Commercial Driver License (CDL)  
"Best Practices Document"

Background
This document has been prepared by the American Association of Motor Vehicle Administrators (AAMVA) and serves as a guideline document to assist jurisdictions in the effective administration of the Commercial Driver License (CDL) Program. This guideline document is intended to provide recommendations that jurisdictions may choose to implement in an effort to increase the overall effectiveness of the CDL Program and increase highway and traffic safety standards nationally and internationally.

This document is divided into ten major sections:

- Issuance Practices
- Information Exchange Practices
- Citation and Conviction Practices
- Testing Practices
- Examiner Training
- Monitoring Practices
- Reciprocity Practices
- Fraud Prevention and Reporting
- Communication/Reporting Practices
- Jurisdictional Assistance Practices

What is a "Best Practices Document"?
A "Best Practices Document" establishes the ideal approach for establishing and maintaining programs. A "Best Practices" is not mandated nor monitored for compliance. The guidelines provided in this document are recommended and provide a jurisdiction with details on optimal model programs.

How is the "Best Practices Document" used?
Sections of this document can be used to provide guidance for improving various sections of the Commercial Driver License (CDL) Program. Each section provides detailed information for the optimal performance relating to the program area. A jurisdiction may choose to implement all or portions of the recommendations contained within each section. Many of the sections contained in this document are applicable to other program areas, i.e., non-commercial driver licensing/testing.
Who is the "Best Practices Document" designed for?
This document is designed for Chief Driver License Administrators and their Commercial Driver Licensing staff.

Why is the "Best Practices Document" important?
The Commercial Driver License Program is federally mandated through an act of Congress, and known as the Federal Motor Carrier Safety Act of 1996. In recent years the CDL Program has received a lot of attention at the federal level by agencies such as the National Transportation Safety Board (NTSB), the United States Department of Transportation (USDOT) Office of the Inspector General (OID), the United States Congress, the Federal Motor Carrier Safety Administration and law enforcement. In addition the program has received attention from the commercial vehicle industry including: trucking companies/associations, bussing companies/associations, training organizations, insurance carriers, the Commercial Vehicle Safety Alliance (CVSA) and many others.

Who is AAMVA?
AAMVA is a tax exempt, non-profit organization striving to: develop model programs in disciplines related to motor vehicle administration, police traffic services and highway safety; serve as an information clearinghouse for these same disciplines; and act as the international spokesman for these interests.

Founded in 1933, AAMVA is a voluntary, non-profit, tax exempt, educational organization. AAMVA represents the state and provincial officials in the United States and Canada who are responsible for the administration and enforcement of laws pertaining to the motor vehicle and its use.

The Association’s programs encourage uniformity and reciprocity among the states and provinces, and liaison with other levels of government and the private sector. AAMVA also stresses highway safety through its involvement in numerous national coalitions. Its program development and research activities provide guidelines for more effective public service.

AAMVA is an international association. Its member jurisdictions are the United States, American Samoa, the District of Columbia, Guam, Puerto Rico, the Virgin Islands, the ten provinces of Canada and the Yukon and Northwest Territories.

The primary membership of the Association consists of the motor vehicle and traffic law enforcement administrators of the member jurisdictions (voting members) and other governmental representatives serving in similar capacities within the United States and Canadian federal governments (non-voting members).

Associate membership is available to organizations, associations and business enterprises with interests that are compatible with AAMVA and its program objectives.
Commercial Driver License Best Practices Contents

1.0 CDL Issuance Practices
   1.1 First Time Issuance
   1.2 Transfer Issuance
   1.3 Reinstatement Issuance

2.0 CDL Information Exchange Practices
   2.1 CDLIS
   2.2 PDPS/NDR
   2.3 Transfer of Driver Records
   2.4 Disqualifying Offences

3.0 CDL Citation and Conviction Practices
   3.1 Citation Process
   3.2 Citation Reporting
   3.3 Conviction Process
   3.4 Conviction Reporting
   3.5 Disqualifying Offences

4.0 Testing Practices
   4.1 Knowledge Test Administration
   4.2 Skill Test Administration
   4.3 Driver Manual Maintenance and Distribution
   4.4 Third Party Testing Administration
   4.5 Recording/Reporting CDL Test Results

5.0 Examiner Training
   5.1 Materials
   5.2 Examiner Requirements
   5.3 Trainer Requirements
   5.4 Certification
6.0 CDL Monitoring Practices
   6.1 Jurisdictional & Third Party Testing Facilities
   6.2 Jurisdictional & Third Party Testing Examiners
   6.3 Covert Monitoring/Auditing
   6.4 Auditor Qualifications, Training and Monitoring
   6.5 Monitoring Out-of-Jurisdiction Test Results

7.0 Reciprocity Practices
   7.1 Accepting License Transfers
   7.2 Accepting Permit Transfers
   7.3 Accepting Out-of-Jurisdiction Test Results

8.0 Fraud Prevention and Reporting
   8.1 Applicants
   8.2 Counter Personnel
   8.3 Test Facilities
   8.4 Examiners
   8.5 Auditors

9.0 Communication/Reporting Practices
   9.1 Fraud Occurrences - Findings and Recommendations
   9.2 Fraud Transfer Cases
   9.3 Industry System

10.0 Jurisdictional Assistance Program
    10.1 AAMVA
    10.2 FMCSA
    10.3 Jurisdictional Assessment Assistance
Part 1

Background
1.1 - Legislative And Regulatory History of The Commercial Driver License Program

The Commercial Motor Vehicle Safety Act (CMVSA) of 1986 created a national Commercial Driver's License (CDL) program by requiring the U.S. Department of Transportation to establish national minimum testing and licensing standards for commercial drivers. The CMVSA created two goals: the first, to improve highway safety by ensuring that drivers of large trucks and buses are qualified to operate those vehicles and, second, to remove unsafe, unqualified drivers from the highways. The CMVSA required establishment of the Commercial Driver's License Information System (CDLIS) to serve as a clearinghouse for commercial driver licensing and conviction data.

The CMVSA required several significant pieces of regulatory action. The first, issued on July 1, 1987, made it illegal for commercial drivers to hold more than one license and for employers to employ drivers with multiple licenses. This regulation also established disqualification requirements for driving under the influence of alcohol, leaving the scene of an accident, certain felonies including controlled substance felonies and serious traffic violations.

The second major regulatory action, issued on August 22, 1988, established the minimum standards for state testing (knowledge and driving skills) and licensing of commercial motor vehicle (CMV) drivers. This rule also established the various classes of CDLs along with the necessary endorsements and air brake restriction. This same rulemaking enabled states to grandfather existing drivers from the driving skills testing requirements of the regulation and permitted states to enter into agreements with third parties to administer the CDL skills test.

The third major regulatory action, issued on October 27, 1988, established 0.04% as the blood alcohol concentration level at or above which a CMV driver would be deemed impaired, thereby holding a CMV driver to a higher standard than automobile drivers.

The fourth and final major CMVSA regulatory action, issued on June 17, 1994, established the standards a state must meet to be in substantial compliance with all of the commercial driver licensing requirements of the CMVSA and avoid the loss of federal-aid highway funds. The standards and procedures established in this rulemaking are the basis by which state CDL compliance reviews are conducted by the Federal Motor Carrier Safety Administration (FMCSA).

The Motor Carrier Safety Act of 1991 directed the Secretary of Transportation to establish sanctions, penalties and disqualifications relating to violations of out-of-service orders by persons operating CMVs. This requirement became effective on June 17, 1994.

The ICC (Interstate Commerce Commission) Termination Act of 1995 directed the Secretary of Transportation to require sanctions and penalties for CMV drivers who are convicted of violating the laws or regulations pertaining to railroad-highway grade crossings. This requirement became effective on October 4, 1999.

The passage of the Motor Carrier Safety Improvement Act of 1999 (MCSIA) created the Federal Motor Carrier Safety Administration (FMCSA) and broadened the scope of FMCSA’s authority for administration of the CDL program. The Act adds CDL disqualifying offenses for drivers and also includes a provision that allows the Secretary of Transportation to prohibit a non-complying state from issuing commercial licenses. The Act also gives the Secretary authority to reduce a state’s grant funding under the Motor Carrier Safety Assistance Program (MCSAP), if the state is found to be in substantial non-compliance with CDL requirements. The purpose of MCSIA was to enhance and strengthen the CDL requirements established after passage of the 1986 CMVSA.
1.2 - CDL Effectiveness Study

Prior to the CDL program, many states did not have a classified license system, and any person licensed to drive an automobile could also legally drive a CMV. Even in states that did have a classified licensing system, drivers’ skills were not necessarily tested in a representative CMV. As a result, many drivers were operating vehicles that they may not have been qualified to drive. Additionally, many drivers were able to obtain licenses from multiple states, allowing them to hide or spread convictions among several driving records.

In 1997, The Federal Highway Administration’s (FHWA) Office of Motor Carrier and Highway Safety (OMCHS) initiated a CDL Effectiveness Study to examine the implementation of the CDL program and to assess its effectiveness and benefits to highway safety. The principal purpose of this study was to provide the FHWA with measures to evaluate and assess if the CDL program has been effective in addressing problems that led to the enactment of the CMVSA and reducing the incidence of CMV crashes. The results of the study were published in a 1999 report titled, Commercial Driver’s License Effectiveness Study.

Among the conclusions contained in the report are:

- The incidence of CDL holders possessing multiple licenses of any type has been vastly reduced.
- States are not uniform in the administration and operation of their segment of the national CDL program. Some of this variation can be attributed to the lack of written guidelines for the program.

Among the recommendations contained in the report are:

- The implementation of a peer review process should be considered. State and federal participants could provide the functional forum for states to analyze each other’s CDL program, offer feedback and improve operations.
- FHWA should implement periodic measurement of each state’s compliance with the Commercial Driver License Information System (CDLIS) System Specifications and CDLIS State Procedures. Similar manuals for other areas of the CDL program should be developed.

1.3 - CDL Fraud

In recent years, CDL fraud has surfaced as a significant problem in the testing and licensing of commercial drivers. These events have caused concerns that the CDL program requires more oversight to promote improved highway safety. The need for increased oversight was also documented in the CDL Effectiveness Study.

The largest federal investigation of CDL improprieties named “Operation Safe Road”, which was carried out in Illinois and Florida, resulted in 39 convictions as of December, 2001. The U.S. Department of Transportation’s Office of Inspector General, the Federal Bureau of Investigation, the Internal Revenue Service, the Postal Inspection Service, and the Illinois State Police carried out the investigations. Those convicted include employees at state testing facilities, Illinois state government officials, and instructors at driving schools. At one of several facilities in Illinois where problems were initially uncovered, authorities allege that at least 250 unqualified applicants obtained licenses to drive trucks in exchange for bribes, and the manager of the facility was convicted of racketeering for taking at least $100,000 in bribes. Investigators found problems involving both knowledge and skills testing. The investigation in Illinois spread to Florida when applicants from Illinois were alleged to be traveling to fraudulently obtain CDLs from two employees of a Florida-based driving school. The applicants then returned to Illinois to exchange the Florida CDL for a valid Illinois CDL. Under federal standards, such exchanges of licenses in a new state do not require retesting of the commercial driver.
The situation in Illinois and Florida had a nationwide impact. Investigators identified 211 drivers who potentially obtained fraudulent licenses in Illinois and then transferred their licenses to 20 other states, and 692 other suspect drivers from Florida who transferred their licenses to 32 other states.

The Illinois and Florida investigations were the largest, but not the only, CDL-related investigation over the last several years. Since 1998, at least 14 other states had indictments or ongoing federal or state investigations that involved improprieties in the CDL testing and licensing process. The cases include such incidents in which individuals attempted to cheat on knowledge tests, cases in which applicants taking the driving tests were not required to complete key elements such as air brake tests or highway driving, and to a case where individuals were under investigation for selling passing scores. Criminal investigations of CDL fraud show that third-party testers, non-state employees who can administer driving tests, have been particularly susceptible to fraud.

As a consequence of the fraudulent testing and licensing of drivers, highway safety has been compromised and states have incurred additional expense. For example, one commercial driver who fraudulently obtained his CDL from an Illinois state inspection station was involved in an accident that killed six children. FMCSA reports that at least nine deaths have occurred in accidents involving drivers who illegally obtained their CDLs in Illinois. In 2000, FMCSA alerted investigators and Georgia authorities to a third-party examiner, subsequently arrested, for his alleged involvement in the illegal sale of over 500 CDLs. In the same year, an investigation by federal and state officials in North Carolina resulted in an indictment against a third-party examiner accused of fraudulently certifying that he had tested over 60 individuals who received CDLs.

In 2001, federal and state investigators in Ohio uncovered a third-party examiner who improperly administered the CDL driving test to over 200 applicants. The examiner’s test lasted 10 minutes versus the 60 minutes that Ohio’s test is supposed to take. In late 2002, over 700 drivers were retested by the Michigan Department of State for third-party testing fraud. Across the country, state officials have now retested thousands of CDL holders to be certain they are qualified to hold CDLs.
1.4 - CDL Program Review Panel

In late 1998, as a result of the problems in Illinois and Florida, the FMCSA formed a CDL Program Review Panel to review the Illinois and Florida CDL programs. The panel conducted a two-pronged effort to:

- Identify those drivers issued suspect CDLs by Florida and Illinois to verify whether those licensed had been properly tested and were qualified to operate a commercial motor vehicle.
- Conduct a comprehensive evaluation in both Illinois and Florida to determine if weaknesses in the CDL program had contributed to the fraud and any other licensing problems in each state.

Based on the results of the panel's review a report was prepared. This report, *Evaluating Commercial Driver License Program Vulnerabilities*, presents findings and recommendations that can improve CDL programs and ensure that safe, qualified commercial drivers operate on the nation’s highways. Several conclusions were reached. Among them are:

- The single-license objective continues to be met.
- Deficiencies in the CDL program, including testing and issuance of licenses, created increased safety risk not only in Illinois and Florida, but nationally.
- Weaknesses in the administration and oversight of the CDL program in both Illinois and Florida made the program vulnerable to fraud.
- Inconsistencies were observed in the states’ oversight and evaluation of their CDL program activity. This was especially true in the critical area of third-party testing. A lack of thorough CDL program control and oversight renders the program vulnerable to fraud and abuse, which increases the safety risk on the nation’s highways.
- There is limited use of program trend data and statistical reports by management to identify and address emerging issues before problems occurred.
- A lack of thorough CDL program management control procedures and oversight practices renders the program vulnerable to fraud and abuse.
- The information and data generated with the program, which could be used in detecting areas of weakness, suspicious and fraudulent activities within the program have not been incorporated into a structured program management system.
- There is limited utilization of available reports in managing the program and employees.
- Failure to utilize readily available data contributes to the potential to exploit program weaknesses and the weakening of highway safety efforts.

The panel made numerous recommendations to improve the CDL program. Among them are:

1. States should develop and implement analytical tools to continuously measure and assess their CDL program activity to identify program trends and/or weaknesses and take corrective actions, as necessary.
2. States should develop fiscal and managerial procedures to ensure sufficient budget and resources are dedicated to their CDL oversight responsibilities.
3. States should have internal and external means to encourage the reporting of fraudulent or suspicious licensing activities.
4. States should develop, implement and regularly update internal and third-party CDL program oversight practices.
5. States should utilize existing applications such as Social Security number verification to improve system controls.
6. States should update and maintain CDL program management policies and procedures to govern program operations.
7. States should promote and share “best practices” to prevent CDL testing and licensing irregularities.
8. States should review and bolster their CDL program oversight resources.
9. States should develop and implement a formal review process for monitoring and oversight of their licensing facilities.

10. States should develop procedures to ensure program oversight and re-certification of third-party examiners/testers as required by 49 CFR 383.75.

11. States should implement programs that encourage and make easy the reporting by employees and the general public of suspected fraudulent activities in the CDL program.

12. To ensure test integrity, states should adapt and implement the most recent national CDL knowledge test questions within at least one year of their adoption by AAMVA.

13. Every state with third-party skills testing should conduct a comprehensive review of its program monitoring and oversight operations to minimize the risk of fraud or improper testing by its contractors.

14. States should review their driver license residency requirements and strengthen their license issuance practices requiring valid forms of identification and authentication that applicants must meet for domicile requirements.

15. FMCSA should adopt rules requiring state management and fraud prevention monitoring reports on a periodic basis.

16. State program managers must improve their access to and understanding of systems data to detect problems and improve program management.

1.5 - Office of Inspector General’s Audit Reports

In 1998, the United States House of Representative’s Committee on Transportation and Infrastructure requested that the United States Department of Transportation’s Office of Inspector General (OIG) conducted audits to review the effectiveness of CDL programs. Their first audit was to determine the adequacy of the FMCSA’s oversight of CDL programs to ensure that states take action to appropriately disqualify commercial drivers. This audit report was released in June, 2000 and showed that the objective of limiting drivers to one CDL has been largely achieved but problems existed with how states disqualified commercial drivers convicted for traffic violations.

The OIG’s second audit focused on the oversight of federal standards for testing commercial drivers and issuing CDLs. Specifically, it sought to answer the following questions:

1. Does FMCSA have an adequate basis for relying on annual certifications from the states that they meet federal standards for testing and licensing commercial drivers?

2. Are FMCSA’s oversight reviews sufficient to identify weaknesses in state CDL programs regarding the testing of commercial drivers and the issuance of CDLs?

3. Does FMCSA ensure that significant weaknesses disclosed by federal oversight reviews or annual state certifications are corrected?

The audit findings were released in a May, 2000 audit report. Some of the findings are:

1. Existing federal standards and state controls are not sufficient to defend against the alarming threat posed by individuals who seek to fraudulently obtain CDLs.

2. Federal standards are not sufficient to address how states should verify the eligibility of CDL applicants and what training and qualifications should be provided to CDL examiners.

3. Annual certifications by the states that their CDL programs comply with federal standards are not supported by sufficiently comprehensive audits or reviews. Other than conducting inspections of their third-party testers, none of the 13 states visited conducted audits or reviews to support their annual certifications. More rigorous state self-assessments of their overall CDL programs would increase the opportunity for early correction of program weaknesses.

4. A significant problem currently facing the National CDL Program is fraud in the testing and licensing of commercial drivers. Suspected criminal activity dealing with CDLs has been identified in 16 states since 1998.
5. Federal standards do not require CDL applicants to demonstrate they are citizens of the United States or legally present in the United States. Requirements in this area vary. Only four of the 13 states we visited had laws requiring applicants for driver's licenses to demonstrate that they are citizens of this country or legally present in the United States. Demonstrating legal presence in the United States should be a requirement to obtain a CDL.

6. Federal standards do not require CDL applicants to show proof of state residency. At the time of our review, only one of the 13 states we visited required proof of residency during the CDL application process. Federal standards do, however, require the applicant to be domiciled (have his or her permanent home and principal residence) in the state issuing the CDL. Only four of the 13 states we visited had laws that met the domicile requirement. Federal standards should be adopted to require the applicant to demonstrate residency before the state issues a CDL.

7. Federal standards require CDL applicants to have a Social Security number. States are not required, however, to verify Social Security numbers against the Social Security Administration records, although a system is available to make this verification. Only three of the 13 states we visited performed such checks. Recent FMCSA oversight reviews identified six states that were not verifying Social Security numbers, but no standard exists for enforcing the issue. Verification of an applicant's Social Security number should be a federal requirement.

8. Federal standards do not include specific training or qualification requirements for CDL driver examiners. A national association recommended a minimum of 40 hours of training for driver examiners, and 10 of the 13 states visited met or exceeded this standard. Five states did not require state CDL examiners, including those who administer the driving tests, to hold CDLs. By establishing training and qualification standards, FMCSA can ensure consistent skill and knowledge for this critical participant in the testing process.

9. Federal standards currently allow learner's permit holders who have not passed a CDL knowledge test to operate a commercial vehicle of any size, provided they are accompanied by a CDL holder. Since states are not required to record the learner’s permit on the central database for CDLs, individuals could obtain permits in more than one state, thus defeating the goal of limiting drivers to a single commercial license.

10. Federal standards related to English language proficiency for commercial drivers require clarification. The federal standard for motor carrier safety requires carriers to ensure that their commercial drivers are able to read and speak the English language sufficiently to converse with the general public, understand highway and traffic signs, respond to official inquiries, and make reports and records. However, the federal standard on CDL testing and licensing does not place any requirement on the states to test for language proficiency.

11. FMCSA guidance allows states to administer the CDL knowledge test in foreign languages. Eight of the 13 states visited allowed the use of interpreters for the knowledge tests, although various restrictions on their use were in place. Driving tests were also administered in a foreign language by bilingual examiners in two of the 13 states we visited. Given the variations and the previously noted condition on enforcing residency requirements, the current situation allows individuals to obtain CDLs in a state where the language requirements are different, and then return to their home state, where they may be able to exchange their CDLs without retesting. Establishing performance-oriented English proficiency standards and an agreed-to testing protocol would discourage license shopping across states and establish consistent, nondiscriminatory practices nationwide.

12. Existing federal standards and state Controls are not sufficient to defend against the alarming threat posed by individuals who seek to fraudulently obtain CDLs.

13. Federal standards are not sufficient to address how states should verify the eligibility of CDL applicants and what training and qualifications should be provided to CDL examiners.
1.6 - Concerns After September 11, 2001

After the terrorist attacks on September 11, 2001, apprehension arose about the potential use of trucks in terrorist activities. The threat from hazardous materials gained increased attention after September 11, 2001, when the Justice Department released a list that included 22 people indicted for obtaining fraudulent CDLs to transport hazardous material. The indictments resulted from an investigation in Pennsylvania that started in 2000. None of the 22 individuals have been connected to the terrorist attacks. Due to concerns about terrorist actions involving hazardous materials delivered by truck, Congress passed The USA Patriot Act in October, 2001 requiring that drivers seeking a hazardous materials endorsement to their CDLs be subject to a background records check. On May 5, 2003, the Transportation Security Administration (TSA) and the U.S. Department of Transportation issued an interim final rule to secure the transport of hazardous materials including explosives. The rule requires background checks on all applicants for a new or renewal CDL hazardous materials endorsement before a CDL is issued. The background check process includes the collection of an individual's fingerprints. Federal standards on CDL drivers seeking hazardous materials endorsements had not been finalized at the time of this report.

Although not essential to or directly related to the atrocities committed on September 11, 2001, it was discovered that many of the terrorists held driver’s licenses, some fraudulently issued and some from states with lax standards. This has focused attention on the integrity of states’ driver licensing systems.

On July 16, 2002, the White House issued the National Strategy for Homeland Security. Included as a major strategy for states is the enhancement of minimum standards for state-issued driver licenses. One of the issues identified, in the report that must receive immediate state attention, is to ensure that the person receiving a license meets necessary driving competency standards and has a verifiable identity.
Part 2

Rationale for The
Best Practices
Manual For The
Licensing and
Testing of
Commercial Drivers

The CDL program was established in 1986 to ensure uniformity and consistency for United States jurisdiction's CDL programs.

During the years following passage of CMVSA, the focus and concentration of federal and state resources relative to driver licensing were committed to the development and implementation of the CMVSA CDL program requirements. There was a sense of satisfaction among federal and state administrators that the objective of the CDL program has been realized. Thousands of multiple licenses had been recovered; standardized testing of the driver workforce was in place; and new CDL documents were issued. In summary, the focus of the CDL program had shifted from one of development and implementation to one of administration and evaluation.

However, in recent years, concerns have arisen in Congress and with both Federal and State administrators that the CDL program had significant weaknesses and needed more oversight to improve highway safety. The Federal Highway Administration’s Office of Motor Carrier and Highway Safety’s 1998 Commercial Driver License Effectiveness Study concluded that states are not uniform in the administration of their CDL programs. As discussed earlier in Section 1.5, the United States Department of Transportation’s Office of Inspector General conducted two audits on the CDL program and found numerous problems and weaknesses in the distraction of CDL programs. Many examples of the lack of uniformity were cited in the reports.

Suspected criminal activity dealing with CDLs has been identified in at least 16 states. As a result of this fraud, highway safety has been compromised. Fraud in Illinois and Florida prompted the FMCSA to form a CDL Program Review Panel to review the Illinois and Florida programs. The Panel’s report, Evaluating The Effectiveness of Commercial Driver License Programs, cited numerous weaknesses in the management and oversight of both programs. These problems underscore the need for management controls and how the absence of controls can have a direct negative impact on highway safety. The report specifically calls for states to promote and share “best practices” to prevent CDL testing and licensing irregularities.

The attacks of September 11, 2001, have focused national attention on the integrity of state’s driver licensing programs. Federal legislation has been introduced to preempt states control of their driver’s license programs.

Dan Hartman, a FMCSA administrator, stated in May, 2002 that the most significant problem the CDL system faces is fraud in the licensing authority offices that administer the system.

The Council of State Governments and the National Conference of State Legislators in a position paper dated June, 2002 have called for an increased role for law enforcement agencies in the administration of a states’ driver license program because of a perception that the state DMVs are not capable of making the needed improvements.

On September 9, 2003, Mr. Robert Cramer, director of the General Accounting Office of special investigations told the United States Senate Finance Committee that two years after the September 11 attacks heightened US security concerns, his investigators were 100 percent successful at obtaining driver licenses in eight states using alias identities and counterfeit documents. In addition, in a few cases where DMV employees noticed that documents were counterfeit, they failed to notify security agents. In the same Senate Finance Committee, Youseff Hmimssa, a Moroccan who testified against four men in Detroit who were charged with being part of a sleeper cell of terrorists, described how easy it is to obtain and make false documents that can be used to obtain a driver’s license.

It is quite clear that state DMVs must, on their own accord, immediately take steps to increase uniformity and enhance integrity in the commercial driver licensing system.
2.2 - The American Association of Motor Vehicle Administrator's Role In The Testing and Licensing of Commercial Drivers

Founded in 1933, the American Association of Motor Vehicle Administrators (AAMVA) is a tax-exempt, nonprofit organization representing state and provincial officials in the United States and Canada who administer and enforce motor vehicle laws. AAMVA strives to develop model programs in motor vehicle administration, police traffic services and highway safety. The association serves as an information clearinghouse for these same disciplines, and acts as the international spokesman for these interests.

From the CMVSA passage in 1986 to today, AAMVA has worked hand in hand with the Federal Highway Administration, the newly created Federal Motor Carrier Safety Administration (FMCSA), and the National Highway Traffic Safety Administration. CDLIS is operated, on behalf of the Secretary of Transportation, by AAMVA. In recent years, AAMVA has been actively involved in projects related to the FMCSA’s national priorities to enhance and improve the CDL program. These priorities are:

1. Projects to enhance the accuracy, speed, and completeness of driver history information exchange among the various components of the system, including law enforcement, prosecutors, the courts, and driver licensing agencies.
2. Projects to improve the states’ control and oversight of CDL program activities particularly state licensing agency and third-party testing facilities.
3. Projects to develop CDL program management control procedures and oversight practices, including use of program trend data and statistical reports to detect areas of weakness, suspicious or fraudulent activities of both state personnel and third-party testing facilities.
4. Outreach and training to the judicial community on the CDL program in general and specifically, the importance of proper adjudication and sanctioning.

In response to the need to increase the uniformity and enhance the integrity of the CDL programs, AAMVA has developed this Best Practices for the Testing and Licensing of Commercial Drivers manual to address several of these priorities.

2.3 - Purpose of The Manual

The purpose of this manual is to identify the best practices for all the activities that take place in:
1. Applying for a CDL.
2. Establishment of identity for a CDL.
3. Determination of CDL eligibility.
4. Meeting CDL screening requirements.
5. Passing all CDL required tests.
6. Issuance of the CDL.

This includes all management practices associated with these activities for both state-employed and third-party examiners including training, supervision, and auditing practices. These best practices include the laws, rules and procedures needed to issue an original, duplicate and renewal CDLs as well as CDL upgrades. States are strongly encouraged to support each component of the Best Practices.

2.4 – Important Adjunct to The Manual

Fundamental to each state’s success in adopting these Best Practices is their adoption of rules or legislation enacting all federal regulations dealing with CDL drivers.
A state shall comply with the federal rules contained in 49 CFR 383 that include the following:

A. General
   1) 383.1 - Purpose and scope.
   2) 383.3 - Applicability.
   3) 383.5 - Definitions.
   4) 383.7 - Waiver provisions.

B. Single License Requirement
   1) 383.21 - Number of driver’s licenses.
   2) 383.23 - Commercial driver’s license.

C. Notification Requirements and Employer Responsibilities
   1) 383.31 - Notification of convictions for driver violations.
   2) 383.33 - Notification of driver’s license suspensions.
   3) 383.35 - Notification of previous employment.
   4) 383.37 - Employers responsibilities.

D. Driver Disqualifications and Penalties
   1) 383.51 - Disqualification of drivers.
   2) 383.53 - Penalties.

E. Testing and Licensing Procedures
   1) 383.71 - Driver application procedures.
   2) 383.72 - Implied consent to alcohol testing.
   3) 383.73 - State procedures.
   4) 383.75 - Third-party testing.
   5) 383.77 - Substitute for driving skills tests.

F. Vehicle Groups and Endorsements
   1) 383.91 - Commercial motor vehicle groups.
   2) 383.93 - Endorsements.
   3) 383.95 - Air brake restrictions.

A state should adopt legislation and promulgate rules to support the federal rules contained in 49 CFR 384 that includes the following:

A. General

B. State requirements for:
   1) 384.201 - Testing program.
   2) 384.202 - Test standards.
   3) 384.203 - Driving the influence.
   4) 384.205 - CDLIS Information.
   5) 384.206 - State record checks.
   6) 384.207 - Notification of licensing.
   7) 384.208 - Notification of disqualifications.
   8) 384.209 - Notification of traffic violations.
   9) 384.210 - Limitation on licensing.
10) 384.211 - Return of old license.
11) 384.212 - Domicile requirement.
12) 384.213 - State penalties for drivers of CMVs.
13) 384.214 - Reciprocity.
14) 384.215 - First offense.
15) 384.216 - Second offenses.
16) 384.217 - Drug offenses.
17) 384.218 – Second serious traffic violation.
18) 384.219 - Third serious traffic violation.
20) 384.221 - Out-of-service regulations (intoxicating beverage).
21) 384.222 - Violation of out-of-service orders.
22) 384.223 - Railroad-highway grade crossing violations.
23) 384.224 - Noncommercial motor vehicle violations.
24) 384.225 - Record of violations.
25) 384.226 - Prohibition on masking convictions.
26) 384.231 - Satisfaction of state disqualification requirement.
27) 384.232 - Required timing of record checks.
28) 384.233 - Background records checks.

- A state should adopt legislation and promulgate rules to support the federal rules contained in 49 CFR 1570 on fraud and intentional falsification of records.
- A state should adopt legislation and promulgate rules to support the federal rules contained in 49 CFR 1572 on security threat assessment for commercial drivers' licenses with a hazardous materials endorsement.
Part 3

Formulation of Best Practices
3.1 – Taxonomy

The testing and licensing of commercial drivers is a subsystem of a state’s driver licensing system. A taxonomy of the subsystem reveals there are eight major functions. These functions areas are:

1. Program Administration.
2. Program Oversight.
3. Application Processing.
4. Establishing Age/Identity/Legal Presence.
5. Determining Eligibility.
6. Screening.
7. Testing.
8. Issuance.

These eight functions have a total of 29 components. The 29 components of these functions have a total of 79 elements within them. The matrix on page 15 details the functions, components and elements of the testing and licensing of commercial drivers.

3.2 – Review of Literature

An extensive review of the literature on the following subjects was conducted:

1. Best practices in general.
2. Best practices in the traffic safety and motor vehicle administration areas.
3. Best practices from AAMVA committees and working groups.
4. Material from AAMVA working groups related to the licensing of drivers.
5. Federal regulations pertaining to commercial drivers and commercial motor vehicles.
6. Reports from the United States Department of Transportation related to commercial drivers and commercial motor vehicles.
7. Reports from the National Transportation Safety Board on commercial motor vehicle drivers.

In addition to the aforementioned literature, a review of individual states manuals, procedures, laws and other miscellaneous materials regarding driver licensing and commercial driver licensing was performed. These materials were provided by the states at the request of AAMVA.
## Matrix of The Functions and Components of The Testing and Licensing of Commercial Drivers

### Functions

<table>
<thead>
<tr>
<th>Functions</th>
<th>100</th>
<th>200</th>
<th>300</th>
<th>400</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Program Administration</strong></td>
<td>110 Authority</td>
<td>210 State Operations</td>
<td>310 Public Information</td>
<td>410 DOB/Name DLN/SSN</td>
</tr>
<tr>
<td></td>
<td>111 Laws/Rules</td>
<td>211 Staff</td>
<td>311 Pre-applications Info/Instruct</td>
<td>411 Documentation</td>
</tr>
<tr>
<td></td>
<td>112 Policies/Procedures</td>
<td>212 Responsibilities</td>
<td>312 Problem Resolution</td>
<td>412 Verification</td>
</tr>
<tr>
<td><strong>Resources</strong></td>
<td>120 Authority</td>
<td>213 Miscellaneous</td>
<td>320 Application Form</td>
<td>420 Domicile/Legal Presence</td>
</tr>
<tr>
<td><strong>Staffing</strong></td>
<td>122 Authority</td>
<td>220 Miscellaneous</td>
<td>321 Miscellaneous Requirements</td>
<td>421 Documentation</td>
</tr>
<tr>
<td><strong>Job Qualifications</strong></td>
<td>130 Authority</td>
<td>221 Contract</td>
<td>330 Special Procedures</td>
<td>422 Verification</td>
</tr>
<tr>
<td></td>
<td>131 Staff</td>
<td>222 Surety Requirements</td>
<td>331 Computers</td>
<td>430 Special Procedures</td>
</tr>
<tr>
<td></td>
<td>132 Third Party</td>
<td>223 Insurance Requirements</td>
<td>332 Miscellaneous</td>
<td>431 Documents</td>
</tr>
<tr>
<td><strong>Training</strong></td>
<td>140 Authority</td>
<td>224 Notification Requirements</td>
<td></td>
<td>432 Miscellaneous</td>
</tr>
<tr>
<td></td>
<td>141 Staff</td>
<td>225 Test Record Requirements</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>142 Third Party</td>
<td>226 Facilities</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Management Info</strong></td>
<td>150 Authority</td>
<td>227 Auditing</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>151 Data Base</td>
<td>228 Manuals</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>152 Reports</td>
<td>229 Miscellaneous</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Program Admin</strong></td>
<td>160 Authority</td>
<td>230 Special Procedures</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>161 Internal</td>
<td>231 Security</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>162 External</td>
<td>232 Fraud Detection</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>163 Audits</td>
<td>233 Miscellaneous</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Communications</strong></td>
<td>170 Authority</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>171 Plan/Internal</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>172 Plan/External</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Functions</th>
<th>500</th>
<th>600</th>
<th>700</th>
<th>800</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Determining Eligibility</strong></td>
<td>510 Driver Record</td>
<td>610 Vision</td>
<td>710 Knowledge Tests</td>
<td>810 License Document</td>
</tr>
<tr>
<td></td>
<td>511 Verification</td>
<td>611 Criteria</td>
<td>711 Standards</td>
<td>811 Required Data Elem.</td>
</tr>
<tr>
<td><strong>Criminal Record</strong></td>
<td>520 Driver Record</td>
<td>612 Verification</td>
<td>712 CDL Manual</td>
<td>812 Other Elements</td>
</tr>
<tr>
<td></td>
<td>521 Verification</td>
<td>620 Medical</td>
<td>713 Test Administration</td>
<td>820 Special Procedures</td>
</tr>
<tr>
<td></td>
<td>621 Verification</td>
<td></td>
<td>714 Special Procedures</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>720 Skills Tests</td>
<td></td>
</tr>
<tr>
<td><strong>Components</strong></td>
<td>721 Standards</td>
<td>722 CDL Manual</td>
<td>723 Test Administration</td>
<td>724 Special Procedures</td>
</tr>
</tbody>
</table>
3.3 – Definition of A Best Practice
A search for the precise definition of a best practice reveals that there is no common definition of a best practice and there are no widely accepted sets of best practices, guidelines, or protocols.

For the purposes of this manual, a best practice is the optimum way to carry out any element of the testing and licensing of commercial drivers. In effect, best practices are recipes, written by experts, for enhancing the integrity of a state’s commercial driver licensing system, as well as promoting uniformity.

3.4 – Concepts of A Best Practice
It must be recognized that a best practice:
1. May not be universally replicable.
2. Is not necessarily a practice that everyone already agrees upon.
3. Does not represent a minimum standard.
4. Comports with the requirements set by laws.
5. Tends to spread throughout a field after success has been demonstrated.

3.5 – Duration of A Best Practice
It must be recognized that best practices are in an evolutionary state and must be maintained in a timely and consistent manner. The best practice of today may not be the best practice of tomorrow.

3.6 – Best Practices
There are three different types of best practices identified in this manual:
1. Practices made up of tacit knowledge already in place in CDL programs.
2. Practices made up with a combination of both codified and tacit knowledge.
3. Practices based on expert opinion and consensus of professional judgment.

These best practices provide guidance and direction to State driver licensing agencies and to other audiences that affect commercial driver licensing. If appropriately implemented, the cited practices will be reasonably likely to increase program uniformity and the integrity of the commercial driver licensing system.

3.7 – State’s Usage of Manual
Each state should do a self-assessment and compare their practices with those detailed in this manual.
Part 4

Definition of Terms and Acronyms
4.1 – Acronyms

BCIS – Bureau of Citizenship and Immigration Services

CDL – Commercial Driver License

CDLIS – Commercial Driver License Information System

CFR – Code of Federal Regulations

EVVE – Electronic Verification of Vital Events.

FMCSA – Federal Motor Carrier Safety Administration

FHWA – Federal Highway Administration

INSASVI – Immigration and Naturalization Service

NAPHIS – National Association of Public Health Information System

NLETs – National Law Enforcement Telecommunications System

SSOLV – Social Security On Line Verification

TSA – Transportation Security Administration

4.2 - Terms

Many states use terms in their statutes, laws, rules, policies, and procedures that are unique to their state or have a different meaning than other states. Listed below are definitions of terms used in the best practices.

Applicant – An individual who applies to a state to obtain, transfer, upgrade, or renew a CDL.

Audit Plan – A detailed written set of methods for carrying out the systematic examination of records, documents and operational activities to determine:

1. Adequacy and effectiveness of CDL program polices and procedures.

2. Compliance with applicable CDL program statutes, laws, regulations, policies and procedures.

3. Reliability, accuracy and completeness of administrative records and reports.

4. The extent to which resources are properly protected and effectively used.

CDL Learner's Permit – A license issued by a state or other jurisdiction, to an individual, which authorizes the individual to operate a motor vehicle on the highways under the direct control of a valid CDL driver.

CDL Program Staff – All the employees of a state’s CDL program.
Communication Plan – A detailed written set of methods for providing and exchanging CDL Program information to both internal and external audiences.

Component – An element or ingredient. (See Element)

Designated Representative – A person identified by an organization, who is an officer, owner, partner or employee of the organization and who is authorized by the organization to administer the organization’s third-party testing operations and to ensure the organization’s compliance with third-party testing program requirements.

Domicile – A state where a person has his/her true, fixed, and permanent home and principal residence and to which he/she has the intention of returning whenever he/she is absent. (See Residency)

Driver’s License – A license issued by a state or other jurisdiction, to an individual, which authorizes the individual to operate a motor vehicle on the highways.

Element – A component part or quality.

Examiner – A person who is employed by a state to administer CDL Skills Tests or a person who is employed by or under the direction or control of an organization authorized to administer CDL skills tests.

Examiner Certificates – A document issued to a person that authorizes them to administer CDL skills tests on behalf of a state.

Function – A special duty or performance required in the course of work or activity.

Organization – A public or private agency or business authorized by a state to participate in and administer CDL skills tests.

Organization Certificates – A document that authorizes a business or government agency to conduct CDL skills tests on behalf of a state.

Residency – A state where a person has his/her true, fixed, and permanent home and principal residence and to which he/she has the intention of returning whenever he/she is absent. (see Domicile)

Risk Assessment – The process of identifying potential risks, quantifying their likelihood of occurrence and assessing their likely impact on the testing and licensing of commercial drivers.

Safety Rating – (???)

Segment – Any of the parts into which a body is separated or separable.

Security Management Plan – A detailed written set of methods to protect the CDL Program from fraud, cheating, and stealing, as well as from natural disasters.

Skills Test Certificate – A document that certifies that an applicant for a CDL has successfully passed specified CDL skills testing.

State – A state of the United States and the District of Columbia.
Subsystem – Any system that is part of a larger system. A system that is secondary or subordinate to the main system. A major portion of a system that performs a specific function in the overall operation function of a system. A major function subassembly or grouping of items or equipment that is essential to operational completeness of a system.

Surety Bond – A debt instrument issued by an entity on behalf of a second party, guaranteeing that the second party will fulfill an obligation or series of obligations to a state. In the event that the obligations are not met, a state will recover its losses via the bond.

System – A set or arrangement of things so related or connected as to form a unit or whole. A methodical arrangement of activities or parts designed to achieve repetitive or reproducible results.

Third-party Tester – Meaning is the same as organization.
Function 100
Program Administration

Components

110 Authority
120 Resources
130 Job Qualifications
140 Training
150 Management Information
160 Internal Controls
170 Communications
111-1 A state should enact laws and/or promulgate rules:
   A. That binds a state to comply with the terms and provisions of the Driver License Compact and the Non-resident Driver Compact or successor compacts.
   B. That makes it punishable by law to counterfeit or alter authentications features such as watermarks, holograms, and other symbols, letters and codes used in identification documents without the authorization of the appropriate authority.
   C. Require an applicant for a CDL Learner’s Permit to meet all of the requirements for a CDL except Pre-Trip, Basic Skills and Road Trip.

111-2 A state should adopt legislation making it a felony for:
   A. A person who makes a false certification regarding any CDL application.
   B. A person who bribes or attempts to corrupt a person or agency that conducts a driving test under an agreement with a state with the intent to influence the opinion or decision of the person or agency conducting the test.
   C. A person who forges, counterfeits, or alters a driving test certificate issued by a designated examining officer appointed or designated by a state.
   D. A designated examining officer appointed or designated by a state who conducts a driving test under an agreement entered into with a state and who varies from, shortens or in any other way changes the method or examination criteria prescribed under that agreement.

111-3 A state should adopt legislation:
   A. Making it illegal for any person, who knowingly encourages, facilitates or participates in improper, illegal or fraudulent CDL driver testing.
   B. That requires retesting for any person to have been improperly, illegally or fraudulently tested for a CDL.
   C. For any organization or examiner to intentionally misrepresent a CDL skills test by omitting any testing requirement or procedure or participates in any illegal activity related to CDL driver licensing.
112

112-1 A state should develop policies and procedures to support the best practices contained in this manual.

112-2 A state should utilize AAMVA model manuals for CDL Program Staff.

112-3 A state should utilize AAMVA model manuals for Third-Party Testing Organization’s Designated Representative Staff that contain state specific Third-Party testing information:

   A. Statutes related to the licensing and testing of CDL.
   B. Rules related to the licensing and testing of CDL.
   C. Policies related to the licensing of commercial drivers.
   D. The procedures necessary to carry out these laws, rules and policies.
   E. Specific third-party information.
   F. Special section on penalties for fraud, falsification of records, improper and unlawful driver license and testing activities.
A state should have adequate resources and personnel in sufficient numbers to provide efficient and effective program administration and oversight.

A state should have as focal point of the program, a person designated as a CDL program manager to coordinate and communicate the CDL program and identify deficiencies.

Duties should include:

A. Program Coordination
B. Program Monitoring and Oversight
C. Program Evaluation
D. Program Compliance

A state’s CDL program manager should receive, review and approve all CDL reports generated by the management information system.
### Best Practices for The Testing and Licensing of Commercial Drivers

<table>
<thead>
<tr>
<th>Function Number</th>
<th>Component Number</th>
<th>Element Number(s)</th>
<th>Program Administration</th>
<th>Qualifications</th>
<th>CDL Program Staff</th>
</tr>
</thead>
<tbody>
<tr>
<td>100</td>
<td>130</td>
<td>131</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

#### 131

131-1 CDL Program Staff should meet the following qualifications:

<table>
<thead>
<tr>
<th>TYPE OF QUALIFICATIONS</th>
<th>CDL PROGRAM STAFF POSITIONS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Perform Background Check</td>
<td>X X X X X X X X X X x</td>
</tr>
<tr>
<td>Perform Driver Record Check</td>
<td>X X X X X X X X X X x</td>
</tr>
<tr>
<td>Legal Resident of United States</td>
<td>X X X X X X X X X x</td>
</tr>
</tbody>
</table>
An organization desiring to become a Third-party Tester must meet the following qualifications:

- Be an established business in a related field for at least two years.
- Hold a satisfactory safety rating from the FMCSA, if applicable.

An owner or designated representative of a Third-Party testing organization must meet the following qualifications:

- Driving record subject to same criteria as other CDL program staff.
- Criminal record subject to same criteria as other CDL program staff.
- Perform credit check.
- Post surety bond.
- Be a legal resident of the United States.

A third-party testing organization’s skills tests examiners must meet the following qualifications:

- Hold a CDL with appropriate endorsements and classifications.
- Driving record subject to same criteria as other CDL program staff.
- Criminal record subject to same criteria as other CDL program staff.
- Perform credit check.
- Be a legal resident of the United States.
- Pass a drug test.
- Administer tests for only one organization.
141

141-1 CDL Program Staff should receive training as follows:

<table>
<thead>
<tr>
<th>TYPE OF TRAINING</th>
<th>CDL PROGRAM STAFF POSITIONS</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>PROGRAM MANAGER</td>
</tr>
<tr>
<td>Basic Pre-service</td>
<td>X</td>
</tr>
<tr>
<td>Advanced Pre-service</td>
<td>X</td>
</tr>
<tr>
<td>Risk Assessment</td>
<td>X</td>
</tr>
<tr>
<td>Security Management</td>
<td>X</td>
</tr>
<tr>
<td>CDL Audit Procedures</td>
<td>X</td>
</tr>
<tr>
<td>CDL Skills Test Administration</td>
<td>X</td>
</tr>
<tr>
<td>AAMVA’s Examiner Training</td>
<td>X</td>
</tr>
<tr>
<td>AAMVA’s Fraud Detection Training</td>
<td>X</td>
</tr>
<tr>
<td>General Medical</td>
<td>X</td>
</tr>
<tr>
<td>Fingerprinting</td>
<td>X</td>
</tr>
<tr>
<td>Database Administration</td>
<td>X</td>
</tr>
<tr>
<td>Investigations, Interviewing and Surveillance</td>
<td>X</td>
</tr>
<tr>
<td>Record Management</td>
<td>X</td>
</tr>
<tr>
<td>Specialized Auditing</td>
<td>X</td>
</tr>
<tr>
<td>Specialized Training</td>
<td>X</td>
</tr>
<tr>
<td>Specialized Medical</td>
<td>X</td>
</tr>
<tr>
<td>Specialized Computer</td>
<td>X</td>
</tr>
<tr>
<td>Specialized Criminal Justice</td>
<td>X</td>
</tr>
</tbody>
</table>

141-2 Any CDL Program Staff member should receive annual in-service training.

141-3 Any CDL Program Staff that is certified to be a CDL skills test examiner should be required to attend in-service training as a condition of active status as a CDL skills tests examiner.
142-1 A third-party organization’s owner and/or designated representative should receive the following training before certification into the program:

A. Basic pre-service training.
B. Security Management training.
C. CDL skills test administration training.
D. Record management training.

142-2 A third-party organization’s skills test examiner should receive the following training before certification into the program:

A. Basic pre-service training.
B. CDL skills test administration training.
C. Record management training.
D. AAMVA’s certified examiner training.
E. AAMVA’s fraud detection training, if applicable.

142-3 All Third-Party designated representatives and examiners involved in a third-party organization must attend annual in-service training to remain in the program.
Each state should create a “CDL testing database” that includes information on:

A. Each third-party testing organization involved in the program.
B. Each owner of third-party testing organizations.
C. Each designated representative of third-party testing organization.
D. Each state and Third-Party examiner involved in the program.
E. Documents.
F. Audits.

Information contained in the database regarding each organization (company/tester) should include, at minimum, the following elements:

A. Organization information.
B. Designated representative.
C. Insurance information.
D. Bond information.
E. Examiner information.
F. Testing site information.
G. Route information.
H. Certification information.
I. Score sheet Information.
J. Audit information.
K. Complaints.
L. Adverse action/sanctions by licensing authority.
M. Status.
N. Comments.
O. FMCSA Safety Rating

Information contained in the database regarding each designated representative and examiner should include the following elements:

A. Personal information.
B. Examiner ID information.
C. Certificate information.
D. Test score information.
E. Passing rates information.
F. Training information.
G. Confirmation of criminal record check completed.
H. Complaints.
I. Adverse action/sanctions by licensing authority.
J. Status.
K. Bond information.
L. Comments.
151-4 Information contained in the database regarding inventory control should include the following elements:

A. Organization certificates.
B. Skills test certificates.
C. Examiner’s ID.
D. Score sheets.

151-5 Information contained in the database regarding audits should include the following elements:

A. Type of audit.
B. Dates/times/etc.
C. Company information.
D. Examiner information.
E. Auditor information.
F. Audit findings.
G. Comments.

151-6 Transaction data should be captured automatically and transferred to a separate file. Instant on-line access to file and automatic generation of reports should be part of the system requirements.

151-7 Eligibility/screening and testing data (E/S/T) should be captured automatically and transferred to a separate file. Instant on-line access to file and automate generation of reports should be part of the system requirements.

151-8 Instant on-line access to database is required to perform analyses, evaluation and research.
152

152-1 The following should be generated by CDL Program staff:

A. Site inspection reports.
B. Complaint investigation reports.
C. Special audit reports.
D. Annual audit reports.

152-2 The following reports should be generated automatically from the database at the end of each month, and each year and be reviewed and monitored:

A. Test summary report.
B. Transaction summary report.
C. Listing of current third-party testing organizations.
D. Inventory control reports.
E. Any other reports to adequately administer oversight of the program.

152-3 A monthly report should be prepared by the CDL program manager and should be submitted to the chief driver license administrator.

152-4 New section for Supervisor Exception Reporting.¹

- Something that deals with exception reporting by a supervisor
- Any change to a data element needs to be flagged.
- Exception report must be reviewed.

¹ Per Kevin Lewis notation.
### 161

161-1 A formal audit plan should be developed annually. The framework for an audit plan can be found in AAMVA’s document *Internal Controls and DL/ID Issuance Best Practice, August, 2003*. This document is located in Appendix__________ of this manual.

### 162

162-1 A state should establish preventative controls to discourage errors, irregularities and fraud. These controls plan can be found in *Internal Controls and DL/ID Issuance Best Practice, August, 2003*. This document is located in Appendix__________ of this manual.

162-2 A state should establish a code of ethics.

162-3 A state should have each CDL program employee and third-party organization’s designated representative and examiners read and sign a code of ethics.

162-4 A state should conduct background checks as detailed in best practice 131-1.

162-5 A state should follow the formal training plan contained in best practice 141-1.

162-6 A state should develop a formal procedures manual as defined in best practices 112-2 and 112-3.

162-7 A state should have procedures for reporting fraud as contained in best practices 232-1 and 232-5.

162-8 A state should have a policy on annual mandatory consecutive leave for designated employees.

162-9 Passwords and IDs should be kept in a separate data base, with only authorized supervisors having access.

162-10 A state should develop procedures on limiting access to certain information and documents on a need to know basis.

162-11 A state should develop procedures requiring a two-person process to verify documents and approve transactions.

162-12 A state should have surveillance cameras installed and in use in every location where a CDL can be issued.

162-13 A state should establish logs and ensure audit trails are clear for investigative controls.

### 163

163-1 A state should conduct in-person random audits on transactions.

163-2 A state should conduct random computer audits of transactions.

163-3 A state should conduct random audits on document inventories and fiscal inventories.

163-4 A state should develop and systematically review exception reports.
A state should develop an annual communication plan that includes the following:

A. Internal communication strategies.
B. Third-party testing communication strategies.
C. Public information strategies.
D. Strategies for communicating problems and problem resolution.
E. Strategies for immediate notification of risk and fraud.
F. Annual report of all activities, trends and accomplishments.

Internal communications media should include, at a minimum, an internal website that is updated daily with periodic updates and news.

A fraud reporting hotline should be established that is independent of the CDL program.

An electronic network should be established where all persons involved with the CDL program have the capability to receive and send communications.
Function 200
Program Oversight

Components

210  State Operations
220  Third-party Operations
230  Special Procedures
211-1 If employees have the ability to override any part of a transaction, a state should establish a reporting system that provides details of the override.

A. All levels of employees should be able to be checked and track their access.
B. Limits should be placed on who can do overrides.

211-2 A state should develop procedures for a daily review by designated managers of the following transactions:

A. Licenses to non-citizens.
B. Transaction overrides.
C. All licenses issued without automatic verification.

211-3 Procedures should be established to remove personnel from the CDL program for convictions resulting from driving and personal conduct. (Note – same as pre-employment.)

211-4 A state should mark the driver history records of the CDL manager, all CDL program employees, and others as determined by the jurisdiction so a state will be notified of any and all events that are recorded on the examiner’s record. These notifications should be directed to the CDL Coordinator. The driver history file of all CDL program staff should be flagged and all transactions to the file should be submitted to the CDL Program Manager. The driver history file of the CDL program manager should be flagged and all transactions to the file should be submitted to the Chief Driver License Administrator.

211-5 Applicants that have successfully completed a skills test should be retested on a random basis. These retests should be on the basis of both organizations and examiners.

211-6 A state should provide examiners with an examiner’s manual containing details on testing and any other state imposed requirements:

A. Information on screening applicant’s documents.
B. Details on how to conduct the tests.
C. Details on information that must be given to the applicant.
D. Scoring procedures and minimum passing scores.
E. Information for selecting driving test routes.
F. Lists of the skills to be tested.
G. Instructions on where and how the skills will be tested.
H. How performance skills will be scored.
I. Causes for automatic failure of skills test.
J. Completing and accounting for a skills test certificate.
211-7 Examiners should not be allowed to administer more than six CDL skills tests in a work day.
   A. If more tests are given, there should be legitimate reasons recorded and reported, such as failures on pre-trips, or multiple class C tests.
   B. Higher numbers of skills tests without legitimate reasons, may indicate inappropriate examiner behavior.

211-8 Examiners should administer at least 10 CDL skills tests in the year to maintain certification/authorization to conduct tests. Examiners who do not meet this standard should be required to complete a refresher course in skills testing.

211-9 Examiners must be certified and evaluated annually to administer the CDL skills tests.
A state’s chief motor vehicle administrator should receive, review and sign off on the following annual CDL reports:

A. Risk assessment report.
B. Communication plan.
C. Security management plan.

A state’s chief driver license administrator should receive, review and sign off on the following CDL reports:

A. Risk assessment report.
B. Communication plan.
C. Training plan.
D. Security management plan.
E. Audit plan.
F. Inventory control plan.
G. Transaction override reports.

A state’s chief driver license administrator should insure that a (n):

A. Risk assessment is conducted annually under the auspices of the CDL program manager.
B. Communication plan is developed annually for the CDL program.
C. Training plan is developed annually for the CDL program manager.
D. Audit plan is developed annually for the CDL program.
E. Inventory control plan is developed annually for the CDL Program.
F. Annual report is developed.
G. Computer generated reports are timely and of high quality.
H. Reports from CDL program staff are timely and of high quality.
### Best Practices for The Testing and Licensing of Commercial Drivers

<table>
<thead>
<tr>
<th>Function Number</th>
<th>Component Number</th>
<th>Element Number(s)</th>
<th>Element(s)</th>
</tr>
</thead>
<tbody>
<tr>
<td>200</td>
<td>210</td>
<td>213</td>
<td>213</td>
</tr>
<tr>
<td>Program Oversight</td>
<td>State Operations</td>
<td>Miscellaneous</td>
<td>213-1</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>213-2</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>213-3</td>
</tr>
</tbody>
</table>

#### 213

213-1 Any CDL Program staff member is prohibited from obtaining or using personal information concerning an license applicant or using personal information concerning any license applicant for purposes of surveys, marketing or solicitation. Driver and vehicle information and records obtained from a state are subject to the restrictions imposed by applicable federal, state and local privacy protection laws.

213-2 Each CDL Program staff member should be issued a photo identification card.

213-3 Each CDL Program staff member should be required to report to his or her immediate supervisor, any criminal convictions. In addition, CDL examiners shall report any motor vehicle conviction and any traffic crash.
221 Have an agreement with each third-party tester that contains the following provisions:

A. Allows for inspections and audits as detailed in element number 227.
B. Surety bond requirements as detailed in element number 222.
C. Insurance requirements as detailed in element number 223.
D. Notification requirements as detailed in element number 224.
E. Test record requirements as detailed in element number 225.
F. Test administration requirements as detailed in element number 721.
G. Facility requirements as detailed in element number 226.
H. Requirements in regard to test fees and scheduling as detailed in element number 229.
I. Requirements in regard to advertising and privacy as detailed in element number 229.
J. Requires all third-party examiners to meet the same qualifications and training standards as a state examiner to the extent necessary to conduct skills test in compliance with federal regulations.
K. Requires annually, either state employees to take the tests actually administered by the third-party testers as if a state employee were the test applicant, or a state to test a sample of drivers who were examined by the third-party tester to compare pass/fail results.
L. Reserves to a state to take prompt and remedial action against any third-party tester when such third-party tester fails to comply with state or federal standards for the CDL testing program or with any other terms of the third-party contract.
M. Allows either a state or the third-party organization to cancel the contract for any reason with 30 days notice.
N. Requires the third-party tester to make full restitution to the state for all fees associated with investigating improprieties resulting in convictions or requiring the retesting of applicants.
### Surety Bond Requirements

**222-1** Surety bond requirements should include:

- A. Each third-party organization should provide a surety performance bond for at least $100,000.
- B. A company authorized to do business in a state must write the bond.

**222-2** Bond may be cancelled only after giving 30 days written notice to a state.
### Best Practices for The Testing and Licensing of Commercial Drivers

<table>
<thead>
<tr>
<th>Function Number</th>
<th>Component Number</th>
<th>Element Number(s)</th>
<th>223</th>
</tr>
</thead>
<tbody>
<tr>
<td>200</td>
<td>220</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Program Oversight</td>
<td>Third-Party Org./Examiners</td>
<td>Insurance Requirements</td>
<td></td>
</tr>
</tbody>
</table>

**223**

223-1 Third-party organizations should maintain insurance that meets the following requirements on motor vehicles owned, rented or leased or registered to the organizations when their vehicles are used to administer CDL skills tests:

A. Possess a certificate of insurance issued by an insurance company licensed to do business in a state or a certificate of self-insurance issued under state statutes.

B. Maintain bodily injury and property damage liability insurance coverage on motor vehicles used to administer CDL skills tests in the amount of not less than $1,000,000 for bodily injury to or death of one or more persons in any one accident and not less than $100,000 for injury to or destruction of property of others in any one accident.

C. Maintain insurance coverage, which does not exclude from coverage any person while CDL skills tests are administered by the organization, any person suffering bodily injury of sustained property damage as a result of CDL skills tests administered by the organization or any person employed by the organization to administer CDL skills tests.

D. Should not use motor vehicles to administer CDL skills test unless the owner or registrant of the vehicle produces a certificate of insurance for the vehicle that is in force and issued by an insurance company who meets state requirements.

223-2 A third-party organization should maintain general business liability insurance in the amount of at least $1,000,000. Evidence of this coverage in the form of a certificate from the insurance carrier must be filed with a state. The certificate must state that the insurance may not be canceled except upon 30 days written notice to a state.

223-3 A third-party organization, before being approved to administer CDL skills tests, should provide to a state certificate of insurance verifying insurance coverage required. All certificates should be prepared by the insurance provider and sent directly to a state by the provider. All certificates should list a state as certificate holder and contain a provision indicating that the coverage will not be cancelled nor materially changed without 30 days written notice to a state.
224-1 A third-party organization should notify a state in writing prior to any change in the organization’s name, address, designated representative, change in ownership or any change in the test location, off road basic control skills layout or road test routes. Any change must be approved in writing by a state before the organization implements the proposed change.

224-2 A third-party organization should notify the State in writing within 24 hours of any of the following:

A. Any change in the employment status of any person authorized by a state to be an examiner for the organization or any change in the availability of CDL skills testing offered by the organization.
B. Receipt of any complaint alleging a criminal or civil action, or any irregularity in CDL skills test administration, which is received by the organization regarding any examiner employed by or acting under the control of the organization.
C. An organization ceases operations.
D. Changes in medical condition, which may disqualify an examiner from meeting minimum medical qualifications, if applicable.

224-3 A third-party organization is responsible for ensuring that examiners notify a state and the organization in writing as follows:

A. Within 24 hours after any change of medical condition that arises which may disqualify the examiner from meeting the minimum medical qualification required to operate the class of vehicle use for CDL skills tests, if applicable.
B. Before the end of the next business day after the examiner receives notice of any civil or criminal complaint or complaint about CDL skills tests administration.
C. Within one business day after receipt of a written or verbal request for information and report as requested by a state.
D. Within one business day of any accident, which is reportable under state law, that occurs during the administration of CDL skills tests.
225

225-1 A third-party organization should maintain, at a designated location, all organizational, skills tests, and certificate inventory records.

225-2 A third-party organization should employ a skills test record-keeping system that is logical and easily accessible for inspections.

225-3 All test documents should be maintained alphabetically by the applicant’s last name within each calendar year. Copies of the following test applicant documents must remain on file for a minimum of four years:

A. Score sheets.
B. Issued skills tests certificates.
C. Documentation regarding lost/missing certificate inventory and replacement skills tests certificates.
D. Applicant’s photo license.
E. Applicant’s medical certificate, if applicable.
F. Vehicle registration.
G. Vehicle insurance.

225-4 All reports submitted to a state should be kept on file for the previous four years.

225-5 A skills test certificate inventory log must be maintained for the previous four years.

225-6 CDL skills test documents more than four years old should be disposed of in a method that assures the documents cannot be used or taken by non-authorized personnel, i.e., shredded or destroyed.
226

226-1 Third-party organizations should have on-line capabilities to a state’s driver history files in order to accomplish the following:

A. Master scheduling.  
B. Verify photo and signature.  
C. Record test data.  
D. Issue a control number.  
E. Administrative communications.  

226-2 A Third-party organization’s testing facilities must:

A. Have a permanent street address within the boundaries of the state.  
B. Must have adequate space for vehicle inspection and basic control skills testing activities.  
C. Have test areas that are safe and adequate for proper inspection and testing.  

226-3 Facilities must meet all requirements of federal, state and local laws, including zoning ordinances.  

226-4 Facilities must have records, forms and other CDL materials locked and away from public access.
Each organization and applicant for certification as an organization must permit representatives of a state, with or without prior notice, to conduct inspections and audits of operations, facilities and records as they relate to CDL testing. A state may seize any records pertaining to the organization’s CDL testing.

An organization which has been certified, and has executed an agreement, will be subject to inspection by a state and or the Federal Motor Carrier Safety Administration, who may inspect and audit the organization’s CDL testing program, including conducting examiner performance evaluations, inspections, investigations, and audits. Inspections may be made with or without prior notice.

Inspections, investigations and audits may include, among other things:

- A review of records relating to CDL testing.
- A review of CDL procedures, practices and operations.
- A review of off-road basic control skills courses and on-road driving routes.
- An inspection of all vehicles used for CDL testing.
- A review of the qualifications and test performance of examiners.
- Testing a sample of drivers who have been issued a certificate indicating they have passed the tests administered by the organization.
- Surveys or personal interviews of applicants who have been administered tests by the organization.
- Electronic surveillance, videotaping, or taking photos of the CDL tests, with or without prior notice.
- Any other review a state deems necessary to complete an inspection, investigation, or audit.
Best Practices for The Testing and Licensing of Commercial Drivers

<table>
<thead>
<tr>
<th>Function Number</th>
<th>Component Number</th>
<th>Element Number(s)</th>
<th>228</th>
</tr>
</thead>
<tbody>
<tr>
<td>200</td>
<td>220</td>
<td>228</td>
<td></td>
</tr>
<tr>
<td>Program Oversight</td>
<td>Third-Party Org./Examiners</td>
<td>Manuals</td>
<td></td>
</tr>
</tbody>
</table>

228

228-1 Ensure that examiners are qualified to administer tests on the basis of training, including the AAMVA Certified Commercial Examiner Program, and/or other experience. States are encouraged to become accredited by AAMVA and to certify their examiners.

228-2 A state should provide examiners with an examiner's manual containing details on testing and any other state-imposed requirements, including:

A. Information on screening applicant’s documents.
B. Details on how to conduct the tests.
C. Details on information that must be given to the applicant.
D. Scoring procedures and minimum passing scores.
E. Information for selecting driving test routes.
F. Lists of the skills to be tested.
G. Instructions on where and how the skills will be tested.
H. How performance skills will be scored.
I. Causes for automatic failure of skills test.
J. Completing a skills test certificate and accounting for certificate issuance.

States are encouraged to use the AAVMA model manual and include jurisdiction specific information where needed.
229

229-1 Third-party organizations should be required to comply with the following test scheduling, fees and refund requirements:

   A. Have a current printed fee and refund policy that is available to all applicants. The policy should clearly explain the fees charged for cancellations, no-shows, improper documents, faulty equipment, and vehicle rentals, as well as refund procedures.
   B. Maintain a test scheduling system that captures and preserves past, present and future test dates and times and includes every test applicant’s full name, driver license number, and phone number. The organization should keep all scheduling records for a minimum of four years.

229-2 Organizations should be required to report to a state any misdemeanor or felony convictions, any motor vehicle conviction, and any traffic crashes involving their examiners/testers.

229-3 Fees that third-party organizations charge for the administration of skills test should not be regulated but should be reported to the DMV. Jurisdictions may wish to consider setting limits on fees, if appropriate.

229-4 Examiners should not be permitted to test people they train, in order to maintain tester objectivity.

229-5 Third-party organizations should be required to comply with the following advertising and privacy requirements:

   A. An organization may not advertise that it can issue or guarantee the issuance of a CDL, or imply that the organization can influence a state in the issuance of a CDL, or imply that preferential or advantageous treatment from a state can be obtained.
   B. An organization may put in its advertising that it is certified by a state, but must not use the word “State” in its name, or imply, through its name and advertising, that it is a subdivision of, or endorsed by a state.
   C. DMVs may promulgate regulations of organizations and advertising.
   D. An organization or any agent of the organization is prohibited from advertising or otherwise soliciting testing services to any individual on premises rented, leased or owned by a state.

229-6 Printed receipts bearing the organization’s name must be given to every applicant.

229-7 Organizations should not be allowed to test their own family members.

229-8 Each third-party’s designated representative and all examiners should be issued an identification card upon being authorized to administer CDL skills tests. Such card should be worn at all times when organization is administering CDL skills tests.
229-9 An organization or any agent of the organization is prohibited from obtaining or using personal information concerning all license applicants or using personal information concerning any license applicant for purposes of surveys, marketing or solicitation. Driver and vehicle information and records obtained from a state are subject to the restrictions imposed by applicable federal, state and local privacy protection laws.
231

231-1 A security management plan should be in place including how to respond to breaches of security in the CDL program.

231-2 All CDL Program Staff should receive training in security management and fraud detection.

231-3 A section on security management and fraud detection should be included in:

   A. State’s Procedures Manual.
   B. State’s CDL Skills Test Examiner’s Manual.

231-4 Establish fraud reporting line independent of CDL program for citizens and employees.

231-5 A state should have defined processes on “what to do” when fraudulent documents have been identified before a CDL was issued and after the CDL was issued.

231-6 States should develop a process and establish policies to mark a driver license history record to alert other viewers of the record that a problem exists with this record.

231-7 The CDL applicant’s application documents, including the previous CDL or other license, should be photocopied and maintained by the CDL program staff during the application through testing process.
AAMVA's Best Practices Manual for The Testing and Licensing of Commercial Drivers

232

232-1 Procedures should be in place on detecting fraud and how employees should respond when fraud, cheating or criminal activity is detected. These should include procedures when the report is from:

A. A public or private citizen or non-citizen.
B. An applicant.
C. An employee.
D. A Third-party examiner or designated representative.
E. Another state agency including law enforcement.
F. A federal agency.

A hot line should be established to allow anyone to report fraud to an individual outside of the CDL Program Staff.

232-2 All CDL Program Staff should receive training in fraud detection.

232-3 A section on fraud detection should be included in:

A. State’s Procedures Manual.
B. State’s CDL Skills Test Examiner’s Manual.

232-4 A statement about the penalties for committing fraud should be included in each manual produced by the CDL Program.
233

233-1 A state should develop a review process for:

A. All CDL program policies and procedures.
B. Internal and third-party CDL oversight practices.
C. Internal and third-party CDL licensing facilities.

233-2 A state should have each CDL program employee and third-party organization's designated representative and examiners read and sign a code of ethics.
Function 300
Application Processing

Components

310  Public Information
320  Application Form
330  Special Procedures
### 311

311-1 A state should have information available to the general public with 24-hour access on all aspects of the CDL program.

311-2 A state should have a public information program included in their communication plan.

311-3 A state should have an automated system of transaction assistance for identification, eligibility, screening, testing, and issuance procedures upon an applicant entering a driver licensing facility.

311-4 A state should have “read access only” rights to every other state’s driver history files.

### 312

312-1 A state should have an automated system to resolve problems related to all components of the CDL program.

312-2 Information should be published in all CDL program materials on how to report fraudulent activities.
321

321-1 A state should have instant on-line verification of name, date of birth, driver license and social security number with driver history record.

321-2 A state should have on-line retrieval of pictures and signatures of applicants with previously issued licenses and ID cards.

321-3 A state should have defined processes on "what to do" when fraudulent documents have been identified before a CDL was issued and after the CDL was issued.
331

331-1 States should develop a process and establish policies to mark a driver license history record to alert other viewers of the record that a problem exists with this record.

331-2 Computers should be programmed so that examiner ID numbers associated with all phases of the CDL process can be entered and retrieved so employees involved with specific transactions can be identified.

331-3 Computers should be programmed so transactions can only be conducted in a set order with internal controls. For example, testing results cannot be entered into the computer until CDLIS and PDPS checks have been made.

331-4 Computers should be programmed to automatically check CDLIS and PDPS for each CDL transaction.
332-1 A state should take the applicant’s color or digital photo immediately after the applicant has submitted his/her application.

332-2 A state should capture fingerprints of all driver applicants for use on driver’s record immediately after the applicant has submitted his/her application.

332-3 Each individual must complete and sign the application form. A state must forward it to TSA in a form and manner acceptable to TSA.

332-4 A state must inform the individual that a copy of the individual’s criminal history record will be provided to the individual by TSA, if the individual makes a written request for the record.
Function 400
Age/Identity/Legal Presence

Components

410  DOB/Name/DLN/SSN
420  Domicile/Legal Presence
430  Special Procedures
### Proof of Age and Identity

<table>
<thead>
<tr>
<th>Function Number</th>
<th>Component Number</th>
<th>Element Number(s)</th>
<th>Showdown</th>
</tr>
</thead>
<tbody>
<tr>
<td>400</td>
<td>410</td>
<td>411</td>
<td>DOB/Name/DLN/SSN</td>
</tr>
</tbody>
</table>

#### 411

- **411-1** A list of acceptable documents to proving a person’s name and date of birth should be established from the AAMVA document titled “AAMVA – Status Report to AAMVA Membership”, July 2003.

- **411-2** Documents offered to meet proof of age and identity, which are in a foreign language, shall be accompanied by:
  
  A. Photocopy of the document, to be retained by a state.
  B. A written English language translation, on the form provided by a state, authenticated by a certified translator.

- **411-3** Any applicant that produces a birth certificate from a country other than the United States should be required to prove his/her legal presence.

- **411-4** A list of acceptable documents to establishing a person’s social security number should be established from the AAMVA document titled “AAMVA – Status Report to AAMVA Membership”, July 2003. States should require applicants to provide documentation that they have a social security number, as per the guidelines set by the AAMVA.
Best Practices for The Testing and Licensing of Commercial Drivers

<table>
<thead>
<tr>
<th>Function Number</th>
<th>Component Number</th>
<th>Element Number(s)</th>
<th>Number(s)</th>
</tr>
</thead>
<tbody>
<tr>
<td>400</td>
<td>410</td>
<td>412</td>
<td>412</td>
</tr>
<tr>
<td>Age/Identity/Legal Presence</td>
<td>DOB/Name/DLN/SSN</td>
<td>Verification</td>
<td></td>
</tr>
</tbody>
</table>

412

412-1 A state should have instant on-line validation and verification of driver history file from home state, including photo and signature.

412-2 A state should have instant on-line verification of social security number with the Social Security Administration through the SSOLV.

412-3 A state should have an instant on-line cross check of social security number from home state’s driver file.

412-4 A state should have instant on-line validation and verification with the National Association for Public Health Statistics and Information Systems (NPHIS) and Electronic Verification of Vital Events (EVVE).

412-5 A state should have instant online access to a state’s Law Enforcement Information Network (LEIN) so that arrest warrants can be checked.
421

421-1 A state should not accept post office boxes for establishing residency.

421-2 A list of documents acceptable to establishing a person’s residency should be established from Attachment 1 of the AAMVA document titled, “AAMVA – Status Report to AAMVA Membership”, July 2003.

421-3 A state should require an applicant to prove his/her legal presence in the United States through use of the Immigration and Naturalization’s documents.

421-4 All non-citizens should be required to present two identification documents that adhere to AAMVA’s standardized listing of acceptable primary and secondary identification documents of which:

A. At least one must be a primary document that contains the applicant’s date of birth (Original or certified copy).
B. Any secondary document must contain applicant’s name and sufficient information to verify primary document validity.
### Best Practices for The Testing and Licensing of Commercial Drivers

<table>
<thead>
<tr>
<th>Function Number</th>
<th>Component Number</th>
<th>Element Number(s)</th>
<th>422</th>
</tr>
</thead>
<tbody>
<tr>
<td>Age/Identity/Legal Presence</td>
<td>Domicile/Legal Presence</td>
<td>Verification</td>
<td>422</td>
</tr>
</tbody>
</table>

422

422-1 A state should verify an applicant’s address by electronic means.

422-1 A state should verify proof of legal presence with an instant check of status through Immigration and Naturalization Service’s Alien Status Verification Index.

422-2 A state should tie the CDL expiration date to the documented non-immigrant alien’s duration of stay.

422-3 All non-citizen applicants should be referred to specially trained examiners or specialty sites staffed by specially trained examiners.
431

431-1 A state should have defined procedures for acceptability, validity, forgery and alteration of documents.

431-2 A state should not issue both a CDL and a state ID card.

431-3 A state should verify an applicant’s signature upon the application with documents presented for name and date of birth.

431-4 Applicants that do not have the proper documentation for age/identity should not be allowed to proceed to the screening or testing process.

431-5 Documents establishing age, identity, residency and legal presence should be collected, copied and recorded, then returned to the applicant.

432

432-1 A state should program their computer system so that the entering of a social security number will initiate a check against the Social Security Administration database.

432-2 A state should tie the expiration of the CDL to the end of stay date indicated by the non-citizen’s immigration documents.

432-3 Adopt standardize exception-processing procedures with multiple checks and balances.

432-4 A transaction should be terminated upon suspicion of fraud or questionable documentation. Standardized procedures should be followed after termination.
Function 500
Determining Eligibility

Components

510  Driver Record
520  Criminal Record
A state should have the capability to conduct an:

- A. Automatic on-line check with NDR.
- B. Automatic on-line check with CDLIS.
- C. Automatic on-line check with state of record.
- D. Automatic on-line check of LEIN.
521

521-1 A state should check their state’s Law Enforcement Information System (LEIN) to determine if there are any warrants out against the applicant.

521-2 A state should not issue a CDL if the applicant has any outstanding arrest warrant. The state should continue with the transaction without issuing the CDL, and discretely contact law enforcement.
Function 600
Screening

Components

610  Vision
620  Medical
611

611-1 A state should screen all applicants for a new or renewal CDL for vision.

612

612-1 A state should have automatic on-line driver history record to determine previous vision problems and restrictions.

612-2 A state should record results on-line with records updated immediately.
621

621-1 A state should require the submission of a long-form physical for every new CDL applicant and every two years thereafter and have qualified staff on board to review the form.

621-2 A state should have:
   A. Automatic on-line driver history record check to determine previous medical problems and restrictions.
   B. Results recorded on-line and records updated immediately.
   C. Procedures in place to ensure applicant meets the medical fitness requirements of 49 CFR 39.

621-3 A state’s handicap plate/placard database should be automatically accessed upon application as part of the medical verification process.
Function 700
Testing
Components

710  Knowledge Tests
720  Skills Tests
711

711-1 The basic knowledge test, for all CDL applicants, must comply with all federal regulations.

712

712-1 A state should provide a driver’s manual containing information on how to obtain a CDL with endorsements to all CDL applicants. States are encouraged to use the AAMVA model manual and include state specific information.

712-2 A state’s CDL Manual must contain:

A. State procedures and steps in obtaining a CDL.
C. Vehicle groups and endorsements as specified in 49 CFR 383 Subpart F.
D. The substance of knowledge and skills, which drivers shall have. Details on testing procedures, including the purpose of the test, how to respond, any time limits for taking the test, and special procedures determined by a state.
E. Directions for taking the test.
F. Include in the driver manual information on the implied consent to alcohol testing (described in 49 CFR § 383.72) and the penalties (contained in 49 CFR 383.51(b)) to which a CDL holder is exposed for failure to comply with such testing.
G. Special section on penalties for fraud, falsification of records, improper and unlawful driver license and testing activities.
### Best Practices for The Testing and Licensing of Commercial Drivers

<table>
<thead>
<tr>
<th>Function Number</th>
<th>Component Number</th>
<th>Element Number(s)</th>
<th>713</th>
</tr>
</thead>
<tbody>
<tr>
<td>700</td>
<td>710</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Testing</td>
<td>Knowledge Tests</td>
<td>Test Administration</td>
<td></td>
</tr>
</tbody>
</table>

#### 713

713-1 CDL knowledge tests should be administered in a secure environment, conducive to testing with a CDL program staff person monitoring at all times.

713-2 Fully computerized and secure CDL knowledge testing systems where questions are randomly generated and scores are automatically recorded should be used.

713-3 When fully computerized CDL knowledge testing is not available, computers should be used that randomly generate a new test for each CDL applicant.

713-4 Software for CDL knowledge testing systems must be approved by the AAMVA.

713-5 Record each test an applicant is administered on a database that includes the following:

A. Name of test.
B. Score on the test.
C. Outcome (Pass/Fail).
D. Employee number.
E. Date.
F. Start and Stop Time.
G. Comments
H. Retention
### Best Practices for The Testing and Licensing of Commercial Drivers

<table>
<thead>
<tr>
<th>Function Number</th>
<th>Component Number</th>
<th>Element Number(s)</th>
<th>Element</th>
</tr>
</thead>
<tbody>
<tr>
<td>700</td>
<td>710</td>
<td>714</td>
<td>Special Procedures</td>
</tr>
</tbody>
</table>

#### 714

714-1 A state should not allow interpreters of any type for any CDL knowledge test.

714-2 A state should not accept knowledge test scores from other states.

714-3 Knowledge tests should be administered in English only.

714-4 Knowledge test passing scores should be valid for six months from the date of test.

714-5 No knowledge tests should be administered until applicant has been screened and determined eligible for a CDL.

714-6 Policies should be established for retaking knowledge tests. Knowledge tests should not be allowed to be taken twice in one day. Minimum time periods between subsequent test failures should be established by the state.

714-7 Knowledge test scores can only be corrected though a two-person supervisory process.
721-1 CDL skills test should not be scheduled until all required knowledge tests have been successfully completed and electronically recorded. All skills testing must be done in compliance with federal regulations.
Best Practices for The Testing and Licensing of Commercial Drivers

<table>
<thead>
<tr>
<th>Function Number</th>
<th>Component Number</th>
<th>Element Number(s)</th>
<th>CDL Driver’s Manual Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>700</td>
<td>720</td>
<td>722</td>
<td></td>
</tr>
<tr>
<td>Testing</td>
<td>Skills Tests</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

722

722-1 States are encouraged to use the AAMVA model manual and include state specific information.

722-2 A state’s CDL Driver’s Manual should provide answers to the following questions about a state’s CDL skills testing:

A. How to schedule a CDL skills test?
B. When and where to obtain a CDL skills test?
C. How much will it cost?
D. What documents do I need when I take the test?
E. What does the test consist of?
F. How will the test be scored?
G. What will happen if I am caught cheating?
H. What is the time period required before re-taking tests?
I. When will test results be provided?
Before an applicant takes a CDL skills test, the examiner must:

A. Verify the person’s eligibility. Applicant must have documentation verifying successful completion of the CDL knowledge tests that are appropriate for the vehicle the applicant will be tested in.
B. Verify the person’s identity by comparing the digital image and signature on a state issued license with all other documents.

CDL skills tests should be conducted in a vehicle:

A. Which is representative of the group of vehicle for which the applicant seeks to be licensed for and for which the examiner is qualified to administer tests in.
B. Occupied only by authorized personnel and the applicant.
C. Equipped with seats and seat belts (if manufactured with seatbelts) for every occupant.

CDL skills test score sheets should be designed to:

A. Be scanned.
B. Have a control number.
C. Have a bar code that contains the control number.

CDL skills tests score sheets should be designed to capture the following information:

A. Date of test.
B. Time test started/finished.
C. Examiner’s name/ID number/signature.
D. Test site ID/route ID.
E. Applicant name/DL Number/DL Information.
F. Applicant’s signature.
G. Vehicle plate number/GVWR.
H. Trailer plate number/GVWR.
I. Vehicle description.
J. Type of group designator, endorsements and restrictions tested for.
K. Final results and scores for all tests.
L. Reason for automatic failure.
M. Scoring area for each test component.
N. Certificate number issued.
O. Comments.
P. Whether the vehicle is equipped with manual or automatic transmission.
723-5 Provide examiners with, and ensure the use of, standardized scoring sheets for the skills tests, as well as standardized instructions and pre-trips.

723-6 Automatically fail any applicant who does not obey traffic laws, causes an accident or when examiner prevents a dangerous action or accident during the skills test.

723-7 Record each test an applicant is administered on a data base that includes the following:
   A. Applicant name.
   B. Name of test.
   C. Score on the test.
   D. Outcome (Pass/Fail).
   E. Employee number.
   F. Date.
   G. Time.
   H. Certificate number issued.
   I. Comments.

723-8 Policies should be established for retaking skills tests. Minimum time periods should be:
   A. First failure 1 week.
   B. Second failure 2 weeks.
   C. Third failure 3 weeks.
   D. Fourth failure 4 weeks.
   E. Fifth failure 1 year.

723-9 Maximum of six full skills tests per day.

723-10 No skills tests after dark.

723-11 Require retesting after suspension, disqualification and revocation.
724-1 A state should not allow interpreters of any type for the CDL pre-trip and basic skills tests.

724-2 A state should have formal rules or policies on skills test certificates that include the following:
   A. Distribution to authorized persons only.
   B. Security for the storage of the certificates.
   C. Records of distribution to authorized person, examiners, etc.
   D. Authorized persons should account for every skill test certificate assigned to them.
   E. Replacement of damaged, lost or unaccounted certificates.
   F. Reporting stolen or missing certificate in inventory.
   G. Return of unused certificates.

724-3 A state should adopt formal rules or policies on the conduct of skills tests that include the following:
   A. Examiners should conduct at least 10 complete skills tests each year.
   B. Central audit groups should maintain acceptable pass and fail ratios.
   C. Applicants who fail to successfully complete any portion of the CDL skills test cannot be retested more than once in the same business day. An exception may be granted if the test failure was due to vehicle or document deficiencies.
   D. CDL skills tests are conducted during daylight hours.
   E. A maximum of six full skills tests per business day can be administered.
   F. Tests are not conducted during inclement weather conditions or other hazardous conditions that would make driving of a vehicle unsafe or would render test results unreliable.
   G. Examiner does not administer tests to any applicant who has received skills or behind-the-wheel training from that examiner.
   H. If the third-party organization also provides driver training services, it should not require its student to retake tests from the organization as either a part of or as a condition of receiving training services or instruction.
724-4 The practice of grandfathering for CDL skills tests should not be allowed.

724-5 Applicants that fail any portion of the CDL skills tests should be required to take the complete CDL skills tests upon retesting.

724-6 Applicants that fail the pre-trip inspection test should not be allowed to take the basic control skills test or the road test during that test administration.

724-7 Applicants that fail the basic control skills test should not be allowed to take the road test during that test administration.

724-8 A state should not accept test certificates or test results for a third-party tester in another state.

724-9 The same CDL Skills Test Examiner should conduct all portions of the CDL skills tests.
Function 800
Issuance

Components

810  License Document
820  Special Procedures
### Best Practices for The Testing and Licensing of Commercial Drivers

**Function Number**: 800  
**Component Number**: 810  
**Element Number(s)**: 811 (Cont)

<table>
<thead>
<tr>
<th>Issuance</th>
<th>License Document</th>
<th>Required Data Elements</th>
</tr>
</thead>
</table>

#### 811

811-1 A state must insure that the CDL document contains the following data elements:

<table>
<thead>
<tr>
<th>Data Elements</th>
<th>FMCSA Required</th>
<th>AAMVA Recommended</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 Prominent CDL Statement</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>2 Name of State Issuing License</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>3 Name</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>4 Street Address</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>5 City</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>6 State</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>7 Mailing or Residence Zip Code</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>8 Country Code</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>9 Driver License Number</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>10 Group Designation (DL Classification Code)</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>11 Endorsement Code</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>12 Restriction Code</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>13 Date of Birth</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>14 Sex</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>15 Height</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>16 Weight</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>17 Eye Color</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>18 Signature</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>19 Color Photo or Image</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>20 Date of Issuance</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>21 Date of Expiration</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>22 Customer Number</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>23 Document Discrimination Number</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>24 Ability To Purchase Alcohol</td>
<td>Yes</td>
<td></td>
</tr>
</tbody>
</table>

#### 811-2 Need whole new section on restrictions (Kevin Lewis)
### 812

812-1 The layout of a state’s CDL document should conform to the current specifications of AAMVA’s National Standards for the Driver License/Identification Card, as well as meet the requirements found in the AAMVA document *Enhancing Driver’s License Administration (Status Report to AAMVA Membership, July 2003)*.

812-2 The data format of a state’s CDL document should conform to the current specifications of AAMVA’s National Standards for the Driver License/Identification Card, as well as meet the requirements found in the AAMVA document *Enhancing Driver’s License Administration (Status Report to AAMVA Membership, July 2003)*.

812-3 Security features of a state’s CDL document should conform to the current specifications of AAMVA’s National Standards for the Driver License/Identification Card, as well as meet the requirements found in the AAMVA document *Enhancing Driver’s License Administration (Status Report to AAMVA Membership, July 2003)*.

812-4 Any biometrics used for a state’s CDL document should conform to the current specifications of AAMVA’s National Standards for the Driver License/Identification Card, as well as meet the requirements found in the AAMVA document *Enhancing Driver’s License Administration (Status Report to AAMVA Membership, July 2003)*.

812-5 Color photos or images used for a state’s CDL document should conform to the current specifications of AAMVA’s National Standards for the Driver License/Identification Card, as well as meet the requirements found in the AAMVA document *Enhancing Driver’s License Administration (Status Report to AAMVA Membership, July 2003)*.

812-6 Digital signatures used for a state’s CDL document should conform to the current specifications of AAMVA’s National Standards for the Driver License/Identification Card, as well as meet the requirements found in the AAMVA document *Enhancing Driver’s License Administration (Status Report to AAMVA Membership, July 2003)*.

812-7 Use of barcodes and or magnetic stripes on a state’s CDL document should conform to the current specifications of AAMVA’s National Standards for the Driver License/identification Card, as well as meet the requirements found in the AAMVA document *Enhancing Driver’s License Administration (Status Report to AAMVA Membership, July 2003)*.

### Table: Best Practices for The Testing and Licensing of Commercial Drivers

<table>
<thead>
<tr>
<th>Function Number</th>
<th>Component Number</th>
<th>Element Number(s)</th>
<th>Issuance</th>
<th>License Document</th>
<th>Other Elements</th>
</tr>
</thead>
<tbody>
<tr>
<td>800</td>
<td>810</td>
<td>812</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

AAMVA’s Best Practices Manual for The Testing and Licensing of Commercial Drivers 100
821

821-1 A state should have automatic on-line entry of the picture to the driver history record.

821-2 A state should have automatic on-line entry of the signature to the driver history record.

821-3 A state should use every reasonable means to insure the individual who is obtaining the CDL is the qualified applicant.

821-4 A state should have inventory control procedures on all documents, numbers, forms, etc. in regard to the issuance of a license.

821-5 Equipment must be secured from theft and tampering and designed in such a way as to render them inoperable in case of theft or tampering.

821-6 Comprehensive audit trails should be in place to monitor the consumable products used for issuance.

821-7 Consumables should be locked up in a secure location and be available only to a select few.
Section 6.0 - CDL Monitoring Practices

"The Examiner/Exam Center Assistance Program"

Introduction

The success of a jurisdictions driver examiner program lies in the success of a quality control program. The general public and government officials rely on professional driver licensing personnel to make sound licensing decisions. The professional driver-licensing examiner has a civic responsibility to determine if an applicant meets the minimum qualifications to operate certain types of vehicles on the nations highways. Therefore these licensing decisions have a large impact on public safety.

While the role of the examiner is to administer the licensing test, the jurisdiction has the responsibility of assuring the public that the examiner meets and maintains the requirements set forth by the jurisdiction and the federal government for licensing personnel.

This section contains guidelines and information that will assist jurisdictions in establishing and maintaining a system for quality control/quality assurance in ensuring that exam centers and examining personnel (jurisdiction or third party) maintain professional standards. These guidelines and practices are especially critical if out-of-jurisdiction test results are accepted.

The Examiner Assistance Program is an ideal name for a quality control or quality assurance program. In general, people do not like the terms audit or quality control. Nor do people like to be observed, monitored or evaluated. As well, people tend to be reluctant to change. Ultimately the goal of a quality assurance program is to upgrade and improve the quality and professionalism of driver licensing personnel. Therefore, it is important to keep the idea of on-going training and education in mind. Every evaluation or audit should be treated as a teaching and learning experience and not thought of as the typical stern and intimidating audit or evaluation. Auditors/monitors should receive a course approved by the American Association of Motor Vehicle Administrators (AAMVA) that enables them to perform the required tasks within the Examiner Assistance Program.

Auditor/monitors should receive specialized training to assist with this task. The information in this section will describe in detail the types of training that auditor/monitors should receive and outlines key components/procedures that every jurisdiction’s
Examiner Assistance Program should include.

The section contains four major areas:

6.1 Jurisdictional & Third Party Testing Facilities
6.2 Jurisdictional & Third Party Testing Examiners
6.3 Covert Monitoring/Auditing
6.4 Auditor Qualifications, Training and Monitoring

<table>
<thead>
<tr>
<th>Section 6.1</th>
<th>Jurisdictional &amp; Third Party Testing Facility Audits</th>
</tr>
</thead>
<tbody>
<tr>
<td>Types of Audits</td>
<td>Audits should be conducted of the exam test site facility and the examiners who work at the facility. The audit should include state and third party exam test sites and examiners.</td>
</tr>
</tbody>
</table>

When to Conduct Test Site Facility Audits

Auditing of a test site facility, state site or third party, should be conducted, at a minimum, on an annual basis. Test sites need to be audited and monitored for jurisdictional and federal compliance. For a jurisdiction to maintain the reliability of their licensing system, a program must be installed to monitor test facilities and examiners.

An exam test site, as well as examiners, should be tracked for their pass/fail ratios. If a test site has a very high passing percentage, 85%-90% or higher (or as identified by the jurisdiction), a test site audit should be conducted. Example forms have been included in the document for assisting in the process of determining a test site facilities overall pass/fail ratios.

Other reasons for more frequent test site audits should be conducted:

- lack of examinations given
- customer complaints
- repeat audits for test sites identified as needing improvement
- recently established test facility
- spot checks (unannounced)

Conducting a test site audit can be a rather lengthy process. Depending on the purpose of the audit, a full or a partial audit may be conducted. The full audit should be conducted, at a minimum, annually. A partial audit may be conducted for follow-up visits, spot checks, customer complaints, etc. Conducting a test site audit may include all or some of the following procedures:
Audit Paper-work, Files and Forms

An audit should be conducted of all paper work, files and forms used by the test site on an annual basis. The documents should be examined for neatness, accuracy, completeness, and for any signs of fraudulent documentation. A note should be made of any personnel not documenting information correctly.

Audit Knowledge Testing Area

A visual inspection of the knowledge test area should be conducted, at a minimum, on an annual basis. The auditor should inspect the area for general appearance, cleanliness, accessibility (handicap accessibility), capacity (seating), emergency exits, noise control factors, examiner area, etc.

Audit Road Test Route

An inspection of the road test route should be conducted, at a minimum, on an annual basis. The auditor should inspect the road test route for general appearance, changes in traffic patterns (new intersections, traffic lights, lanes, lane markings, passing zones, construction areas, etc., that may have an impact on the validity and reliability of the road test), unauthorized changes to the road test route, accommodation for vehicles being tested, length of route, time to drive route, etc.

Audit Off-Road Testing Area

An inspection of the off-road testing area should be conducted, at a minimum, on an annual basis. The auditor should inspect the off-road testing area for general appearance, condition of surface, obstacles in the area, flow and volume for traffic needed, exercise dimensions and layout, etc. If the test site is marked with painted lines, rope or other markings for exercise boundaries, these should also be inspected for accuracy and condition.

Note: It should not be assumed that there have been no changes to the knowledge testing area, off-road test sites and road test routes since the previous audit.

Audit of Third Party CDL Test Site Vehicles

In addition to the other audit types, a CDL third party test site should be audited for condition of vehicles if vehicle rentals are available to the general public, or the third party is a commercial
carrier or a commercial training program. These vehicles should be inspected for general condition, cleanliness, operating condition, representative for class being tested, and for legal operating requirements.

6.2 Jurisdictional & Third Party Examiner Audits

When to Conduct Examiner Audits

Examiner audits should be conducted, at a minimum, on an annual basis. Biannual audits are strongly encouraged. The annual audits should be an integral part of any licensing program. It is important to remember that this standard should apply for both state examiners and third party testers. In addition audits should be conducted when warranted. Each examiner should be tracked for their individual pass/fail ratios for exams administered. If an examiner has a very high passing percentage, 85%-90% or higher (or as identified by the jurisdiction), an examiner audit should be conducted. Sample forms have been provided in the document to assist in the process of tracking examiner pass/fail ratios. Other reasons examiner audits should be conducted:

- lack of examinations given
- customer complaints
- repeat audits for examiners identified as needing improvement
- recent graduate of an examiner training program
- spot checks (unannounced)

Conducting Examiner Audits

The following descriptions outline various methods for conducting examiner audits for state personnel or third party personnel. The intent of a quality control program is to evaluate the examiner’s reliability when administering a licensing test. The key to any licensing system is to use reliable testing measures. In addition, examiners must be reliable when administering the test to assure that the tests are administered as designed and administered consistently each time they are administered. All jurisdictional and federal testing requirements must be followed for each and every test administered. Therefore the role of test reliability largely falls on the shoulders of the examiner. There are several methods of conducting examiner audits to ensure that test validity and reliability are achieved and maintained.

The first method of conducting an examiner audit is to have the auditor take the test(s), as an applicant, while committing predetermined errors. The examiner(s) being audited would then
score the test(s). This can be done very effectively to audit multiple examiners. This procedure is very similar to the procedures used in training new examiners. The auditor should conduct the exam in a productive manner and avoid conducting the test to fast or in manner with the intent of tricking or confusing the examiner(s). At the end of the mock test, the auditor will compare the scores and identify any areas of deficiencies while pointing out examiner's strong points. It is important to remember that the purpose of the audit is to give the examiner assistance in conducting the examination and should be treated as a learning experience.

The second method of conducting an examiner audit would be to have the auditor shadow the examiner while conducting an actual examination. During the test the auditor scores the applicant as well. When the entire examination process has been completed, the auditor will compare their results to the examiner's results and provide constructive criticism and positive reinforcement. The auditor's results of the test should in no way have an impact on the licensing decision made. The auditor should observe the process and then interact with the examiner upon departure of the applicant. Announced and unannounced visits should be conducted.

The third method of conducting an examiner audit would involve calling in a recently licensed person for a retest and conduct the examination with both the auditor and the examiner scoring the retest. This type of applicant retest should be conducted by the auditor. The auditor would be responsible for conducting the test and determining if the applicant passed or failed. Once the applicant has left, the results would be discussed with the examiner. There are two outcomes that should be examined in this process.

1) The applicants test results should be nearly the same as the first time they took the test from the examiner being audited. However, keep in mind that these results may vary somewhat due to the length of time since the previous examination, environmental conditions, emotional conditions, etc. 2) Most importantly the examiners results on the retest should be very similar to the auditors for the retest. The results should be discussed with the examiner upon departure of the applicant.

The fourth method of conducting an examiner audit would be very useful for conducting follow-up visits or spot checks if time is a factor. The auditor would merely give the examiner a scenario of events and ask the examiner how they would react to that given situation. Several scenarios should be presented to the examiner being audited to ensure some reliability of this type.
of auditing process. This process should only be used on a limited basis.

A fifth method for the examiner audit process involves short random site visits. An official audit does not need to take place. Short unofficial visits will keep examiners alert and shows that the jurisdiction is genuinely concerned about the testing program.

6.3 Covert Monitoring/Auditing

When to Conduct Covert Monitoring/Auditing

Covert monitoring and audits should be conducted on a regular basis. Improprieties by examiners are not likely to occur during announced (overt) site visits. Ideally, each examiner, at a minimum, should receive an overt and covert audit on an annual basis. While the covert audit process is intended for examiners, problems with testing facilities may also be identified.

Overt audits provide a forum for the learning experience and process. Covert audits provide the opportunity to identify the potential for fraud.

Types of Covert Audits

The first type of covert audit involves observing the examiner from a distance.

Observe the examiner from a distance during the Vehicle Inspection and Basic Control Skills tests noting administration procedures used, length (time) of the test, examiner conduct, and any unusual events.

Using an inconspicuous vehicle, follow the examiners vehicle during the Road test. Follow the vehicle from a distance to avoid being noticed and to allow for the opportunity to observe the testing process. Avoid using the same vehicle on a regular basis to avoid being identified by examiners.

During the road test, ensure that the examiner is utilizing the full prescribed road test route. This is a common area for examiners attempting to shorten the test. If the basic skills exercises are conducted during the road test, ensure that they are being administered.

Make a note of any actions from the driver that may appear to be dangerous or illegal and compare to the examiner’s score at a later date.

Note: It is very difficult to score the driver from the vehicle
behind. Do not attempt to compare scoring against the examiner if doing so.

The second type of covert audit involves utilizing well trained auditors or employees posing as actual applicants. A permit will need to be issued to the auditor or employee to have the appearance of being legitimate. All appropriate procedures should be followed for scheduling an appointment and following test procedures as an actual applicant. This process may also be used for the reinstatement driver.

Extensive training should be provided to the auditors or employees in driver training and audit practices. The individuals must possess a CDL license to be qualified. Driver training should be provided to ensure that an efficient level of skill is present and to provide a minimum level of knowledge and skills as a CDL driver. Auditor training should be provided to ensure that the covert audit is conducted in a safe, effective and professional manner.

When taking the test, the auditor should identify areas within the tests that will be conducted with weaknesses. The auditor should not attempt to do anything that is unsafe or illegal during the tests.

During the test, avoid doing anything that will confuse or disrupt the examiner, the purpose of the audit is to evaluate the examiners performance and not to trick them.

Do not establish a system that gives credit to the auditor for identifying examiners with weaknesses or committing fraud. This type of system will generate overzealous auditors and is counter productive for both the examiner and the jurisdiction. The covert audit should be conducted as objectively as possible.

To avoid revealing the identity of the auditor, the results of the covert audit should not be discussed with the examiner unless fraud is identified. The results should be provided to an auditor normally assigned to the examination site.

Make attempts to avoid revealing the covert auditor's identity to maximize the length of time that the person may be utilized. Eventually this person will become recognizable if returning to the same facility. Utilize these auditors at examination sites throughout the jurisdiction to avoid being recognized. A great deal of time and money will be spent training the covert auditor. Therefore, utilize this person properly to maximize the life span of the position.
Note: A third party (or private investigation firm) may be utilized to assist in this process. Ensure that proper guidelines and procedures are documented and implemented if doing so. In addition, quality control measures will need to be implemented by the jurisdiction to insure quality control over the third party (or private investigator).

The third type of covert audit involves telephone interviews with recently licensed applicants involving examiner(s) in question. The telephone interviews should involve only a few short questions and should not imply that the examiner has done anything wrong or is in question. The questions asked should simply center around the testing process.

1) Which portions of the test did you take?
2) Did the length of the tests seem appropriate?
   a) Vehicle Inspection
   b) Basic Control Skills
   c) Road
3) What were the results of the tests that you took?
4) How long did it take to complete the testing process?
5) Name of person who conducted the test.
6) Were there any other examiners involved?

Additional question may be used. Keep questions short and basic. Avoid creating an open dialog.

The fourth type of covert audit simply involves monitoring weekly or monthly reports from exam centers. Improprieties can be easily identified when reviewing these reports. Examples include identifying a very high percentage of passing ratios, length of time between retest and identifying a high volume of tests conducted by an examiner within a day/week/month. The jurisdiction should define the maximum number of tests that can conceivably be conducted during a day/week/month and then observe the reports for inconsistencies.

6.4 Auditor Qualifications, Training and Monitoring

Training Requirements for Licensing Auditor

A licensing auditor should receive extensive training in several areas. Ultimately the success of a quality assurance (examiner assistance) program lies in the success of well trained auditors. A lack of trained audits would certainly be counter productive in this very important and essential process.

Examiner Training & Requirements

The auditor should be a trained examiner in the area(s) of licensing that they will be conducting audits. Auditors should meet all requirements of the licensing examiner. In addition, a
set number of years as an examiner should be required. If it is not possible to use an experienced examiner, additional training should be added to enhance the background and knowledge of the auditor.

**Auditor Training**

The auditor should receive training that covers information in the following areas:

- jurisdiction’s documentation and reporting procedures
- road test route requirements, off-road test site requirements, knowledge test site requirements, how to establish road test routes, and how to evaluate a road test against road test requirements
- full comprehension of tests, manuals and other important information pertaining to appropriate area(s) of auditing/testing
- observational skills
- public/employee relations
- evaluation techniques
- consultation techniques
- employee sensitivity training
- characteristics of a good auditor
- concepts of behavioral development
- modifying behavior
- who should be audited and when audits should be conducted

**Covert Auditor Training**

Covert auditors should meet all the requirements listed above. In addition, these auditors should receive driver training using CDL practices if covert practices include the applicant role.

Additional training on conducting the covert operation should be provided. This training should cover the different types of covert audits, reporting procedures and covert auditor techniques.

**6.5 Monitoring Out-of-Jurisdiction Test Results**

**Overview**

Jurisdictions may accept out-of-jurisdiction test results at their own discretion. An agreement should be established between those jurisdictions. However, it is the responsibility of the jurisdiction to ensure that the test results are valid.

The agreement should state:

1. the process for sending/receiving test results, and
2. acceptability of third party test results.

Ideally all test results should be transmitted between
jurisdictions. Under certain conditions, test results from a third party within another jurisdiction may be accepted.

**Results from Jurisdiction**

If accepting test results from another jurisdiction, ensure that the jurisdiction has employed proper oversight, such as the Examiner Assistance Program, of all jurisdictional and third party testing facilities and examiners.

**Results from Third Party from Another Jurisdiction**

If a jurisdiction chooses to directly accept test results from a third party within another jurisdiction, the jurisdiction must assume oversight (quality control/assurance) of the third party. If the jurisdiction does not choose to assume oversight, test results must be transmitted by the jurisdiction with oversight responsibilities of the third party. This is a requirement through "Interpretation" from the Federal Motor Carrier Safety Administration (FMCSA). Additional information on FMCSA Rules and Regulations can be found at [http://www.fmcsa.dot.gov/](http://www.fmcsa.dot.gov/).
# APPENDIX A

## CDL Test Site

### Knowledge Test Monthly Summary

Test Site ______________

Month of ______________

<table>
<thead>
<tr>
<th>Test</th>
<th>Number of Tests Taken</th>
<th>Number of Tests Passed</th>
<th>% of Tests Passed</th>
<th>Number of Tests Failed</th>
<th>% of Tests Failed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Written/Oral</td>
<td>W</td>
<td>O</td>
<td>W</td>
<td>O</td>
<td>W</td>
</tr>
<tr>
<td>General Knowledge</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Air Brakes</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Combination Vehicle</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Passenger</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Tank Vehicles</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Double/Triples</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Hazardous Materials</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

* Count each portion of the CDL knowledge tests as separate tests taken.
# APPENDIX B

## CDL Test Site

### Knowledge Test Monthly Summary

**Test Site** Centerville  
**Month of** January

<table>
<thead>
<tr>
<th>Test</th>
<th>Number of Tests Taken</th>
<th>Number of Tests Passed</th>
<th>% of Tests Passed</th>
<th>Number of Tests Failed</th>
<th>% of Tests Failed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Written/Oral</td>
<td>W O</td>
<td>W O</td>
<td>W O</td>
<td>W O</td>
<td>W O</td>
</tr>
<tr>
<td>General Knowledge</td>
<td>58 12</td>
<td>46 9</td>
<td>80% 75%</td>
<td>12 3</td>
<td>20% 25%</td>
</tr>
<tr>
<td>Air Brakes</td>
<td>42 10</td>
<td>36 7</td>
<td>86% 70%</td>
<td>6 3</td>
<td>14% 30%</td>
</tr>
<tr>
<td>Combination Vehicle</td>
<td>36 8</td>
<td>30 6</td>
<td>83% 75%</td>
<td>6 2</td>
<td>17% 25%</td>
</tr>
<tr>
<td>Passenger</td>
<td>16 8</td>
<td>13 7</td>
<td>81% 88%</td>
<td>3 1</td>
<td>19% 12%</td>
</tr>
<tr>
<td>Tank Vehicles</td>
<td>20 8</td>
<td>17 6</td>
<td>85% 75%</td>
<td>3 2</td>
<td>15% 25%</td>
</tr>
<tr>
<td>Double/Triples</td>
<td>18 7</td>
<td>15 4</td>
<td>83% 57%</td>
<td>3 3</td>
<td>17% 43%</td>
</tr>
<tr>
<td>Hazardous Materials</td>
<td>15 N/A</td>
<td>10 N/A</td>
<td>67% N/A</td>
<td>5 N/A</td>
<td>33% N/A</td>
</tr>
<tr>
<td><strong>Totals</strong></td>
<td>205 53</td>
<td>167 39</td>
<td>81% 74%</td>
<td>38 14</td>
<td>19% 26%</td>
</tr>
</tbody>
</table>

* Count each portion of the CDL knowledge tests as separate tests taken.
<table>
<thead>
<tr>
<th>Class</th>
<th>Number of Tests Taken</th>
<th>Number of Tests Passed</th>
<th>% of Tests Passed</th>
<th>Number of Tests Failed</th>
<th>% of Tests Failed</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Vehicle Inspec. Basic Control Skills Road Test</td>
<td>Vehicle Inspec. Basic Control Skills Road Test</td>
<td>Vehicle Inspec. Basic Control Skills Road Test</td>
<td>Vehicle Inspec. Basic Control Skills Road Test</td>
<td>Vehicle Inspec. Basic Control Skills Road Test</td>
</tr>
<tr>
<td>A</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>B</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>C</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

* Count each portion of the CDL test (vehicle inspection, basic control skills and road test) as separate tests taken.
# APPENDIX D

## CDL Knowledge Test Results

<table>
<thead>
<tr>
<th>Driver Name &amp; Driver License Number</th>
<th>Date</th>
<th>CDL Class</th>
<th>Examiner Signature/Number</th>
<th>Written/Oral</th>
<th>Gen. Know.</th>
<th>Comb. Veh.</th>
<th>Air Brake</th>
<th>D/T</th>
<th>Tank Veh.</th>
<th>Pass. Tans.</th>
<th>HAZ-MAT</th>
</tr>
</thead>
<tbody>
<tr>
<td>N:</td>
<td></td>
<td></td>
<td></td>
<td>W</td>
<td>O</td>
<td>P</td>
<td>F</td>
<td>F</td>
<td>F</td>
<td>F</td>
<td>F</td>
</tr>
<tr>
<td>DL:</td>
<td></td>
<td></td>
<td></td>
<td>W</td>
<td>O</td>
<td>P</td>
<td>F</td>
<td>F</td>
<td>F</td>
<td>F</td>
<td>F</td>
</tr>
<tr>
<td>N:</td>
<td></td>
<td></td>
<td></td>
<td>W</td>
<td>O</td>
<td>P</td>
<td>F</td>
<td>F</td>
<td>F</td>
<td>F</td>
<td>F</td>
</tr>
<tr>
<td>DL:</td>
<td></td>
<td></td>
<td></td>
<td>W</td>
<td>O</td>
<td>P</td>
<td>F</td>
<td>F</td>
<td>F</td>
<td>F</td>
<td>F</td>
</tr>
<tr>
<td>N:</td>
<td></td>
<td></td>
<td></td>
<td>W</td>
<td>O</td>
<td>P</td>
<td>F</td>
<td>F</td>
<td>F</td>
<td>F</td>
<td>F</td>
</tr>
<tr>
<td>DL:</td>
<td></td>
<td></td>
<td></td>
<td>W</td>
<td>O</td>
<td>P</td>
<td>F</td>
<td>F</td>
<td>F</td>
<td>F</td>
<td>F</td>
</tr>
<tr>
<td>N:</td>
<td></td>
<td></td>
<td></td>
<td>W</td>
<td>O</td>
<td>P</td>
<td>F</td>
<td>F</td>
<td>F</td>
<td>F</td>
<td>F</td>
</tr>
<tr>
<td>DL:</td>
<td></td>
<td></td>
<td></td>
<td>W</td>
<td>O</td>
<td>P</td>
<td>F</td>
<td>F</td>
<td>F</td>
<td>F</td>
<td>F</td>
</tr>
</tbody>
</table>

Gen. Know./Total Tests %Pass %Fail
Air Brake./Total Tests %Pass %Fail
Tank Veh. ./Total Tests %Pass %Fail
HAZMAT./Total Tests %Pass %Fail
Comb. Veh./Total Tests %Pass %Fail
Double/Triples./Total Tests %Pass %Fail
Pass. Tans. ./Total Tests %Pass %Fail
Total Number of Tests Given./Total Tests %Pass %Fail
# APPENDIX E

## CDL Skills Test Results

<table>
<thead>
<tr>
<th>Drivers Name</th>
<th>Driver License Number</th>
<th>Date</th>
<th>CDL Class</th>
<th>Examiner Signature ID Number</th>
<th>Vehicle Inspection</th>
<th>Basic Control Skills</th>
<th>Road Test</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Pass</td>
<td>Fail</td>
<td>Pass</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Vehicle Inspection/ Total Tests _____ %Pass _____ %Fail _____
Road Test/ Total Tests _____ %Pass _____ %Fail _____
Basic Control Skills/ Total Tests _____ %Pass _____ %Fail _____
Total Number of Tests Given _____ %Pass _____ %Fail _____
**APPENDIX F**

**Test Site** Smithsburg  
**CDL Skills Test Results**  
**Month** February, 1999

<table>
<thead>
<tr>
<th>Drivers Name</th>
<th>Driver License Number</th>
<th>Date</th>
<th>CDL Class</th>
<th>Examiner Signature ID Number</th>
<th>Vehicle Inspection</th>
<th>Basic Control Skills</th>
<th>Road Test</th>
</tr>
</thead>
<tbody>
<tr>
<td>John H. Smith</td>
<td>20-172-654</td>
<td>2/4/96</td>
<td>B</td>
<td>1479</td>
<td>x</td>
<td>x</td>
<td>x</td>
</tr>
<tr>
<td>Brian Henry Jones</td>
<td>21-204-987</td>
<td>2/5/96</td>
<td>A</td>
<td>1490</td>
<td>x</td>
<td>x</td>
<td>x</td>
</tr>
<tr>
<td>Richard John Palmer</td>
<td>19-216-432</td>
<td>2/10/96</td>
<td>A</td>
<td>1479</td>
<td>x</td>
<td>x</td>
<td>x</td>
</tr>
<tr>
<td>Susan L. Smith</td>
<td>19-656-765</td>
<td>2/11/96</td>
<td>A</td>
<td>1501</td>
<td>x</td>
<td>x</td>
<td>x</td>
</tr>
<tr>
<td>John M. Doe</td>
<td>19-361-098</td>
<td>2/11/96</td>
<td>C</td>
<td>1479</td>
<td>x</td>
<td>x</td>
<td>x</td>
</tr>
<tr>
<td>Charles Michael Johns</td>
<td>21-873-886</td>
<td>2/15/96</td>
<td>B</td>
<td>1501</td>
<td>x</td>
<td>x</td>
<td>x</td>
</tr>
<tr>
<td>Jane R. Stripmatter</td>
<td>20-947-834</td>
<td>2/15/96</td>
<td>C</td>
<td>1490</td>
<td>x</td>
<td>x</td>
<td>x</td>
</tr>
<tr>
<td>John H. Smith</td>
<td>20-172-654</td>
<td>2/16/96</td>
<td>B</td>
<td>1501</td>
<td></td>
<td></td>
<td>x</td>
</tr>
<tr>
<td>Richard John Palmer</td>
<td>19-216-432</td>
<td>2/20/96</td>
<td>A</td>
<td>1490</td>
<td>x</td>
<td></td>
<td>x</td>
</tr>
<tr>
<td>Thomas A. Arnolds</td>
<td>19-456-456</td>
<td>2/22/96</td>
<td>B</td>
<td>1479</td>
<td>x</td>
<td>x</td>
<td>x</td>
</tr>
<tr>
<td>Susan L. Smith</td>
<td>19-656-765</td>
<td>2/25/96</td>
<td>A</td>
<td>1490</td>
<td></td>
<td></td>
<td>x</td>
</tr>
<tr>
<td>Charles Michael Johns</td>
<td>21-873-886</td>
<td>2/27/96</td>
<td>B</td>
<td>1479</td>
<td>x</td>
<td>x</td>
<td>x</td>
</tr>
</tbody>
</table>

Vehicle Inspection/ Total Tests 10  %Pass 80  %Fail 20  
Road Test/ Total Tests 11  %Pass 55  %Fail 45  
Basic Control Skills/ Total Tests 10  %Pass 80  %Fail 20  
Total Number of Tests Given 31  %Pass 71  %Fail 29
### CDL WRITTEN TESTS SUMMARY

<table>
<thead>
<tr>
<th>Test</th>
<th>Number of Written</th>
<th>% of Written Passed</th>
<th>% of Written Failed</th>
<th>Number of Oral</th>
<th>% of Oral Passed</th>
<th>% of Oral Failed</th>
</tr>
</thead>
<tbody>
<tr>
<td>General Knowledge</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Combination Vehicle</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Air Brake Test</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Doubles/Triples</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Tank Vehicle</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Passenger Transit</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Hazardous Materials</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total of All Knowledge Tests Combined</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### CDL SKILLS TESTS SUMMARY

<table>
<thead>
<tr>
<th>Test</th>
<th>Total Number of Tests Given</th>
<th>Total % Passed</th>
<th>Total % Failed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vehicle Inspection</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Basic Control Skills</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Road Test</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total of All Skills Tests Combined</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Jurisdiction: ______________________

Person Completing Report: ______________________

Title: ______________________

Telephone Number ______________________  FAX Number ______________________