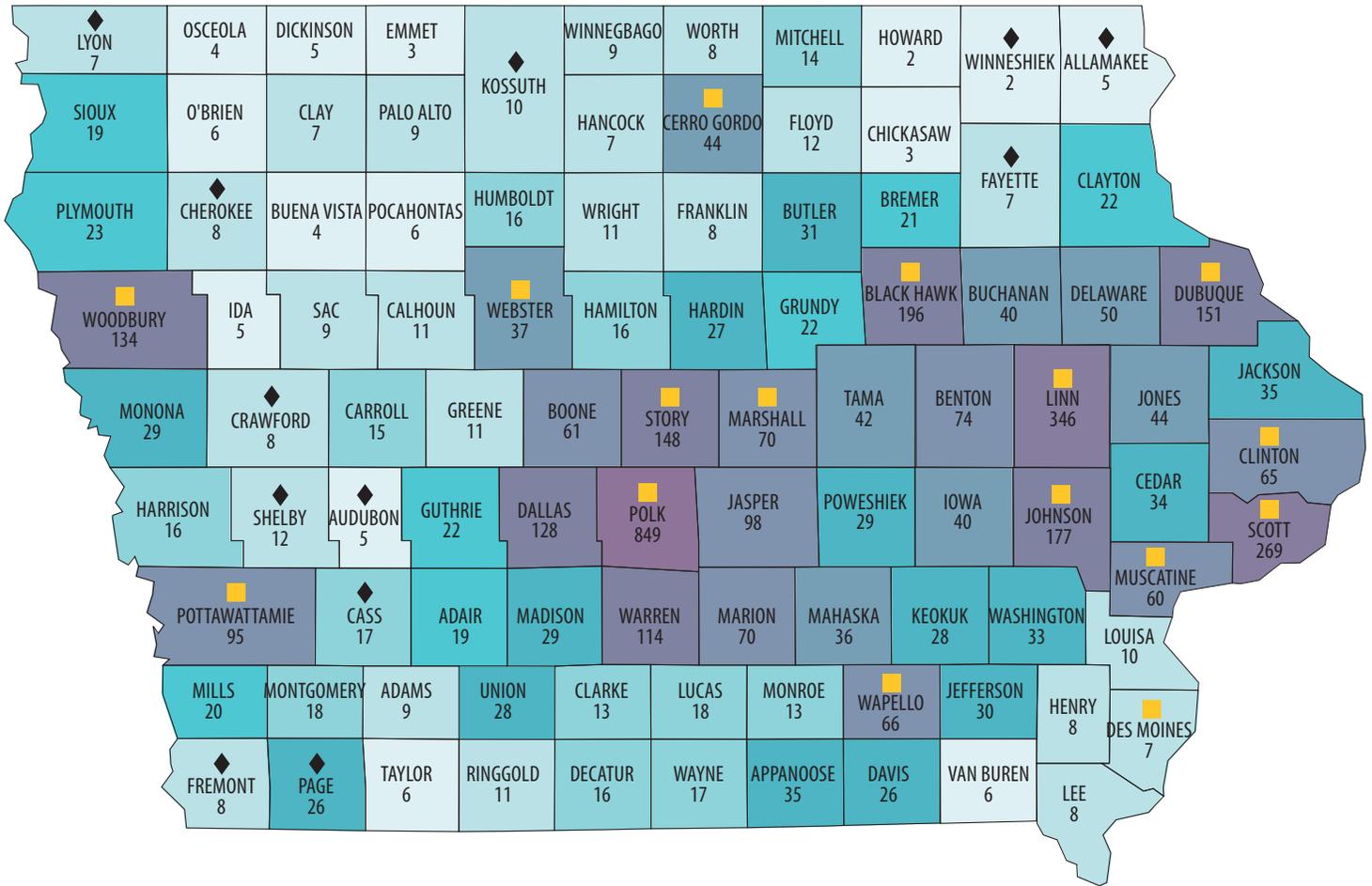
*\*Iowa DOT locations offer a maximum of 201 CDL skills test appointment slots/week; county treasurer locations offer a maximum of 52 CDL skills test appointment slots/week.*

When looking at the annual statewide capacity of the existing state and county CDL testing sites and comparing it to the overall CDL testing demand at state and county locations, after factoring in retesting demand and customers not showing up for their scheduled appointments, the supply of full CDL skills test slots (10,576 statewide) is approximately equal to the overall equivalent demand for full CDL skills test slots (10,249 statewide). However, we also needed to look at the geographic spread of the available CDL skills testing locations and compare it to the specific demand for CDL skills testing in each county to determine whether barriers in access to CDL skills testing exist based on where a CDL applicant resides or works in the state.

# CDL SUPPLY AND DEMAND BY COUNTY

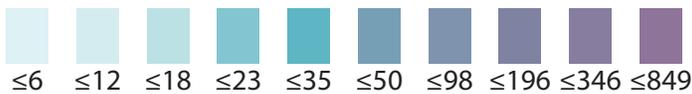
The map displayed below shows the annual number of individual CDL applicants who took a CDL skills test at either a state or county testing location broken out by the individual's county of residence. Each county shows the number of residents from that county who sought a CDL skills test at any state or county CDL skills testing location in the state. These numbers were derived using calendar year 2018 skills test data retrieved from CSTIMS.

FIGURE 8 | CDL DEMAND BY COUNTY



## LEGEND

### CDL DEMAND

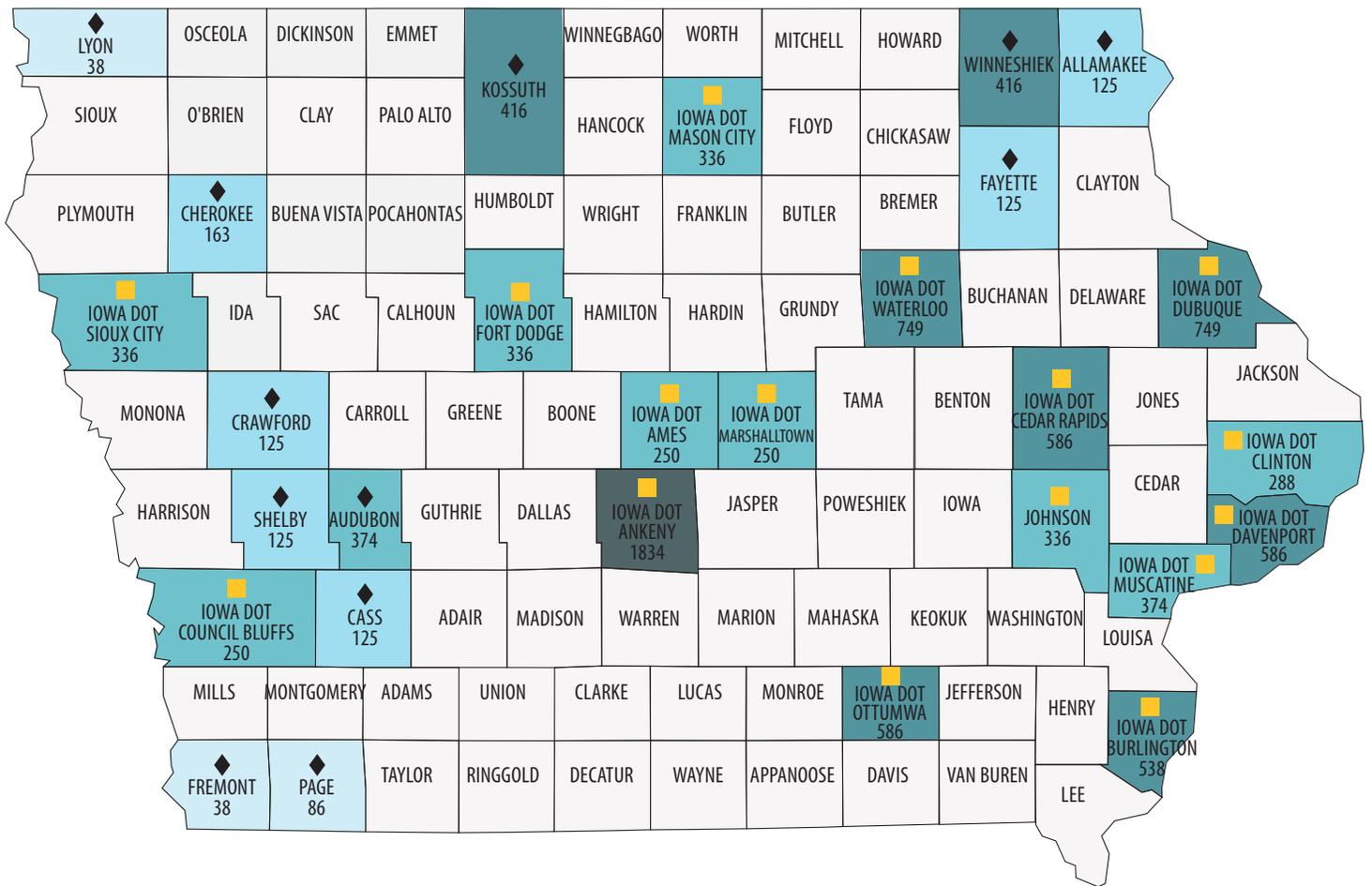


### CDL LOCATIONS



The map displayed below shows the number of full CDL skills test slots available annually at each of the 28 Iowa DOT and county treasurer locations. The numbers shown reflect the actual number of full CDL skills test slots available after taking holidays and staff PTO averages into account.

FIGURE 9 | ANNUAL TESTING SLOT CAPACITY BY COUNTY



LEGEND

ACTUAL TESTING SLOTS

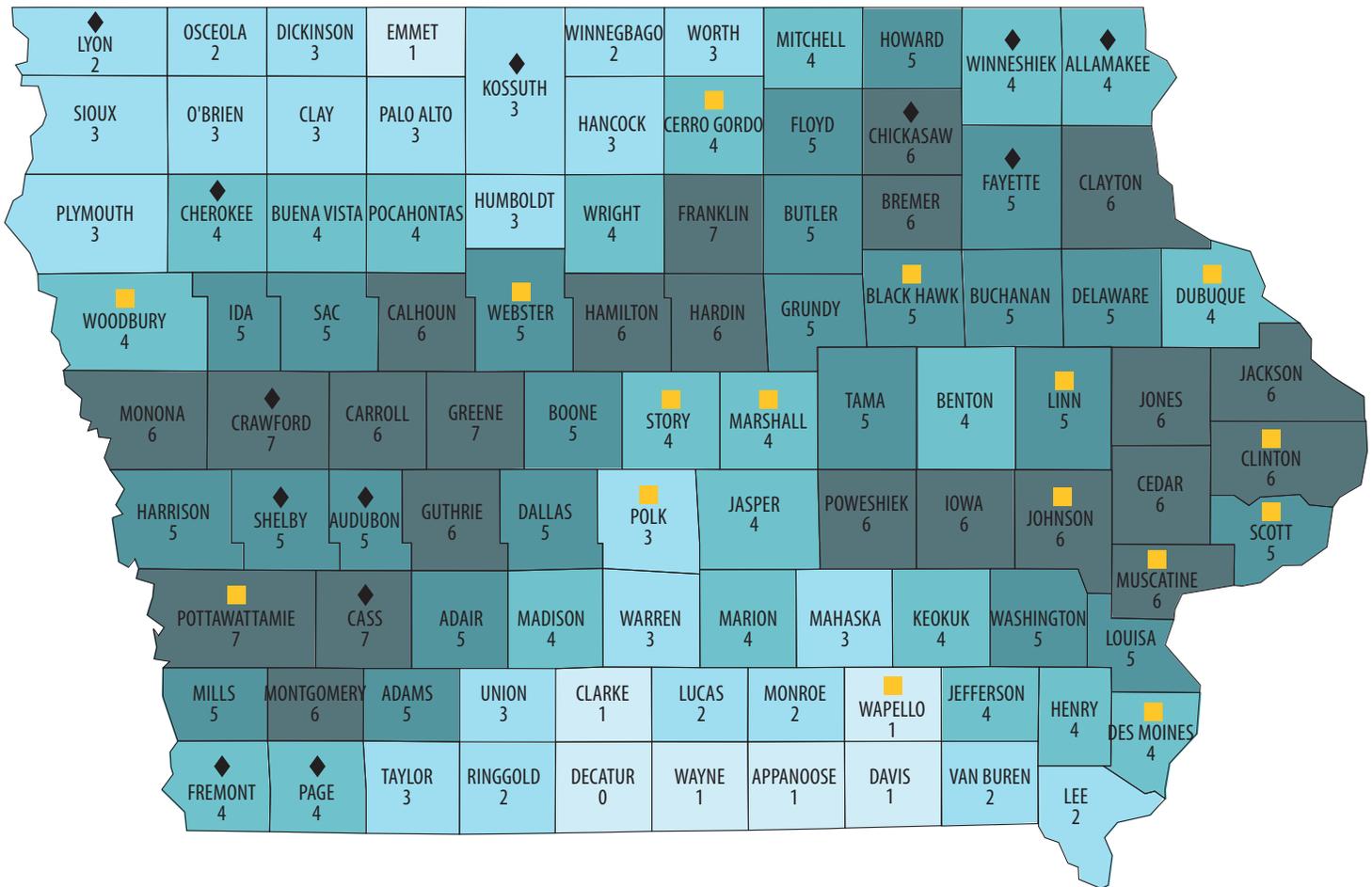


CDL LOCATIONS



The map shown below breaks out the number of Iowa DOT or county treasurer CDL skills test locations within 60 miles of the geographic center of each county. This visual is simply intended to illustrate how many location options are available to an individual who is seeking to schedule their CDL skills testing, based on where the individual lives or works within the state.

FIGURE 10 | NUMBER OF CDL LOCATIONS WITHIN 60 MILES BY COUNTY

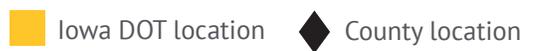


LEGEND

NUMBER OF CDL LOCATIONS WITHIN 60 MILES OF COUNTY



CDL LOCATIONS

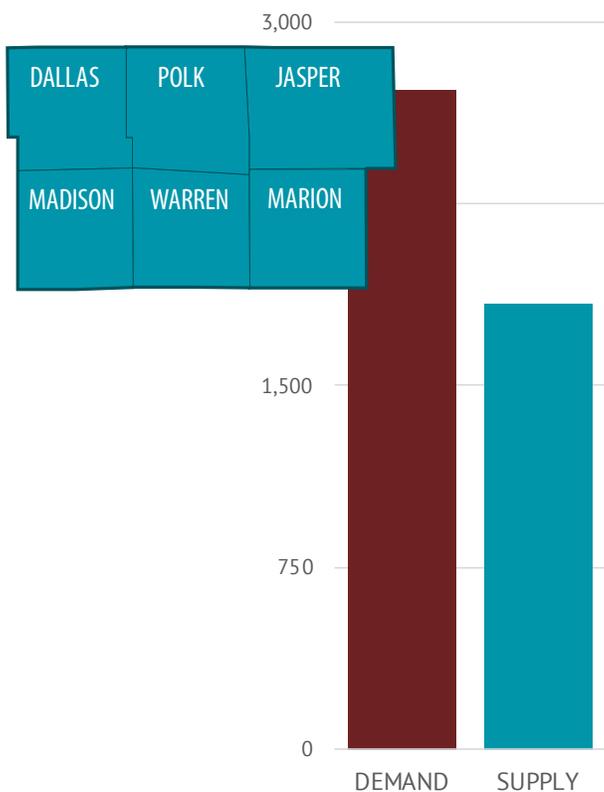


When reviewing the availability of CDL skills test slots throughout the state, the data indicates there is one geographic area (central/south central Iowa) where the demand of CDL skills tests outweighs the availability of CDL skills test appointments nearby, suggesting that access to testing may be a problem for applicants in this area.

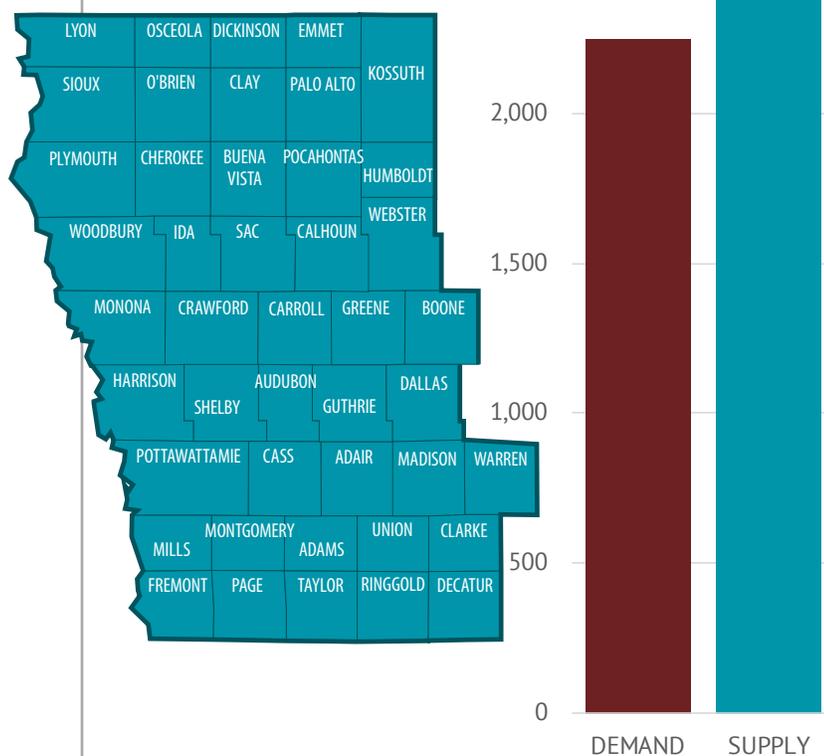
The total combined demand for residents of Polk, Dallas, Jasper, Madison, Warren, and Marion Counties equals 1,288 individuals seeking a CDL skills test. When you factor the failure and “no show” rate, that means the actual demand is approximately 2,718 CDL skills test appointments. While CDL skills test applicants may go to any CDL skills testing location to complete their test, the location at the Iowa DOT Ankeny Service Center is the closest testing location for each of the listed counties. The Ankeny location can only provide approximately 1,834 full CDL skills test appointment slots each year, meaning the location is unable to meet the demand for the surrounding central/south central Iowa region. Although some applicants who reside in this central/south central Iowa area may choose to test elsewhere, we also know that many applicants who reside outside of this area are also using the Ankeny location for CDL skills testing. For example, many employers located in central/south central Iowa choose to use the Ankeny testing location even if their drivers are not necessarily residents of Polk or a nearby county due to proximity and ease of getting their trucks to the testing location. Even without knowing how many individuals choose to use the Ankeny testing location who do not live in the central/south central Iowa area, the data shows that the Ankeny location is struggling to meet the demand of CDL skills tests for applicants who reside in the central/south central Iowa region.

We also looked at the western and eastern sides of the state to measure the demand against the number of full CDL skills test appointment slots available. The western side of the state<sup>3</sup> had an annual total of 1,059 individuals seeking a CDL skills test, requiring approximately 2,245 full CDL skills test appointment slots. There are three Iowa DOT locations and nine county locations in this area<sup>4</sup> that can offer approximately 2,412 appointment slots when you adjust for staffing variances, meaning the data shows that the demand of CDL skills tests is currently being met by the number of appointment slots available. Of note, this calculation does not include the Iowa DOT Ankeny or Ames CDL skills testing locations, which may also be used by residents of this western Iowa region and may be a likely option for those who reside or work closer to central/south central Iowa.

**FIGURE 11.1 | CENTRAL/SOUTH CENTRAL IOWA CDL SKILLS TEST DEMAND VS. SUPPLY**



**FIGURE 11.2 | WESTERN IOWA CDL SKILLS TEST DEMAND VS. SUPPLY**



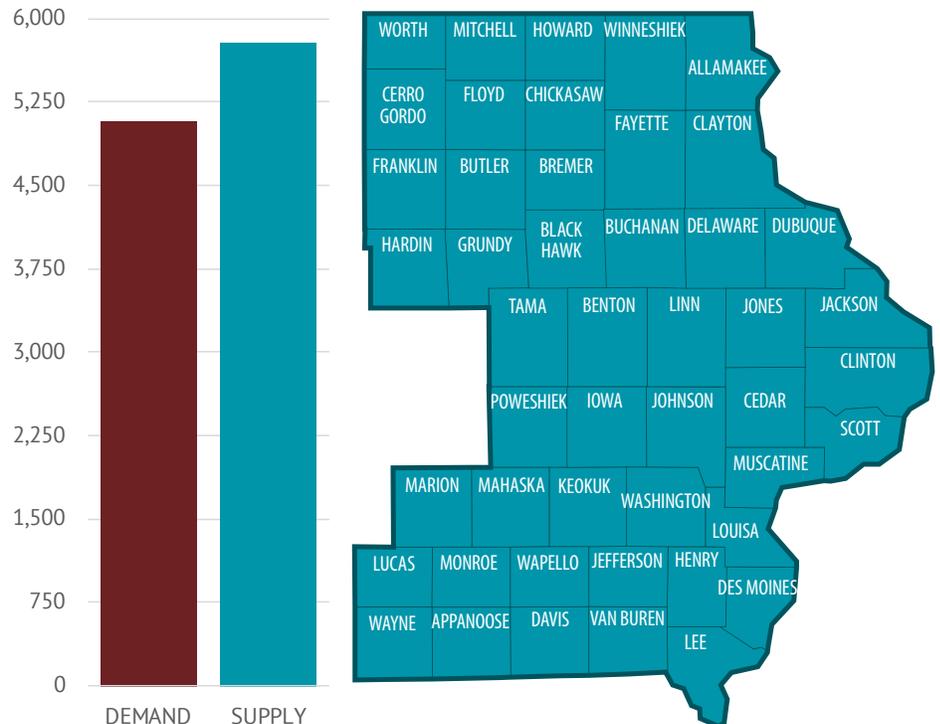
3 Counties included in the western side of the state calculation include: Lyon, Osceola, Dickinson, Emmet, Kossuth, Sioux, O'Brien, Clay, Palo Alto, Plymouth, Cherokee, Buena Vista, Pocahontas, Humboldt, Woodbury, Ida, Sac, Calhoun, Webster, Monona, Crawford, Carroll, Greene, Boone, Harrison, Shelby, Audubon, Guthrie, Dallas, Pottawattamie, Cass, Adair, Madison, Warren, Mills, Montgomery, Adams, Union, Clarke, Fremont, Page, Taylor, Ringgold, Decatur.

4 The three Iowa DOT locations in the noted western Iowa region are Sioux City, Council Bluffs, and Fort Dodge. The nine county treasurer locations are Lyon County, Kossuth County, Cherokee County, Crawford County, Audubon County, Shelby County, Cass County, Fremont County, and Page County.

Conversely, the eastern side of the state<sup>5</sup> shows an average annual demand of 2,391 individuals seeking a CDL skills test, requiring approximately 5,069 full CDL skills test appointment slots. There are ten Iowa DOT testing locations and three county testing locations<sup>6</sup> in this area with an ability to offer approximately 5,794 full CDL skills test appointments (adjusted for staffing variances). Again, the demand is being met here with the supply of full CDL skills test appointment slots at 1.14 times the demand. Of note, this calculation does not include the Iowa DOT CDL skills testing locations in Ankeny or Marshalltown, which may also be used by eastern Iowa applicants who reside or work closer to those central/south central Iowa locations.

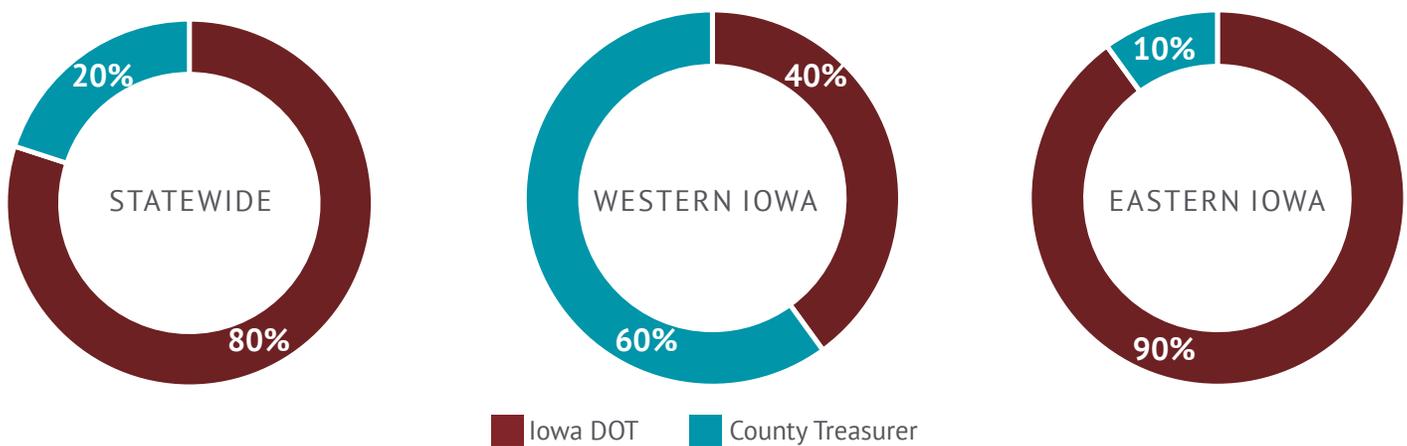
A major factor affecting CDL skills testing in the western side of the state is the reliance on county treasurers which are providing the majority of CDL skills testing on this side of the state, whereas the eastern side of the states is mostly supported by Iowa DOT-provided CDL skills testing locations.

FIGURE 11.3 | EASTERN IOWA CDL SKILLS TEST DEMAND VS. SUPPLY



Statewide, the data shows that the Iowa DOT provides 80 percent of CDL skills test appointments while county treasurers provide 20 percent. However, in the western Iowa region mentioned above, the nine county treasurer locations are supplying approximately 60 percent of the full CDL skills test appointment slots while the Iowa DOT locations are supplying approximately 40 percent of the full CDL skills test appointment slots annually. In the above referenced eastern Iowa region, county treasurer locations supply less than 10 percent of the full CDL skills test appointment slots annually.

FIGURE 12 | RELIANCE ON COUNTY TREASURERS FOR CDL SKILL TESTING



When reviewing the geographic spread of where CDL skills test appointment slots are available (using the statewide total of 10,576 full CDL skills test appointment slots), the data shows that out of all the CDL skills test appointment slots available, 55 percent are on the eastern side of the state, 22.5 percent are available on the western side of the state, and 22.5 percent are available in the central/south central Iowa region.

<sup>5</sup> Counties included in the eastern side of the state calculation include: Worth, Mitchell, Howard, Winneshiek, Allamakee, Cerro Gordo, Floyd, Chickasaw, Fayette, Clayton, Franklin, Butler, Bremer, Fayette, Hardin, Grundy, Black Hawk, Buchanan, Delaware, Dubuque, Jackson, Jones, Linn, Benton, Tama, Poweshiek, Iowa, Johnson, Cedar, Clinton, Scott, Muscatine, Washington, Keokuk, Mahaska, Marion, Lucas, Monroe, Wapello, Jefferson, Henry, Des Moines, Lee, Van Buren, Davis, Appanoose, and Wayne.

<sup>6</sup> The Iowa DOT locations in the noted eastern Iowa region are Mason City, Waterloo, Dubuque, Clinton, Cedar Rapids, Iowa City, Muscatine, Davenport, Ottumwa, and Burlington. The three county locations are Fayette County, Winneshiek County, and Allamakee County.

## THIRD-PARTY CDL SKILLS TESTING

Most of our analysis focuses on access to CDL skills testing at state and county locations; however, it is important to include CDL skills testing performed by third-party testers. The Code of Federal Regulations, CFR Section § 383.75, authorizes CDL skills tests to be performed by third-party testers in addition to testing programs operated by state driver's license authorities. Iowa Code section 321.187 specifically limits the entities authorized to provide third-party CDL skills testing in Iowa to three types: Iowa community colleges, an Iowa-based motor carrier or its subsidiary that has a principal place of office in this state and operates a permanent commercial driver training facility in this state, or an Iowa nonprofit corporation that serves as a trade association for Iowa-based motor carriers. Iowa Administrative Code 761-607.30 further implements Iowa's third-party CDL skills testing program.

In addition to providing professional education and training to prepare drivers for success, third-party CDL skills testers positively influence CDL skills testing access by absorbing CDL skills tests that would otherwise place a heavier demand on Iowa DOT and county treasurer testing locations. There are 13 community colleges who currently provide CDL skills tests and two Iowa based motor carriers who provide CDL skills testing<sup>7</sup>. The Iowa Motor Truck Association was also recently authorized to provide third-party CDL skills testing (see 2019 Iowa Acts, House File 418, section 1) but has not yet begun offering testing.

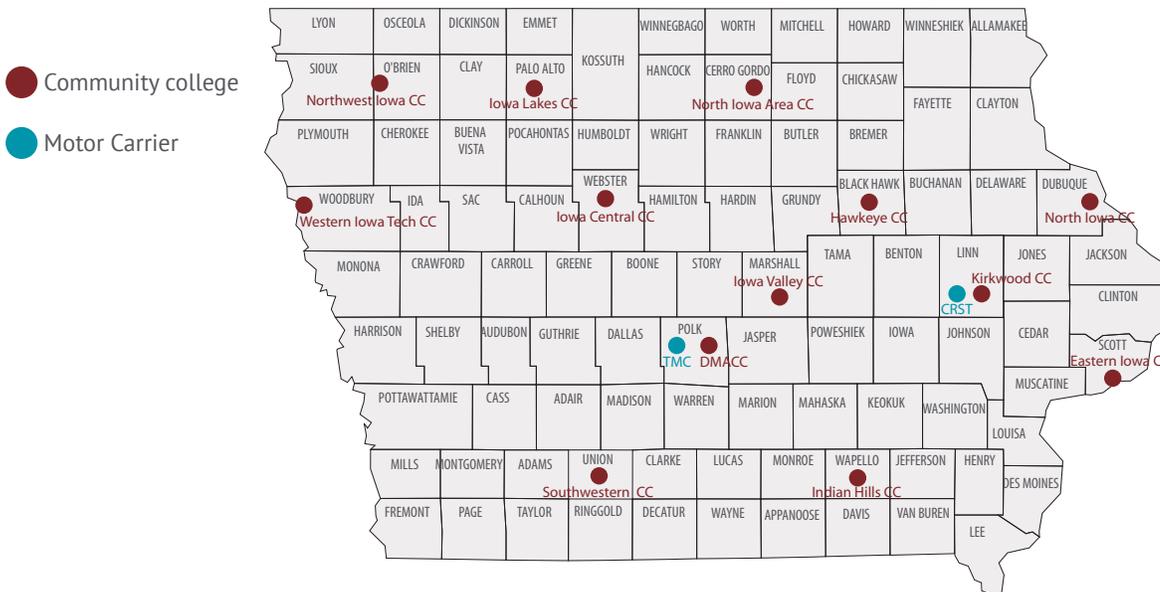
Community colleges generally provide skills testing to students as part of their CDL course and program with the college; however, community colleges are also authorized to provide skills testing to applicants that are not enrolled in a course or program with the college. Community colleges have the authority to set their own fees for CDL courses as well as for CDL skills testing that may occur outside of their course program. Generally, we have found that most testers who complete their testing with a community college are students who enroll in the college's CDL program, and that very few testers complete their CDL skills testing with a community college without being enrolled in their program.

The 13 community colleges currently have 42 active third-party examiners throughout the state. From October 31, 2018 through November 1, 2019, community colleges performed a total of 11,521 separate segments of the CDL skills test and tested more than 3,500 individual CDL skills test applicants. Because each component of the test may be scheduled separately, this number counts each of the three parts of the test separately (pre-trip inspection, basic control skills, and the on the road driving test).

The two Iowa-based motor carriers offer CDL training and skills testing as part of their recruitment for skilled drivers. The two carriers currently have a total of 20 active third-party examiners. From October 31, 2018 through November 1, 2019, the two Iowa-based motor carriers performed a total of 14,505 separate segments of the CDL skills test and tested approximately 2,500 individual CDL skills test applicants.

As noted above, federal regulations and Iowa law require the state to train and certify all third-party examiners and to audit the skills tests performed by each third-party examiner at least once every two years to ensure adherence to the federal skills testing standards. These same regulations also require the state to audit the skills tests performed by all state and county examiners.

FIGURE 13 | IOWA THIRD-PARTY CDL SKILLS TEST ORGANIZATIONS 2019



<sup>7</sup> Des Moines Area Community College (Ankeny); Eastern Iowa Community College (Davenport); Hawkeye Community College (Waterloo); Indian Hills Community College (Ottumwa); Iowa Central Community College (Fort Dodge); Kirkwood Community College (Cedar Rapids); Northwest Iowa Community College (Sheldon); Western Iowa Tech Community College (Sioux City); North Iowa Area Community College (Mason City); Iowa Lakes Community College (Emmetsburg); Iowa Valley Community College (Marshalltown); Northeast Iowa Community College (Peosta); Southwestern Community College (Creston); CRST International/North America Driver Training Academy (Cedar Rapids); TMC Transportation - The Mickow Corporation (Ankeny)

## CONCLUSIONS AND RECOMMENDATIONS

Based on the review of the demand for CDL skills tests compared to the availability of full CDL skills test appointments, we have concluded that there are certain administrative steps that should be taken to improve the overall CDL skills test accessibility and experience for CDL applicants. We are also providing additional recommendations to be considered by the legislature to stabilize CDL skills testing provided by county treasurers and to further reduce failure and “no show” issues negatively affecting CDL skills testing access statewide.

### ADDRESS CDL APPLICANT TEST FAILURE RATE

Our study found that there is a significant number of failures occurring in the CDL skills test, particularly during the first testing component, the pre-trip vehicle inspection. The failure rates require the number of CDL testing appointment slots to be increased statewide by approximately 2,903 annually. In calendar year 2018, if all applicants were successful on their first CDL skills testing attempt, only 4,837 CDL skills test appointment slots would have been needed statewide. Because the pre-trip vehicle inspection is known to be more difficult to successfully pass, we sometimes see applicants use their first CDL skills test appointment as a means to “practice” and get a feel for this segment of the test, knowing there is little likelihood they will pass on their first attempt, and this negatively affects access to full CDL skills test appointment slots at all testing locations throughout the state.

An examiner blocks 90 minutes for one full test to be completed, and when the pre-trip vehicle inspection test is failed, more than 60 minutes of the scheduled CDL skills test appointment time is unused and diverted to other purposes. The content of the test and the manner and sequence in which it is required to be administered cannot be altered as these are controlled exclusively by the Federal Motor Carrier Safety Regulations (FMCSRs). While it is unrealistic to expect all applicants to be successful on their first attempt, there are administrative actions that can be taken to improve the preparation available to CDL applicants to increase pass rates, and thereby decrease the number of re-tests needed. This will have the result of increasing CDL skills test capacity statewide.

One action is the development of training videos and other study materials to improve the applicant’s ability to pass the pre-trip vehicle inspection portion of the CDL skills test on their first attempt. This could include enhancing our existing app focused on preparing CDL applicants to successfully pass the CDL knowledge exams. We will actively monitor the ongoing pass/fail rate as one of our major CDL performance metrics.

Considering the pre-trip vehicle inspection is closely related to an applicant’s familiarity with the vehicle they are using for the test, another action will include an effort to bring education and preparation materials to employers who often supply the trucks for the CDL skills tests. Employers have an interest in seeing their employees or prospective employees pass the skills test in as few attempts as possible to minimize the amount of time their licensed drivers and company trucks are off of normal routes and schedules. We will immediately begin work to focus on improving the failure rates statewide beginning calendar year 2020.

Federal regulations, 49 CFR part 380, will also require all CDL skills test applicants to first successfully complete an Entry-Level Driver Training course (ELDT) with a training provider approved by FMCSA. This federal requirement was initially set to become effective in February 2020; however, it has been delayed until February 7, 2022. When this requirement becomes effective it may positively influence the pass rate for CDL skills test applicants.

### ADDRESS “NO SHOW” APPOINTMENTS

Our study found that there is a significant number of wasted CDL skills test appointment slots due to CDL applicants not showing up for their scheduled appointment slot (“no shows”). These “no shows” significantly affect the availability of CDL skills test appointments, resulting in approximately 3,965 additional CDL skills test appointment slots being rescheduled annually. The number of test slots required to be rescheduled due to “no shows” exceeds the number of test slots required to be rescheduled due to test failures by approximately 1,000. As a result, we are undertaking a review of our CDL skills test appointment scheduling system to determine if investment in a more robust system could assist in minimizing this issue. Currently, when an applicant makes an appointment either by phone or in-person, neither Iowa DOT nor county treasurer staff can check to see whether they already have an appointment scheduled in another location. We also do not have a system that allows appointment reminders to be automatically sent to the applicant. Additional analysis is necessary to determine if certain locations experience “no shows” more frequently than others and whether there are specific actions that can be taken to minimize “no shows” from occurring in those locations.

## STABILIZE CDL SKILLS TESTING BY COUNTY TREASURERS AND FURTHER REDUCE FAILURES AND “NO SHOWS” AT ALL TESTING LOCATIONS

As discussed earlier in this report, county treasurers retain from the fees they collect seven dollars for each driver’s license or non-operator identification card they issue under Iowa Code Chapter 321M as reimbursement for the cost of providing driver and identification services, and no other reimbursement structure exists for counties that provide CDL skills tests. As shown by the information and maps above, most counties have chosen not to provide CDL skills tests as part of their driver and identification services, and those that do are not consistently dispersed throughout the state and limited in the number of test slots they offer. During the 87th General Assembly, HF 2476 was introduced and the proposed legislation sought to stabilize existing county CDL skills test services and incentivize additional counties to offer CDL skills test services by allowing county treasurers to assess a fifty-dollar fee to administer the CDLs skills test to residents of their county and to assess a seventy-five-dollar fee to administer the CDL skills test to those who did not reside in their county. The proposed legislation indicated that the fees would be retained in the county’s general fund and would therefore be accessible to compensate the county for required staff to administer the testing.

To increase the reliability and predictability of CDL skills testing by county treasurers and to reduce failures and “no shows” at all testing locations statewide, we recommend a similar proposal be reconsidered with a few adjustments to the original bill that was introduced.

Based on information collected by the American Association of Motor Vehicle Administrators (AAMVA) we know that at least 26 other states charge a fee for CDL skills testing either when scheduling the initial CDL skills test appointment or if the applicant is required to schedule a retest due to either a test failure or a no-show (See Appendix A for additional details). Several states charge an upfront fee for state-provided administration of the CDL skills tests which may deter individuals from scheduling an appointment they do not intend to keep and to avoid scheduling an appointment before they are fully prepared to successfully pass the test to avoid having to re-test as a result of a test failure. Those fees range from \$5 - \$200 per test. A few states only charge a fee if the CDL skills test applicant is not successful the first time they attempt to test and need to reschedule a second attempt. Other states rely solely on third-party testers who assess CDL skills testing fees directly to the test applicants.

Iowa law does not currently authorize the department to charge a fee for any CDL skills testing performed by a state or county location. We recommend the legislature consider authorizing an overarching fee structure that applies to all state and county locations to minimize the number of “no shows” for CDL skills testing, incentivize applicants to be fully prepared for a successful examination, stabilize county treasurer testing location options, and incentivize more county treasurer offices to provide CDL skills testing throughout the state. Our recommendation is to limit the fee to no more than \$60 per full CDL skills test appointment to prevent the fee from becoming an unintended barrier to entry into the truck driving industry, and to make the fee payable “up front” (at the time of scheduling). Taking this comprehensive approach would accomplish the following:

1. Support and stabilize CDL skills testing at existing county CDL locations (an outcome particularly important for western Iowa, where there is greater reliance on county services).
2. Expand county CDL skills testing by incentivizing additional counties to offer CDL skills testing.
3. Avoid incentivizing applicants to choose state locations over county locations to avoid the fee.
4. Improve the supply of and access to CDL skills test slots by discouraging applicants from scheduling multiple appointments they do not intend to keep.
5. Improve failure rates by discouraging applicants from appearing for the CDL skills test unprepared.
6. Avoid negative impact to the state’s Statutory Allocations Fund (SAF) and Road Use Tax Fund (RUTF)<sup>8</sup>.

<sup>8</sup> Under section 321.145 of the Iowa Code, driver’s license and non-operator identification card fees are deposited in the state’s SAF. Funds retained in the SAF that exceed allocations from the SAF in the current state fiscal year are deposited in the state’s RUTF in the subsequent fiscal year. Accordingly, increases or decreases in revenue directed to the SAF result in dollar-for-dollar increases or decreases to the RUTF in subsequent fiscal years.

We recommend that the fees collected by Iowa DOT locations should be directed to the state’s Statutory Allocation Fund (SAF), and the fees collected by county locations should be retained by the county and directed to the county’s general fund, consistent with current fee distribution.

The existing licensing fees for CDLs and the various CDL endorsements are shown below.

FIGURE 14 | **CDL LICENSING FEES**

LICENSE TYPE	COST	DURATION OF LICENSE
Class A commercial	\$8/year	8 years
Class B commercial	\$8/year	8 years
Class C commercial	\$8 year	8 years
Commercial learner’s permit <i>(Must be added to an existing license)</i>	\$12	1 year

FIGURE 14.1 | **CDL ENDORSEMENT FEES**

CDL ENDORSEMENT	COST
Double/triple trailers	\$5
Passenger	\$10
Tank vehicles	\$5
Hazardous materials	\$5
School bus	\$10

The projected fiscal impact of a \$60 CDL skills test administration fee given current distribution of services is shown below:

- 10,249 full CDL skills tests administered annually × \$60 = \$614,940.
- 8,093 skills tests performed by Iowa DOT × \$60 = \$485,580 to the Statutory Allocation Fund (SAF).
- 2,156 skills tests performed by county treasurers × \$60 = \$129,360 to 12 separate county general funds.

However, it is important to note that these totals would decrease as we project that the number of CDL skills tests administered would decrease overall as the implementation of a CDL skills test administration fee would reduce the number of applicants who fail or do not show up for their skills test. Additionally, administrative efforts to improve pass rates and decrease the number of “no shows” will also decrease the number of total full CDL skills test appointment slots required statewide.

Not all county treasurer offices will be able to provide CDL skills testing as not every location is able to meet the federal standards for a CDL skills testing course due to a lack certain traffic controls or roadway requirements (See Appendix B for detailed CDL skills test measurements and traffic intersectional requirements). However, those counties who can locate an acceptable course would be able to better support staffing needs by assessing the fee, and we predict there would be an increase in the number of county treasurers offering CDL skills testing by at least four additional county treasurer offices. Additionally, the authorization to assess a fee for CDL skills testing would provide a more stable and reliable testing model for the 12 counties who already provide CDL skills testing through their county offices and staff. An across-the-board fee would also improve access to CDL skills testing by reducing “wasted” CDL skills test appointment slots that are not used to their full extent due to either failures or no-shows.

If an across-the-board CDL skills test administration fee is not considered, we recommend an alternative reimbursement mechanism to support and provide stability to existing CDL skills testing locations at county treasurer locations and to incentivize expansion of CDL skills testing provided at the county level. The alternative recommendation is to authorize county treasurers providing CDL skills testing to retain an additional \$20 per CDL skills test segment administered in addition to the seven dollars per card the county already retains under the existing fee structure of Iowa Chapter 321M. The \$20 per CDL skills test segment fee would be retained from fees that are otherwise directed to the SAF and that pour over to the RUTF in subsequent fiscal years. This approach would help stabilize existing county CDL skills test services and incentivize additional counties to offer CDL skills tests but would not impact no-shows or test failures due to lack of preparation and would not avoid impact to the SAF and RUTF.

County locations currently offer approximately 2,156 full CDL skills test appointment slots annually (which include the equivalent of all three test segments). Based on the number of CDL skills tests offered by county treasurers currently, the annual fiscal impact to the SAF and RUTF is estimated to be approximately \$129,360<sup>9</sup>. The fiscal impact may adjust as the number of retests decrease; however, an increase in fiscal impact may also be realized if additional counties begin offering CDL skills testing.

<sup>9</sup> 2,156 full CDL skills tests multiplied by \$60 = \$129,360.

## STATE TESTING

As noted previously, the central/south central Iowa region is struggling to keep up with the demand for CDL skills testing at state and county locations. There is one Iowa DOT CDL skills testing location in Ankeny to serve the needs of central/south central Iowa, which includes but is not limited to Polk, Dallas, Jasper, Madison, Warren, and Marion Counties as illustrated previously in this report. There are no county treasurer locations offering CDL skills testing in this part of central/south central Iowa. The overall demand in these central/south central Iowa counties for CDL skills testing is approximately 2,718 CDL skills test appointments annually (including retests due to failures and “no shows”). Our current capacity to offer CDL skills test slots in the Ankeny location is approximately 1,834 CDL skills test slots (when factoring in staff absences, holidays, etc.). This means there is an annual gap of 884 full CDL skills test slots in the Ankeny location, or 17 tests each week. When adjusting for holidays and absences, one Iowa DOT CDL examiner is able to provide 14 CDL skills test appointments each week (assuming they were solely dedicated to administering CDL skills tests and no other driver and identification services work). Based on this information, the Ankeny location could meet the demand of CDL skills testing in the central/south central Iowa region if they were able to offer an additional 17 CDL skills test appointment slots each week; which would require the addition of two full-time equivalent CDL examiner positions.

The demand of individuals seeking a CDL skills test in central/south central Iowa shows the greatest demand is in Polk County and Dallas County, accounting for 76 percent of the demand of the six central/south central Iowa counties referenced. We are opening a state-operated driver’s license and identification service center in Waukee in January 2020; however, we did not include CDL skills testing in our initial plan when transitioning driver and identification services from Dallas County to the Iowa DOT as it would have limited our ability to lease a suitable service center in Dallas County and because we intended to keep CDL skills testing focused in our Ankeny location (owned by the Iowa DOT) using the existing CDL concrete pad and established course.

After the new service center opens in Waukee, we anticipate a shift of regular driver and identification services customers to begin visiting the Waukee location instead of the Ankeny location. This should provide for more capacity in the Ankeny location, and potentially allow additional CDL skills testing appointment slots to be scheduled. If the prediction about the shift of customers moving from Ankeny to Waukee proves accurate, we anticipate we could add up to eight additional CDL skills test appointment slots to the Ankeny location on a weekly basis, which would equate to approximately 332 more CDL skills test appointment slots annually. However, the data indicates that this increase would still leave the Ankeny location short of meeting the total demand in central/south central Iowa by about 500 skills test appointments annually, or just under 10 appointment slots each week, and would still require one additional full-time equivalent position to be added to the location to fully meet the CDL skills testing demand.

Despite this gap, we are not recommending the addition of any full-time equivalent positions at this time due to the uncertainty about how the future Waukee customer volumes will affect the existing Ankeny location. Additionally, we anticipate that decreasing the number of retests necessary by addressing both failure and no-show issues, as well as stabilizing county treasurer testing with the potential to see more testing options available via other county treasurer locations, will collectively alleviate some of the demand placed on the existing Ankeny CDL testing location.

We recommend reevaluating the need to adjust staffing levels and the potential addition of any full-time equivalent positions to meet the CDL skills testing demand in the Ankeny location when we begin budget preparations for state fiscal year 2022.

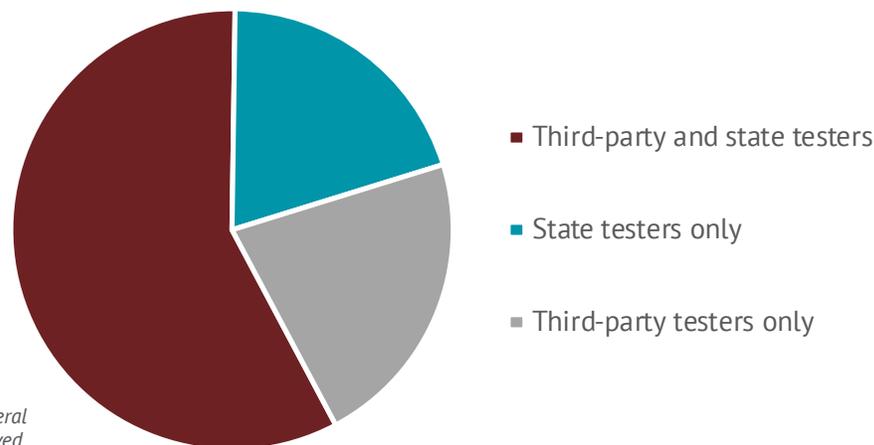
## THIRD-PARTY TESTING

As indicated earlier in this report, there are currently thirteen community colleges and two Iowa-based motor carriers providing third-party CDL skills testing throughout the state. Additionally, the Iowa Motor Truck Association was also recently authorized to provide third-party testing but has not yet begun testing applicants. Iowa Code section 321.187 does not currently authorize entities to provide CDL skills testing outside of community colleges, Iowa-based motor carriers, or their subsidiary, with a principal place of office in this state who operates a permanent commercial driver training facility in this state, or an Iowa nonprofit corporation that serves as a trade association for Iowa-based motor carriers.

As mentioned previously, some states follow a model in which CDL skills testing is provided exclusively by third-party testers, including private corporations and businesses. The U.S. Government Accountability Office, at the request of commercial motor vehicle industry stakeholders that raised concerns about delays prospective drivers face in taking the skills tests needed for a CDL, completed a study regarding commercial driver's licensing programs and oversight. The resulting report<sup>10</sup>, issued in July 2015, detailed information on the manner in which U.S. jurisdictions deliver CDL skills tests. Some key observations from that report are as follows:

- Officials from jurisdictions that relied exclusively or primarily on state testers had longer wait times for testing services. Officials from licensing agencies that relied on state sites had skills test appointments that were typically available within two weeks at those sites, while most officials from states that used third-party testers reported likely availability within one week<sup>11</sup>.
- It was reported that third-party test sites, unlike state sites, can offer more test appointments through the day and expanded hours, including more weekend hours, and are more widely dispersed through the jurisdiction in which they operate. Although not noted in the report, we note that third parties also have the ability to provide a representative vehicle in which to complete the test, which is often a major obstacle for CDL applicants – many do not have access to a representative vehicle and have to find someone to bring the vehicle to the test site to take the test. However, these conveniences typically come with a higher cost (at least \$100 or more) to the individual CDL applicant.

FIGURE 15 | JURISDICTIONS USING THIRD-PARTY TESTERS



Source: *Commercial Driver's Licensing – Federal Oversight of State Programs Could Be Improved*

Iowa has a healthy third-party CDL skills testing program with the existing community college and motor carriers. Although their skills test services are typically only offered to participants in their training programs, they positively impact statewide capacity for and supply of CDL skills test slots by providing CDL skills tests to approximately 6,000 total individuals that would otherwise seek CDL skills tests at state and county locations.

During the 2019 legislative session, the legislature expanded Iowa's third-party testing program by adding as authorized third-party testers Iowa nonprofit corporations that serve as a trade association for Iowa-based motor carriers. Subsequent to that the Iowa Motor Truck Association (IMTA), which is a non-profit corporation acting in that capacity in Iowa, has signaled its intent to develop a third-party CDL skills test program serving drivers and motor carriers across the state. IMTA is in the process of developing their program but has not yet started offering CDL skills testing. As they develop and launch their program, we will work with them to train and certify examiners and to approve test sites and routes for basic control skills tests and road tests offered by them. Based upon the status of this recent expansion of third-party testing in Iowa, we do not recommend additional expansion of third-party testers in Iowa. Instead, we recommend additional time be taken to evaluate the impact of IMTA's emerging program before expanding third-party testing further.

<sup>10</sup> The full report titled *Commercial Driver's Licensing – Federal Oversight of State Programs Could Be Improved* can be found at the following link: <http://www.gao.gov/assets/680/671429.pdf>

<sup>11</sup> As mentioned previously in this report, the average wait time statewide for CDL skills testing in Iowa is typically around 14 days, or two weeks.

Additionally, as mentioned previously, federal regulations require the state driver licensing authority to train, certify, and audit all testing programs, including third-party testers and examiners. Currently, we provide the required Certified Commercial Examiner training and certification program once a quarter by partnering with community colleges for classroom and outdoor range space for instruction as well as use of their commercial trucks. Prior to this training, all prospective examiners are required to complete reading materials and successfully complete online learning modules. Expanding third-party testing would increase the number of examiners that need to be trained and certified and would require additional investment in both training and auditing. We currently conduct auditing by utilizing existing trained Iowa DOT staff who are otherwise devoted to operational driver and identification customer service functions in their driver's license service center locations. Expanding third-party CDL skills testing would require us to augment our auditing program as well as the resources available to perform the necessary audits.

## SUMMARY OF RECOMMENDATIONS

The following summarizes the recommendations based on our study.

### IOWA DOT ACTIONS

- Take administrative action to decrease the CDL skills test failures, particularly in the pre-trip vehicle inspection segment.
- Take administrative action to assess CDL skills test appointment scheduling process and determine if investment in a more robust appointment scheduling system could assist in minimizing this issue.

### ACTIONS TO BE CONSIDERED BY THE LEGISLATURE

- Consider authorizing both Iowa DOT and county treasurer locations to assess an across-the-board, up-front fee to accomplish the following:
  - Support and stabilize CDL skills testing at existing county CDL locations.
  - Expand county CDL skills testing by incentivizing additional counties to offer CDL skills testing.
  - Avoid incentivizing applicants to choose state locations over county locations to avoid the fee.
  - Improve the supply of and access to CDL skills test slots by discouraging applicants from scheduling multiple appointments they do not intend to keep.
  - Improve failure rates by discouraging applicants from appearing for the CDL skills test unprepared.
  - Avoid negative impact to the state's Statutory Allocations Fund (SAF) and Road Use Tax Fund (RUTF)<sup>12</sup>.
- Alternatively, consider authorizing county treasurers to retain an additional \$20 per CDL skills test segment administered in addition to the seven dollars per card the county already retains under the existing fee structure of Iowa Chapter 321M.

### ACTIONS THAT ARE NOT RECOMMENDED

- We do not recommend additional expansion of third-party testers in Iowa. Instead, we recommend additional time be taken to evaluate the impact of IMTA's emerging program before expanding third-party testing further.
- We do not recommend the addition of any full-time equivalent positions for the Ankeny testing location. We recommend reevaluating the need to adjust staffing levels and the potential addition of any full-time equivalent positions to meet the CDL skills testing demand in the Ankeny location until state fiscal year 2022.

<sup>12</sup> Under section 321.145 of the Iowa Code, driver's license and non-operator identification card fees are deposited in the state's SAF. Funds retained in the SAF that exceed allocations from the SAF in the current state fiscal year are deposited in the state's RUTF in the subsequent fiscal year. Accordingly, increases or decreases in revenue directed to the SAF result in dollar-for-dollar increases or decreases to the RUTF in subsequent fiscal years.

## APPENDIX A | OTHER STATES' DATA REGARDING CDL SKILLS TEST ADMINISTRATION FEES

Information obtained via AAMVA Survey conducted 2/20/2018 through 3/21/2018 plus information provided directly from jurisdictions

STATE	COST FOR CDL SKILLS TEST ADMINISTRATION	ADDITIONAL FEE FOR A CDL SKILLS TEST FAILURE (FEE TO RETAKE TEST DUE TO FAILURE)	ADDITIONAL FEE FOR CDL SKILLS TEST NO-SHOW (FEE FOR FAILING TO APPEAR FOR A SCHEDULED CDL SKILLS TEST APPOINTMENT)
Alabama	\$20	\$15 knowledge retest \$20 for skills retest	NO
Alaska	\$25 for CDL skills test with the DMV	\$25 retake fee	No
Arkansas	\$50 includes knowledge test and three attempts	If there are more than three failed attempts, they must purchase another \$50 application.	N/A
California	\$76 (original fee), or an endorsement requiring the skills/drive test	\$76 original fee includes three attempts on each knowledge tests. If applicant fails three times then they have to start all over, and repay \$76 for another three chances.  \$35 retest fee if applicant fails after first time for skills/drive test	N/A
Colorado	Per Colorado state statute, fees are set for CDL skills test at \$225 \$100 for school districts and not-for-profit	To retake the knowledge exam it is \$11.15 each exam \$225 for skills test	Colorado does not have a fee assessed as we are 100 percent third-party testing.
Florida	All CDL skills test are administered by third parties and the state does not set the fee. Average cost statewide is around \$400 for the three-part test.	\$10 retest fee for failed knowledge exams. The third parties will charge a fee for a retest. The fee charged is the same in most cases.	N/A
Georgia	\$50 at a state facility Up to \$150 at a third-party test facility	\$10 for knowledge \$50 at a state facility for skills Up to \$150 at a third-party test facility for skills	\$50 at state sites
Idaho	Skills test are performed by contract skills testers and there is a \$10 fee to the state, and up to \$190 to the tester. There would be no separate costs, unless the driver came back for another test for whatever reason.	Yes, same as the original fees.	No, since these are third-party contracted skills testers. The driver makes appointments directly with them, and not the state.
Illinois	Testing fee is in the CLP/licensing fee. The applicant gets three attempts to pass at each test. Three fails require a new fee, then they will get three more attempts for additional tests.	No	No

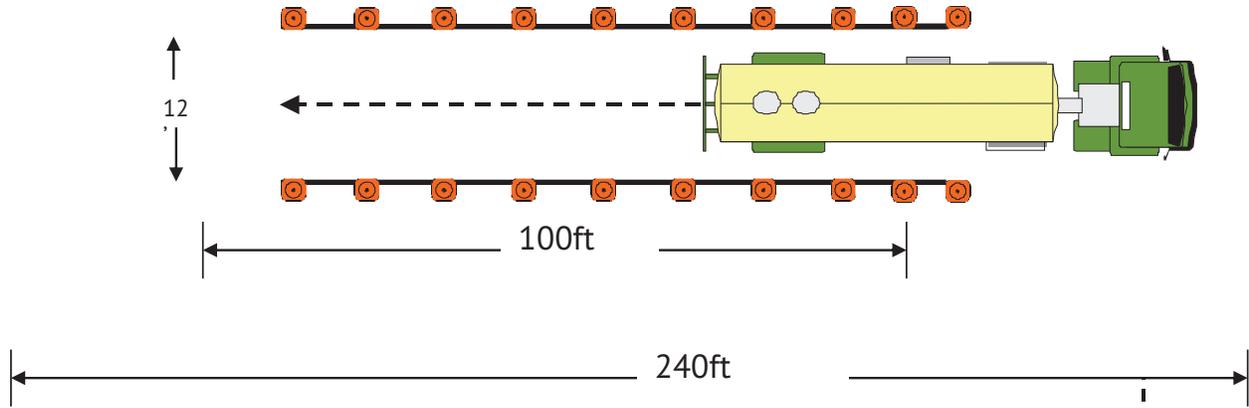
Indiana	Skills test fee - \$100 Current CMV rental fee - \$75 Each skills test administered has the same fee(s).	No fee for the knowledge exams. Each skills test administered has the same fee(s).	Indiana has third-party CDL skills test sites. Each site determines if a fee will be charged and the amount of that fee.
Kansas	\$15	\$1.50 for knowledge test \$10 for skills test	No
Kentucky	No	\$50 retest fee	N/A
Louisiana	\$100 (We are a total third-party testing state)	No	No
Maine	First test at no fee, subsequent retests at \$70 per exam.	\$70 for basic class A/B/C CDL testing \$20 for each endorsement and the same amount for any retest	No show fee is the same as original application fee(s) noted previously.
Maryland	The CLP application includes the skills test fee. There is no fee for each skills test that is required.	\$20 fee for each time they need to reschedule a skills test after they fail.	\$20 retest fee if the applicant schedules an appointment and is a no-show.
Michigan	Michigan CDL skills tests are administered by approved third-party examiners. Fees for road tests vary between testing agencies.	No	N/A
Minnesota	No cost unless test is failed twice. Third or more test has a \$20 retesting fee.	\$20 retest fee after two failures	No
Missouri	\$25 for all skills test results submitted at the time of application. The test results may include one or more skills test components.	No	No
Nebraska	No cost to take CDL skills test with the Nebraska DMV. Nebraska also utilizes third-party examiners who charge a fee. The fee varies from company to company and is set by the individual company.	No	N/A
Nevada	Original, transfer, or renewal that requires knowledge and skills tests \$142.25.	N/A	N/A
New Hampshire	No separate charge for skills testing	Retest fees apply for knowledge and skills retest. \$20 for skills retest \$10 for each knowledge retest with the exception of general knowledge and combination-\$20	\$20 no-show fee and a 30-day wait for another appointment, unless the applicant can show exigent circumstances.

New Mexico	<p>CDL Skills tests are done by third-party testers. Testers charge between \$150-\$200 for each skills test.</p> <p>We do not bank, so a driver is paying for a full skills test.</p>	<p>If a person fails a knowledge test, the retaken test is also free. If the tests are taken at a municipal or private office, there may be a charge of \$10-\$15 for the transaction.</p> <p>If a person fails a skills test they must pay the \$150-\$200 for the test.</p>	<p>The third-party testers do not refund an applicant if they do a no-show or if they cancel within so many hours.</p>
New Jersey	\$125 test receipt fee, non-refundable		
New York	\$40 per skills test	Yes. Fees do not vary.	If the driver is considered a no-show, they forfeit the \$40 skills test fee and must pay again before rescheduling.
North Dakota	\$5 for the CDL road test		
Oklahoma	No cost for the first test	\$4 fail fee for each failure	No
Oregon	<p>\$70 for a CDL skills test, regardless of the number of segments completed</p> <p>Third-party testing organizations establish their own fee schedule</p>	Fees for knowledge and skills testing are assessed on a per-test basis regardless of whether it is the initial or a subsequent attempt.	No
Pennsylvania	<p>All fees are paid when applying for the commercial learner's permit. There is not a specific fee for the CDL skills test, unless you are testing with a third-party tester. Those fees are set by the third-party tester and are market driven. Most third-party testers charge a flat rate for each skills test required regardless of what you are testing for.</p>	No, unless testing with a third-party tester, and then the fees are market driven.	No
Rhode Island	\$100 for entire skills test	<p>\$100 retake skills test</p> <p>Retake knowledge test \$10 per test</p>	\$100 for the skills test. They forfeit the fee if they fail to show.
South Carolina	No charge for a skills test administered by an SCDMV examiner	<p>State law requires the DMV to administer the CDL skills test to individuals free of charge the first time; thereafter, the DMV is authorized to charge a fee of \$25 for each CDL skills test administered by the department. If the customer fails any portion of the skills test (vehicle inspection, basic control, road) on the first attempt, the \$25 fee is required for every subsequent attempt to pass the skills test.</p>	No

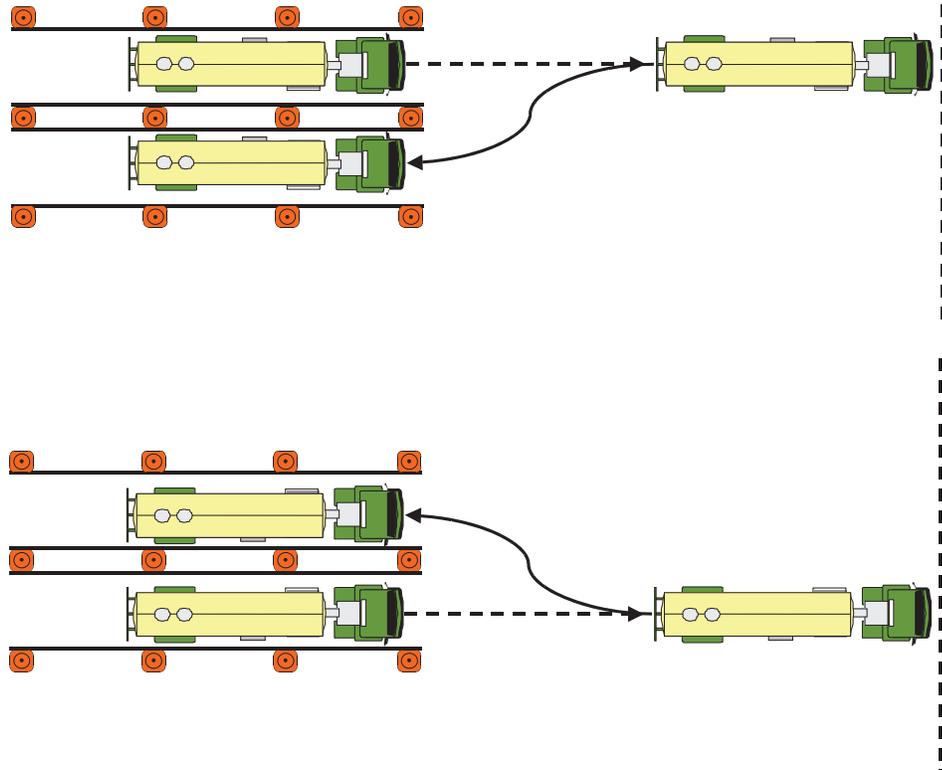
South Dakota	Our third-party testers can charge up to \$90 plus tax. This fee is for each scheduled skills test.	The customer may fail any test up to three times for each fee before having to pay an additional fee.	N/A
Tennessee	\$6	Failed examinations incur the \$6 application fee.	No
Texas	\$61	The application fee covers the ability to test three times before being required to pay a new fee of \$61.	N/A
Utah	\$78 (2 attempts)	\$52	N/A
Vermont	Road test - \$32 Road test scheduling deposit - \$24		
Virginia	No fee for CDL skills tests	No	\$50 no-show fee
Washington	The cost of the skills test can vary depending on the type of vehicle and who you take your test with: A truck or passenger (excluding school bus) skills test taken with an independent third-party examiner (TPE) or DOL examiner: \$250 Any type of vehicle for Head Start employee - \$225 A school bus test taken with Educational School District, DOL examiner, or TPE - \$100 You are allowed 2 skills tests for this fee.		
West Virginia	\$25	N/A	N/A
Wisconsin	CDL Skills Tests in Wisconsin are performed by third-party companies. The fees for the tests are \$50 per segment, with a traditional three segment test. Additional fees may apply if endorsements are added after initial issuance.	No charge for knowledge tests, but the skills test fails would just result in additional test fees of \$50 per segment.	No.
Wyoming	\$80	N/A	N/A

# APPENDIX B | SKILLS EXERCISES, INSTRUCTIONS, AND SCORE SHEETS

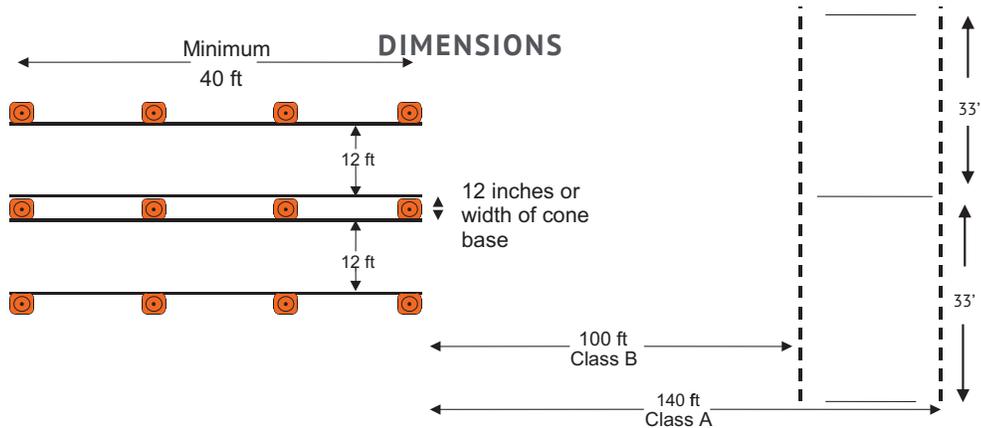
## STRAIGHT LINE BACKING



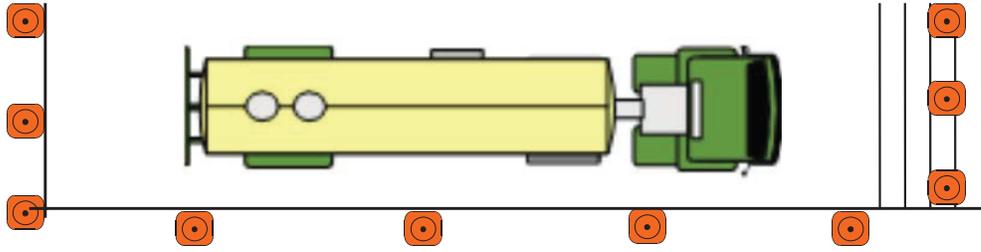
## OFFSET BACKING



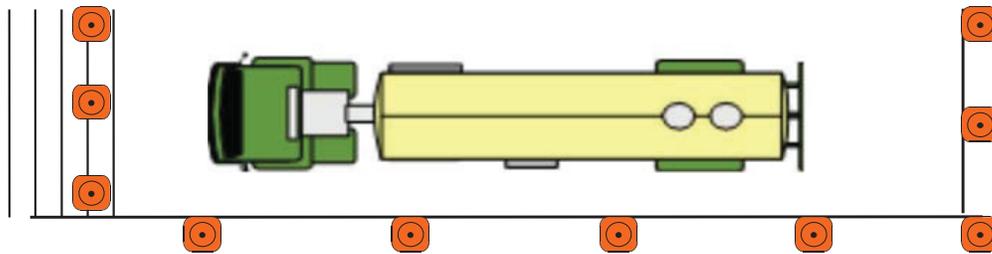
## DIMENSIONS



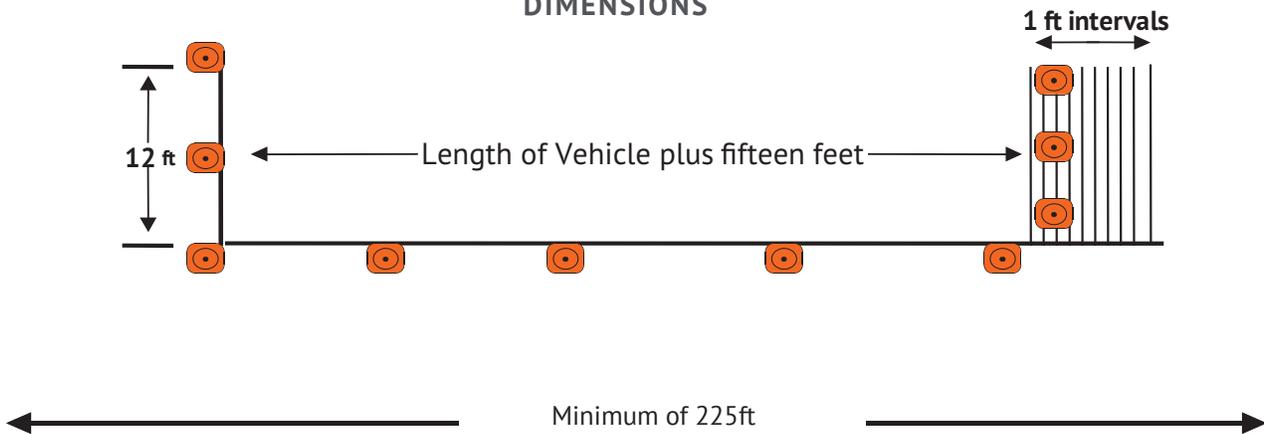
### CONVENTIONAL PARALLEL PARK



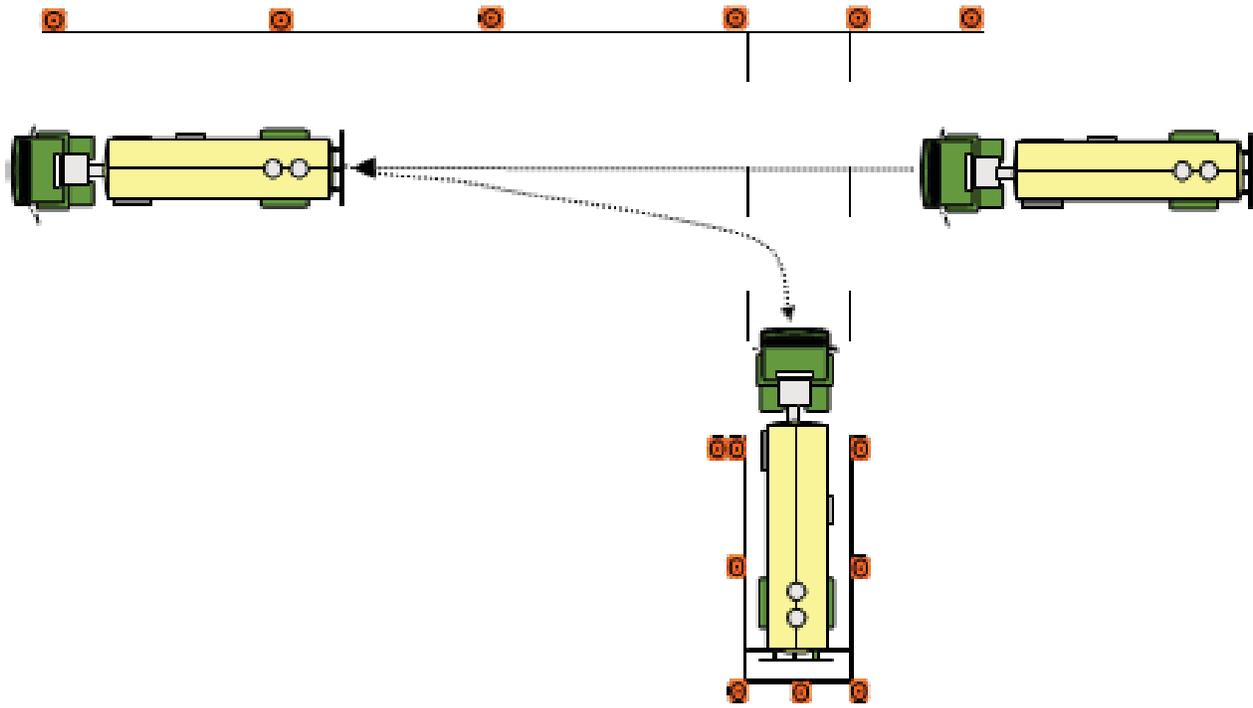
### SIGHT-SIDE PARALLEL PARK



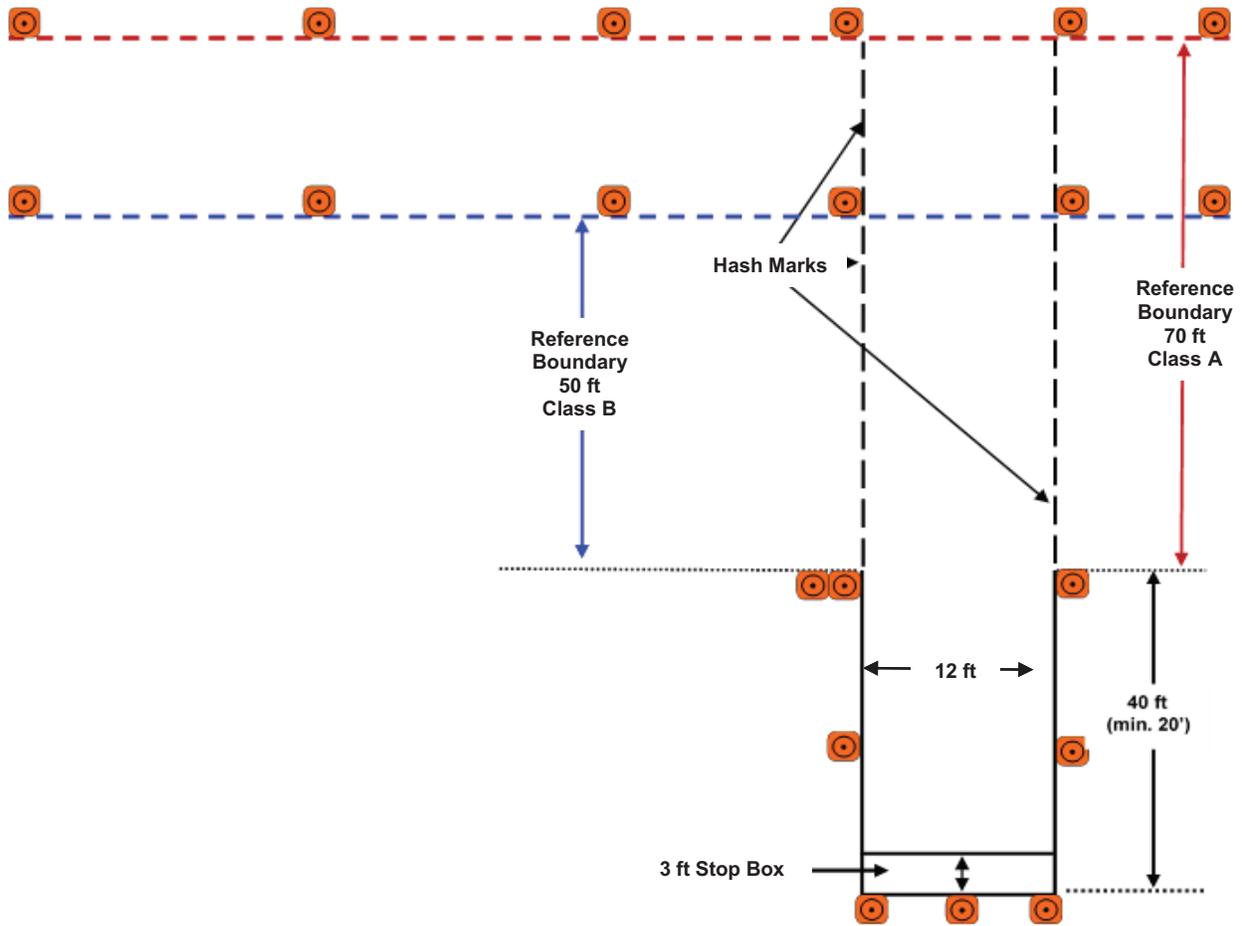
### DIMENSIONS



### 90° ALLEY DOCK

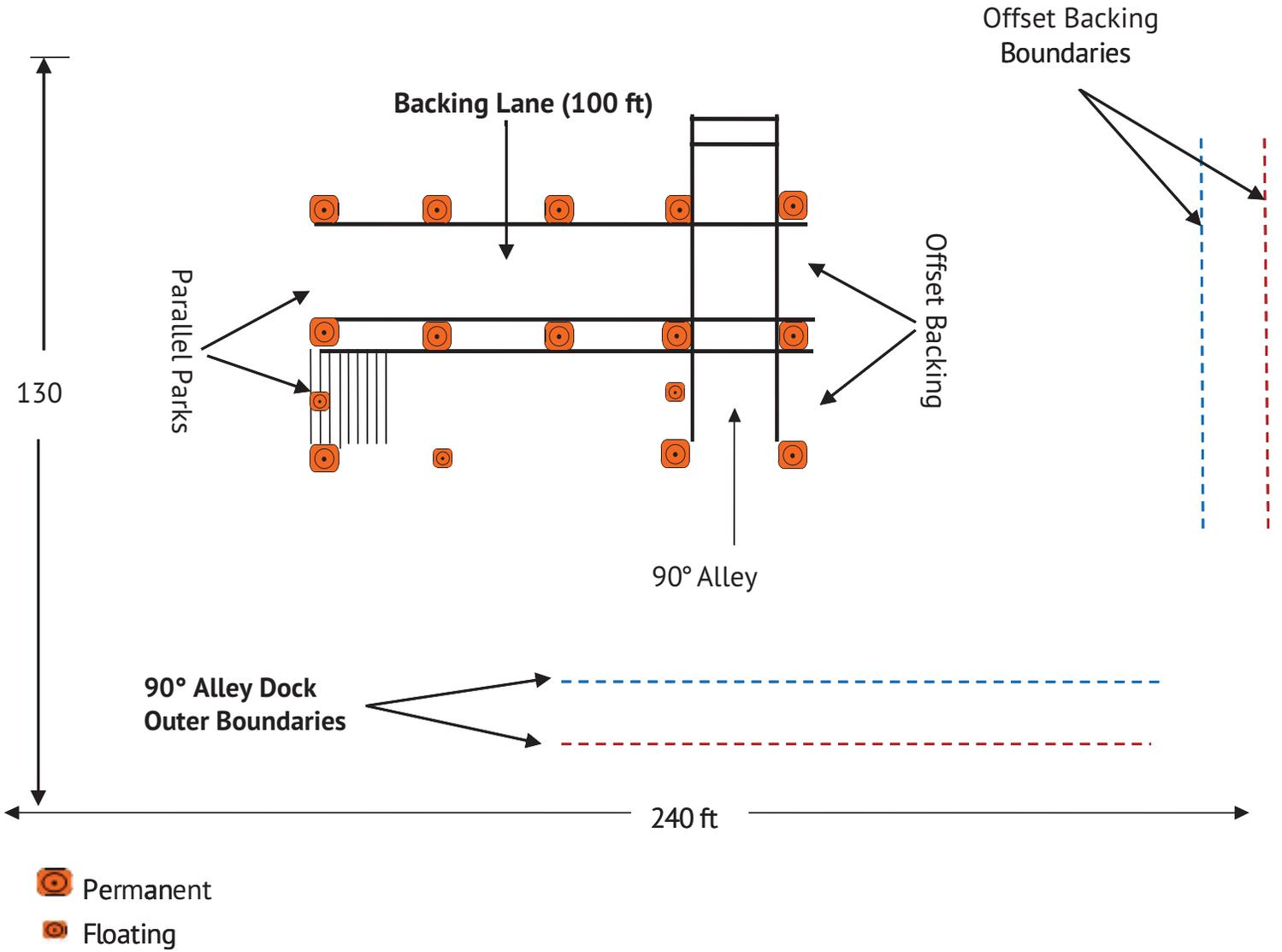


### DIMENSIONS FOR A 90° ALLEY DOCK



\*40' is suggested as ideal. However, if space for a 40' dock is not available, the dock may be adjusted to less than 40' but no less than 20'

# SAMPLE CAROUSEL LAYOUT AND DIMENSIONS



Depending on how familiar you are with the area, it often takes one to two days to set up a good road test route. There is no minimum or maximum length for a route. There is no minimum amount of time that a route has to take. A route is acceptable when it allows the driver to be tested on all the required maneuvers. Since the route will be used for many drivers, it is worth taking the time to make it a good, efficient test route.

You can modify a route any time you find a way to make it more efficient. It is a good idea to design at least two routes. Then, if construction or a traffic jam prevents the use of one route, you can use the other. All maneuvers listed in Subsection 6.2 should be included on all routes.

## **6.2 ROAD TEST REQUIRED MANEUVERS**

### **FOUR LEFT AND FOUR RIGHT TURNS**

Include turns at traffic lights, stop signs, and uncontrolled intersections. The turns should range from easy to somewhat difficult for commercial vehicles. You should try to get a mixture of types of intersections so that they vary in complexity. Try to include turns that have multiple approach lanes and a single approach lane turning onto a street with multiple lanes.

### **TWO LANE CHANGE MANEUVERS**

Include two lane change maneuvers. Each maneuver should include a lane change to the left and to the right. The lane change maneuvers can be conducted during any portion of the road test. The locations should be suitable for conducting lane changes and allow enough time for the driver to complete each lane change. The lane change maneuvers may be conducted during the expressway, highway or urban driving sections provided a sufficient amount of driving distance is available.

### **A STRAIGHT SECTION OF URBAN BUSINESS STREET**

This section should be at least two miles long. It should contain through intersections and intersections with traffic lights. It should have moderate traffic density. The section should be one that lets you see how the driver copes with traffic in a typical business area. One set of lane change maneuvers may be conducted within this section.

### **INTERSECTIONS**

Select two through intersection and two intersections where a stop has to be made (a stop sign is preferred. These intersections should not be included in the urban section. One of the stop intersections should not be controlled by traffic lights (2- or 4-way stop).

### **ONE RAILROAD CROSSING**

Try to have an uncontrolled (no lights or stop arms) railroad crossing. The crossing should have enough sight distance for you to see if the driver checks left and right while approaching the crossing. The driver's looking left and right down the track will often be the only way you can tell if the driver has noticed the crossing.

If there is no railroad crossing in the testing area, do the following. Find a lightly traveled street or road that contains a landmark which you will point out to the driver. Tell the driver to pretend that there is a railroad crossing at that point. The landmark can be an intersection, an entrance to the road, or a road sign or billboard. Read the standardized instructions for the simulated railroad crossing prior to crossing the simulated railroad tracks. Give the driver instructions out of traffic, while the vehicle is stopped.

### **TWO CURVES, ONE CURVE TO THE LEFT AND ONE CURVE TO THE RIGHT**

Try to get curves that are tight enough to produce noticeable off tracking on a truck/tractor trailer. The curves should have clearly marked driving lanes. If a curve is not available, a highway on-ramp or exit ramp may be used as a curve.

### **SECTION OF EXPRESSWAY OR HIGHWAY**

You should use an expressway segment in or close to the testing area. If there is no expressway, freeway, etc., then use a highway with a minimum speed of 45 m.p.h.

The expressway section should be a four-lane controlled access highway such as an interstate highway that is at least 2 miles long. The section should start with a conventional ramp entrance and end with a conventional ramp exit. One set of lane change maneuvers may be conducted within this section.

If using a highway section, it should be a two or four lane highway that is at least two miles long. (In general, look for an area of highway that provides higher speed driving challenges similar to those found on an expressway.) One set of lane change maneuvers may be conducted within this section.

**ROADSIDE STOP/START**

The section of the road selected for this maneuver must allow the driver to pull the vehicle safely over and stop out of the normal flow of traffic. Be sure to select a location where commercial vehicles can safely exit and enter the roadway.

**LOW CLEARANCE, WEIGHT RESTRICTION, OR TRAFFIC SIGN**

This task requires the driver to observe vehicle height and/or weight restrictions. A variety of situations could be used with overpasses and bridges being good candidates. The overpass should have a posted clearance height. The bridge should have a posted weight limit. If you cannot find overpasses or bridges with posted limits, use ones that do not have posted limits. If you cannot find any low clearances or bridges, look for places or situations where there are signs that a heavy vehicle driver should see. Examples would be signing for “No Commercial Vehicles After 11:00 p.m.” or “Bridge with 10 Ton Weight Limit in 5 Miles.”

**STUDENT DISCHARGE**

Used only for school bus drivers, this task is composed of a number of steps. Find a lightly traveled street or road that contains a landmark which you will point out to the driver as the location to discharge school students. Give the driver the instructions for the student discharge. Score the driver as they demonstrate and describe the procedure for discharging students. The examiner may pretend to be a student to ensure the maneuver is completed correctly.



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