

**RESPONSE TO EXECUTIVE ORDER 11.23.21.01** 



Prepared by the

GEORGIA DEPARTMENT OF DRIVER SERVICES

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## **Acronyms and Definitions**

Acronyms			
AAMVA	American Association of Motor Vehicle Administrators	FARS	Fatality Analysis Reporting System
ATA	American Trucking Association	FMCSA	Federal Motor Carrier Safety Administration
ATRI	American Transportation Research Institute	GAO	U.S. Government Accountability Office
BLS	U.S. Bureau of Labor Statistics	GDA	Georgia Driving Academy
CDL	Commercial Driver's License	GDC	Georgia Department of Corrections
CFR	Code of Federal Regulations	GMTA	Georgia Motor Trucking Association
CLP	Commercial Learner's Permit	HAZMAT	Hazardous Materials
CMV	Commercial Motor Vehicle	IFTA	International Fuel Tax Agreement
CMVTA	Commercial Motor Vehicle Training Association	IRP	International Registration Plan
CSC	Georgia Customer Service Center	NHTSA	National Highway Traffic Safety Administration
DCS	Department of Community Supervision	OCGA	Official Code of Georgia Annotated
DCSS	Georgia Division of Child Support Services	RRP	Risk Reduction Program
DDS	Georgia Department of Driver Services	TAP	Transition Assistance Program
DOC	Department of Commerce	TCSG	Technical College System of Georgia
DOD	Department of Defense	TPT	Third-Party Tester
DOL	Department of Labor	TSA	Transportation Security Administration
DOR	Department of Revenue	UPS	United Parcel Service
ELDT	Entry-Level Driver Training	USG	Board of Regents of the University System of Georgia
Definitions			
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#### D

Class A Class A CDL designation that permits drivers to operate a truck, trailer, or tractor-trailer combination in which the combined weight exceeds 26,001 pounds and the unit being towed exceeds 10,000 pounds

Class B Class B CDL designation that permits drivers to operate single vehicles weighing 26,001 or more pounds and the unit being towed is less than 10,000 pounds

## Acknowledgments

The CDL stakeholder group's work was a collaboration between various state agencies, private entities, membership organizations, and other key groups in response to the State of Georgia Executive Order 11.23.2021. These members shared respective knowledge, resources, and experiences to propose solutions and recommendations for addressing the CDL driver shortages in Georgia. DDS extends its appreciation to the following organizations and individuals for helping to complete this effort and prepare this report.

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Commercial Driver Training and Trade Schools

# ADDRESSING CDL DRIVER SHORTAGES RESPONSE TO EXECUTIVE ORDER 11.23.21.01

## **SUMMARY OF RECOMMENDATIONS**



August 2022

For more than a decade, there has been a growing concern regarding the shortage of commercial truck drivers and the impact on transporting goods and the nation's economy. Commercial truck drivers are essential for transporting necessities and prime commodities; many businesses depend on trucks at some point in the supply chain distribution. With the surge in e-commerce (increased demand for shipped goods) and the growing pressures on and within the trucking industry, the American Trucking Association (ATA) estimated a shortage of 80,000 drivers in 2021—an additional 19,200 drivers are needed compared to the pre-pandemic estimates. Georgia, like other states, is experiencing its share of supply chain crises. The state recently experienced a decrease in the number of registered trucks and heavy truck drivers employed by Georgia-based companies between 2019 and 2020. However, the number of valid Class A CDL holders in Georgia increased slightly by 0.4% (from 303,700 to 304,800).

Only some national-level issues identified by the American Transportation Research Institute (ATRI) were also high-priority issues experienced by members of the Georgia Motor Trucking Association (GMTA)—such as truck parking, tort reform, and detention or delay at customer facilities. According to a CDL Usage Survey administered in March 2022, nearly 24% of survey respondents with an active CDL and a registered user account with DDS <u>do not</u> operate commercial motor vehicles (i.e., 3,688 out of 15,441).

DDS and members of the CDL stakeholder group have already taken proactive and strategic steps to address the challenges current and prospective CDL drivers faced before the release of the State of Georgia Executive Order 11.23.2021. However, members of the CDL stakeholder group acknowledge a need for stronger inter-agency collaboration and cross-sector solutions. The following recommendations, developed by the stakeholder group, reflect a balance of feasibility, cost-effectiveness, and timely solutions that can help address Georgia's commercial truck driver shortages.

## Recommendations Recently Implemented by the Department of Driver Services

- 1. Increase efficiency in administering CDL knowledge and road skills tests by reducing applicant waiting times.
  - A. Increase the number of Customer Service Centers that can administer CDL Road Skills Tests.
  - B. Prevent CDL applicants from creating multiple bookings.
  - C. Reduce the waiting period after failing CDL knowledge and skills tests.
  - D. Research approaches to implement modified CDL Road Skills Tests for applicants seeking to remove the E restrictions on CDLs and school bus drivers waiving portions of the vehicle inspection examination.

<sup>&</sup>lt;sup>1</sup> American Trucking Associations, 2021, "Driver Shortage Update 2021." Available online: https://www.trucking.org/sites/default/files/2021-10/ATA%20Driver%20Shortage%20Report%20201%20Executive%20Summary.FINAL .pdf

- 2. Increase the use of Third-Party Testers for the CDL Road Skills Tests.
  - A. Expand the CDL Third-Party Testing Program to include commercial driver training and trade schools.
  - B. Reduce the commercial truck fleet size requirement needed to be an eligible TPT site.
  - C. Enhance and cross-promote existing TPT Programs at state agencies.
- 3. Improve applicants' access to credible resources to help them prepare for the CDL knowledge and road skills tests.
  - A. Create an online resource page to help applicants prepare for CDL examinations.
  - B. Revamp DDS CDL training videos and resources.
  - C. Provide automated feedback to applicants who fail the CDL knowledge exam.
- 4. Modify the program used to reinstate lifetime CDL disqualifications.
  - A. Allow out-of-state drivers to meet requirements for reinstatement and review reinstatement rules for drivers with K restrictions only.
  - B. Streamline the application process for reinstating lifetime CDL disqualification.

## **Recommended Federal and State Statute Changes**

- 1. Continue supporting federal pilot programs and legislation that allow CDL holders aged 18 to 20 years to operate commercial vehicles in interstate commerce.
- 2. Increase the award amount for the HOPE Career Grant to support high-quality training for new entrants into the trucking industry.
- 3. Review state statutes and DDS internal policies related to disqualifying CDLs due to criminal offenses or traffic violations.

## **Recommendations Involving External Partners**

#### State and Local Agencies

- 1. Cross-promote the Military Skills Test Waiver Program and Even Exchange Military Program with the Department of Defense, Veterans Services, and the Department of Corrections.
- 2. Support cross-agency partnerships and initiatives that address the barriers prospective drivers in the offender population face when entering the commercial trucking industry.
- **3.** Expand the Third-Party Tester Program to selected job training programs within the Department of Community Supervision and Department of Corrections.

#### Other Partners

- **4.** Advocate for a national study that investigates the CDL knowledge test pass/fail rates and the impact of the Entry-Level Driver Training (ELDT) requirements.
- **5.** Request more unified American Association of Motor Vehicle Administrators (AAMVA) resources to support CDL training providers and their student drivers.

## Background

### **Problem Description**

For more than a decade, there has been a growing concern regarding the shortage of commercial truck drivers and the impact on transporting goods and the nation's economy. Commercial truck drivers are essential for transporting necessities and prime commodities; many businesses depend on trucks at some point in the supply chain distribution. Before the COVID-19 pandemic, the ATA estimated the shortage to be 60,800 drivers.<sup>2</sup> With the surge in e-commerce (increased demand for shipped goods) and the growing pressures on and within the trucking industry, the ATA estimated a shortage of 80,000 drivers in 2021—an additional 19,200 drivers are needed compared to the pre-pandemic estimates.<sup>3</sup> While it's clear the COVID-19 pandemic exacerbated the driver shortages and supply chain, some theorized the freight demand would return to pre-COVID levels, and the growth in driver shortages may soon decline or return to the estimated levels in 2018 and 2019.<sup>4,5</sup>

According to the U.S. Bureau of Labor Statistics, about 1.8 million heavy and tractor-trailer truck drivers nationwide in May 2020 (i.e., 62,390 drivers [3.5%]) have employment based in Georgia.<sup>6,7</sup> The ATA estimates the 2020 annualized turnover rate for large, long-haul truckload carriers at 90% and 69% for smaller truckload fleets. There are many reasons for the driver shortage, but the solutions, though not clear, will require a multi-sector and collaborative approach. According to the ATA, the primary contributing factors to the commercial driver shortages are:

- There are many retirements within the industry due to the aging workforce and high median age
  of current drivers—half of the commercial drivers nationwide were over 46 years old in 2017.8
- The current industry infrastructure, especially with the increased demand, produces additional challenges that directly impact and frustrate commercial truck drivers (i.e., limited truck parking and resting spots, supply chain congestion, and inefficiencies at the customer shipper/receiver facilities).
- Employers find it difficult to attract and retain qualified drivers due to the industry's hiring standards (i.e., clean driving records, criminal history, and drug tests).
- Many prospective and current drivers have lifestyle concerns associated with the occupation (i.e., long hours away from home, grueling work schedules, and chronic health conditions related to sedentary work).
- Federal statutes regulating the commercial trucking industry help promote roadway safety.
   However, these statutes also limit the opportunities for facilities to transport goods (i.e., drivers must be 21 years of age or older to operate a CMV in interstate commerce<sup>9</sup>).

<sup>&</sup>lt;sup>2</sup> Costello, Bob, and Alan Karickhoff, American Trucking Associations, 2019, "Truck Driver Shortage Analysis 2019," https://www.trucking.org/sites/default/files/2020-01/ATAs%20Driver%20Shortage%20Report%202019%20with%20cover.pdf

<sup>3</sup> American Trucking Associations, 2021, "Driver Shortage Update 2021," https://www.trucking.org/sites/default/files/2021-10/ATA%20Driver%20Shortage%20Report%202021%20Executive%20Summary.FINAL\_pdf

<sup>&</sup>lt;sup>4</sup> Huff, Aaron, "Fleets Preparing to Face a Driver Shortage Like It's 2018 All Over Again," *Commercial Carrier Journal*, 5 Oct. 2020, https://www.ccjdigital.com/fleets-driver-shortage-preparation/#

<sup>5</sup> Ashe, Ari, "Economy Will Not Return to Pre-COVID Levels until Mid-2021: ATA," The Journal of Commerce Online, 8 June 2020, https://www.joc.com/trucking-logistics/truckload-freight/economy-will-not-return-pre-covid-levels-until-mid-2021-ata\_20200608.html

<sup>&</sup>lt;sup>6</sup> The estimated number of Heavy and Tractor-Trailer Truck Drivers (major occupational group 53-3032) reported by U.S. Bureau of Labor Statistics does not include self-employed workers.

<sup>7</sup> United States Bureau of Labor Statistics. (2020), Occupational Employment and Wage Statistics May 2020. [Data file]. Available from https://www.bls.gov/oes/tables.htm

<sup>8</sup> American Trucking Associations, 2017, "ATA Driver Compensation Study 2017," https://www.atabusinesssolutions.com/ 9 49 CFR. 391.11(b)(1)

ATRI identified the top critical issues in the trucking industry (i.e., commercial drivers and motor carriers) through their annual national survey. The top three issues highlighted in 2020 were driver shortages, driver compensation, and truck parking. GMTA also prioritized key issues faced by Georgia commercial drivers in an internal memorandum shared with selected state agencies and partners (see Appendix A). Only some national-level issues identified by ATRI were also high-priority issues experienced by GMTA members. These critical issues identified by ATRI and GMTA are summarized in the table below.

## Summaries and Comparison of the Top Critical Issues Identified by ATRI and GMTA American Transportation Research Institute (ATRI) **GMTA ATRI** Georgia Motor Trucking Association (GMTA) Truck Parking – There is limited truck parking available for drivers transporting goods during long-hauls. Tort Reform - There is a growing concern over litigation regarding trucks involved in trafficand non-traffic-related crashes. These lawsuits increase the number of trucking companies filing bankruptcy and higher insurance costs. Detention/Delay at Customer Facilities - Supply chain congestion and inefficiencies at the customer shipper/receiver facilities cause delays and impact how drivers operate within the "hours-of-service" rules. Title and Registration for Commercial Vehicle - Registering new commercial vehicles or updating the fleet (i.e., replacement tags) is inefficient and time-consuming. The current process causes new commercial vehicles to remain inoperative for many weeks and, therefore, a loss in companies' potential income. Uniformity in Truck Routes - The truck routes at the local city/county levels often change (with little notice) and result in inconsistencies across jurisdictions. These changes impact the freight flow and the supply chain, especially when longstanding truck routes to businesses are closed. More efforts similar to the truck-only lanes between Macon and Atlanta should continue and be encouraged. Funding to Support Training for New Entrants – Currently, the Georgia HOPE Career Grant covers CDL knowledge and skills training within the TCSG. However, the funding amounts are insufficient to upgrade or expand the program. TCSG operates at a loss to provide the high-quality, hands-on training required to yield safe and skillful commercial drivers. Compliance, Safety, Accountability - Some requirements and standards established by federal and state legislations create industry challenges with hiring and operations. Hours of Service - Federal regulations determine the amount of time commercial truck drivers can be on duty (including driving time and the frequency of rest periods) to help ensure drivers are alert. Driver Shortages - The aging workforce, high retirement rates, and hiring standards create challenges for the growing freight demand. Driver Compensation - Despite the increase in driver pay and benefits over recent years, the industry may recruit and retain drivers if pay and benefits increase. Insurance Cost/Availability - The rising cost of insurance increases the operational cost of trucking, particularly for smaller fleets. Driver Retention - The industry's high demands, especially during the COVID-19 pandemic,

Note: The list summarizes the critical issues identified in the ATRI report and GMTA memorandum. Only selected issues discussed in the roundtables are presented. See the reports referenced in the footnotes for a full list of the top critical issues.

make it challenging to retain qualified drivers.

<sup>&</sup>lt;sup>10</sup> American Transportation Research Institute, October 2020, "Critical Issues in the Trucking Industry – 2020," https://truckingresearch.org/wp-content/uploads/2020/10/ATRI-Top-Industry-Issues-2020.pdf

## Georgia Commercial Trucking Industry Snapshot<sup>11</sup>

Before the COVID-19 pandemic, the trucking industry in Georgia experienced an increase in the number of CDL and CLP holders registered trucks (including those approved for interstate travel) and employed commercial drivers. With an increased number of commercial truck drivers on the road, the number of crashes and fatal crashes involving large trucks<sup>12</sup> (including drivers from other states) also increased.

During the pandemic response in 2020, Georgia experienced a decline in nearly all metrics except CDL Class A<sup>13</sup> drivers and employed light truck drivers.

- CDL Class A drivers <u>increased</u> by 0.4% (1,084 more).
- Employed light truck drivers <u>increased</u> by 2.0% (620 more).
- Registered trucks <u>de</u>creased by 3.8% (79,874 fewer).

According to a CDL Usage Survey administered in March 2022, **nearly 24%** of survey respondents with an active CDL and a registered account with DDS **do not operate commercial motor vehicles** (3,688 out of 15,441).

				PERCENT		CHANGE	
	2018	2019	2020		<b>andemic</b> 8–2019)		<b>demic</b> 9–2020)
Commercial Driver's Licenses and Permits	419,992	425,054	423,364	<b>A</b>	1.2%	$\nabla$	-0.4%
Class A	297,976	303,719	304,803		1.9%		0.4%
Class B	122,016	121,335	118,561	$\nabla$	-0.6%	$\nabla$	-2.3%
New CDL issued (driver has never previously held a CDL)	18,509	18,985	14,816	<b>A</b>	2.6%	$\bigvee$	22.0%
Drivers 18 to 20 years of age with CDL or CLP	284	957	1,137		237% 3.36 times		18.8%
Registered Trucks	1,977,924	2,128,194	2,048,320		7.6%	$\nabla$	-3.8%
Georgia-based international registration plan registrations	50,772	50,203	51,082	$\nabla$	-1.1%	<b>A</b>	1.8%
Georgia-Based Employment	90,390	93,530	93,530		3.5%	-	0.0%
Heavy trucks	62,500	63,010	62,390		0.8%	$\nabla$	-1.0%
Light trucks	27,890	30,520	31,140		9.4%		2.0%
Crashes Involving Large Trucks <sup>14</sup>	5,787	4,887	5,096	$\nabla$	-15.6%	<b>A</b>	4.3%
Fatal crashes (at least one fatal injury) involving large trucks	179	180	210		0.6%		17%

Source: Georgia Dept of Driver Services, Georgia Dept of Revenue, Georgia Dept of Labor, BLS, Georgia Dept of Transportation crash data modified by Crash Outcomes Data Evaluation System at Georgia Department of Public Health, NHTSA FARS

<sup>&</sup>lt;sup>11</sup> See Appendix B for a detailed description and explanation of these industry metrics.

<sup>12</sup> Commercial truck drivers' involvement in crashes does not imply that the truck driver caused the crash either by their actions or failure to act.

<sup>13</sup> Class A designations can operate a truck trailer or tractor-semitrailer combination in which the combined weight exceeds 26,001 pounds and the unit being towed exceeds 10,000 pounds. Class B designations can operate single vehicles weighing 26,001 or more pounds and the unit being towed is less than 10,000 pounds.

<sup>14</sup> Georgia Crash Outcomes Data Evaluation System. (2022, August). Large Trucks: 2020 data. (Georgia Traffic Safety Facts). Atlanta, GA: Governor's Office of Highway Safety.

## Moving the Needle

## **Recent Changes at DDS**

Before the State of Georgia Executive Order 11.23.2021, DDS had taken proactive and strategic steps to improve efficiency in the CDL licensing process in Georgia. For more than a decade, DDS has made changes within the agency's discretion to reduce the barriers applicants face to obtain a CDL while adhering to federal and state regulations and not compromising roadway safety. These efforts are summarized below.

- **DDS** implemented the third-party road skills test (2009)
  - Georgia is one of 27 states using state and third-party resources to administer the CDL skills tests. 15 Since 2009, DDS has partnered with private entities, government agencies, and selected technical colleges to establish the CDL TPT Program. As of September 2021, there are 248 DDS-approved third-party examiners in Georgia. Georgia audits state and third-party examiners (covertly and overtly) at least twice a year-more frequently than the minimum federal requirement of at least once every two years.<sup>16</sup>
- DDS reduced the re-test wait time for CDL Road Skills Test (2015, 2017, 2022) State regulations guide the mandatory waiting periods for CDL road skills re-tests (after experiencing one or more failures). 17 In 2015, DDS changed the mandatory waiting period for applicants who failed the first attempt of the CDL skills test from 30 days to seven days and again to two days in 2017. More recently, in 2022, DDS proposed to further reduce the re-test mandatory waiting times to one day. With the state-mandated CDL road skills re-test waiting times reduced, the scheduling days experienced by applicants depend on customer demand and CSC's capacity rather than rules and statutes. Waiting times can vary depending on the service center location—remote and rural areas tend to have shorter waiting periods and smaller customer volumes than metropolitan areas.
- DDS accepts Veteran Form DD-214 (January 28, 2022) Previously, in accordance with state mandate 18, veteran applicants must submit a Certificate of Eligibility (DS-516) from the Veterans Field Service Office to complete their application for a veteran's driver's license. DDS now accepts Form DD-214 (Discharge Papers and Separation Documents verifying former military service) from veterans, omitting the need to obtain a Certificate of Eligibility (DS-516). This form lightens the paperwork and processing burden within Veteran Services and simplifies the licensing process for veteran applicants.
- DDS accepts HAZMAT exam scores for out-of-state transfers (February 3, 2022) DDS is streamlining the experience for applicants seeking to obtain a HAZMAT endorsement on their CDLs. These applicants must pass the HAZMAT knowledge test and TSA background checks to get the endorsement. If the CDL HAZMAT endorsement

<sup>15</sup> Government Accountability Office, "Commercial Driver's Licensing: Federal Oversight of State Programs Could Be Improved," GAO-15-607 (Washington, D.C.: July 2015). Available at: http://www.gao.gov/assets/680/671429.pdf

<sup>16 49</sup> CFR § 383.75(a)(2), 49 CFR § 384.229(c) 17 Rule 375-3-1-.12 Re-Examination Upon Failure

<sup>18</sup> OCGA §40-5-36, §40-5-103

applicant provides documentation and proof of passing the HAZMAT knowledge exam in another state, DDS will waive the HAZMAT knowledge exam and accept the scores from the out-of-state authorized state Department of Motor Vehicle. This implementation reduces the waiting time and further expedites issuing the endorsement so the applicant can use it immediately.

### DDS complies with the Entry-Level Driver Training (ELDT) regulations (February 7, 2022)

The ELDT federal mandate sets the minimum training requirement for entry-level drivers before taking the CDL skills tests. ELDT requires CDL applicants to demonstrate proficiency in knowledge and skills within their formal training before taking the CDL Road Skills Test. To support this new regulation, DDS updated the internal agency rules and state website to inform applicants and DDS CSC representatives of these new mandates. The website also points CDL applicants to the FMCSA Training Provider Registry to access credible resources when preparing for their examinations.

## Recommendations

Below are the recommendations developed by the CDL stakeholder group to address the commercial truck driver shortages across various aspects that impact the trucking industry, such as applicants' interest and preparation for CDL examinations, the CDL licensing process, and industry nuances and challenges. These recommendations were selected based on the feasibility, cost-effectiveness, and timeliness to influence the CDL driver shortages in Georgia. The recommendations are grouped as follows:

- Recommendations recently implemented by DDS
- Recommended federal and state statute changes
- Recommendations involving external partners

## Recommendations Recently Implemented by the Department of Driver Services

- 1. Increase efficiency in administering CDL knowledge and road skills tests by reducing applicant waiting times.
  - A. Increase the number of CSCs that can administer CDL tests.
  - B. Prevent CDL applicants' multiple bookings.
  - C. Reduce the waiting period after failing CDL knowledge tests.
  - D. Research approaches to implement modified CDL Road Skills Tests for applicants seeking to remove the E restrictions on CDLs and school bus drivers waiving portions of the vehicle inspection examination.

As of September 2021, DDS had 82 CDL state examiners and 10 CDL testing sites throughout Georgia. Each testing site has at least two carousels that allow up to four full examinations and one partial examination per day to adhere to federal regulations. <sup>19</sup> Based on internal assessments, one CSC is underutilized, and four CSCs are operating at or near full capacity. These established CDL testing sites collectively administered an annual average of 10,960 road skills tests between 2018 and 2020—approximately 920 tests per month. The impact of the COVID-19 public health emergency response did not demonstrate a change in the number of tests administered in 2020; however, the monthly average of tests administered in 2021 decreased by nearly one-third.

Over the years, the most common complaint among applicants seeking a CDL is the waiting times between the scheduling and the first opportunity available to take a CDL Road Skills Test. DDS maintains the capacity to administer CDL knowledge tests on-demand with no waiting. In other words, customers can walk in without an appointment to take CDL knowledge tests and related endorsement tests. The average waiting time for the CDL Road Skills Tests across all CSCs is 12 days. Georgia adheres to the minimum federally required waiting period between applicants holding

<sup>&</sup>lt;sup>19</sup> The American Association of Motor Vehicle Administrators (AAMVA) Best Practices for the Testing and Licensing of Commercial Drivers is a maximum of six full skills tests per day per examiner.

a CLP before taking the initial CDL skills test (14 days).<sup>20</sup> Therefore, applicants can usually take the initial skills test as soon as the 14-day minimum waiting period has passed and there is no delay. Waiting times, however, can range between one to six weeks depending on the service center location—remote and rural areas tend to have shorter waiting periods and smaller customer volumes than metropolitan areas.

DDS will implement strategies to reduce waiting times in high-demand areas by creating more examination slots. This can be accomplished by increasing the number of CSCs that can administer the CDL Road Skills Tests, preventing CDL applicant double-bookings, and reducing the minimum waiting time to retake the CDL knowledge test. DDS will also consider additional opportunities to streamline applicants' experience by removing the E restrictions on CDLs or waiving the Vehicle Inspection portion of the CDL Road Skills Test.

#### A. Increase the number of CSCs that can administer CDL Road Skills Tests.

In January 2021, DDS started the planning process to establish two additional CDL testing sites in Douglasville and Hazlehurst by 2022. These new locations are in regions with a higher demand for CDL examinations. The new Douglasville and Hazlehurst sites are strategically positioned to alleviate the CDL customer volume at current CSC testing sites operating at or near full capacity. Additionally, DDS is currently relocating the existing Forsyth CSC to be more centralized and easily accessible to potential CDL customers. After these sites are established, DDS will reassess the change in waiting times to determine if additional carousels and/or state examiners are needed at the existing CDL testing locations.

#### B. Prevent CDL applicants from creating multiple bookings.

Many CDL applicants create multiple appointments across the CSC locations to schedule the earliest examination slot available. DDS is working with its information technology vendor (DRIVES, DDS Online Services) to streamline the scheduling process by prompting each applicant to schedule only one appointment at a time across all CSC locations. This change in the scheduling process will result in more open slots available and opportunities to serve more unique customers.

#### C. Reduce the waiting period after failing CDL knowledge and skills tests.

According to DDS internal policies, applicants who fail the CDL knowledge test the first time must wait at least one day to re-test. Failure on the second attempt (or subsequent attempts) requires applicants to wait at least seven days to re-test. Considering the available resources and the ELDT regulations, DDS is confident more applicants will be prepared for the CDL knowledge and skills tests. Therefore, in 2022, DDS proposed to amend its internal policies for CDL knowledge and skills re-tests. If approved, the new policy will require a one-day waiting period after customers' first and subsequent failures at DDS CSCs and DDS-approved TPT sites. This change will also further expedite the issuance of CDLs so applicants can begin to use them immediately.

# D. Research approaches to implement modified CDL Road Skills Tests for applicants seeking to remove the E restrictions on CDLs and school bus drivers waiving portions of the vehicle inspection examination.

FMCSA developed and issued state CDL testing and licensing standards, including issuing restrictions. According to these standards, CDL truck drivers are prohibited from operating a commercial vehicle with a manual transmission if their skills test was performed using a commercial vehicle with automatic transmission—an E restriction will be issued on the CDL. Members of the GMTA (particularly drivers with Class A CDLs) find it inconvenient and redundant to retake the three-part CDL Road Skills Tests in a manual commercial vehicle to remove the E restriction. According to their memo, the waiting time to schedule a CDL road skills re-test can take up to six weeks (depending on CSC location) and impacts potential income as their fleet remains inoperative during the waiting period. This issue mainly affects freight trucking company fleets with both automatic (including automated-manual) and manual transmissions commercial vehicles. By offering modified examinations for E restriction removal, applicants can complete their tests faster, and there will be more examination slots available for other CDL applicants taking partial examinations.

Additionally, FMSCA temporarily waived portions of the pre-trip vehicle inspection skills test requirements for certain school bus drivers in response to the nationwide shortage of school bus drivers. The shortage was exacerbated by the COVID-19 pandemic and public emergency responses. The vehicle inspection component of the test (known as "under-the-hood") can be waived for drivers seeking a Class B CDL with interstate-only restriction (K restriction) and School bus (S) and Passenger (P) endorsements. During the pandemic, the number of Georgia Class B CDL holders dropped by 2.3% (2,770 fewer drivers). DDS sees the value of implementing this temporary waiver to address Georgia's school bus driver and potentially the commercial driver shortages.

DDS will consider implementing modified CDL Road Skills Tests for applicants seeking to remove the E restriction and those school bus drivers opting to waive portions of vehicle inspection examination.

#### 2. Increase the use of Third-Party Testers for the CDL Road Skills Tests.

- A. Expand the CDL TPT Program to include commercial driver training and trade schools.
- B. Reduce the commercial truck fleet size requirement needed to be an eligible TPT site.
- C. Enhance and cross-promote existing TPT Programs at state agencies.

In response to truck driver shortages and supply chain issues related to the COVID-19 public health emergency responses, FMCSA issued a waiver allowing state-authorized TPT examiners to administer the CDL knowledge test. <sup>23</sup> Georgia, however, decided not to accept the waiver because the existing infrastructure and capacity at the local CSC can meet the CDL knowledge test demand. CDL knowledge tests are typically administered immediately with no waiting times

 $<sup>^{21}\</sup> https://www.fmcsa.dot.gov/registration/commercial-drivers-license/drivers$ 

<sup>22</sup> https://www.fmcsa.dot.gov/sites/fmcsa.dot.gov/files/2022-01/FMCSA%20School%20Bus%20Waiver%20-%20COVID%20Response%20-

<sup>%20</sup>FINAL%20-%20Jan%203%2022.pdf

<sup>23</sup> https://www.fmcsa.dot.gov/sites/fmcsa.dot.gov/files/2021-11/Third%20Party%20Skills%20Tester%20Waiver%20-%20FINAL%20Nov%2029%2021.pdf

(walk-ins with no appointments). Federal statutes also allow TPTs to administer the CDL Road Skills Test, <sup>24</sup> which Georgia opted to implement in 2009. DDS partnered with private entities (e.g., Publix Supermarket and UPS), government agencies (e.g., county boards of education), and selected technical colleges to participate in the TPT Program. According to the GAO 2015 CDL survey, <sup>25</sup> Georgia is one of 29 states using *both* state and third-party methods to administer the CDL Road Skills Test.

As of September 2021, DDS certified 167 third-party examiners across 91 TPT sites approved to administer the CDL Road Skills Test to employees or student drivers seeking to obtain a Class A or Class B CDL at their operational site. Of those 91 TPT sites, 11 were commercial driver training schools. Many anecdotal experiences suggest that increasing the use of third-party tests may address the delays applicants experience in scheduling appointments to take their CDL Road Skills Tests. Additionally, the DDS Regulatory Compliance Division CDL Unit conducted an internal evaluation that showed how expanding the TPT Program—to include *commercial driver training and trade schools*—alleviated the customer volume at the local CSCs and increased the region's capacity to administer more CDL Road Skills Tests.

To service more customers in a shorter timeframe, DDS will expand and enhance the CDL TPT Program to include other state agencies, commercial driving schools, and technical colleges willing to collaborate. Additionally, DDS will encourage other establishments to participate in the TPT by reducing the required number of commercial trucks (fleet size) needed to be an eligible testing site.

A. Expand the CDL TPT Program to include commercial driver training and trade schools. In 2020, DDS began exploring the idea of expanding the TPT Program to include commercial driver training and trade schools by initiating a pilot that would carefully weigh, under close observation, the potential benefits and risks of having these entity types in the program. The CDL TPT Pilot Program allowed four commercial driver training and trade schools to administer the CDL Road Skills Test to their student commercial drivers seeking to obtain a Class A or Class B CDL at their operational site. The results from the 2021 pilot study showed that the four pilot sites served 20% of all applicants seeking to complete the CDL Road Skills Tests across all DDS-approved TPT sites. Moreover, these four pilot sites added 75 additional examination slots weekly, increasing the capacity to administer more road skills tests.

GDA, a commercial driver training school, participated in the 2021 DDS TPT pilot study and reported two significant outcomes: 1) a 60% growth in the number of graduates in their program and 2) intentions to expand their campuses to accommodate approximately 250 more students annually by September 2022. This success story further highlights the benefits of the TPT Program for both prospective drivers and participating DDS-approved TPT sites. See Appendix C for more detail on GDA's feedback and perspective on the commercial driver shortages.

Through a systematic review of the information and data collected by the DDS Regulatory Compliance Division CDL Unit, evidence shows the CDL TPT Pilot Program provided substantial benefits to DDS and made the testing administration more efficient. Expanding the TPT Program to other eligible and established commercial driver training and trade schools

<sup>25</sup> GAO-15-607 Commercial Driver's Licensing: Federal Oversight of State Programs Could Be Improved

<sup>24 49</sup> CFR § 383.75

will alleviate the customer volume flowing into the CSCs, especially during semester cycles where cohorts of student drivers complete their training simultaneously.

Considering the key findings in the evaluation, DDS will transition the participating pilot sites into the entire TPT Program. Additionally, DDS will strategically expand the TPT Program to other eligible and credible commercial driver training and trade schools whose geographic locations will support local CSCs and help meet the area's high demand.

#### B. Reduce the commercial truck fleet size requirement needed to be an eligible TPT site.

As of February 2022, the TPT applicants must have a minimum commercial truck fleet size of 25 and a solid organizational infrastructure to participate in the TPT Program. DDS will consider reducing the minimum fleet size requirement to two or more trucks. Reducing the fleet size requirement will encourage more commercial driver training and trade schools and other private organizations to participate in the TPT Program. Additionally, DDS will consider allowing smaller entities to form coalitions and combine resources to become a single DDS-approved TPT site. By growing the TPT Program, local CSCs and certified TPT sites can administer more CDL Road Skills Tests and serve more applicants seeking to obtain CDLs.

The DDS Regulatory Compliance Division CDL Unit will consider amending the process for TPT sites to renew their vehicle cards for on-the-road commercial motor vehicles. This new process will allow TPT sites to complete their vehicle card renewals virtually in lieu of on-site inspections, but only if the initial on-site inspection has been completed. This procedural change will streamline the renewal process and decrease the time to approve commercial motor vehicles.

DDS will closely monitor the expansion of the TPT Program so the capacity to regulate and audit the program is not compromised. See "Considerations" below for more detail.

#### C. Enhance and cross-promote existing TPT Programs at state agencies.

As part of the initiative to expand the TPT Program, DDS is willing to partner with other state agencies with the organizational capacity to provide this service and share the same potential customers. These state agencies include but are not limited to the DOD, Department of Veterans Service, DOC, DCS, TCSG, and the Georgia University System.

#### Considerations:

Expanding the TPT Program presents clear benefits to licensing commercial drivers in Georgia; however, a few considerations exist. Expanding the program will require additional DDS resources to deter and prevent fraudulent or suspicious activities among the approved TPT sites. Increasing the number of certified TPT sites authorized to administer CDL tests will also present greater risks for fraudulent or negligent activities. The DDS Regulatory Compliance Division CDL Unit will have to conduct more overt and covert audits and provide more technical assistance to ensure all TPT sites are compliant with the DDS policies and federal regulations. DDS will meticulously manage the strategies implemented to expand the TPT Program so the capacity to regulate and audit the activities at participating sites is not compromised.

## 3. Improve applicants' access to credible resources to assist with preparing for the CDL knowledge and road skills tests.

- A. Create an online resource page to help applicants prepare for the CDL examinations.
- B. Revamp DDS CDL training videos and resources.
- C. Provide automated feedback to applicants who fail the CDL knowledge exam.

To obtain a CDL in Georgia, applicants (over 18 years of age with a valid license) must pass the knowledge tests (including endorsement exams, if applicable) by correctly answering at least 80% of the questions. To pass the Georgia CDL roads skills test, applicants must successfully perform all the required skills, including Vehicle Inspection, Basic Control Skills, and Road Test listed in 49 CFR 383.113 through 49 CFR 383.123.

TPT sites generally have higher passing rates than the rates experienced at the CSCs. This scenario can be attributed to several fundamental and intrinsic factors of the operations at TPT sites. TPT applicants are more likely to be prepared for the road skills test due to their investment in formal training structured toward passing the Georgia CDL Road Skills Test. Whereas the CSCs are open to the public, some may or may not have received formal training. As a result, the average passing rate in 2021 across all DDS-approved TPT sites was 66%, with 8 out of 10 applicants passing on the first attempt, compared to the DDS CSC's passing rate of approximately 60%.

In 2021, FMCSA established the ELDT<sup>26</sup> mandate that sets forth a new minimum entry-level driving training requirement for applicants seeking a CDL. These new regulations require new drivers to complete specific theory and behind-the-wheel instruction from a school or provider listed on FMCSA's Training Provider Registry before taking the CDL skills test. As of February 2022, DDS has successfully implemented the ELDT mandates, with no administrative and technical errors or complaints from the public. This mandate establishes a national safety standard for new drivers in the industry and will most likely result in a greater proportion of applicants being prepared to pass the CDL examinations. With the number of re-tests reduced, CSCs will have more examination slots available to serve more unique applicants.

To further support this mandate and improve applicants' level of preparation for the CDL examinations, DDS will create an online resource page, revamp DDS's CDL training videos and resources, and provide feedback to applicants who fail the CDL knowledge exam.

#### A. Create an online resource page to help applicants prepare for the CDL examinations.

The webpage will point applicants to credible sources of information, including the *CDL Drivers Manual*, FMCSA's Training Provider Registry, access to practice knowledge exams and refresher courses provided by AAMVA, and information regarding the commercial driving training and trade schools approved to participate in the DDS TPT Program.

#### B. Revamp DDS CDL training videos and resources.

Each year, DDS updates the *Commercial Drivers Manual* to help CDL applicants prepare for the knowledge tests and be informed of the current state and federal statutes that may impact their licensure. In the past, DDS created resources like the "Meet the Truck" video that walks

new commercial driver applicants through the pre-trip Vehicle Inspection portion of the three-part road skills test. DDS will also consider developing new content and resources to help prepare applicants for the Basic Skills and Road Test portions of the test. The aim of producing these resources is to help applicants pass the CDL knowledge and road skills tests on the first attempt. With the number of re-test due to previous failures reduced, CSCs will have more examination slots available to serve more applicants.

#### C. Provide automated feedback to applicants who fail the CDL knowledge exam.

AAMVA and FMCSA determine the CDL knowledge test questions administered by DDS. Applicants must correctly answer at least 40 out of the 50 randomly selected questions from the testing bank to obtain a passing score (80%) and receive a CLP. DDS will discuss the feasibility of providing an automated *feedback sheet* to failing applicants. This feedback sheet will show which attempted questions were answered incorrectly and reference where to find the correct answers in the driver's manual. As every question available in the testing bank is mapped to the CDL driver's manual, the feedback sheet will help failing applicants pinpoint specific areas to focus on to pass the knowledge exam and increase the chances of passing the test during the second attempt. Additionally, this will help passing applicants understand areas they responded to incorrectly and promote safer driving practices.

#### Considerations:

DDS plans to support applicants' preparation for the CDL knowledge and road skills tests by directing them to DDS-approved resources; however, there are a few concerns. While having access to several CDL knowledge practice examinations is beneficial to the applicant, it may deter some from studying the *CDL Drivers Manual*, therefore, relying solely on taking practice tests as their strategy for learning. The differences in driver safety outcomes based on learning and preparation strategy are unknown. Additionally, the increased awareness of the commercial driver shortages will result in many new resources and proposed solutions from private entities evolving. Potentially, this can lead to more scams, fee-based referral systems, and other opportunities that can take advantage of new CDL driver applicants. DDS will encourage applicants to use the approved resources to support their testing preparations.

DDS fully supports the timely implementation of the ELDT regulations requiring formal training before taking the CDL knowledge or road skills tests. However, there are a few concerns if the cost of investing in formal training (although not a new cost as a result of the mandate) may become a barrier for potential drivers seeking to enter the commercial truck driving industry. Based on anecdotal information, a substantial portion of CDL holders who completed their road skills test at the CSC did not enroll in training courses to prepare for their examinations—in other words, they were self-taught or learned through other experiences.

#### 4. Modify the program used to reinstate lifetime CDL disqualifications.

- A. Allow out-of-state drivers to meet requirements for reinstatement and review reinstatement rules for drivers with K restrictions only.
- B. Streamline the application process for reinstating lifetime CDL disqualification.

CDL disqualifications remove driving privileges temporarily or permanently depending on the type of offense or violation. A "lifetime disqualification" means the driver is disqualified for life from operating a commercial motor vehicle; however, it can be reinstated after ten years under certain conditions, as prescribed under 49 CFR 383.51. The reinstatement program supports eligible drivers to regain their license to operate commercial vehicles after successfully completing driving and/or health programs that provide substantial evidence they are safer drivers. This eligibility includes a seven-year history of safe driving on their motor vehicle report (driver record), criminal and clinical evaluations that reflect no substance abuse treatment is necessary, completing the DUI Alcohol or Drug Use Risk Reduction Program (RRP) if applicable, and a certificate of completion from a DDS-certified driver improvement clinic (defensive driving course). To increase the number of eligible CDL drivers in Georgia, DDS will improve the CDL reinstatement program by reviewing the reinstatement rules and streamlining the application process for reinstatement.

## A. Allow out-of-state drivers to meet requirements for reinstatement and review reinstatement rules for drivers with K restrictions only.

All states must adhere to the federal minimum standards and criteria for reinstating CDLs after a disqualification event. However, states may determine the application process, license fee, license renewal cycle, renewal procedures, and other reinstatement requirements. Some states have more rigid criteria and standards incorporated into their CDL reinstatement program. Currently, Georgia's CDL reinstatement program is only available to applicants who have established residency in Georgia. DDS will amend the rules to allow out-of-state drivers with a CDL disqualification originating in Georgia that meet the requirements to regain their CDL. Additionally, Georgia will consider removing K restrictions for drivers who had their CDL reinstated.

#### B. Streamline the application process for reinstating lifetime CDL disqualification.

Application forms are a common source of frustration for applicants seeking to reinstate their CDL licenses after a disqualification event. Along with DDS internal rule changes, DDS will streamline the application forms and processes to request only necessary information to determine if the reinstatement criteria and requirements are met. This includes removing application requirements DDS representatives can access, such as Georgia driving history.

#### **Considerations:**

DDS will strive to modify the program used to reinstate lifetime CDL disqualifications; however, there are a few considerations of how this will address the CDL driver shortage. Due to potential liabilities and insurance considerations, drivers with a history of major traffic/criminal offenses or CDL disqualifications may not meet the employers' hiring criteria. Drivers with previous offenses (i.e., criminal or traffic) that impacted their licensure status may also experience difficulties securing employment with trucking companies. As part of the hiring process, employers may require driving records and ask questions regarding prior CDL disqualifications to pre-screen applicants.

## **Recommended Federal and State Statute Changes**

1. Continue to support federal pilot programs and legislation that allow CDL holders aged 18 to 20 years to operate commercial vehicles in interstate commerce.

On January 14, 2022, FMCSA started a *three-year pilot program*, "Safe Driver Apprenticeship Pilot Program," to determine the benefits and safety impacts of allowing 18-to-20-year-old drivers to operate commercial vehicles in interstate commerce. According to federal regulations, drivers must be 21 years of age or older to operate a commercial motor vehicle in interstate commerce.<sup>27</sup> This nationwide, three-year pilot study will allow approved motor carriers and experienced commercial truck drivers to offer apprenticeship opportunities to at least 350 eligible young drivers and monitor their driving activity until they reach 21 years of age.<sup>28</sup> Allowing young drivers to engage in interstate commerce will begin to address the shortage and hopefully give these drivers fulfilling careers and longevity in the industry. This approach may also lower the median age of CDL holders as the aging workforce retires.

Georgia is one of many states that issues CDLs to drivers 18 to 20 years old. However, these drivers have K restrictions on their licenses that only allow for intrastate commerce (within Georgia borders). In the current economic environment and the federal regulations over the trucking industry, CDL applicants under 21 years of age are not incentivized or motivated to get a CDL. In 2021, there were 957 drivers, aged 18 to 20 years, who held a CDL. Most of these licenses have agricultural restrictions, primarily to operate large farming equipment. There are some issues that opponents raise concerning this regulation change, such as novice young drivers who may lack the experience and maturity to operate large trucks—leading to more roadway crashes, injuries, and fatalities. In 2020, 1% of all traffic-related crashes involving large trucks in Georgia were young truck drivers aged 18 to 20 years old (251 out of 22,536). Additionally, advanced technology deployed within trucks promotes safer driving practices and behaviors (i.e., camera installations to detect drowsy drivers and monitored speeds based on traffic volumes), the number of crashes involving large trucks may decrease, or crashes may be less severe if they occur.

Considering the relatively low number of young (18 to 20 years of age) CDL holders in Georgia, this legislation change may significantly impact or address driver shortages within Georgia and encourage younger drivers into the industry. The CDL stakeholder group recognizes that this legislation change can immediately benefit other individual states and collectively as a national effort.

2. Increase the award amount for the HOPE Career Grant to support high-quality training for new entrants into the trucking industry.

With the new ELDT regulations requiring formal training before taking the CDL knowledge or road skills tests, the enrollment into commercial driving training schools available to the public may increase if the courses are affordable to the potential entrants. The TCSG is listed with FMCSA's

<sup>&</sup>lt;sup>27</sup> 49 CFR 391.11(b)(1) (2019)

<sup>&</sup>lt;sup>28</sup> Federal Motor Carrier Safety Administration, "Participant Informed Consent Form and Authorization to Use and Disclose Personal Information: Safe Driver Apprenticeship Program." https://mdacsurvey4.mdavisco.com/Media/1/SDAP\_Informed\_Consent.pdf

Training Provider Registry and provides driver training for Class A or Class B CDLs. Financial aid solutions help offset the educational investment for eligible prospective drivers who plan to complete their training with TCSG, like the HOPE Career Grant and Zell Miller Grant. The HOPE Career Grant is available to eligible students<sup>29</sup> who enroll in selected majors aligned with industries in high demand, where there are more jobs available than skilled workers to fill these positions. Commercial truck driving is identified as an essential industry to support the State's economic growth. DOL projected the heavy and tractor-trailer truck industry as one of the top occupations with the most job growth through 2028—with an estimated 7,830 new job openings in 2022.<sup>30</sup>

As of July 2021, the one-time awarded amount for eligible **HOPE** Career Grant recipients seeking to enroll in commercial truck driving training was capped at \$1,000 for the 2021–2022 award year. The tuition cost to enroll in a commercial driving training program within the TCSG is \$1,500, typically lower than other private entities. Other Georgia-based, private commercial driving training schools' tuition costs can range from \$2,000 to \$5,000. However, these fees do not include books, materials, drug tests, motor vehicle driver records, CLP after passing the knowledge examination, or road skills tests. These additional items can total between \$270 and \$410.

Estimated Cost to Complete CDL Training in Georgia					
Tuition and Fees*	\$1,500–\$5,000				
Books and Materials	\$90				
Physical Exam	\$45–\$80				
Initial Drug Test	\$30–\$40				
Seven-Year Motor Vehicle Report	\$8				
Commercial Instructional Permit (CLP)**	\$45				
CDL Skill Tests**	\$50–\$150				
Estimated Total	\$1,770–\$5,410				

Source: Adapted and modified from the Central Georgia Technical College Commercial Driving Programs Brochure<sup>32</sup>

With the demands on the commercial trucking industry and the many regulations in place, TCSG's training programs continue to provide intensive instruction through their full-time staff and hands-on training approach. The high cost of procuring and maintaining CDL equipment and facilities results in higher costs to deliver the training curriculum—more than what is covered by student tuition. By increasing the HOPE Career Grant award for truck driving programs to \$2,500, TCSG can improve its equipment and facilities, implement high-quality training without operating at a loss, expand its programs, and increase the number of graduates entering the workforce while fully covering the program cost for students.

<sup>\*</sup> Tuition and fees vary by training site. TCSG tuition is typically lower compared to other private entities.

<sup>\*\*</sup> Does not include cost for re-tests if there is a previous failure. CDL Road Skills Test costs \$50 at the DDS CSC and up to \$150 at authorized Third-Party Testing sites.

<sup>&</sup>lt;sup>29</sup> The eligibility requirements for the HOPE Career Grant includes having Georgia residency, enrollment at a USG or TCSG eligibility postsecondary institution, demonstration of satisfactory academic performance, not defaulted on an educational loan, not convicted of committing certain felonies involving drugs, and must not be incarcerated.

<sup>&</sup>lt;sup>30</sup> Georgia Department of Labor, "2020–2022 Short-Term Employment Projections," Workforce Statistics and Economic Research, https://explorer.gdol.ga.gov/vosnet/mis/current/stepcurrent.pdf

<sup>31</sup> https://gsfc.georgia.gov/document/document/2022-hope-grant-career-grant/download

<sup>32</sup> https://www.centralgatech.edu/wp-content/uploads/pdfs/academics/programs/ctd/CTDBrochure.pdf

### Review state statutes and DDS internal policies related to the disqualification of issuance of CDLs due to criminal offenses or traffic violations.

Improving traffic safety and reducing the number of crashes involving large trucks is a top priority and an effort that requires state and national participation. DDS acknowledges the significant role CDL drivers play in reducing the number of large trucks involved in roadway traffic crashes, and therefore, takes disqualification events very seriously. DDS will revoke CDLs as a result of habitual traffic offenses (i.e., two or more serious traffic violations in three years in commercial or noncommercial vehicles), human/drug trafficking, and holding multiple licenses (except a U.S. Military license). DDS internal policies for CDL disqualifications align with state and federal statutes; however, the Georgia statutes are under review for proposed changes regarding the CDL suspension, revocation, and disqualification criteria that may be more rigid than the federal guidelines, in some instances.33 Federal statutes focus more on traffic-related violations to establish CDL disqualification criteria. Georgia statutes also consider traffic-related violations, in addition to other non-traffic and criminal violations in the state-level CDL disqualification criteria.

#### **Top Reasons for CDL Suspensions and Revocations**

#### Traffic-Related:

- 1. Excessive speeding under Georgia's Super Speeder Law<sup>34</sup>
- 2. Driving under the influence of alcohol and/or drugs
- 3. Accumulated traffic violation points on the driver's driving record

#### Non-Traffic-Related:

- 1. Failure to appear in court or neglect to pay a traffic citation
- 2. Failure to provide valid proof of automobile liability insurance
- 3. Failure to meet child support obligations under the Georgia law

Failure to meet child support obligations does not directly target CDL holders but any delinquent noncustodial with a valid driver's license. DCSS understands the impact license suspension has on employment and has revised its process to reinstate driver's licenses—by providing potential alternatives to driver's license suspension for delinquent noncustodial parents based on State law. 35 Currently, DDS will suspend CDLs after receiving the first "Notice of Intent to Deny or Suspend" from DCSS. DDS will consider waiting until the second notification before suspending CDLs.

DDS will consider ways to modify the criteria for which criminal and traffic offenders may hold their CDLs without compromising the safety of other roadway users. This will require revisiting the state statutes and DDS internal policies to propose amendments aligned with the minimum requirements outlined by federal statutes.

#### Considerations:

DDS will strive to modify the criteria for maintaining a commercial license among those with traffic violations: however, there are a few considerations of how this will address the CDL driver shortage. Drivers with previous criminal or traffic offenses have greatly impacted their employability and may experience difficulties securing employment with trucking companies. Due to habitual traffic violations, these companies may be reluctant to hire drivers with points on their driver records. Companies may request driving records to demonstrate the prospective drivers' ability to operate commercial or personal vehicles safely.

 $<sup>^{33}</sup>$  O.C.G.A.  $\S40\text{-}5\text{-}151$  (f); O.C.G.A.  $\S40\text{-}6\text{-}393$  (d); 49 CFR  $\S$  383.51  $^{34}$  O.C.G.A.  $\S40\text{-}6\text{-}189$   $^{35}$  O.C.G.A.  $\S19\text{-}11.9.3\text{(o)}$ 

## **Recommendations Involving External Partners**

Addressing the shortage of commercial truck drivers and its economic impact will require strong interagency partnerships and cross-sector solutions. These recommended cross-agency strategies align shared goals and leverage resources to streamline and expand services to the shared target populations.

#### State and Local Agencies

1. Cross-promote the *Military Skills Test Waiver Program* and *Even Exchange Military Program* with the Department of Defense, Veterans Services, and the Department of Corrections.

The *Military Skills Test Waiver Program* allows eligible military service members to apply for and obtain a CDL without taking the road skills test. Georgia is one of the few states implementing the *Even Exchange Military Program* that waives the CDL knowledge tests for applicants with formal Military Commercial Motor Vehicle training and experience. Military drivers must demonstrate competence in knowledge and skills in similar vehicles to obtain a CDL. This program is beneficial to military veterans seeking jobs, making them immediately eligible for employment in the trucking industry and increasing the number of qualified job applicants. There are opportunities to promote this program to other military members being served by other state agencies.

TAP, within Veteran Services, provides information and resources to service members transitioning from military to civilian life, including employment options for veterans. Through the many online courses offered by TAP, there are opportunities to promote and share how service members in specific job functions may qualify to be CDL drivers in their civilian life. DOC proposes to advertise the Military Skills Test Waiver Program through their Veterans Reentry Dorm Program, which prepares offenders for reentry as they transition from incarceration into the community. Additionally, some DDS-approved TPT sites that are commercial driver training and trade schools have reportedly promoted the Military Skills Test Waiver Program to prospective students who may be eligible.

To increase the number of military veterans obtaining a CDL, DDS will partner with DOD, Veterans Services, and DOC to promote the Military CDL Skills Test Waiver Program.

2. Support cross-agency partnerships and initiatives that address the barriers prospective drivers in the offender population face when entering the commercial trucking industry.

The Georgia Department of Corrections partners with the Technical College System of Georgia to provide access to CDL training to their Transition Centers resident population—prison inmates who are eligible for transition into the community. Some states have implemented such CDL programs (i.e., CDL grants and benefits for felons and ex-felons); however, this population in Georgia often experiences unique barriers to entering the trucking industry. For example, the restricted schedules of this population prevent their enrollment in training courses. The Transition Centers require its

inmates to complete a full-time work schedule as part of the program policies to prepare inmates for release, making it difficult and sometimes impossible for inmates to attend the CDL training. In attempts to address this barrier, some TCGS campuses have started offering weekend courses, which have reportedly been successful and well-attended among the Atlanta Transition Center residents.

The offender population faces additional barriers related to costs. State-appropriated funds to support DOC and TCGS training programs have significantly decreased. This decrease limits and reduces the availability of driving training courses, making it more difficult for inmate populations or Transition Center residents to access these opportunities. Some prospective drivers in the offender population also consider the \$15 fee for the CLP challenging, as most will pass the CDL knowledge skills tests after the second attempt. DOC will consider approaches to offer CDL knowledge test preparation and perhaps the CDL Road Skills Test to inmates before their release into the Transition Centers.

#### Considerations:

Due to potential liabilities and insurance considerations, drivers with criminal histories may not meet the employers' hiring criteria. Drivers with previous criminal offenses have greatly impacted their employability and may experience difficulties securing employment with trucking companies. Additionally, companies are reluctant to hire drivers who are on parole or probation with traveling restrictions and cannot transport goods across state borders. Companies are more likely to hire drivers who can execute interstate and intrastate assignments for an extended duration. Some companies may have concerns about the drivers' chances of recidivism, which can negatively impact their existing work plans and organizational workflow.

## 3. Expand the Third-Party Tester Program to selected job training programs within the Department of Community Supervision and Department of Corrections.

In efforts to address any barriers or challenges the offender population face, DCS has a variety of programs to help offenders reenter society and secure employment. DCS partners with TCSG to provide vocational training and employment opportunities to the offender population they serve. DCS will continue to promote the CDL training and explore options to expand and support the collaboration with DDS and the CDL stakeholder group members. There is an opportunity to expand this program by building relationships with carriers willing to hire eligible members of the offender population for *intrastate* commerce. This effort to engage private businesses may be beneficial for addressing the in-state supply chain—transporting goods from the Georgia ports to local warehouses and from the local warehouses to retailers.

DDS will consider partnering with other state agencies to provide CDL instruction, training, and testing when feasible. If the program expands and there is a demand, there can be opportunities for selected sites to become DDS-approved TPTs for the CDL Road Skills Test.

#### **Considerations:**

DDS will strive to modify the criteria for maintaining a commercial license among criminal offenders; however, there are a few considerations of how this will address the CDL driver shortage. Drivers

with previous criminal offenses have greatly impacted their employability, and companies may be reluctant to hire drivers with parole/probation traveling restrictions.

### Other Partners

## 4. Advocate for a national study that investigates the CDL knowledge test pass/fail rates and the impact of the ELDT requirements.

FMCSA developed the standards and model for testing and licensing CDL holders. All states must use the same testing materials, procedures, and score sheets when determining whether CDL applicants meet the basic entry-level skill set to operate commercial motor vehicles safely. Applicants must correctly answer at least 40 of the 50 randomly selected questions from the testing bank to obtain a passing score (80% or above) and receive a CLP. While states must adhere to the testing guidelines provided by FMCSA, they may include additional state-specific information regarding the testing and licensing processes in the *CDL Drivers Manual*. Additionally, the recent ELDT federal mandate that requires applicants to complete formal training before taking the road skills test may also indirectly improve the scores on the knowledge tests. DDS continues to share credible resources, information, and updates to federal statutes with prospective CDL applicants.

In 2021, Georgia's passing rate for the CDL knowledge test was 38%, meaning 62% of applicants failed the knowledge test. DDS will consider surveying other jurisdictions to compare pass/fail rates for the CDL knowledge test. It is uncertain whether the amount and quality of resources states provide contribute to the variation in passing rates. DDS and other stakeholder group members recommend a national study on the federal level that will investigate the CDL knowledge test pass/fail rates and the impacts of the ELDT requirements. Greater insight into these variations will be beneficial for individual state licensing agencies to determine if they are within the acceptable or anticipated range for pass/fail rates for knowledge and skills tests.

## **5.** Request more unified AAMVA resources to help training providers prepare their student drivers for the CDL examinations.

DDS is committed to providing applicants with credible sources of information that will help prepare CDL applicants for examinations. These resources include state-specific information (i.e., CDL Drivers Manual, DDS rules, and DDS-approved TPT sites) and federal information (i.e., FMCSA's Training Provider Registry). DDS would also like to direct prospective CDL applicants, third-party testers, and other training providers to a central repository of resources and information provided by AAMVA. A more streamlined and centralized repository of information related to CDL test preparations for all state licensing agencies, training providers, and prospective CDL applicants will reduce the possibility of conflicting information and the number of time entities and individuals must spend to find information. As states are required to use the same testing materials, procedures, and score sheets, states should also have access to the same level and quality of materials to support applicants' preparation for the CDL examinations. With state licensing agencies directing customers to centralized AAMVA resources, state-by-state deviations in pass/fail rates for CDL examinations will reduce.

## **Next Steps**

The twelve recommendations discussed in this report outline the current and next steps that Georgia state agencies and their partners can take to address some contributing factors to the commercial truck driver shortage. These recommendations will require a multi-sector and collaborative approach across federal and state partners, state agencies, and local businesses. Some recommendations can be implemented relatively quickly, like agency internal policy changes. However, other recommendations will take longer to implement and require additional resources like significant funding and legislative action.

The recommendations in this report are primarily focused on the action items within the control and purview of the state agencies and the contributing members of the stakeholder group. However, some unexplored topics and recommendations include approaches to recruiting and retaining drivers within the industry. State and federal officials are encouraged to host a series of focus groups and listening sessions that engage truck driving students enrolled in ELDT programs, current drivers, unions, and privatized motor carriers to gain further insight into the industry.

According to news media outlets, ATA studies, and other social commentaries, the national truck driver shortage may be alleviated if the commercial truck driving industry was more rewarding and favorable to potential and current drivers. Some areas for improvement include, but are not limited to:

- Improving the quality of trucking jobs (i.e., safer driving practices, truck parking, and uniform truck routes)
- Increasing truck driver compensation (pay and unpaid detention time)
- Addressing detention/delay at customer facilities, supply chain congestions, and inefficiencies
- Investigating predatory commercial motor vehicle leasing arrangements

Due to the nature of the supply chain distribution, Georgia cannot tackle this issue alone; it will require collaboration with other states and engagement from businesses in the private sector. DDS and other members of the stakeholder group remain committed to continuing this work in collaboration with national, state, and local partners.

# **Appendices**

- A. Georgia Motor Trucking Association Suggestions for Improvements
- **B.** Georgia Commercial Trucking Industry Narrative
- C. Georgia Traffic Safety Facts: Large Trucks (2020 data)
- D. Feedback from the Georgia Driving Academy
- E. Methodology

## A. Georgia Motor Trucking Association Suggestions for Improvements

## Georgia Motor Trucking Association

Suggestions for Improvements December 10, 2021

The association appreciates the opportunity to submit suggestions for improvements in the way the state interacts with and/or supports the ability of the trucking industry to deliver for the businesses and people of Georgia. The points below are numbered, but not in a particular rank of importance. They cover a wide area. Some issues need a legislative fix where support from the administration would be immensely valuable; some could be changed with Gubernatorial directive alone. They are deliberately concise, but GMTA will be glad to expand and expound on any point as desired.

#### General Operations

- 1) The extended night operation at the Port of Savannah is well needed, but there is a window between the closing of a normal workday and the restart of port operations that diminishes the value of the extended hours. It can sometimes be a three-hour period between the port closing and reopening. This can prevent some drivers from utilizing the availability because they Hours of Service limits are reached.
- 2) Steamship lines continue to put containers on Demurrage Hold before the day is complete, and do not recognize the expanded hours. For example, when the port closes at the end of normal hours, the steamship lines will go in and put the containers on hold before they go home, preventing truckers from picking up on night shift again, limiting the value of the expanded hours.
- 3) Truck parking needs continued attention. GDOT has done good work in trying to create an inventory of what parking exists. More should be done to figure out where there are holes in availability and to better share information with the industry. GDOT should also look for places to build more or partner with private industry to allow expansion of facilities.
- Conduct a full trucker led reassessment of how the state interacts with the industry and how operations can be streamlined.

The state has good people, but poor systems. The title and registration system for commercial trucks is far behind that of other states when it comes to operations. It has restrictions and redundancies that serve no purpose except to increase cost and create confusion. Newly purchased trucks often sit for weeks or even more than a month being unproductive because of slow response times to what could be automated or electronic processes. Changes to fleets (adding or subtracting trucks) are needlessly cumbersome and expensive – as is the process of obtaining replacement tags, and again, these poor processes often cause trucks to sit unusable for days or weeks.

States such as Virginia, Indiana and even Arizona, have much more simplified and modernized systems. Virginia, for example, allows companies to purchase plates in advance and then assign them to truck VINs as vehicles are purchased. (More detailed anecdotal instances are noted at the end of the document).

These matters are particularly frustrating to carriers of all sizes as they are well-equipped to handle almost any transaction electronically as that is normal for their interactions with customers, banks, etc. The state's legacy operations are a real drag on Georgia trucking companies. Upgrades here would be beneficial to both the state and the industry.

- 5) Focus on statewide uniformity in truck routing. Too often cities or counties change long-standing truck routes with little notice and/or for local political reasons with no thought to impact on freight flows (or sometimes the businesses on those routes). In some cases, truck routes don't match when moving from one jurisdiction to another on the same road. Worse, there have been cases where, legally, all truck routes to a given business have been closed. Georgia should have at the least, a set of guidelines counties and municipalities must follow when exploring or changing truck routes.
- 6) Truck parking needs continued attention. GDOT has done good work in trying to create an inventory of what parking exists. More should be done to figure out where there are holes in availability and to better share information with the industry. GDOT should also look for places to build more or partner with private industry to allow expansion of facilities.
- 7) Tort reform. While it may not be immediately apparent, the negative and deteriorating litigation atmosphere in the state pushes business out and increases costs for all. In 2006 Georgia was one of the leaders in balancing the rights of plaintiffs and defendants, over the years it has declined to now being openly listed as the 3<sup>rd</sup> worst state in the nation for business. In fact, the recent "Hatcher" decision takes the "lawsuit lottery" to a new level. Georgia is now rife with frivolous settlement demands and lawyers openly trolling for nuclear verdicts using third-party litigation financing. These hurt trucking and every logistics company that operates in Georgia. It raises costs for all Georgians, and it needs to be addressed.
- 8) Continue to support the truck-only lane between Macon and Atlanta. This is a great example of creativity on the part of GDOT and should be fully funded and encouraged. It has little downside and great potential to benefit the corridor.
- 9) Help the trucking industry develop a simple, effective, equivalent taxation regime for electric vehicle. The total collected should be itemized and the state should investigate further developing a tax system that is more efficient -- perhaps even an energy tax related to EV owners. It is an area that will continue to change and needs continued study.

- 10) Stop speaking poorly about trucks/trucking. Too often comments are made in terms of "getting trucks off the roads." Trucking carriers more than 70% of all freight and every study shows it will continue to do so, if not grown in proportion, over the next 25 years. Trucking, with its flexibility, efficiency and responsiveness to the market is key to Georgia's leadership in logistics. Official statements and policy should never favor one market sector over another (pick winners and losers). Georgia officials should remind the public that trucks are the reason they can live and shop local (or have online products delivered directly to their homes) and should avoid appearing to favor one mode over another.
- 11) Consider allowing the trucking industry to self-tax (like an authority or CID), to raise funds it can spend to promote careers in the industry, compliance, and safety. There are several states which do this in conjunction with state trucking associations (SC, TN, AR for example). There are other examples as well.
- 12) Upgrade the TCSG's ability to serve demand for new CDL drivers. There is a mismatch in funding where each TCSG college loses money on each CDL student because of how funding is calculated. The state needs to change the funding formula, but also update equipment and hire more instructors. As part of this, the state should explore moving the theory part of training online and making it available to all, so that most time in class could be spent on "hands-on" training with vehicles.
- 12) Consider creating an assigned risk pool for trucking companies. This is not a cure for the Tort Reform needs of the state, but it will help. It can also help address the insurance issues around giving younger drivers jobs.

#### Driver and Registration Specific Challenges

- 1) Many drivers coming out of school these days have an Automatic Restriction on their Commercial Driver's License (CDL) which prohibits them from driving a truck with a manual transmission. To get this restriction removed, drivers are required to do a complete retest as if they never had a CDL. It can take 30 to 45 days in many cases to get a retest scheduled. This causes an unnecessary issue for carriers use a combination of primarily automatics and manual transmission. The trucking company can easily train the CDL holder on manual transmissions, but the length of time required to retest makes that person less productive for a long period.
- 2) Since COVID, Titles are done by appointment only for individuals and companies. It often takes 1 to 3 days to get an appointment and individuals who are outside a 15-minute window are (reportedly) refused entrance and must restart the process. This is just another delay in getting equipment on the road so it can be productive.

Worse, dealers are not allowed to make the appointment. They are required to "Drop Off" the Titles and wait 3 to 10 days for the Title(s) to be processed and placed in the Georgia System. Therefore, when selling trucks to customers that plan to lease them to others – a very

common practice – it is an extensive time delay to get the Title processed to register the truck IRP to get the tag.

If if the paperwork is incorrect, there is no real-time opportunity to correct errors. Title applications are returned – sometimes with cryptic notes as to the reason for rejection – and the process must be restarted from scratch. This system should be upgraded to allow more electronic processing and a decision made to either require appointments for all, or move to a "first come, first served" basis for in-person actions. The "drop off" aspect creates inefficiencies for both the state and private sector.

The current system, for example can result in a new truck owner (usually an individual in these circumstances) needing to make one or even two payments on the truck before it ever produces a dime in revenue due to the time delay in getting the title processed and the IRP Tag on it. This should not be the case.

#### Various Anecdotes and Quotes from Truckers:

"A big bottleneck involves securing IRP tags. If you are a new entrant in the marketplace and you need to set up a new IRP Account, it can take 30+ days to get it done. You cannot speak to anyone, and they will not communicate with you. If the file you submit is not exactly to their liking, they will return the entire package and you start all over again. This means that in many cases, once a person buys a truck, it can take up to 60 days before they can put that truck on the road due to the time delay getting the Title processed and getting the IRP Tag. Even for companies with an active IRP Account, it can take 3 to 5 days to get the IRP Tags. Since everything is now being done online, this process could be streamlined to drastically reduce the turnaround time."

"One other huge issue is damaged/mutilated tags. For me to replace an IRP tag, I must file a police report and submit a copy of the report with the tag replacement request. This is ridiculous and a waste of time. I understand if the tag is lost and no longer in my control. If the tag is illegible or damaged...and in my control, I would prefer to sign an affidavit declaring such, and be able to request the replacement right away."

"One thing that would help is allowing the carrier to assist. If I have a copy of our lease agreement copied, the driver copied in the email, it should be apparent that we are doing this together. If I am copied on the email, I get a nasty email back saying I'm not authorized, and the driver will have to resubmit without me copied. Because of this, there are times that a driver gets an email back that it is complete or that he has an issue. Because he doesn't know fully what to look for, there are times they miss the emails and don't realize it."

"We get sometimes a dozen "lawyer letters" a week demanding money for so-called victims. A lot of times we weren't even involved in the accident, someone just saw our truck in the area and figured they'd throw us in hoping we'd pay a settlement. It's getting worse and worse every year."

"I had to settle one claim where the woman was texting and driving with children in the car and ran off the road and into the back of our parked truck. She was cited but then got the citation dismissed by going to a class. As soon as her record was clean, she got one of these biliboard lawyers to sue. Our attorney said we couldn't use her texting and driving as a defense because she got the citation dismissed. He said we'd lose in front of a jury because she was a mother with children in the car. We had to pay a settlement. This is ridiculous!"

## **B.** Georgia Commercial Trucking Industry Narrative

#### Licensure

In 2020, 4.5% of all licensed drivers in Georgia held a CDL or CLP—394,649 valid CDLs and 28,715 valid CLPs. More than 70% of CDLs and CLPs have a Class A designation that allows commercial drivers to operate heavy trucks. The number of valid Class A CDLs and CLPs increased by 1.9% (5,743 additional drivers) between 2018 and 2019 (pre-pandemic) and 0.4% between 2019 and 2020 (1,084 additional drivers). Class B CDL drivers can operate lighter trucks and school buses. The number of valid Class B CDLs and CLPs decreased by 0.6% (681 fewer drivers) between 2018 and 2019 (pre-pandemic) and 2.3% between 2019 and 2020 (2,774 fewer drivers).

According to the ATA, the national median age for commercial truck drivers was 46 years in 2017— half of the commercial drivers nationwide were over 46 years old.<sup>37</sup> The Georgia Department of Driver Services estimates the 2020 median age for valid Class A CDL license holders in Georgia to be 54 years (with an average age of 50). Twenty-two percent of Class A CDL holders in Georgia are at or above the median retirement age (65+ years). Less than 1% of Class A CDL holders (13,800 drivers) are under 21 years of age and therefore permitted to transport goods across state borders.

### Registered Trucks

According to the Georgia Department of Revenue, there were over 2 million registered trucks in 2020, representing nearly 20% of all registered motor vehicles in Georgia. While the number of registered trucks increased by 7.5% during the five-year period (2016–2020) (140,400 additional trucks), the recent comparison shows the number of registered trucks decreased by 3.8% between 2019 and 2020 (79,800 fewer trucks).

With an International Registration Plan (IRP), commercial vehicles can travel to all states in the continental United States, the District of Columbia, and all Canadian provinces. The table below shows the five-year trend (2017–2021) of the International Fuel Tax Agreement (IFTA) and IRP metrics monitored by the DOR.

Calendar Year	Total Fleets	Fleets Renewed	Total Registrants	Power Units	IFTA Accounts
2017	15,893	12,490	14,261	49,227	10,025
2018	15,973	12,804	14,480	50,772	10,441
2019	16,184	13,045	14,737	50,203	10,928
2020	16,570	13,001	15,285	51,082	11,378
2021	20,423	15,142	18,339	57,319	16,516

<sup>&</sup>lt;sup>37</sup> Trucking Associations, 2017, "ATA Driver Compensation Study 2017," https://www.atabusinesssolutions.com/

#### Freight Companies and Employment

The Georgia Secretary of State tracks the number of establishments (companies or independent contractors) registered in the trucking transportation industry. As of February 2022, 1,481 companies registered with Georgia Bids as contractors in the trucking transportation industry—728 were long-distance haulers, and 667 were local haulers.<sup>38</sup>

According to BLS, the number of employed heavy- and tractor-trailer truck drivers in Georgia increased by 30%, from 48,050 drivers in 2011 to 62,390 drivers in 2020 (14,340 additional drivers). The Georgia Department of Labor's short-term employment projections listed heavy and tractor-trailer truck drivers as the most demanded jobs in 2020–2022, with an estimated 7,830 annual openings and 6,820 annual occupational separations (4,050 occupational transfers into another industry and 2,770 labor force exits)<sup>39</sup>. Their long-term projections (2018–2028) anticipate the heavy tractor-trailer truck driver industry will have a growth rate to be 15.5%, with 10,090 new openings from growth over the period.<sup>40</sup>

#### Roadway Safety

According to NHTSA, there were 210 fatal crashes (motor vehicle traffic crashes with at least one fatal injury) involving large trucks that resulted in 234 fatal injuries on Georgia roadways in 2020. The number of fatal crashes involving large trucks increased by 17%, compared to the 180 crashes in 2019. During the same period, motor vehicle traffic crashes involving large trucks decreased by 16%, from 20,672 in 2019 to 17,336 in 2020. The reduction in overall crashes and those involving large trucks may be attributed to the reduction in traffic volume and fewer vehicle miles traveled in 2020 due to the COVID-19 pandemic responses.<sup>41</sup>

<sup>38</sup> Long-distance general freight trucking establishments (NAICS 48412) usually provide trucking between metropolitan areas that may cross North American country borders. Included in this industry are establishments operating as truckload or less than truckload carriers. Local general freight trucking establishments (NAICS 484110) usually provide trucking within a metropolitan area that may cross state lines. Generally, the trips are sameday return.

<sup>&</sup>lt;sup>39</sup> Georgia Department of Labor, "2020–2022 Short-Term Employment Projections," Workforce Statistics and Economic Research, https://explorer.gdol.ga.gov/vosnet/mis/current/stepcurrent.pdf

<sup>&</sup>lt;sup>40</sup> United States Bureau of Labor Statistics (2020), Workforce Statistics and Economic Research, Long-term Projections 2018–2028. [Data file]. Available from https://projectionscentral.org/Projections/rest\_and\_downloads

<sup>&</sup>lt;sup>41</sup> Georgia Crash Outcomes Data Evaluation System (2022, February), Traffic Safety During the COVID-19 Public Health Emergency: 2020 preliminary data (Georgia Traffic Safety Facts), Atlanta, GA: Governor's Office of Highway Safety

## C. Georgia Traffic Safety Facts: Large Trucks (2020 data)

https://www.gahighwaysafety.org/georgia-traffic-safety-facts/

## **Georgia Traffic Safety Facts**

2020 Data

#### August 2022

#### **Key Findings**

- In 2020, 14 percent of all traffic fatalities involved at least one large truck— 234 persons fatality injured.
- Between 2019 and 2020, the number of traffic fatalities involving large trucks increased by 15 percent, and the rate of fatalities involving large trucks per VMT traveled by large trucks increased by 21 percent.
- Eighty-five percent of crashes that involve large truck-related crashes involved other vehicles and 15 percent were single-vehicle large truck crashes.
- Among all the traffic-related fatalities and serious injuries involving large trucks, 77 percent were occupants of other vehicles, 16 percent were the large truck operators, 5 percent were non motorists, and 2 percent were large truck passengers.
- A greater percentage of large trucks crashes occur on interstate systems for both urban and rural roadways segments. Sixty-six percent of all Georgia large truck crashes involved drivers with a Georgia license, and 20 percent were licensed from a bordering
- Large truck operators losing control is the top contributing factor for operators involved in single-vehicle crashes—49 percent of operators lost control of their vehicle moments before colliding with another object that was not another vehicle.
- The average age of the CDL licensed drivers is 52.2 years for both male and female CDL holders



#### GOVERNOR'S OFFICE OF HIGHWAY SAFETY

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## LARGE TRUCKS

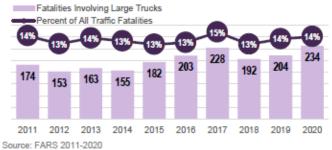
For this fact sheet, a large truck is defined as any commercial or non-commercial, medium or heavy truck with a gross vehicle weight rating greater than 10,000 pounds. Large trucks include tractor trailers, single panel trucks, large pickup trucks, large cargo vans, single-unit trucks, and other combination trucks. Buses and motor homes are not included in the definition of large trucks. See 'Data Considerations' for large truck vehicle classification descriptions. The involvement of large truck operators in traffic crashes does not imply these operators caused the crash either by their actions or failure to act.

This fact sheet contains information from the Fatality Analysis Reporting System (FARS), Motor Carrier Management Information System (MCMIS), Georgia Department of Transportation (GDOT) crash data modified by Crash Outcomes Data Evaluation System (CODES) at the Department of Public Health (DPH), and the Georgia Department of Driver Services (DDS). Refer to the 'Data Considerations' section regarding the data and information presented at the end of this publication.

Motor Vehicle Fatalities and Serious Injuries Involving Large Trucks

In 2020, there were 1,664 fatalities that occurred in motor vehicle traffic crashes on Georgia roadways – the largest number of traffic fatalities since 2006. Fourteen percent of all traffic fatalities (234 persons fatality injured) involved at least one large truck (Figure 1). Traffic fatalities involving large trucks increased by 15 percent in the previous year (from 204 in 2019 to 234 in 2020), and by 34 percent within the past decade (from 174 in 2011 to 234 in 2020).

Figure 1. Number and Percent of Traffic Fatalities that Involved Large Trucks, 2011-2020



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Table 1 presents the number of total traffic fatalities, estimated vehicle miles traveled by large trucks (single unit and combination), and fatalities that involve large trucks. Between 2019 and 2020:

- The estimated VMT by large trucks decreased by 5 percent; however, the proportion of all VMT by trucks increased by a net 3.8 percent point change (from 8.6 to 12.4).
- The proportion of all traffic fatalities that involve large trucks increased by less than a one percent point change (from 13.7 to 14.1).
- The rate of fatalities involving large trucks per VMT traveled by large trucks increased by 21 percent (from 1.35 to 1.63).

Table 1. Rate and Percent of Traffic Fatalities that Involve Large Trucks, 2016-2020

Voor	Total Traffic	VMT by Large Trucks		<u>Fatalities</u> Involving Large Trucks			
Year	Fatalities	Estimated VMT by Large Trucks (millions)*	Percent all VMT	Number		Rate (Fatalities per 100M VMT by Large Trucks)	
2016	1,556	**	**	203	13.0%	**	
2017	1,540	12,070	7.4%	228	14.8%	1.89	
2018	1,504	16,330	9.4%	192	12.8%	1.18	
2019	1,491	15,090	8.6%	204	13.7%	1.35	
2020	1,664	14,349	12.4%	234	14.1%	1.63	

Note: Rates are calculated using VMT estimates, and percent of distribution used by large trucks obtained from FHWA Office of Highway Policy Information Highway Statistics. See data considerations for more information.

Source: MCMIS 2016-2020, FHWA 2017-2020, FARS 2016-2020

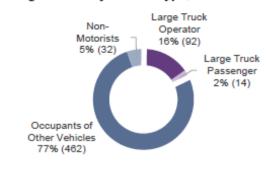
In 2020, there were 5,621 large trucks<sup>1</sup> involved in motor vehicle traffic crashes that resulted in 366 serious injuries<sup>2</sup>, and 234 fatalities<sup>3</sup>. Most large truck-related crashes involved other vehicles — 85 percent involved at least one other vehicle besides the large truck (4,326 out of 5,096 motor vehicle traffic crashes). Eighty-nine percent of serious injuries and 82 percent of all fatalities that involved large trucks occurred in multi-vehicle crashes.

Figure 2 shows the percent of fatalities or serious injuries among all persons involved in crashes with at least one large truck in 2020. Among all the fatal and serious injuries involving large trucks:

- 18 percent were occupants in the large truck (represented by purple in Figure 4).
  - 16 percent were the large truck operator
  - 2 percent were large truck passengers
- 82 percent were occupants of other vehicles or non-motorists (represented by blue in Figure 4).
  - 77 percent were occupants of vehicles that were not a large truck vehicle body type.
  - 5 percent were non-motorists (i.e., pedestrians or bicyclists).

Based on known restraint use, 22 percent of all seriously and fatally injured truck operators were unrestrained, and 78 percent were restrained.

Figure 2. Percent of Persons Fatally or Seriously Injured in Crashes involving Large Trucks by Person Type, 2020



366 Serious Injuries 234 Fatal Injuries

Source: CODES 2020, FARS 2020

3 2020 FAR5

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<sup>1 2020</sup> MCMI5

<sup>2 2020</sup> CODE5 defines suspected serious injuries as injuries are reported by law enforcement and used when any injury, other than fatal injury, prevents the injured person from walking, driving, or normally continuing the activities the person was capable of before the injury occurred.

#### Crash Characteristics

According to MCMIS, there were 5,096 motor vehicle traffic crashes that involved at least one large truck in 2020—a 17 percent increase compared to 4,887 large truck crashes that occurred in 2019. The number of crashes where persons involved were fatally injured increased by 4 percent. Table 2 shows the number of traffic crashes that involved large trucks between 2016 and 2020 by injury severity.

Urban vs. Rural Roadway Classifications⁴

In 2020, 1.5 percent of all motor vehicle traffic crashes involved at least one large truck, and there were 1.46 fatal crashes that involved large trucks for every 100M miles traveled by large trucks statewide in Georgia. (Table 3). Traffic crashes involving large trucks are more frequent on urban roadway segments than rural roadway segments. A greater percentage of motor vehicle crashes that involve large trucks occur on interstate systems for both urban and rural roadways segments.

- The urban roadways accounted for 52 percent of fatal crashes (110 out of 210) and 75 percent of traffic crashes involving large trucks (3,820 out of 5,096). The rate of urban fatal crashes was highest on <u>other urban arterials</u>.
- The rural roadways accounted for 48 percent of fatal crashes and 25 percent of traffic crashes involving large trucks.
   The rate of rural fatal crashes was highest on other <u>rural arterials</u>.

Table 2. Traffic Crashes, Serious Injury Crashes, and Fatal Crashes that Involved Large Trucks, 2016-2020

Year	Fatal Crashes Involving Large Trucks	Suspected Serious Injury Crashes Involving Large Trucks	Traffic Crashes Involving Large Trucks
2016	192	1,027*	5,418
2017	207	927*	5,874
2018	179	446	5,787
2019	180	320	4,887
2020	210	320	5,096

<sup>\*</sup> DOT-523 Crash Report Manual Version 3.0 was revised in January 2018 with a more detailed definition for serious injury. Source: MCMIS 2016-2020, FARS 2016-2020, CODES 2016-2020

Table 3. Number and Rate (per 100M VMT by Large Trucks) of Fatal Crashes and Traffic Crashes Involving Large Trucks by Roadway Classification, 2020

	Fatal	Crashes	Traffic Crashes		
Roadway Classification <sup>4</sup>	Number	Rate per 100M VMT by Large Trucks	Number	Percent of all Motor Vehicle Traffic Crashes	
Urban Roadways	110	1.42	3,820	1.4%	
Interstate Systems	37	1.38	1,618	4.3%	
Other Arterials*	64	3.10	1,479	1.0%	
Other**	9	0.30	723	< 1%	
Rural Roadways	99	2.29	1,238	2.9%	
Interstate Systems	21	1.19	403	9.0%	
Other Arterials	51	3.61	507	3.2%	
Other	27	2.37	328	1.5%	
Statewide***	210	1.46	5,096	1.5%	

<sup>\*</sup> Other arterials include freeways, expressways, principal arterials, and minor arterials. \*\* Other roads include collectors and local roads.

Table 4 shows the percent of crashes involving large trucks by geographical region (i.e., county groupings) and roadway classification in 2020. Most crashes involving large trucks statewide and across all regions occurred on the interstate system and principal arterial roadways. Additionally, 45 percent of all traffic crashes involving large trucks occurred in the ten counties of the Atlanta region.

<sup>\*\*\*</sup> Statewide total includes crashes with unknown roadway classification Source: MCMIS 2020, Numetric 2020, FARS 2020, FHWA 2020

<sup>&</sup>lt;u>Urban roadway classifications</u> are urban road systems located in urban clusters (or metropolitan areas) of at least 2,500 persons and may occur within the rural counties. This is different than urban counties that have a residential population more than 50,000 persons.

Table 4. Motor Vehicle Traffic Crashes Involving Large Trucks by Georgia Region and Roadway Classification, 2020

Roadway Classification	Atlanta Region Counties	Other Urban Counties	Rural Counties	Statewide
Interstate	24%	9%	7%	40%
Principal Arterial	6%	8%	6%	21%
Minor Arterial	6%	7%	5%	18%
Collectors	2%	3%	4%	9%
Local	3%	3%	2%	8%
Other	1%	< 1%	< 1%	2%
Unknown	< 1%	< 1%	< 1%	2%
All Roadways	45%	32%	24%	100%

Note: The sum of the individual cells may not equal row or column totals due to rounding error. Crashes involving large trucks with unknown roadway classification are included in all roadways. Source: Numetric 2020

#### Environmental Characteristics

Table 5 summarizes the environmental characteristics of where and when fatal crashes and traffic crashes involving large trucks occurred in 2020. Fatal crashes and all traffic crashes have similar environmental characteristics in terms of location of the crash, lighting and weather conditions, seasonality, and time of day. Among the fatal crashes that involve large trucks in 2020,

- 72 percent occurred at nonintersection locations;
- 60 percent occurred in daylight conditions;
- 80 percent occurred during the weekday, while 57 percent occurred during the daytime hours (6:00 a.m. to 5:59 p.m.) during the weekday;
- 70 percent occurred in clear weather conditions; and
- 35 percent occurred in the fall season.

Table 5. Motor Vehicle Crashes Involving Large Trucks by Environmental Characteristics, 2020

Environmental Characteristics	Fatal C Involvin Truc	g Large cks	Traffic Crashes Involving Large Trucks		
	Number	Percent	Number	Percent	
Location *					
Intersection (or related)	58	28%	1,507	30%	
Non-Intersection	151	72%	2,931	58%	
Other	1	0%	652	13%	
Light Conditions					
Dark	75	36%	1,319	26%	
Daylight	126	60%	3,624	71%	
Dawn	6	3%	69	1%	
Dusk	3	1%	59	1%	
Day of Week / Time	of Day *				
Weekday	168	80%	4,248	83%	
Nighttime	48	23%	907	18%	
Daytime	120	57%	3,341	66%	
Weekend	41	20%	842	17%	
Nighttime	24	11%	497	10%	
Daytime	17	8%	345	7%	
<b>Weather Conditions</b>					
Clear	147	70%	3,406	63%	
Cloudy	31	15%	1,088	20%	
Rain	24	11%	827	15%	
Other	8	4%	82	2%	
Season					
Winter	41	20%	1,285	25%	
Spring	49	23%	1,077	21%	
Summer	47	22%	1,263	25%	
Fall	73	35%	1,465	29%	

Weekday - 6:00 a.m. Monday to 5:59 p.m. Friday Weekend - 6:00 p.m. Friday to 5:59 a.m. Monday

Daytime - 6:00 a.m. to 5:59 p.m.

Nighttime – 6:00 p.m. to 5:59 a.m.

Source: MCMIS 2020, CODES 2020, FARS 2020

<sup>&</sup>quot;See data considerations for definitions of intersection and non-intersection locations

#### Contributing Circumstances

In 2020, 85 percent of all crashes involving large trucks also involved other vehicles (multi-vehicle crashes), and 15 percent were single-vehicle large truck crashes. The most harmful event in large truck crashes was collisions with other motor vehicles in transport for multi-vehicle crashes, and the overturn of the large truck (non-collision related) for single-vehicle crashes.

Passenger vehicles<sup>5</sup> were more frequently involved in crashes with large trucks than other vehicle types. The most common manner of collision in multi-vehicle crashes involving large trucks was angle, and rear-end crashes for serious injury and other non-fatal crashes. For fatal crashes involving large trucks, angle collisions and collisions with other objects that are not motor vehicles were the highest rank manner of collisions. The manner of collision is not vehicle specific and does not identify which vehicle or driver was at fault. Table 5 below shows the highest-rank manner of collision for multi-vehicle traffic, injury, and fatal crashes that involve large trucks.

Table 6. Highest Rank Manner of Collision for <u>Multi-Vehicle</u> Crashes Involving Large Trucks by Crash Type, 2020

ordon Type, 2020								
Rank	Fatal Crashes		Serious Injury Crashes		Traffic Crashes			
INdilik	Manner of Collision	% of crashes	Manner of Collision	% of crashes	Manner of Collision	% of crashes		
1	Angle	40%	Angle	41%	Angle	31%		
2	Rear end (Front-to-rear)	31%	Rear end (Front-to-rear)	28%	Rear end (Front-to-rear)	28%		
3	Head on (Front-to-front)	13%	*Not a collision with a motor vehicle	15%	Sideswipe same direction	18%		
4	*Not a collision with a motor vehicle	10%	Head on (Front-to-front)	7%	*Not a collision with a motor vehicle	17%		

The first harmful event was not a collision with a motor vehicle in transport Source: MCMIS 2020, Numetric 2020; FARS 2020, CODES 2020

Large truck operators losing control is the top contributing factor among operators involved in single-vehicle crashes. In 2020, 49 percent of operators lost control of their truck moments before they collided with another object that was not another vehicle (Table 7). The top contributing factors among large truck operators involved in multi-vehicle crashes were following too closely (11 percent) and changing lanes improperly (7 percent). The top factors for other drivers involved in multi-vehicle crashes with large trucks were following too closely (12 percent) and failure to yield (10 percent). This does not imply that the large truck operators or other drivers caused the crash either by their actions or failure to act.

Table 7. Top Contributing Factors with All Traffic Crashes Involving Large Trucks by Number of Vehicles Involved and Person Type, 2020

	Single Vehicle Crashes		Multi-Vehicle Crashes					
Rank	Large Truck Operator		Large Truck Oper	ator	Other Driver			
	Description	% of all operators	Description	% of all operators	Description	% of all drivers		
1	Operator lost control	49%	Following too close	11%	Following too close	12%		
2	Other	23%	Lane Change Improperly	7%	Failed to yield	10%		
3	Speeding	21%	Other	6%	Other	8%		
4	Confirmed Distraction	6%	Failed to yield	5%	Driver lost control	5%		
Source:	CODES 2020; FARS 2020							

<sup>&</sup>lt;sup>6</sup> Passenger vehicles include passenger cars, pickup trucks, vans, and sport utility vehicles (SUVs).

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#### Commercial Driver Licensing

A commercial driver's license (CDL) allows drivers over the age of 18 years to operate large and heavy trucks. Class A CDL designations permit drivers to operate a truck trailer or tractor-semitrailer combination in which the combined weight exceeds 26,001 pounds and the unit being towed exceeds 10,000 pounds. Class B CDL designations permit drivers to operate single vehicles weighing 26,001 or more pounds, and the unit being towed is less than 10,000 pounds.

#### Between 2019 and 2020:

- CDL holders (Class A, Class B, or CDL learners permit) increased by nearly 17 percent
- CDL holders aged 18-to-20 years increased by 19 percent
- Georgia crashes involving large truck operators with valid CDL designations increased by 5 percent, and with invalid designations decreased by 13 percent.

In 2020, 66 percent of all Georgia large truck crashes involved operators with a Georgia commercial driver license (CDL), and 20 percent were licensed from a bordering state. The number of crashes involving large truck operators licensed in bordering states increased by 2 percent (from 1,060 in 2019 to 1,077 in 2020).

Table 8. 2019-2020 Percent Change in Commercial Driver Licenses, License Status for Large Truck Operators Involved in Crashes, and License Issuing State of Large Truck Operators involved in Crashes

Measure	2019-20 Percent C					
All Georgia Licensed Drivers	;					
Commercial Drivers Licenses (CDLs)	<b>A</b>	17%				
Class A	<b>A</b>	17%				
Class B	<b>A</b>	16%				
Class CLP (learner permit)	<b>A</b>	17%				
Other License Classes	<b>A</b>	10%				
CDL holders aged 18-20 years		19%				
Large Truck Operators <u>Involved</u> in Georgia Crashes						
Commercial Drivers Licenses (CDLs)	<b>A</b>	5%				
Class A	<b>A</b>	5%				
Class B	<b>A</b>	12%				
Other license Class or status not valid to operate a commercial vehicle	$\nabla$	-13%				
Hazmat Endorsements	_					
State of License Issuance for Large Truck Operator <u>Involved</u> in Georgia Crashes						
Georgia	<b>A</b>	5%				
Georgia Bordering States	<b>A</b>	2%				
Florida	$\nabla$	-3%				
Alabama	$\nabla$	-6%				
South Carolina	<b>A</b>	8%				
North Carolina	<b>A</b>	14%				
Tennessee		11%				
All other States	<b>A</b>	10%				

Source: DOR 2019-2020, MCMIS 2019-2020

### Demographics

Drivers in the 45-to-54 age group have the highest proportion of licensed CDLs compared to other age groups. The average age of the CDL licensed drivers is 52.2 years for both male and female CDL holders. Drivers aged 45-to-54 also represent the highest proportion of drivers involved in serious injury and fatal crashes and properly licensed drivers involved in all traffic crashes (Table 9).

Younger drivers aged 18-to-24 represented 2 percent of all CDL holders, 3 percent of all properly licensed drivers involved in crashes, and 3 percent of all truck operators involved in serious injury or fatal crashes.

Table 9. Licensed Drivers with Commercial Driver Licenses, Licensure Status of Operators Involved in Traffic Crashes, and Operators Involved in Serious or Fatal Injury Crashes, 2020

Age Group	Drivers with CDLs Class A or Class B		Licensure Status of Truck Operators Involved in Crashes		Truck Operators Involved in Fatal or Serious Injury Crashes			
	Female	Male	Total	Class A/B	Undesignated Class	Female	Male	Total*
Less than 18								
18-24	1%	2%	2%	3%	1%	4%	3%	3%
18-20	< 1%	< 1%	< 1%	< 1%	< 1%	4%		1%
21-24	1%	2%	2%	3%	< 1%		3%	3%
25-34	10%	12%	12%	17%	13%	23%	17%	17%
35-44	17%	18%	18%	24%	17%	27%	21%	21%
45-54	28%	26%	26%	26%	17%	23%	28%	27%
55-64	28%	24%	25%	22%	20%	19%	24%	24%
65+	15%	17%	17%	7%	3%	4%	7%	7%
Unknown				1%	30%		< 1%	1%
TOTAL*	<b>52,280</b> 100%	328,743 100%	381,023 100%	<b>4,447</b> 100%	149 100%	26 100%	538 100%	575 100%

Note: The sum of the individual cells may not equal row or column totals due to rounding error.

\*Total includes large truck operators with unknown sex or unknown age.

Source: DDS 2020, MCMIS 2020, FARS 2020, CODES 2020

#### Data Definitions and Considerations:

A large truck is any commercial or non-commercial, medium or heavy truck with a gross vehicle weight rating greater than 10,000 pounds. Large trucks include tractor trailers, single panel trucks, large pickup trucks, large cargo vans (i.e., ambulances), single-unit trucks (i.e., construction equipment), and other combination trucks (i.e., multi-trailer trucks). Buses and motor homes are not included in the definition of large trucks.

A traffic crash is defined as an incident that involved one or more motor vehicles where at least one vehicle was in transport, and the crash originated on a public traffic way, such as a road or highway. Crashes that occurred on private property, including parking lots and driveways, are excluded.

Fatal crashes are defined as crashes involving a motor vehicle traveling on a traffic way customarily open to the public and resulting in the death of a motorist or a non-motorist within 30 days of the crash.

Serious injuries are those suspected serious injuries reported by law enforcement and used when any injury, other than fatal injury, prevents the injured person from walking, driving, or normally continuing the activities the person was capable of before the injury occurred.

Vehicle miles traveled (VMT) by trucks statewide and by roadway type were calculated using VMT estimates, and the percent of distribution used by large trucks obtained from the FHWA Office of Highway Policy Information Highway Statistics.

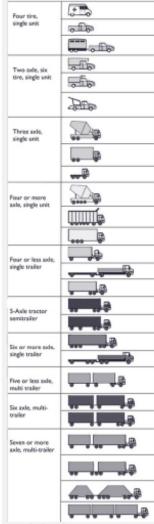
Urban and rural roadway classifications are defined according to 23 USC 101(a)(33) where census tracts population of 5,000 residents or more are considered urban, and areas with less than 5,000 residents are considered rural.

Rural counties are counties that have a population of less than 50,000 according to the United States decennial census of 2010 or any future such census (OCGA Section 31-6-2). This is different than roadway classifications, where urban road systems can be located in urban clusters (or metropolitan areas) of at least 2,500 persons within rural counties.

"At Intersection" is used when a crash occurs on a roadway either in the intersection or in the area between a crosswalk and the perimeter of the intersection. "Not at Intersection" is when the crash occurs more than 50 feet out from the perimeter of an intersection, and the crash is not identified as related to the movement of vehicles through an intersection.

Contributing circumstances capture the precrash elements or improper actions of persons (motorcycle operators, pedestrians, bicyclists, and other motorists) that may have caused the crash. Contributing factors in fatal and non-fatal crashes are often underreported in the datasets. There is at least one record per person involved in a fatal crash (FARS Data) and some missing records for persons involved in motor vehicle traffic crashes (Crash Data).

#### Large Truck Vehicle Classification



Combination units have four or more axles

Source: Adopted from Federal Highway Administration (FHWA) vehicle classifications

#### Additional Information:

Other traffic safety facts are available online at the Georgia Governor's Office of Highway Safety and Crash Outcomes Data Evaluation Systems (CODES): Risky Driving, Traffic Safety During the COVID-19 Public Health Emergency, Distracted Drivers, Occupant Protection, Non-Motorist (Pedestrians and Bicyclists), Motorcycle Safety, Young Adult Drivers, and Older Drivers.

The suggested APA format citation for this document is:

Georgia Crash Outcomes Data Evaluation System. (2022, August). Large Trucks: 2020 data. (Georgia Traffic Safety Facts). Atlanta, GA: Governor's Office of Highway Safety.

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## D. Feedback from the Georgia Driving Academy (Commercial Driver Training School)



Conyers, GA Campus

Date: May 3, 2022

Commissioner Spencer Moore Georgia Department of Driver Services 2206 East View Parkway Conyers, GA 30013

#### Dear Commissioner Moore:

I appreciate the opportunity to respond to your recent letter requesting feedback on several topics related to improving the Supply Chain Crisis. Although, GDA provides CDL training, and we are located near the beginning of the supply chain. In areas that don't directly apply to GDA, I can provide a source.

- 1) Are there opportunities to survey truck drivers about general demands of the job that cause the most issues with retention? Large trucking companies spend millions of dollars yearly on improving their retention and do a good job obtaining information from drivers that exit their employment. One of the best sources to find this information is ATRI (American Transportation Research Institute) at atri@trucking.org. They are constantly polling companies and drivers to determine leading factors of job satisfaction and more. In addition, the American Trucking Association at trucking.org.
- Does your organization have any metrics to show growth or decline in commercial driving operations such as data related to commercial vehicles, commercial transportation businesses, general interest in commercial driving, or other similar data points? GDA has seen a 60% growth in the number of graduate students from FY20 to our current fiscal year FY22, with over 1,000 graduates in FY22 combined between the Conyers and Columbus campuses. GDA is currently in a \$1,000,000+ expansion with an additional 2.5 acres of range in Convers. Once completed in September 2022, this will allow GDA to train an additional 250 students annually. In Sept-Oct 2022 a new GDA facility in Augusta, GA will allow GDA to add 300-400 more Class A CDL drivers to the Georgia Transportation workforce.
- 3) Does your organization have any observations of trends about any facet of commercial driving and the shortages observed thereof, including infrastructure, vehicles, or retention of personnel? Is there any data to support these



## Conyers, GA Campus

observations? News sources are constantly running articles on the shortage of drivers. As a training school we have no problems getting our students hired on as soon as they obtain their CDL license. The majority have multiple job offers before completing the school. Demand to obtain a Class A CDL is higher than I have ever seen in the 27 years I have run a school. Currently both campuses are booked out 3 months. Equipment is an issue for the industry and training schools. 2015 Freightliner tractors cost \$30,000 10 months ago, but today cost \$80,000. Trailers are even harder to find. Large carriers normally would turn their equipment every 2 years, but now are holding onto it for 3-4 years. The equipment market is upside down and the cost of diesel fuel just set an all-time high cost per gallon.

- 4) Are there opportunities within your organization to advertise the Military Waiver program that allows service members to waive CDL test requirements and start driving commercial vehicles equivalent to their military training/driving history? We do train quite a few veterans utilizing their Post 911 benefits. We review a veterans DD214 to determine if they could qualify for the Military Waiver and help them through the process. Not all veterans will qualify for the Waiver.
- 5) If your organization is involved with training, are there any roadblocks or pain points that hinder training new CDL students? The areas that could assist the CDL training schools is reduction in DDS processing times for Licensing Instructors; Vehicle Cards for road vehicles; 3rd party CDL scheduling times (most states follow the FMCSA guideline of 2 days, not 7 days); determine acceptable online theory programs that schools could select from if needed; and reduce the school licensing process for an existing licensed school to open a new or branch location.
- 6) Are there opportunities for your organization to survey CDL drivers about general demands of the job that cause the most issues of retention? As a training school we are on the front end of the student obtaining a CDL to enter the trucking industry, so we would not be a good source to determine the demands of the job that cause the high turnover. We do discuss the demands and lifestyle of a driver during training. In addition, we schedule a variety of major carriers that share with our students the trucking opportunities and lifestyles. Retention has been studied by ATA, ATRI and most of the major trucking companies. For 27 years I have said the individual that can solve the truck driver retention problem will become a billionaire.

1035 Sigman Road, NE, Conyers, GA 30012

770-918-8501

770-918-8770 fax



## Conyers, GA Campus

Thank you again for the opportunity to respond to your questions. If I can provide any additional information or discuss any issues that will help schools operate more efficiently, I am available.

Best Regards,

Brad Barber

Brad Barber Campus President

## E. Methodology

### CDL Stakeholder Group Membership

The DDS organized and led a CDL stakeholder group to develop recommendations to address CDL driver shortages in Georgia. The CDL stakeholder group included representatives from various state agencies, members within the trucking industry, and other significant stakeholder groups. These membership organizations were selected based on their ability to provide meaningful insight into the challenges and barriers faced within the commercial trucking industry and their agency's ability to influence the CDL driver shortages. A complete list of CDL stakeholder group members appears in the Acknowledgements section of this report (**see** Page iii). The following organizations interacted directly with the stakeholder group during roundtable (in-person and virtual) discussions:

- Georgia Department of Driver Services
- Georgia Department of Corrections
- Georgia Department of Community Supervision
- Georgia Department of Revenue

- Georgia Governor's Office of Highway Safety
- Technical College System of Georgia
- Commercial Driver Training and Trade Schools
- Georgia Motor Trucking Association

#### Approach

DDS facilitated private discussions with other state agencies, engaged other entities via email correspondences, and conducted multiple roundtable discussions with staff that focused on the three critical steps CDL applicants take to enter the commercial trucking industry: 1) interest and preparation to become a commercial driver, 2) acquiring a CLP and CDL in Georgia by going through the licensure process, and 3) attaining and maintaining employment in the commercial trucking industry. Members presented CDL-related issues and shared their respective knowledge and experiences within these critical steps. During the meetings, members shared reports, data, and findings from their respective organizations to inform and describe the CDL driver shortages in Georgia. These data reports (DDS internal reports and information received from agencies) were used to facilitate structured discussions around various topics related to the shortage problem. For additional perspective, DDS administered a questionnaire (CDL Usage Survey) to active Georgia CDL holders with a registered customer account at DDS to provide greater insight into the commercial drivers' experience. Organization and entities also provided their feedback and recommendations in email correspondences or internal memorandums (see Appendix A). DDS CDL stakeholder group members shared these documents— that best address and respond to their concerns—with appropriate agencies and state departments.

The stakeholder group focused on specific issues and developed recommendations that would significantly impact the number of CDL drivers in Georgia. Meeting notes with preliminary recommendations were created after each roundtable discussion and revisited in an iterative approach to refine the proposed solutions. The stakeholders acknowledged that the recommendations would affect various agencies and parties involved. Therefore, the members selected recommendations that reflect a balance of feasibility, cost-effectiveness, and timeliness while achieving the intended impact.