**Entry Level Driver Training Advisory Committee**

**Data Needs / Cost Benefit Analysis (CBA) Workgroup Meeting Notes**

**April 3, 2015**

**Meeting Attendees**

Bob Armstrong USDOT, Federal Motor Carrier Safety Administration (FMCSA)

Rob Behnke National Association of Publicly Funded Truck Driving Schools (NAPFTDS)

Brian Dahlin USDOT, Federal Motor Carrier Safety Administration (FMCSA)

Jim Edwards National Association of Small Trucking Companies (NASTC)

Sean Gallagher USDOT, Federal Motor Carrier Safety Administration (FMCSA)

Charlie Hood National Association of State Directors of Pupil Transportation Services (NASDPTS)

Shaun Kildare Advocates for Highway and Auto Safety

Jill Laptosky USDOT, Office of the Secretary of Transportation (OST)

Mike LaRocco National Association of State Directors of Pupil Transportation Services (NASDPTS)

David Money……. Professional Truck Driver Institute (PTDI)

Suzanne O'Malley USDOT, Federal Motor Carrier Safety Administration (FMCSA)

David Parker Great West Casualty Company

Richard Parker ELDTAC Facilitator

Bob Petrancosta FedEx Ground

Boyd Stephenson American Trucking Associations (ATA)

Howard Stone USDOT, Federal Motor Carrier Safety Administration (FMCSA)

Ellen Voie Women in Trucking, Inc.

Tom Weakly Owner-operator Independent Driver Association (OOIDA)

Ronna Weber National School Transportation Association (NSTA)

Andrea Wohleber Transportation Trades Department (TTD), AFL-CIO

**Discussion**

Brian Dahlin (FMCSA) led the discussion. Items discussed included:

* Re-cap of main points from our last conference call on 3/27:
  + Notes from the 3/27 conference call can be found on the ELDTAC website at <https://cms.fmcsa.dot.gov/advisory-committees/eldtac/data-needs-cost-benefit-analysis-cba-working-group-meeting-notes-march-27>).
  + Revised and simplified table of “Categories of Entities Potentially Affected by an ELDT Rule” was presented for review (see the EDLTAC website at <https://cms.fmcsa.dot.gov/advisory-committees/eldtac/categories-number-affected-entities>)
  + Suggestions made by Workgroup to revised the training entity categories.
  + Additional input requested by FMCSA regarding the training entity categories and estimates of the number of entities that currently exist in each category.
  + Recap of the issue of describing the current baseline pre-ELDT rule profile of the affected entities and the industry, followed by then estimating a future post-ELDT rule profile of the same.
  + The FMCSA information collection request (ICR) to State Drivers Licensing Agencies (SDLAs) was discussed. This information collection will be used to refine the estimate of the annual number of new entry-level drivers by class (A or B) and by type of endorsement, as well as the annual number of CDL renewals and CDL transfers.
  + An overview of FMCSA contacts with the insurance industry regarding driver training, safety performance, claim history and insurance premiums was provided.
* Howard Stone (FMCSA) provided an overview of the status of FMCSA’s effort to better define and understand issues and data related to the training entities (categories, number of entities, state requirements, training costs, etc.).
  + Readily available and clear information regarding the various aspects of the training entities is limited as compared to information available for some of the other categories of affected entities such as motor carriers, etc., and therefore the training entities are an area that FMCSA requests additional information on from the Workgroup.
  + John Frey of Werner noted at the 3/20 ELDTAC meeting that Werner recruits drivers in part through approximately 800 driving schools or programs. Bob Armstrong suggested that the workgroup work through ATA, NASTC, and OOIDA to have them ask their members for the name of any CDL schools or programs that they similarly work with or recruit from. This could be compiled and anonymized (carrier names removed) by ATA, NASTC, and OOIDA, and then any duplicate records (e.g., the same driving schools being listed by multiple carriers) could be removed by FMCSA. The final list could provide another data point from which we may be able to better estimate the current number training entities.
* Bob Armstrong (FMCSA) provided an overview of the status of FMCSA’s efforts to collect and analyze other industry data, and safety performance and training data from carriers in particular.
  + FMCSA is currently developing estimates for the number of carrier entities by type of operation (freight, passenger, for-hire, private, etc.) and size category (number of power) units.
  + FMCSA is currently evaluating some preliminary estimates of the number of new entry-level drivers annually, using information from the Commercial Driver’s License Information System (CDLIS) as well as a limited amount of information obtain from a small number of State Drivers Licensing Agencies (SDLAs).
  + A more comprehensive FMCSA information collection request (ICR) to State Drivers Licensing Agencies (SDLAs) is in progress and is to be submitted to OMB in early April. This information collection will be used to refine the estimate of the annual number of new entry-level drivers by class (A or B) and by type of endorsement, as well as the annual number of CDL renewals and CDL transfers. SDLA participation is voluntary; the usefulness of the results of this ICR will be dependent on sufficient SDLA response.
  + Information regarding school bus operators, school bus CDL drivers, and school bus vehicles will be obtained from a variety of sources (industry groups, NHTSA, FHWA, state vehicle registrations data, CDLIS, etc.). Most school bus operators and vehicles are not subject to FMCSA regulatory authority and thus information in the FMCSA Motor Carrier Management Information System (MCMIS) database is limited.
  + Information regarding transit bus operators, transit bus CDL drivers, and transit bus vehicles will be obtained from a variety of sources (Federal Transit Administration National Transit Database, industry groups such as the American Public Transit Association (APTA), etc., CDLIS, etc.). Most transit bus operators and vehicle are not subject to FMCSA regulatory authority and thus information in the FMCSA Motor Carrier Management Information System (MCMIS) database is limited.
  + Bob Armstrong noted that beginning the week of 4/6 he will be able to take more of a lead role in coordinating the safety data collection and analysis efforts, and ask the workgroup to email him directly if they had a particular interest in the safety data and analysis issues and would like to also be more directly involved. Bob provided a brief recap of the some of the main issues regarding the safety data collection and analysis effort:
* Findings from the four research projects underway in the FMCSA Office of Analysis, Research, and Technology (as presented by Dr. Steven K. Smith, Director of the FMCSA Office of Analysis, Research, and Technology, to the ELDTAC on 2/26/2015) will likely not be available in time to inform the Regulatory Evaluation of EDLT during the NPRM phase.
* If possible, we can attempt to obtain driver-level data sets from one or more carriers, containing all of the necessary variables and confounding factors that would need to be analyzed in any reasonable attempt to discern whether there may be a measurable impact upon safety outcomes from driving training (either pre-CDL or post-CDL). If such data exist and can be obtained for one or more carrier, we may then be able to analyze the data to provide at least some initial, albeit limited, empirical basis for trying to present a defensible relationship between driver training and safety outcomes.
* There are many methodological and statistical considerations, many confounding factors (carrier specific, vehicle specific, driver specific, operating environment specific, training type/quality/amount specific, etc.), and previous research attempts throughout industry, government and academia over the past 10 to 20 years appear to have yielded very little in terms of any defensible empirical findings.
* The distinction between pre-CDL and post-CDL training.
* Variability in the type, amount, quality, etc., of both pre-CDL and post-CDL training that is currently received by CDL drivers.
* Transferability of any potential empirical findings is an issue (to what extent are findings from the data of one carrier transferrable to carriers of other size, other types (freight, passenger, hazmat, etc.)).
* Even for a single-carrier data set, which would help to minimize some of the confounding factors that would normally be problematic when attempting to make comparison across multiple carriers, there are still a handful of key variables that are hypothesized as being possible contributing factors to driver safety performance outcomes, in addition to the variable of interest (training), and thus would need to be controlled for. These variables include:
  + **Driver vehicle miles traveled (VMT)**. All else being equal, a driver who drives more miles will have greater exposure and thus would likely experience a greater absolute number of violations or crashes as compared to similar drivers who drive fewer miles and therefore have less exposure.
  + **Driver years of experience**. All else being equal, the hypothesis is that drivers with more years of driver experience exhibit superior safety performance as compared to drivers with few years of experience. This is supported in part by insurance industry experience, whereby drivers with fewer than between 3 to 5 years of commercial vehicle driving experience tend to exhibit a worse claims history than drivers with more experience, all else being equal.
  + **Presence or absence of vehicle safety technology on the CMV** (ABS, stability control, automatic braking systems, etc.). All else being equal, drivers operating vehicles with more onboard safety technologies are hypothesized to be involved in fewer crashes, relative to similar drivers in vehicles without these technologies.
    - For a single carrier, that carrier must have had a portion of its drivers undergo a similar training program (the “experimental” group), and a portion of its drivers having NOT undergone that same training program (the “control” group). Most carriers have a driver population that has entirely undergone the same or similar in-house training. Data from such carriers cannot be used because there is then no “control” group (an untrained population of drivers), or no variation among drivers in the level of training received.
    - To help encourage carrier participation and data submittal, efforts could be made to partly anonymize driver-level driving and safety performance histories in any data to be submitted to FMCSA, by having the data submitted from the carrier to ATA, WIT, etc., and then to the ELDTAC working group in order to also enhance confidential business information (CBI) protections.
  + The workgroup developed the following list of carriers that may potentially have, and potentially be willing to share, driver safety performance and history data of sufficient size, scope and quality that it may be able to serve as the basis for a short-term high-level empirical study of the relationship between driver training and safety outcomes. The carriers and their industry group affiliations that were noted include:

**Freight of Women in Trucking**

**Carrier Name Passenger ATA Member Member**

C.R. England freight yes yes

Maverick freight yes no

Schneider freight no yes

Werner freight yes yes

Con-way freight yes yes

J.B. Hunt freight no yes

U.S. Xpress Enterprises freight yes yes

CRST International freight yes yes

Swift Transportation freight yes no

Greyhound passenger no no

* Richard Parker (ELDTAC Facilitator) requested that FMCSA re-organize its current set of data needs questions and matrix table into a more focused narrative list of prioritized data needs items, presented more explicitly as questions, noting which items in particular FMCSA requires additional industry input on (in contrast to those items that FMCSA is currently developing initial estimates for on its own which will then be presented to and reviewed by the Data Needs CBA Workgroup).