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GUIDELINES  
FOR  
STATE DRIVER LICENSE PROGRAMS

by  
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HSRC  
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## I. FOREWORD

The driver licensing program is the only state program that has the potential to reach all licensed drivers. It has the responsibility for establishing initial qualifications for license applicants and for insuring within reasonable limits that an acceptable level of driving skill is maintained by drivers in order for them to retain their license. When a driver appears to be generating a poor driving record, the driver improvement section of the licensing authority responds with varying levels of intervention. However, driver licensing programs have hardly begun to realize their potential for influencing the licensed driver population.

Historically, licensing programs were established for the purpose of identifying drivers and collecting revenue. However, as the automobile became more than an object of curiosity and gradually took its place as the most important means of personal transportation in our society, licensing programs developed to meet the growing need for establishing some minimal requirements for vehicle operation. Yet programs had to be established in the absence of a sound research basis for the practices being implemented.

More recently states have found that their programs are facing growing constraints. Financial considerations loom large as costs escalate in a political atmosphere that virtually prohibits meaningful increases in fees collected. Many practices that went unquestioned only a decade or so ago are being subjected to severe scrutiny. In some ways states have become reluctant to exercise the authority that statutes appear to delegate to them. At the same time, failure to exercise this authority may leave administrators vulnerable to suit should a licensed driver be proven unfit to the detriment of someone else. In the midst of such a climate, administrators may understandably be reluctant to veer from the time-honored practices that have become accepted by the public

over the years. To make major changes in existing programs probably would require strong evidence of their effectiveness.



## II. PURPOSE OF MANUAL

This manual has been prepared to provide guidance to the states in evaluating and upgrading their driver license and driver improvement programs. It also provides information about resources available to states seeking to improve portions or all of their existing programs.

As has been noted, not all licensing practices have been subjected to careful evaluation and their true effectiveness is unknown. Nevertheless, they persist because they constitute acceptable practice. This manual differentiates between those practices that are substantiated by research evidence and those that are not.

It is also recognized that states vary widely in their licensing practices and in their ability to develop and implement new procedures. Therefore, in this manual a distinction is made between what are considered minimal elements of an acceptable licensing program and what would be included in an optimal program. Information is also provided on practices that look promising or have been shown to be effective and that might be of interest to a state considering upgrading its program.

### III. BACKGROUND

#### A. The Role of the Normal Driver in Traffic Crashes

One of the prevailing myths in traffic safety is that most of the problems are caused by a small number of bad drivers. It is widely believed that if we could get these problem drivers off the road, the rest of us could drive in relative safety. Unfortunately the evidence does not support this contention. In any one year only a small proportion of the drivers will account for all of the accidents and in the following year, once again only a small proportion of the drivers will account for all of the accidents. The problem is that it is an almost entirely different group of drivers having crashes from one year to the next. What this means is that most crashes involve drivers with fairly good driving records.

A distinction needs to be made between all crashes and crashes leading to fatal injury. Fatal crashes are quite different from crashes in general. Drivers at fault in fatal crashes have been shown to have worse records than drivers in general and a very large proportion of them have records of drinking and driving. Fortunately, fatal crashes are only a small fraction of all crashes. However, this means that if we are to make appreciable progress in reducing the total crash problem there is no one small group of drivers on which to concentrate our efforts. We have to focus on all drivers.

#### B. Potential of Driver Licensing Program for Influencing Drivers

There is only one state program that has the potential for reaching all drivers on a routine basis, and that is the driver licensing program. Almost all states now require in-person renewal, which means that at the very least there is personal contact with each driver every four or five years. This

opportunity should not be taken lightly. This is the major contact between the citizen and his state government and it has the potential for generating positive public support for the licensing program -- or for engendering resentment and hostility toward those responsible for administering and monitoring the program. It is entirely up to the licensing personnel what the outcome will be.

Ideally the driver licensing program should be viewed as a state effort to ensure that those licensed to drive have met minimal qualifications shown to have relevance for safe performance. At the same time, however, the program should be seen as ready to assist applicants who fall short of these minimal qualifications so that as many people as possible may drive under circumstances in which they can function safely. Too often the licensing process is viewed by the public as a threatening initiation rite that one must go through in order to receive one's license to drive. Unfortunately, this impression may sometimes be reinforced by license examiners who view themselves as wielding power over the public and passing judgment that either bestows favor or condemns the applicant to further humiliation and anxiety. The licensing program exists to serve the public, that is, the individual applicants, and licensing personnel are there to provide help and assistance while maintaining standards in keeping with the safety and welfare of the public. When properly administered the licensing program offers opportunities afforded by no other government program.

#### IV. MAJOR OBJECTIVES OF DRIVER LICENSING PROGRAMS

Although states may vary somewhat in the specifics of their statutes governing licensing procedures, generally the major objectives of the programs include the following:

A. To ensure that licenses are granted only to applicants demonstrating at least minimal proficiency in areas identified as necessary to safe driving.

These areas include a minimum level of visual acuity, acceptable knowledge of the meanings of traffic signs and symbols, knowledge of the state's traffic laws and of safe driving procedures, and acceptable performance on a behind-the-wheel test of driving skill (road test).

B. To deny licenses to applicants failing to meet minimum standards and, where possible, to provide assistance to such applicants to enable them to qualify for licensure.

Although it is sometimes said that anyone who wants to get a driver license can do so, this is not always true. Even though failure rates often are low for applicants, when these rates are translated into the total number failed it is obvious that many applicants are denied licenses, at least on their first attempt. Repeated attempts may lead to success, but it is only after the applicant has achieved the minimal performance required. Furthermore, applicants very likely are better prepared when they appear for license examination because they know that poor performance may lead to failure. Hence, the possibility of license denial for poor performance is an important element in an effective licensing program.

When drivers fail to meet minimum standards the licensing authority should assist to the extent possible in upgrading their performance. The most frequent example may be a failure of the knowledge test or performance test when the examiner reviews the applicant's shortcomings with him and makes recommendations for further study or practice. Failing the vision test may lead to referral to a vision specialist for remedial measures. Although providing assistance to enable applicants to meet the minimum requirements for licensure often is a difficult goal to achieve, it remains an important one.

C. To identify promptly drivers whose performance falls below an acceptable level.

There are a number of ways this goal may be achieved. Routine testing for renewal applicants is one approach, although the time interval between renewal tends to limit the promptness of the identification. The driver records system provides a more effective vehicle for monitoring driver performance between licensing examinations. Likewise, involvement in certain types of collisions, e.g., ones in which the investigating officer reports temporary loss of consciousness on the part of the driver immediately preceding the crash, or reports from physicians, family, relatives, or neighbors may alert licensing authorities to the need for examination.

D. To assure the availability of programs to assist drivers with problems to improve their performance or, where necessary, to restrict such drivers or remove them from the driving population to protect the safety of the public.

When driving records indicate that drivers are experiencing difficulties, the licensing authority should be in touch with the drivers to offer assistance.

A distinction is made between drivers who have received a single conviction for speeding or other moving offense and those who have accumulated a number of such convictions. The help offered may take any of several forms, depending on the nature and seriousness of the problem. Some of the approaches used are described in the section on driver improvement. In those programs, it should be remembered that the licensing authority has the responsibility for achieving an equitable balance between the rights of the individual and the rights of the public. Thus while every effort should be made to assist drivers, when their performance becomes a serious hazard to others the licensing authority has the responsibility to suspend their driving privileges.

E. To coordinate state programs in driver licensing and particularly driver records with those of other jurisdictions to promote the one license/one record concept.

It has become increasingly evident that states cannot administer an effective licensing program without coordinating their efforts with those of other states. A driver can lose his license in one state and easily obtain a valid license in another jurisdiction because many states conduct no systematic check on the applicant's background and driving history. In our society a driver license from any state ordinarily entitles one to drive in any other state. As a result, no state, no matter how excellent its own licensing program, can protect its citizens from dangerous drivers holding licensure from a state with less stringent procedures. Coordination of state licensing programs is necessary to enable any state to provide reasonable protection to its citizens on the highways.

F. To coordinate activities with those of other state agencies to achieve goals for which there is mutual responsibility and/or mutual interest.

Because the state driver licensing program is the only state program with the potential for personally contacting the majority of adult citizens on a routine basis, it can be used as the focal point for delivery of a variety of services. However, to capitalize on such an opportunity requires a fundamental change in the philosophy of both licensing administrators and other state officials with responsibility for potentially related programs.

Perhaps the best illustration of constructive coordination among state programs is the organ donor program. Technically the program has nothing to do with licensing, and ordinarily one cannot be a donor until licensure is no longer a consideration. Yet there are many excellent reasons for coordinating the organ donor program with that of licensing, and most states have seen fit to do so.

Another example is where voter registration is coordinated with driver licensing. The opportunity to reach adults and the availability of an in-place records system makes this an attractive possibility. Other potential activities may include coordinating delivery of certain health services (e.g., screening for hypertension or making available information on local health services) with or without the presence of health professionals. In support of this concept it should be noted that one important function of vision testing in the licensing station is a health-related one rather than a driving-related one. A further possibility may be the delivery of information on where to find tutoring to learn to read and write. The driving knowledge test is perhaps the best measure of functional illiteracy in the adult population, and all states have some provision for administering the test orally. Since most communities also have available free services to teach reading to adults, the licensing station offers

an excellent opportunity to reach potential candidates for these programs. Driver improvement programs sometimes deal with people whose driving problems stem in large part from life stresses that go beyond the resources offered by the licensing program. Information could be provided to these people about community resources which may in turn lead to improvement in driving.

Licensing administrators undoubtedly could identify other opportunities in their own states for coordinating their activities with other legitimate functions. It should be noted that, if well implemented, such activities could greatly enhance public support for state government and for licensing efforts in particular at minimal increased effort or cost. If total state resources are considered the coordination of services can lead to cost reductions.

To achieve these goals there should be one state agency with responsibility for driver qualification, maintenance and monitoring of driver records, and driver improvement programs.



## V. DRIVER LICENSING GUIDELINES

Although there probably will always be variations among state driver licensing programs, there are certain guidelines that should be followed. These are based in part on current practices and in part on evidence supported by research findings. This section will describe what are viewed as best practices in light of the evidence available.

### A. Driver License Categories

Although not every state has all of the license categories described below, each of the categories exists in enough states to warrant a brief description here and consideration by state licensing officials for incorporation into their own programs.

1. Learner permit. This permit is issued to an applicant who is not yet ready for a full-fledged license for lack of adequate behind-the-wheel skill and experience. The permit assures that driving skill acquisition will occur in the presence of someone already qualified for the license under consideration. Ordinarily the permit applicant must meet the standards established for vision, signs, and knowledge. An off-road skills test may also be required. Issuance of the permit allows the holder to practice driving on the public roads only in the presence of someone holding a valid license of the same class as the permit holder and usually issued by the same jurisdiction issuing the permit. This person should be present in the right front seat. If the applicant is a minor, in some jurisdictions only a permit for class C licensure may be obtained. Some states also allow a minor to obtain a permit to operate a motorcycle. Every state requires that a parent or guardian sign for the minor applicant, and usually driving may occur only when the parent or guardian is present in the front seat. The parent or guardian must hold a valid license to operate the

class vehicle under consideration. If the driver is over age 16 some jurisdictions provide that the person monitoring performance need only hold a valid license of the relevant class and be at least 21 years of age. For motorcycle operation the requirement for the presence of a qualified adult does not apply. A permit is issued for a specified period of time and may be renewed upon expiration.

In some jurisdictions these are known as instruction permits. While they can be issued to applicants of any age, they are most widely used for young beginning drivers.

There is another kind of permit issued to persons enrolling in a driver training course that includes behind-the-wheel instruction. Driver education programs in the public schools and in commercial schools require this special permit before students can drive on the public roads. This permit may be issued by the licensing authority or by some other authority such as the high school offering the driver education program.

2. Provisional license. It is well documented that young beginning drivers have more than their share of crashes. This relationship holds true whether the crash rate is based on the number of licensed drivers or the number of miles traveled. It is perfectly reasonable that this should be the case. Driving is an extremely complex skill and the acquisition of any complex skill entails more errors in the beginning stages than later. Whether one is learning to type, to play tennis, to cook, or to drive, there is every reason to expect a higher rate of error in the beginning stages of learning. In recognition of this higher risk for young beginning drivers, many states have what are called provisional licensing laws. Under these laws young beginning drivers are kept under close scrutiny. If they show any signs of difficulty (convictions, crashes), steps may be taken that would not be taken if the driver were older.

This system is based in part on the belief that early intervention may be more beneficial in the case of the young beginning driver before poor driving habits become firmly established.

While no one seriously disputes the contention that these drivers are at particularly high risk because of their inexperience, it is questionable whether only the increased threat of sanctions can significantly remedy problems caused by inexperience. If it is known that a driver group is inexperienced and will therefore have more problems, it seems sensible to establish procedures to get these drivers through these early stages under less hazardous conditions; that is to say, it is most constructive to help them with the inexperience rather than to simply sanction them more severely when they so predictably have more difficulty.

Some states have recognized this situation and allow for a gradual introduction of the young beginning driver into the driving population. After completing no more than 30 hours of classroom instruction in driver education plus six hours of behind-the-wheel training and upon passing the licensing tests, in most states a youngster may, on his 16th birthday, receive a license that entitles him to drive anywhere at any time and with anybody. It is no wonder that many of these drivers run into trouble. While most states do not require an initial extended supervised learning period, many allow for it with their permit system. To what extent drivers take advantage of these laws to acquire initial driving skill is not known.

States should implement and evaluate programs requiring young beginning drivers to complete an extended period of supervised practice before qualifying for full-fledged licensure. In this way licensing programs may be used to assist young beginning drivers through their initial skill acquisition with less lethal consequences than has been true in the past.

3. Initial license. Initial licensure refers to the first license to drive a specific class of vehicle. Applicants are required to pass the entire battery of tests (vision, knowledge, signs, driving skill). The majority of states allow licensure at age 16 for a Class C license (passenger car, see section on "Classes of License") for persons who have completed an approved driver education course but withhold licensure until age 18 for those who have not. Many states issue licenses to drive to and from school, or for reasons of hardship, to even younger applicants.

4. Transfer license. When a person moves his place of residence from one licensing jurisdiction to another and seeks a license of the same class held in the previous jurisdiction, he undergoes the procedures for a transfer license. A sizeable portion of our population makes such a move each year. Unless the processing of these transfer applicants is conducted with care and accuracy the result could be a loss of important information, multiple licenses and records for the same persons, and a general breakdown in the driver licensing system. While it is not always apparent to the transfer applicant why it is necessary to observe certain precautions, the licensing authority should not sacrifice the integrity of the driver licensing program in order to avoid inconveniencing the public. For a transfer license it is absolutely essential that a careful check be made of identity and of previous records. Usually knowledge and vision tests are required of the transfer licensee.

5. Renewal license. Driver licenses are issued for a definite term. Drivers remaining in the same licensing jurisdiction through more than one licensing period must apply for a renewal. Ideally in these instances the home state would have all the necessary information to make a sound judgment about renewal. In actual practice, however, this is not always the case. Because drivers operate their vehicles across state lines and because licensing

authorities often do not report to the home jurisdiction when convictions for infractions occur, it cannot be assumed that the home state records are complete. Although a renewal license should be the simplest license category to process, until interstate reporting systems are vastly improved a check with the National Driver Register (NDR, explained more fully in a later section) is in order. Such a check will reveal only whether an applicant has been suspended recently in any jurisdiction reporting to the NDR. Such information may not appear in the record file in the driver's state of residence, yet it is essential for purposes of a decision about license renewal. Vision tests should be required upon renewal. In addition, drivers under age 25 should be administered a knowledge test.

6. Duplicate license. When a person's address or name changes, a duplicate license must be issued to show the new information. Furthermore, billfolds do get lost or stolen and licenses do get misplaced or destroyed. There has to be a procedure for replacing lost or missing license certificates. However, in most jurisdictions the procedure has been much too simple to maintain the integrity of the system. While duplicate licensure should not ordinarily require special testing, in the case of lost or stolen licenses there should be a very careful verification of identity and a records check.

#### B. Classes of License

Vehicle Use - Historically the primary distinction made in driver licenses focused on whether the license was to be used for personal driving or driving for hire, that is, the distinction was primarily one of vehicle use. Persons who drove for hire were required to obtain a chauffeur license, whether the vehicle to be driven was a limousine or a tractor trailer. Everyone else obtained a regular operator license. Because the chauffeur license did not

differentiate between a compact passenger car and a moving van, in many states it was possible to take a road test in the smaller vehicle and be licensed to drive the larger one.

Vehicle Type - There has been a marked shift away from the operator-chauffeur approach to driver licensing and toward what is called a classified licensing system that is, a system based on vehicle type. Under this latter system, a person must demonstrate qualifications to operate the class of vehicle for which he is being licensed.

The American Association of Motor Vehicle Administrators (AAMVA) has developed guidelines for such a licensing system, and 30 states now use some version of this approach.<sup>1</sup> Many excellent classified licensing programs vary from the AAMVA scheme either in terms of weight differentiations for classes or in number of classes; that is, they define a larger number of classes using a more refined breakdown of vehicles.<sup>2,3</sup> Nevertheless there is a need for uniformity among states in their licensing systems because of the mobility of drivers. The AAMVA has recommended that there be enough classes of license to make the system practical and effective, but as few as seem reasonable to achieve this goal.

The classes of license described (and underscored) below are taken from the AAMVA's scheme:

Class "C" - Any single vehicle not in excess of 24,000 pounds GVW (gross vehicle weight), or any such vehicle towing a vehicle not in excess of 10,000

<sup>1</sup>A Model State Classified Licensing Program, National Highway Traffic Safety Administration, in cooperation with American Association of Motor Vehicle Administrators. DOT HS 803 384, September, 1978.

<sup>2</sup>Classified Driver Licensing in the United States. National Highway Traffic Safety Administration DOT HS 805 532, December, 1980.

<sup>3</sup>1980 Driver License Administration Requirements and Fees. Federal Highway Administration. 1980.

pounds GVW, except buses and motorcycles. This license class is the one most widely held, covering operators of the vast majority of motor vehicles.

Class "B" - Any single vehicle weighing over 24,000 pounds GVW, or any such vehicle towing a vehicle not in excess of 10,000 pounds GVW, and any bus, and all vehicles under Class "C", except motorcycles. Some jurisdictions qualify this class to specify the number of passengers a vehicle is designed to carry. For example, a distinction may be made between a van that may be used as a bus and a larger vehicle that is clearly designed to carry a large number of passengers.

Class "A" - Any vehicle or combination of vehicles including all vehicles under Class "B" and "C", except motorcycles. This class license covers operators of tractor trailers and other large articulated vehicles. Only a very small percentage of licensed drivers have need for this license class.

Class "M" - Motorcycles, motor scooters, and motorized bicycles (mopeds). This class license may be handled as an endorsement to any of the other classes.

Class "P" - Instruction permit for any of the above classes. Applicants for Class "A" and "B" licenses must possess a valid Class "C" license in addition to the Class "P" permit. This assures at least a minimum level of knowledge and driving experience and permits the learner to concentrate on the acquisition of skills necessary for the safe operation of heavy duty vehicles rather than on the basic application of traffic laws and safe driving practices. At all times prior to licensing, an applicant must be accompanied by a licensed driver authorized to drive the same class of vehicle.

While there may be other vehicle groups that warrant special consideration, in the main they should be handled through license endorsements. School buses fall into this category, in part because of the special considerations

surrounding the transport of school children and in part because some states have a separate administration of school bus driver qualification. Another special category is drivers of emergency vehicles. Because these vehicles frequently travel at high speeds and through complicated traffic patterns, there is a basis for special license endorsement qualifying drivers of this vehicle type. As described above, in establishing license classes, the two major constraints should be that there be as few classes as possible and that there still be enough classes to be effective.

### C. Frequency of Examinations

Examinations should be administered as often as necessary for reasonable assurance that drivers are initially qualified and maintain an acceptable level of performance. However, examinations are costly for both the state and the applicant and therefore should be kept to a minimum while meeting the goal of acceptable driver qualification. Not every test should necessarily be administered at every examination.

Drivers should always be examined on the following occasions:

1. At the time the individual applies for a first license within the state, whether it is the first license ever obtained or a transfer of license from another jurisdiction.
2. At least every four years thereafter.
3. When initiated by driver improvement actions.
4. When initiated because of medical considerations.

In addition, examination may be required at the discretion of the licensing authority for restoration of license following a period of suspension or revocation. Whether examination occurs may depend upon such factors as the length of the suspension and the reasons for suspension.



#### D. Pre-examination Procedures

There are a number of pre-examination procedures that must be followed to maintain the integrity of the driver licensing system. Perhaps the most important function of these procedures is that of driver identification. To ascertain identification it is necessary to obtain adequate information, verify it, and check relevant data banks for any additional information.<sup>1,2</sup> These major functions must be considered for every applicant regardless of the type of license sought, but the extent of the procedures will vary depending upon license type. For example, there may be minimal concern about verifying the identity and previous record of most minimum age applicants since their identity may be supported by driver education certificates issued by the state school system, and they have had little opportunity to generate an adverse driving record.

The following discussion will be applicable to the class "C" license; that is, the license primarily used for the operation of private passenger vehicles. At the end of the section on License Issuance, attention will be directed to variations in procedures for other license classes and for the motorcycle endorsement.

1. Learner permit. Most learner (instruction) permits for a class "C" license are issued to teenage applicants. States vary in their requirements for these young drivers, but many issue a permit to applicants under age 18 only upon evidence of completion of an approved driver education course in addition to passing the necessary licensing examinations. Because the permit for a class "C" license is usually the first license certificate held by an applicant, it is

<sup>1</sup>The Criminal Use of False Identification. A Summary Report on the Nature, Scope and Impact of false ID use in the United States with Recommendations to Combat the Problem. The Report of the Federal Advisory Committee on False Identification. U.S. Department of Justice. 1976.

<sup>2</sup>Driver License Applicant Identification and Licensing System Security. National Highway Traffic Safety Administration in cooperation with American Association of Motor Vehicle Administration. DOT HS 803 800. February, 1979.

at this point that careful background information should be collected and stored.

a. Application form. The purpose of the application form for a class "C" permit is to record relevant information on the applicant's qualifications and data for future identity verification. Information from the applicant (see Section F for examiner input) should include the following (minimal requirements are indicated by an asterisk):

- \* Name in full (first, middle, last, in that order and validated from acceptable documents: The "full name" should be the name given at birth or as later changed through marriage or court order.)

Any other names ever used

- \* Date of application

- \* Mailing address

- \* Residence address (if different)

- \* Social security number (verified from documentation)

- \* Class of permit applied for

- \* Endorsements applied for, e.g., motorcycle, school bus

- \* Date of birth (month, day, year, in that order)

- \* Place of birth

- \* Sex

- \* Race

- \* Height

- \* Weight

- \* Eye color

- \* Medical or physical conditions that may affect driving

- \* Name of high school (or elementary school) attended

- \* Year of last attendance at that school

- \* Location of school
- \* Mother's first and family (maiden) name and where she grew up
- \* Certification statement that the information is true
- \* Signature
- \* Parent-guardian certification (if applicant is a minor)

b. Identity check. In the case of the minor applicant the identity requirements can be met with a birth certificate and a second identification such as a school I.D. card. However, with older applicants the identification should be carefully established. Because there is the possibility that the older applicant may already have a driving history, either within the state or elsewhere, it is advisable to follow the procedures outlined below for the out-of-state transfer applicant.

c. Records check. The driving records of the state in which license is sought should be checked in case the applicant has a history of crashes or convictions prior to valid licensure. In the case of older applicants the National Driver Register (NDR) should also be checked.

2. Provisional license. Some states have special provisions for young beginning drivers whereby they receive closer monitoring and are subject to driver improvement procedures at a lower level of points or demerits. Provisional licensees would be eligible only for a class "C" license or its equivalent, although they may also obtain a Motorcycle endorsement. The pre-examination procedures for the provisional license are the same as for the learner permit for class "C" licensure except the signature of the parent or guardian is not required if previously obtained.

3. Initial license. The initial license is issued when a person has held no previous license. For an initial class C license, the same pre-examination procedures apply as for a permit or a provisional license except that the signature of the parent or guardian is not required if the applicant is 18 or older.

4. Out-of-state transfer license. The licensee who moves to a new licensing jurisdiction is usually required to secure a license in the new state.

a. Application form. The information obtained from the applicant on the application form should include all items requested from the permit applicant. In addition, the transfer application should provide the following:

Driver history

crash history

violation convictions

license restrictions

license suspensions or revocations

pending actions related to driving

\*State(s) of previous licensure within past four years and  
license number(s) if available

\*Previous mailing address

Estimated mileage driven during previous year

b. Identity check. The identity check for a transfer applicant is of more importance than that for a minor permit, provisional, or initial license applicant. The transfer applicant has a previous driving history and could therefore be ineligible for licensure depending upon the record. A careful identity check makes it possible to check the prior record. The examiner must check carefully the documents supporting the applicant's identity and insure that all the information appears to be in order.

c. Records check. The examiner should check his own state records even though the applicant has held a license in a different state. An out-of-state applicant could have already lost his privilege to drive in the new state if he has previously committed certain violations in the new state while using his license from another state. If the records are on-line, the examiner can check state records while the applicant waits. In addition the applicant should be

checked in his former state of residence and against the National Driver Register (NDR) to determine whether he is under license suspension elsewhere.

5. Renewal license. When an applicant is renewing a license within the state, the usual pre-examination procedures are modified. First of all, the state already has considerable information on record and should not send out a renewal notice until this information has been checked and it is ascertained that the applicant is eligible for renewal licensure. To do this, the state driver history file should be checked. Next the state should check the NDR, and if there is a license suspension or revocation in another state, appropriate action should be taken. If neither state records nor the NDR indicate an adverse record, the renewal notice should be printed and sent to the driver. This notice usually constitutes the application form for renewal licensure. The computer-generated version should include the following information:

- \* Name in full (first, middle, last, in that order)
- \* Current address
- \* Social security number
- \* Date of birth (month, day, year, in that order)
- \* Type of license being renewed

The application form should also include space for the following:

- \* Height
- \* Weight
- \* Mother's maiden name and where she grew up
- \* Name of high school (or elementary school) attended
- \* Year of last attendance at that school
- \* Changes in medical or physical conditions
- \* Signature
- \* Thumb print
- \* Estimated mileage driven during previous year

6. Duplicate license. Perhaps the most abused type of license certificate is the duplicate license. If the reason for the duplicate license is to change the name (e.g., in case of a female who has married) or address, the procedures are straightforward. In contrast, the procedure for replacing a lost or stolen license certificate should place heavy emphasis on applicant identification. It is precisely for this type of situation that it is important to collect relevant information on the application form that does not appear on the license certificate. Ideally, the examiner would have available on-line information from the driver's previous application form. The applicant should be queried concerning place of birth, mother's maiden name, and other information that is not likely to be readily available to someone interested in assuming a false identity. Pre-issuance procedures for the duplicate license applicant should place particular emphasis on verifying the driver's identity and ascertaining through an adequate records check that the driver does in fact qualify for a current duplicate license.

#### E. License Examinations

License examinations are administered to establish whether an applicant is qualified to operate the vehicle type for which he is seeking licensure. The examinations should be viewed as establishing minimal qualifications and should not be interpreted as a guarantee of future performance. If an applicant does not have a satisfactory level of knowledge and skill, then of course he cannot be expected to drive safely and licensure should be denied. If, on the other hand, an applicant displays satisfactory knowledge and skill, it does not necessarily follow that the knowledge and skill will always be used in driving. Once again, the following guidelines are discussed for the class C license first.

1. Learner permit.

a. Overall evaluation of applicant by examiner. The examiner should always consider each applicant in terms of his overall appearance and behavior. Since permit applicants are predominantly teenagers, they are likely to show the lowest rate of physical impairment that may interfere with driving. Some physical characteristics that may affect driving will be obvious, such as extremely short height which will require the use of a cushion in the car seat to elevate the driver, or missing or non-functional limbs. More difficult to evaluate are those impairments that are functional, that is, the way the applicant walks or writes his signature. Is the gait unsteady? Do the hands tremble? These are qualitative judgments that the examiner must make, although the examiner does not make a medical diagnosis. At most the examiner would refer the applicant for further evaluation by a specialist.

It should be noted that the examiner continues his overall evaluation of the applicant throughout the licensing process.

b. Vision test. Although good vision alone does not guarantee safe driving, adequate vision is essential to acceptable driving performance. All states require vision testing for an original permit or an original license, including out-of-state transfer, but states vary in what is included in their vision examination. Although most states officially require 20/40 binocular vision for an unrestricted license, all states will license applicants with poorer vision, usually imposing restrictions related to the circumstances.

The most frequently tested vision skills include static visual acuity, color vision, depth perception, and peripheral vision. Recent evidence indicates that other visual skills might be of greater importance in driving, but the special equipment for reliable evaluation of applicants is not yet available commercially.

It should be noted that vision testing serves an important function, since a sizeable portion of the driving population fails to meet the vision standards without corrective lenses. The administration of the vision examination insures that all licensed applicants have met at least some minimal vision standards.

c. Signs test. Much important information is communicated by means of traffic signs and symbols. Although there is a wide variety of traffic signs, there are certain uniform standards that are observed by most states. The examination should include evidence that applicants are aware of the meanings of these signs. Because there are changes in signs over time, the driver license examination also is an excellent place to include information on new signs and symbols that applicants can learn if they have not already acquired the information elsewhere.

d. Knowledge test. Many states focus on state traffic laws in their knowledge test, but other states use the test as an opportunity to convey important information about safe driving practices. Ideally a knowledge test would cover not only the state traffic laws and regulations but also information that is useful in promoting safe and efficient driving. Topics that should be covered include the following:

- State traffic laws

- Road signs and symbols

- Driver signals

- Safe driving practices

- Emergencies and hazards

- Effects of alcohol and drugs, including medications, on driving performance

- Effectiveness of restraint systems

- Differences in urban and rural driving, including driving on expressways



Pedestrian safety, including anticipation, warning, and avoidance of children, intoxicated persons, handicapped persons, and the elderly  
Sharing the road with larger and smaller vehicles and with two-wheeled vehicles

The information on the knowledge test should be covered in the State Driver Handbook.

The knowledge test may be administered in written form or in oral and pictorial form, and presentation may or may not be automated. The knowledge test should be one that has been developed on the basis of sound test construction principles and ideally items should be limited to ones that have been demonstrated to be related to driver performance. Although it is not easy to construct such tests, it is of questionable value for states to administer any other kind.

2. Provisional license. Evaluation of the applicant for a provisional license for Class C licensure should be the same as for the permit applicant, including overall evaluation by the examiner, vision test, and signs test. A knowledge test is also administered unless the applicant currently holds a permit. In addition, a performance test or driving test should be administered. The American Association of Motor Vehicle Administrators (AAMVA) has identified 16 road test maneuvers that a driver encounters in any mix of vehicular traffic and under all circumstances.<sup>1</sup> These include the following:

Left turn from one-way into two-way street

Left turn from two-way into one-way street

Left turn from/into one-way street

Left turn from/into two-way street

<sup>1</sup>Comparative Data State and Provincial Licensing Systems. National Highway Traffic Safety Administration, in cooperation with American Association of Motor Vehicle Administrators. DOT HS 805 335. October, 1980.

Right turn

Controlled intersection

Uncontrolled intersection

Start/stop on grade

Backing

Serpentine (Primarily used for motorcycle)

Parallel park

Angle park

Quick stop

Operation-brake system

Alley docking (Primarily used for large trucks)

U-turn/turnabout

These 16 maneuvers should be considered in the development of an adequate test of driving performance. During the performance test, the applicant should be accompanied by an authorized license examiner who is qualified in the operation of the vehicle type for which licensure is being sought. The examiner should grade each maneuver tested and record the results on the application form. Any performance that is not considered satisfactory should be explained to the applicant.

3. Initial license. The procedures for an initial Class C license should follow the same procedures as those for a provisional license. If the applicant has previously held a permit and thus already passed the vision, signs, and knowledge tests, ordinarily only the road performance test would be administered. However, the examiner always has the responsibility for overall evaluation of the applicant and may require further tests or evaluation that he considers necessary. One possibility is retesting of vision, since rapid vision changes occur during the teen years.

4. Transfer license. When an applicant is transferring licensure from one jurisdiction to another, he must take the vision, signs, and knowledge tests. In addition, the examiner conducts an overall evaluation. In most instances a road test is not administered, although the examiner may require a road test if there are circumstances that warrant it. There is no evidence that routine administration of a road test is useful in licensing transfer applicants for a class C license.

5. Renewal license. Routine renewal of a Class C license requires the overall evaluation by the examiner, the vision test, and the signs test. There is little evidence that routine knowledge testing of applicants who have no violation convictions during the previous licensing interval is related to improved driver performance, except for drivers below the age of 25. This age group is characterized by better performance when knowledge testing is required. If there are difficulties in having different requirements for different age groups, then exemption from knowledge testing should not be allowed until the second license renewal. However, for all age groups routine knowledge testing of renewal applicants provides an opportunity for updating applicants on new traffic laws and regulations, as well as changes in the general driving situation.

6. Duplicate license. The issuance of a duplicate license does not require any additional testing, although testing should always be allowed at the discretion of the examiner and on the basis of his overall evaluation of the applicant.

#### F. Examiner Input to Application Forms

The examiner's input to the application form includes the following:

1. Assessment of medical and physical condition. Based on the overall evaluation of the applicant throughout the licensing process, the examiner

records his assessment of the physical and medical fitness of the applicant to drive.<sup>1,2</sup>

2. Test results. The examiner records the scores from any tests given, including detailed performance on specified items where applicable. In the case of the signs and knowledge tests it is likely that only a total score will be recorded, but more specific information may be included for the vision test, e.g., acuity for each eye with and without corrective lenses, and for the road test where performance on each maneuver may be recorded.

3. Driving restrictions. Based upon test data and other information, the applicant may be deemed able to operate safely only under certain conditions, e.g. with the use of adaptive devices, or under certain conditions related to the driving environment (vehicle speed; daylight driving). Such restrictions must be entered on the application form by the examiner.

4. Photograph. If the applicant has performed satisfactorily on each test and is considered eligible for licensure, the examiner makes a photograph of the applicant to appear as an integral part of the license certificate. A three-quarter profile provides the largest number of identifiable facial characteristics. The state may retain a black and white copy of the photograph for its own files for use in case of future questions of identity.

5. Thumb print. The state may retain a copy of the applicant's right thumb print. This procedure may be followed for all license applicants or only for certain license classes, e.g., drivers of heavy trucks. Although the thumb

<sup>1</sup>Screening for Driver Limitation. A Review Manual to Aid Driver License Examiners in Recognizing Signs and Symptoms of Medical Conditions that may Limit Safe Driving Ability. National Highway Traffic Safety Administration. October 1976.

<sup>2</sup>Waller, J.A. Guide for the Identification, Evaluation and Regulation of Persons with Medical Handicaps to Driving. American Association of Motor Vehicle Administrators. 1967.

print should be retained in the state files, it should not necessarily appear on the license certificate itself.

6. Driver license number. The examiner assigns a unique driver license number to the applicant unless the applicant has previously held licensure in the state and already has a number. Many jurisdictions find the use of the applicant's social security number highly satisfactory for this purpose.

7. Research information. The examiner records any information routinely collected for research purposes such as estimated mileage driven in the previous year, or information being collected for special studies.

8. Examiner number. The number of the driver license examiner should appear on the application form so records can be compiled regarding workloads and for other purposes.

9. Examiner station number. The station number also should appear on the application form. This information, along with the information on examiner number, can be used to identify needed modifications in distribution of workloads.

#### G. License Issuance

1. Examiner actions. The license examiner may either approve or disapprove license issuance to the applicant. If the application is disapproved, the examiner should explain to the applicant the reasons for disapproval. Furthermore information should be given to the applicant as to what steps, if any, must be taken to be considered further for licensure. These steps may include any of the following:

- a. Clarification of documents establishing identity
- b. Clarification of questions concerning driver history
- c. Clarification of other information about applicant

- d. Examination by a qualified vision specialist to determine need for corrective lenses or other assistance in correcting vision.
- e. Examination by a qualified specialist for more indepth evaluation of other medical and/or behavioral problems
- f. Further study of driver handbook to improve performance on knowledge or road signs examination
- g. Further practice under appropriate supervision to improve road test performance.

If an applicant is approved, all previous licenses are obtained from the applicant and a new driver license certificate is issued. The old license, if from another state, should be returned to the jurisdiction that issued it.

2. Driver permit or license certificate. It is important to recognize that in our society the driver license is the preferred document for establishing personal identity for everything from cashing checks and establishing credit to getting a passport. For driving purposes also, rapid identification by means of the driver license is essential. Once a driver has been stopped by enforcement personnel, it is routine procedure to request the driver license.

a. Physical characteristics of the driver license certificate. The driver license certificate should be organized to present sufficient information to establish beyond a reasonable doubt the identity of the holder. Also, it must be small enough to fit easily into a wallet or billfold. Items such as the name, licensee's address, and driver license certificate number should be clearly legible so they can be compared with the state data banks when appropriate. The design and material of this certificate must be durable to withstand the wear and tear anticipated over a multi-year licensing interval.

b. Contents. All certificates, including permit, provisional license, initial license, transfer license, renewal license, and duplicate license, should include the following items. All items are not only desirable but are considered essential and therefore are identified by an asterisk.

- \* Name in full (first, middle, and last, in that order)
- \* Mailing address
- \* Residence address
- \* Date of birth (month, day, year, in that order)
- \* Race
- \* Sex
- \* Permit or license number
- \* Social security number
- \* Permit or license expiration date
- \* Restrictions
- \* Height
- \* Weight
- \* Eye color
- \* Photograph in color
- \* Permit or license class
- \* Endorsements, e.g., motorcycle, school bus
- \* Signature
- \* Organ donor (if yes)

c. Measures against tampering or counterfeiting. Certificates vary in how readily they may be simulated. To discourage tampering or counterfeiting some states use a logo printed in two shades of the same color and laminate the license in plastic; others use intaglio printing. It is also possible to embody the state seal in the plastic itself in such a way that it becomes visible only

when held at a certain angle under appropriate lighting. These measures should make tampering with the driver license certificate readily apparent. Counterfeiting would require fairly sophisticated equipment. All licenses should utilize counterfeit-resistant material that is nonremovable and nonphotographable for the term of the license certificate. The material could be security film, fluorescent, retro-reflective, or other material that would indicate whether the license had been tampered with.

Because of the widespread use of fraudulent licenses for illegal purposes, it is important for states to maintain the utmost security on their equipment used for producing driver licenses.

#### H. Variations in Procedures for Other License Classes and Motorcycle Endorsement

Procedures may differ somewhat for license classes other than Class C. These differences are in part because of the differences in the vehicle type operated and in part because of the differences in the driving patterns of the operators. These differences are described below.

1. Classes B and A. An applicant for a Class B or Class A license should have at least two years experience as a Class C driver. In some states the minimum age for Class B or Class A licensure is the same as for Class C, provided the driving is not for hire. From the standpoint of licensing, however, the greater complexity of operating a Class B or Class A vehicle as opposed to Class C is the same whether the driving is for hire or otherwise. Hence it is recommended that Class B or Class A applicants have at least two years prior driving experience to allow the acquisition of skill in handling traffic situations before assuming responsibility for operating larger and more complex vehicles.



In the case of Class B and Class A licensure, the identity check for original licensure is of even greater importance than in the case of Class C. The Class B or Class A license holder is more likely to be driving for hire and accumulating greater mileage than is true for holders of Class C licenses. In addition, vehicles operated by Class B or Class A license holders usually are larger and hence pose a greater potential hazard if the operator is not competent. The identity check is an essential part of maintaining the integrity of the licensing system and safeguarding the welfare of all highway users.<sup>1</sup> In the case of both original and out-of-state transfer applicants, as well as renewal licensure, the National Driver Register must be checked for whether licensure has been suspended or revoked in another jurisdiction.

Federal motor carrier safety regulations require that most drivers involved in interstate commerce, as well as drivers hauling hazardous materials, must obtain a medical certificate every two years. However, federal authorities are not able to enforce this requirement adequately. Only a very few states include certification of medical fitness as part of their licensing requirements. Yet the state licensing authority is in by far the best position to insure that drivers of Class B and Class A vehicles hold current medical certificates. It is therefore recommended that the state licensing authority require such medical certification for both original and renewal licensure for these license classes.

Permit procedures for Class B and Class A licensure are similar to those for Class C except that the applicant must take tests that relate to the type vehicle for which licensure is being sought. A higher standard should be required for passing on all tests than is true for Class C, including vision, signs, and

<sup>1</sup>Multiple Licensing and Interstate Truck Drivers. National Highway Traffic Safety Administration, in cooperation with American Association of Motor Vehicle Administrators. DOT HS 805 645. January, 1981.

knowledge. The permit allows persons to drive only when accompanied by someone holding a valid license for the vehicle type being operated.

When the performance or driving test is given for full-fledged licensure, it must be in the vehicle type for which licensure is sought. The driving test for Class B or Class A licensure should include a pre-trip inspection, off-road skills test (backing, docking, serpentine, etc.), and an in-traffic test. If air brakes are to be used, a special examination should be administered and a special endorsement applied to the license indicating that the holder is qualified to operate vehicles equipped with air brakes.

2. Motorcycle endorsement. Actually an endorsement, licensure to operate a motorcycle follows the same procedures as those used for a Class C license except that the tests must also cover knowledge and skills regarding motorcycle operation.

## VI. STATE DRIVER INFORMATION

Because driving populations change and because driving rules and regulations change, it is necessary to have some means of communicating information to the public. The driver licensing program is the only one that routinely reaches all drivers, and hence it offers an opportunity for updating and enhancing driver knowledge. There are two major ways in which information is distributed to drivers, namely, through driver manuals and through public education activities.

### A. Manuals

Driver manuals or driver handbooks probably are the most carefully read documents published by the state. Young people study them to ensure passing the test and acquiring a license. When knowledge testing is required for renewal licensure, many older drivers also read and study the driver handbook. As a result, the driver handbook offers a golden opportunity to communicate.

Many driver handbooks cover little besides state traffic laws. Recently, however, there has been a trend toward using the driver handbook to get across other important information to the driving public. While it is important for drivers to be knowledgeable about state traffic laws, the driver handbook should also include information on safe driving practices, how to handle emergency situations, updated information on new road signs and markings, and any other information that is likely to enhance the driver's judgment and performance. More specifically the driver manual should include at least the following:

1. A description of all classes or types of driver licenses and the requirements and procedures for obtaining them.
2. A description and explanation of major current traffic laws and regulations.
3. A description and explanation of the purpose and meaning of traffic signs, road markings, signals, and symbols.

4. A description and explanation of safe driving practices and techniques used under various vehicle and roadway conditions.
5. Information on the magnitude of the state's motor vehicle crash injury and death problem along with primary causes of crashes and how they can be avoided or ameliorated.
6. Information concerning the effects of medicines and drugs (prescribed by a physician, over-the-counter, and illegal), and the effects of alcohol on driving, as well as state laws regarding the use of these substances.
7. Information on other driver conditions, e.g., fatigue, emotional distress, and how they may affect driving performance.
8. Identification of the major motor vehicle safety devices and equipment with an explanation of their purposes and how to maintain and use them properly.
9. A clear and comprehensive description of the importance of using occupant restraints, including infant and child restraints, along with information about the effectiveness of using safety belts and child restraint systems.
10. A description of the size of the health problem posed by motor vehicle injuries with a brief description of the economic costs to society associated with motor vehicle injuries.
11. A description and explanation of driver responsibility when involved in a crash.
12. An explanation of the state's financial responsibility law and any other laws related to motor vehicle insurance.
13. An explanation of the state driver improvement program.
14. A description of current changes in the mixture of vehicles using the highways and how these changes affect driving. Of particular importance is information on how the motorist should drive in relation to heavy trucks, motorcycles, mopeds, and bicycles. Information also should be provided on the handling characteristics of small passenger cars and front wheel drive vehicles.

A state should have several driver manuals, including one for various license classes (passenger vehicles, motorcycles, heavy trucks). In addition

there has been some move toward tailoring driver handbooks to specific driving groups, e.g., young drivers, renewal drivers, older drivers.

Driver handbooks for Class B and Class A applicants and for applicants for a motorcycle endorsement should not repeat what is in the basic driver handbook but rather should cover the laws and information that are specific to the vehicle type involved. These applicants should demonstrate knowledge of the contents of both the basic driver handbook and the special handbook for the class licensure or endorsement being sought. Model manuals have been developed that can be used by interested states.

#### B. Public Education Activities

The driver licensing authority should work closely with the state authority responsible for signing and marking the highways and installing traffic signals. Great strides have been made in signing, marking, and traffic signals, including the introduction of a wide range of symbol signs. However, states do not always have a systematic procedure for informing the public of the meanings of the new signs and markings. Because drivers may go for several years without renewing their licenses and because not all drivers read the handbook, there needs to be a more timely way of getting important information to drivers. Driver license agencies together with highway departments should prepare news releases and arrange for televised interviews with local traffic engineers and other officials to explain changes in the signing, marking, and traffic signals. Likewise, brochures summarizing such information could be included when license renewal notices are mailed out.

## VII. DRIVER RECORDS SYSTEM

A driver licensing program is no better than its records system. Without a comprehensive rapidly accessible records system, the licensing program cannot be effective. The license certificate held by drivers provides linkage to the records system which is an integral part of each person's license to drive.

The driver history file is only one part of a much larger records system that includes information on a wide range of traffic-related activities, such as motor vehicle registration, financial responsibility, crashes, and emergency medical services. The driver history file should be an integral part of this larger system that can readily be linked to the other files if necessary. The American Association of Motor Vehicle Administrators (AAMVA), in cooperation with a wide range of private, state, and federal corporations and agencies, has prepared a comprehensive report detailing the data elements that should be included in a state traffic records system.<sup>1,2</sup> Their report was prepared primarily for persons responsible for the computerized records rather than for driver license administrators. However, the report should be referenced for purposes of setting up the actual records files.

The information included in this manual concerns only the driver license and driver history portions of the traffic records system. It is based on the work referred to below but in addition takes into consideration more recent information on driver licensing and driver history records. This manual should

<sup>1</sup>Design Manual for State Traffic Records Systems. Volume II - Section 1 - standard data elements and coding; driver data subsystem, National Highway Traffic Safety Administration. DOT HS-820 271, July, 1973.

<sup>2</sup>Data Element Dictionary for Traffic Records Systems. American Association of Motor Vehicle Administrators, August, 1979.

be considered as an overview for license administrators. It is not designed for the technical personnel responsible for the operation of the records system.

The driver records system begins with the initial license or permit, or with records of law violation convictions or crashes occurring before that time. The application form itself is maintained in hard copy or on microfiche, but most of the driver record should be on computer file. The core of the driver record consists of a brief file which includes identifying information, license class, current status of the license including any restrictions, and whether certain subfiles or record trailers are available. Through this core record the subfiles may be accessed. These include an identification subfile that has information that can be used for a quick identity check, sometimes a research subfile with special information that is collected routinely for research purposes, and other files that are not necessarily present such as the restriction subfile, the crash subfile, the driver improvement subfile, the alcohol/-drug subfile, and the medical information subfile. The medical subfile provides a computerized summary of medical information and actions taken, but a hard copy file also is maintained, including all medical reports and other related information. Each of these portions of the driver records system is described briefly below. In addition Appendix A presents more detailed information on the contents of the different portions of the driver records system.

#### A. Application Form

Input at the time of application comes from three sources, namely, the applicant, any supporting identification documents, and the driver license examiner. Information from the applicant was described in the section on pre-examination procedures. Information from the supporting documents is stored primarily for purposes of resolving future questions of identification. The

input from the examiner to the application form also has been described in a previous section. All of this information is summarized in Table A1 in the Appendix.

#### B. Driver History Brief File (Driver Record Core)

This brief file is the core of the driver record system. It is the portion of the record that is accessed first and through which all of the subfiles or trailers may be accessed. It includes information that can be used for a quick check of identity including name, address, driver license number, social security number, date of birth, race, sex, expiration date of license, restrictions on license if any, and license type (e.g., permit, renewal) and class (e.g., A, B, motorcycle endorsement). It will indicate the presence or absence of a crash subfile, a violation conviction subfile, or a driver improvement subfile. In addition there is a code for whether license issuance should be stopped for any of a variety of reasons. Although investigation of the total record would indicate that licensure is stopped, including the information here insures that even a review of the brief file will communicate this important message.

This core file also should include a code for the presence or absence of a medical subfile, but this information should not be revealed except through a special access code. Medical subfiles, and even the presence or absence of such files, are ordinarily considered confidential. If plans are realized for interstate electronic access to data banks of sister states by each licensing jurisdiction, safeguards to maintain the confidentiality of medical records, including their presence or absence, become even more important.

All drivers should have an identification subfile and a research subfile, if this latter information is collected. Whether a restriction subfile is present will be indicated by the summary information on restrictions that



appears in the core file. The crash subfile, the violation subfile, and the driver improvement subfile appear only if applicable. The medical subfile, of course, appears only in those special cases where there are medical questions. Table A2, lists the contents of the brief history file.

In summary, the driver history brief file is a compilation of information identifying the driver, his license characteristics, and the presence or absence of certain trailers or subfiles. This brief version of the record enables retrieval of a maximum amount of information in minimal search time.

#### C. Identification Subfile

Information on this trailer is primarily for use in a quick check of identity. The file should contain information concerning the place of birth, the school attended and possibly its location and last year of attendance, mother's first and family names, and place where she grew up. It may be that the type of information collected and stored in this subfile could vary from person to person, e.g., with father's name and place of upbringing given rather than the mother's. A special code should indicate which type of information is stored so that the examiner conducting a quick check of identity will know which questions to ask.

#### D. Research Subfile

This subfile includes any special information that is routinely collected primarily for research purposes. It should not include information to meet short term needs, i.e., information that can be obtained through special data collection procedures for a limited period of time. Possible elements to be included are estimated annual mileage, type of test administered (whether knowledge or road test was given), form of knowledge test given (oral or written, foreign language), scores on tests administered, type of driver training received, etc. Because any addition to a driver file may involve

millions of records, information collected on a routine basis should be kept to a minimum. Most research needs can be met through special data collection procedures and do not require the type of system described here. Table A3 lists possible contents of this subfile.

#### E. Restrictions Subfile

By far the most common restriction is corrective eyeglass lenses. Other restrictions include limitations on time or place of driving (e.g., daylight, on highways with posted speed 45 mph) or speed of driving. Driving also may be restricted to the use of special equipment either for the vehicle, e.g., hand controls, or the driver, e.g., prostheses, or both. Table A4 lists the information included on the restriction subfile.

#### F. Crash Subfile

This subfile includes the date of each crash, the crash severity (property damage only, injury, fatality), the crash report number that should enable ready access to the crash file (and hence to crash-related information), and the type of associated violations of which the driver was convicted, if any. All crashes should be recorded regardless of whether there is a conviction. Ideally the vehicle type in which the crash was experienced should also be recorded. Such information would facilitate the evaluation of hardship licensing and classified licensing programs. Table A5 lists the contents of this subfile.

#### G. Driver Improvement Subfile

This subfile has two major types of information, namely, convictions and driver improvement actions. For each conviction there is information on the date the violation occurred, the violation type and associated points assigned, whether the violation was crash related, the citation number, the date of conviction, and the court of conviction. The citation number is included to enable linkage to the original citation which should provide data on original

charge (which may be different from the conviction), vehicle type in which violation occurred, time of day, day of week, highway type, and possibly the driver's blood alcohol concentration at time of arrest.

The driver improvement action information includes any driver improvement measures taken, e.g., advisory or warning letters, conferences with the driver improvement analyst, or assignment to special schools or clinics held under the auspices of the licensing authority or the courts. Table A6 summarizes the contents of the driver improvement subfile.

#### H. Alcohol/Drug Subfile

This subfile includes information on all alcohol/drug-related offenses. Although some information on such offenses also appears in the driver improvement subfile and may be alluded to in the medical subfile, it is included in a special subfile to enable compilation of information that is not ordinarily stored and to provide for research in this important area. It could be argued that from a research standpoint it would be desirable to have information on all arrests regardless of violation type and of subsequent disposition. However there may be insurmountable legal obstacles to compiling this type of information. In the case of alcohol/drug arrests, however, there is greater justification for such a subfile. The contents of this subfile should be available for research and evaluation purposes only and not for use in any decisions made about an individual driver. Table A7 lists the contents of this subfile.

#### I. Medical Subfile

This subfile includes information on referrals for medical evaluation with corresponding dates, receipt of medical reports and their corresponding dates, any actions taken, re-examinations scheduled, and purge dates if applicable. Table A8 lists the contents.

## J. Medical File - Hard Copy

It is necessary that the entire medical report on a driver be retained, and it is usually simpler to do this by maintaining it in hard copy. The type and amount of information compiled varies so greatly from one driver to another that it does not lend itself readily to automated storage. Hence the hard copy medical file includes the necessary identifying information (name, date of birth, address, race, sex, driver license number, social security number, restrictions, license class, license expiration date). In addition, the file should include information from the driver's entire record whenever decisions are being made from the medical standpoint. Since the vast majority of drivers will not have special medical information compiled on them, the usual constraints of storage space are not applicable here. Table A9 lists possible contents of this file.

In summary, files that are essential to an effective driver licensing system, that is, Minimal Requirements include:

- Application Form (hard copy or microfiche)
- Driver History (Brief File)
- Restrictions Subfile
- Crash Subfile
- Driver Improvement Subfile
- Medical Subfile
- Medical File (hard copy)

Files that are recommended in addition (Optimal Requirements) include:

- Identification Subfile
- Research Subfile
- Alcohol/Drug Subfile

Effective operation of a driver licensing system requires the maintenance of information from a variety of sources updated in a timely fashion. The information must be readily accessible by persons responsible for making decisions about the driver's licensure. Without a comprehensive records system that meets the criteria of currency and accessibility, the driver licensing

program cannot achieve optimal effectiveness. Ideally the file should be accessible to license examiners in the field stations so that records can be checked prior to license issuance. In addition the driver history file should have the capability for linkage to crash files so that detailed information on driver crashes may be obtained. If the driver improvement subfile of the driver history includes citation numbers for convictions, the file can be linked to additional information on the circumstances surrounding the citation, e.g., vehicle type, roadway type, time of day and day of week. The usefulness of the information in the records system is directly associated with its accessibility. No matter how complete the records are, if they are not easily obtained by examiners at the time decisions are being made, they are not meeting their purpose. Officials of the licensing agency should have direct access to the records system. All other inquiries should be processed through the licensing agency, including inquiries from other states, from insurance companies, and from potential employers.

### VIII. POST LICENSING DRIVER CONTROL

Once the driver is licensed, he is entitled to operate specified vehicle types on the public roads. Drivers vary in how they handle this responsibility. While most drivers only rarely experience problems, some have enough difficulty that it is appropriate for the licensing authority to take action.

The purpose of the post licensing control system is to encourage good drivers to maintain their level of performance, and to identify promptly persons who appear to be having difficulty with their driving and to institute the appropriate measures to help such drivers improve their performance. Obviously, the post licensing control function should be handled by the licensing authority and should be closely coordinated with the traffic records system.

Since most drivers do not experience convictions within a given license renewal cycle, the only opportunity to reach them routinely is through the renewal testing program. This program has been described earlier. For drivers who do not maintain clean driving records, there are three major facets of post licensing driver control, namely, identification of problem drivers, driver treatments, and administrative actions. The following discussion treats these in more detail.

#### A. Identification of Problem Drivers

There should be uniform procedures established throughout the states for identifying problem drivers, and these procedures should be based on "point system" principles or on the total number of traffic law violation convictions experienced by a driver. Another way of identifying problem drivers or drivers who may be likely to develop driving problems is through monitoring of certain public records. In most states records concerning divorces granted and records of persons recently released from prison are public information. It has been

found that persons who have recently experienced a divorce and persons recently released from prison are at higher risk of having driving problems. Identification of such high risk groups can be used as a starting point in developing preventive programs.

It should be noted in these latter cases that it would be inappropriate for the licensing authority to contact persons identified from public records other than driving histories. However, the licensing authority could encourage other agencies or groups to communicate appropriate information to persons identified as high risk. For example, the licensing agency could assist in developing material to be communicated by prison officials to persons being released from prison. Likewise information could be communicated by divorce lawyers or by court personnel to persons seeking separation or divorce. Any information communicated should be couched in language that is supportive and helpful but that nonetheless communicates the higher risk of crash and the value of seeking assistance in transportation.

## B. Driver Treatments

Once a driver is identified through driving records as having a driving problem, the licensing agency may respond in a variety of ways depending upon the type and seriousness of the infraction. Possible actions include those of a statutory nature, driver improvement actions, and administrative actions. These are discussed as follows:

1. Statutory actions. Some infractions lead to consequences that are specified by law. What the specific offenses are may vary from one state to another, but the more serious the offense the more likely it is that it will carry with it a statutory consequence. Convictions for driving under the influence of alcohol are a primary example, and in many states such a conviction leads to mandatory loss of license. Convictions for speeding above a certain

level or accumulation of a specified number of points in the driver record may likewise call for mandatory measures. Many states have habitual offender statutes that define the number and type of convictions that result in habitual offender status. Not only is loss of license mandatory for habitual offenders but driving while so confirmed may lead to imprisonment.

Such statutory actions simplify matters in some ways, but the prohibition of any discretionary judgment can in itself cause problems. If statutes mandate penalties that are preceived as unduly harsh, it is difficult to obtain convictions. In these cases the harsh penalties actually are counter-productive, that is, they reduce the probability of conviction. Another problem with mandatory measures is that they do not allow for extenuating circumstances. In one case a fire in a small town elementary school necessitated the transportation of numerous children to health care facilities. One citizen whose license was revoked for drunk driving was called upon to assist in the driving and did so. An officer who observed his driving and knew his license was revoked reported the incident, and the licensing agency had no recourse but to extend the revocation. Nevertheless statutes that mandate clearly defined consequences of specified acts are intended to insure equitable administration of traffic sanctions.

2. Driver improvement actions. Most states base driver improvement actions on convictions for traffic violations rather than on crashes. While the primary purpose of driver licensing and driver improvement programs is to reduce traffic crashes, drivers may be involved in crashes for which they are not responsible. In the case of convictions the driver already has been found to be responsible and the licensing agency is relieved of the necessity for determining culpability.



There is another good reason for using convictions rather than crashes as a basis for instituting driver improvement measures. Research has shown that convictions are a better predictor of future crashes than are crashes themselves. Thus, the states are on firm ground when they use convictions to identify drivers for driver improvement actions. Nevertheless there is evidence that once a violation occurs, persons of lower socioeconomic status are more likely to receive a conviction. Therefore administrators should take such information into account when dealing with problem drivers from lower socioeconomic backgrounds.

Driver improvement measures vary according to the frequency and seriousness of the offense. The major types of driver improvement actions are as follows:<sup>1</sup>

a. Advisory or warning letters. These letters are appropriate for drivers who have their first or second conviction, depending upon the gravity of the offense, within a 12-month period. The letter tells the driver that the licensing agency has noted the offense. It further explains the state's point system or whatever system is employed for identifying drivers in need of special attention. Letters may vary in style and form depending upon characteristics of the offense and of the recipient.

Advisory or warning letters are a low cost and effective means of improving driver performance. They should be the first step in dealing with drivers who have experienced infractions but who do not appear to be seriously derelict in their driving performance.

b. Driver improvement classes. Most drivers will not progress beyond the first level at which a warning letter is sent. This is partly due to the proven effectiveness of advisory letters and partly because many drivers would not

<sup>1</sup> Model Driver Improvement System. Administrator's Manual. National Public Services Research Institute. April, 1981.

experience another conviction anyway. However some drivers continue to accumulate convictions. In these cases some further action is required. This further action may take the form of driver improvement classes or courses. A number of such courses have been developed, with the National Safety Council's Defensive Driving Course probably the one most frequently used. There is evidence from some states that these classes are effective.

A particularly promising driver improvement class is the Group Educational Meeting (GEM) developed in California. The GEM is a one and one-half hour meeting between a driver improvement analyst and a group of 15 to 25 drivers. Each participant is given a copy of his driver record to review and is advised of the need to improve driving performance. In addition, information is provided on ways to achieve improvement. There are also slide and film presentations on accident avoidance and hazard preception. Audiovisual presentations are preceded and followed by written tests. Discussion is a part of the program, and the driver improvement analyst is encouraged to be supportive and friendly. Evaluation has shown the GEM to be highly cost/beneficial.

c. Driver improvement interviews. An interview should be conducted with a driver who has received an advisory letter and has participated in a driver improvement class or course but who continues to compile convictions on his record. The interview should be conducted by a driver improvement analyst who has received training in interviewing techniques. The analyst should review the driver's record and give him the opportunity to describe what led to the infraction and conviction. Of particular significance are the driver's ideas as to how the infractions may have been avoided. The information thus obtained can give valuable clues to what types of remedial measures may be most effective.

The driver improvement analyst has available a number of traditional options such as suspension, probation, or referral to the medical advisory board. In addition there is a unique opportunity to consider whether the driver may benefit from some other type of service. Every community has available a variety of resources and services. The analyst should become familiar with those available in the area from which his clients come. Ideally, the analyst should make personal acquaintance with persons administering the local services and try to become familiar with the types of problems that are dealt with by each resource. In this way the analyst can best inform drivers of other services that might be helpful. Use of these other services may be recommended in addition to or instead of any action that may be taken by the licensing authority.

This approach is based on the observation that many "problem drivers" actually are drivers who are experiencing problems, and whose problems have spilled over into their driving. If a driver is preoccupied because his marriage is dissolving or because his teenage son is on drugs, it is unlikely that assignment to a driver improvement course will be especially beneficial. It may be that referral to a local counseling service will have a much more beneficial effect on his driving.

It is important to note, however, that regardless of what information or recommendation is provided, under all circumstances the driver is held responsible for his own driving performance.

d. Referral to Medical Advisory Board. Every state should establish a Driver License Medical Advisory Board to provide counsel to the Commissioner of Motor Vehicles on medical aspects of driver licensing. The Board should include but not be limited to physicians licensed to practice medicine in the state and representing various medical specialties. Specialties commonly represented on

such Boards include neurology, internal medicine, psychiatry, ophthalmology, cardiovascular medicine, orthopedics, endocrinology, and general medicine. In addition, one member should be an optometrist licensed to practice optometry in the state. More recently there has been an increase in the number of drivers who are receiving routine dialysis because of failing kidney function. As a result some state medical advisory boards are considering adding a nephrologist, that is, a kidney specialist, to their Medical Advisory Board.

The Medical Advisory Board should advise the Commissioner on medical criteria and vision standards to be used in licensing drivers. They also should recommend procedures and guidelines for licensing individuals with physical or mental impairments. The Board also should assist in developing training for driver examiners in the medical aspects of licensure, assist in orienting the general physician population as well as the public on the medical aspects of driver licensure, and evaluate individual problem cases that require more in-depth evaluation than is provided for by the guidelines established by the Board. The Board should establish different medical criteria and vision standards according to the license class of interest.<sup>1,2</sup>

A driver may come to the attention of the Medical Advisory Board through a number of routes. License applications ordinarily include questions about health history such as seizures, heart trouble, paralysis, fainting or dizzy spells, or any serious problems with alcohol or drugs. In addition license examiners should be trained to recognize signs and symptoms of medical conditions that may impair driving performance. If information from the

<sup>1</sup> Functional Aspects of Driver Impairment; a guide for state medical advisory boards; American Association of Motor Vehicle Administrators, 1980

<sup>2</sup> The Role of Medical Advisory Boards in Driver Licensing. National Highway Traffic Safety Administration. DOT HS 802 013, March, 1977.

application or the examiner indicates that medical evaluation is appropriate, the examiner should instruct the applicant on how to obtain a medical report and explain why the evaluation is being requested.

The majority of referrals to the medical evaluation program are instituted at the time of license application. Other sources of referral include reports from enforcement personnel in whose judgment a driver is in need of special evaluation (usually identified as a result of a violation or crash), the court system in the case of persons found to be mentally incompetent or persons committed for treatment of alcoholism or drug addiction, relatives or acquaintances, and in some states the agency responsible for services to the blind.

Although most cases referred for medical evaluation can be handled routinely, some require closer scrutiny and must be carefully reviewed by the Medical Advisory Board. While all licensing decisions are made by the licensing authority, generally the advice of the Medical Advisory Board is followed.

3. Administrative actions. There are a number of administrative actions that are used to limit or prohibit driving. These include placing restrictions on driving, placing the driver on probation, and, finally, suspending or revoking the license.

a. License restriction. Restrictions may be placed on a license because of driver limitations (e.g., vision limitations, retardation of judgment and response) or driver problems, e.g., drinking problems coupled with economic need. In the latter case some states issue a limited license variously referred to as a hardship license, occupational license, limited permit, restricted permit, or conditional license. Basically such a license is designed to enable the person to engage in driving that is necessary for him to maintain his livelihood while prohibiting other driving. Restrictions for this purpose may address the

time of day, the location, and/or the type of highway on which driving may occur. In the case of drivers with drinking problems restrictions often prohibit driving at nights or on weekends. Another kind of restriction requires that special equipment be present on the vehicle to be driven. This restriction type is usually used for drivers who require special prostheses to operate a vehicle, e.g., hand operated brakes and clutch.

Elderly drivers whose perception and reactions are reduced may be restricted to daylight driving and/or to a specified distance from their home. Such restrictions often enable elderly persons to retain their independence with no significant sacrifice in highway safety.

b. Probation. In some instances a driver may be allowed to continue to drive under probation rather than have his license suspended. Probation carries with it the stipulation that a subsequent conviction will institute the suspension. There is evidence that probation coupled with the threat of suspension can be effective in improving driving performance, and it is an especially effective tool of the driver improvement analyst or hearing officer.

c. Suspension/revocation. Sometimes all other driver improvement efforts fail and there is no recourse but to suspend or revoke the license. Ordinarily suspension is discretionary on the part of the licensing authority and refers to loss of the license for a relatively short period of time. On the other hand, revocation is usually mandatory and leads to loss of licensure for an extended period of time. However, the two terms often are used interchangeably.

It is well known that some drivers continue to drive while their license is suspended or revoked,<sup>1</sup> but even so it appears that they may exercise greater

<sup>1</sup>Involvement of Suspended/Revoked Drivers in Traffic Crashes. A Statement of the Problem. National Highway Traffic Safety Administration in Cooperation with American Association of Motor Vehicle Administrators. DOT HS 804 104. June, 1979.

caution in their driving and experience fewer crashes and convictions than comparable drivers whose license is not suspended. Furthermore, there is evidence that drivers whose license is suspended because of driving under the influence of alcohol have better subsequent records than similar drivers who attend a special alcohol school for such offenders.<sup>1,2</sup> Thus it appears that even though license suspension or revocation must be regarded as a last resort, it can be an effective driver improvement measure for the multiple offender.

### C. Driver Recourse Through Administrative Review and/or the Courts

Persons who have had their driving privileges restricted, suspended, or revoked must be given the right and the means of appeal and must be so informed at the time action is taken against their license. To provide for the exercise of this right, the state licensing agency must establish a hearings procedure.

Should the driver wish to appeal his case, the licensing agency should provide for an administrative review, and a trained and authorized hearing officer should preside. This person should have the authority to uphold, modify, or rescind the actions previously taken by the driver improvement analyst. A record of the hearing proceeding should be maintained in the event the driver seeks subsequent relief through the court system.<sup>3</sup>

<sup>1</sup> Hagen, R.E., Williams, R.L., McConnell, E.J., Fleming, C.W. An Evaluation of Alcohol Abuse Treatment As An Alternative to Driver License Suspension or Revocation. California Department of Motor Vehicles. December, 1978.

<sup>2</sup> Salzberg, P., Hauser, R. and Klingberg, C.L. License Revocation and Alcoholism Treatment Programs for Habitual Traffic Offenders. Washington Department of Licensing. August, 1981.

<sup>3</sup> Whitcomb, R.F. A Study of Administrative Hearings Conducted by State Driver Licensing Agencies. Arthur Young and Company. April, 1977.

#### D. Enforcement of Post Licensing Driver Control

The imposition of driver control measures, whether they are driver improvement actions or administrative actions, is designed to encourage the driver to drive safely, to drive within specified limitations, or in some instances to refrain from driving entirely. In all instances the extent to which the driver control action is successful depends in large part upon the cooperation of the driver. Realistically, resources are not available to ensure that all or even most drivers always abide by whatever restrictions or limitations may be imposed by the state. However, there are certain procedures that can be followed to help enforce whatever driver control measures are taken. These include: (1) court reporting of drivers convicted for offenses while under license suspension or revocation; (2) exchanging information with other states concerning traffic convictions; (3) notifying the driver of any actions taken; (4) notifying appropriate enforcement personnel; (5) reporting license suspensions and revocations to the National Driver Register; (6) routinely checking the National Driver Register before issuing a new or renewal license; (7) implementing a statewide audited uniform traffic ticket system.

1. Court reporting of drivers convicted for offenses while license is under suspension or revocation. All traffic courts should routinely and promptly report to the licensing agency all traffic-related convictions with special notice taken of convictions for traffic-related offenses occurring while license is under suspension or revocation or occurring under circumstances in which the driver is not observing specified license restrictions.

2. Exchanging information with other states. Violation convictions and suspensions and revocations imposed upon out-of-state drivers should be reported to the home state promptly. In return, such information received from other states concerning in-state drivers should be entered into the driver history file and dealt with according to the state laws governing such infractions. It



is only in this way that the driver history file can become a basis for an effective driver improvement program. So long as each state's driver history file contains only partial information, it is not possible to identify drivers as soon as they are in need of driver improvement measures, and driving problems may worsen as a result.

3. Notifying driver of any actions taken. If a driver has his license restricted, suspended, or revoked, he must be notified of such action or else he cannot be held responsible for complying with it. The state licensing agency must have a system for handling these procedures.

4. Notifying appropriate enforcement personnel. If a driver's license is suspended or revoked, the local enforcement agencies in the area where the driver resides should be notified, as well as the state enforcement agency. In this way the police can work more closely with the driver licensing agency to ensure that the license action is enforced.

5. Reporting license suspensions and revocations to the National Driver Register (NDR). All suspensions and revocations of license should be reported to the NDR other than routine non-judgment financial responsibility suspensions, and suspensions imposed solely to meet the requirements of the Non-Resident Violator Compact.<sup>1</sup> In this way drivers can be discouraged from obtaining additional licenses from other jurisdictions while their license is suspended or revoked.

6. Routinely checking the National Driver Register. When persons apply for a license as an out-of-state transfer or as a routine renewal, or if someone age 18 or older applies for an original license, the NDR<sup>2</sup> should be checked

<sup>1</sup>Nonresident Violator Compact of 1977. National Highway Traffic Safety Administration. February, 1979.

<sup>2</sup>The National Driver Register: A Part of the States Driver Licensing System. A Report to the Congress. National Highway Traffic Safety Administration. DOT HS 805 527. June, 1980.

before license is issued. It is only through routine use of the NDR that multiple licensure of serious traffic offenders can be reduced.

7. Implementing an audited Uniform Traffic Ticket System. All traffic tickets used throughout the state should be of the same type and carry a unique identifying number. They should be issued, controlled, and audited at state level. All ticket numbers should be entered onto computer before being issued to police agencies and eventually to individual enforcement officers. Ideally the central records system should be notified at each stage of ticket disposition. Such a system quickly identifies breakdowns, e.g., failure of courts to communicate to the licensing agency concerning convictions. In the absence of an on-line auditing system, at the very least a record should be maintained of every transaction so that, should the need arise, the status of any ticket can be verified. An audited uniform traffic ticket system increases the probability that problem drivers will be identified early enough to maximize the beneficial effects of remedial actions taken.<sup>1</sup>

<sup>1</sup>Appendix B contains a brief description of a statewide uniform traffic ticket system.

## IX. PERSONNEL

No matter how well designed a driver licensing system may be, ultimately it is no better than the individual examiner who implements it at the local station. The attitude and demeanor of the driver license examiner can do much to influence the public, either engendering positive supportive attitudes toward the state licensing program or eliciting anger and resentment toward the system. Some state legislators claim that they receive more mail about the driver license program than about any other state activity.

The state driver licensing agency should have direct responsibility for selecting, compensating, and managing all personnel engaged in driver licensing in the state. The agency should develop an adequate professional staff of examiners, driver improvement analysts, hearing officers, and other key personnel.

### A. Driver License Examiner

The importance of the examiner's role cannot be overemphasized. Most states require that the license examiner hold only a high school diploma or its equivalent. Waller has commented on the importance of adequate education, knowledge and training for driver examiners:

"A high school diploma can characterize persons representing a wide range of ability and commitment. The economic health of a state will to some extent affect the attractiveness of the driver examiner position and hence the quality of the applicants available for selection. Because of variations in quality of educational systems and economic conditions, it is probably fair to assume that there is variation among the states in the overall quality of the driver license examiner corps. The fact that most states require little or no specialized training beyond high school means that there

are very real constraints resulting from the characteristics of the examiners. To a very considerable extent these limitations can be modified by good training programs, both initial and on-the-job. Again, other constraints will dictate the extent to which such training programs are possible.

"It is worthwhile to consider what it means to have a driver license examiner corps that for the most part has not gone beyond high school. The driver license examiner must deal with essentially every segment of the adult population including the best educated, the most cantankerous, the physically and mentally ill, the poorly educated in need of special consideration, persons whose race, sex and ethnicity differ from those of the examiner, etc. There may be no other position in state government that requires the versatility in dealing with human nature that is demanded of the driver license examiner. Not only must he be capable of dealing with such a range of applicants, but also he usually has to do so with an audience composed of a variety of other applicants. Recognizing that there are many individual exceptions, it is probably fair to say that most examiners will not be prepared to deal with every type of applicant with whom he is confronted. Realistically, we cannot expect the driver license examiner to be an expert in human relations (even though some of them, especially with experience, become amazingly adept in this most difficult area), nor can we expect him to have the knowledge and skill of a trial lawyer (although examiners are usually informed of the changes in traffic law, and some become

remarkably knowledgeable of its intricacies). It should also be recognized that in this, as in other fields, not every examiner can be expected to be delighted at the opportunity to put in extra time and effort to meet the demands of crowded offices at closing time."<sup>1</sup>

In addition to at least a high school education, a reasonable level of intelligence and maturity and the ability to work with people are the major prerequisites for a driver license examiner. Furthermore, the examiner should be given preassignment training in all of the duties to be performed.<sup>2</sup> The American Association of Motor Vehicle Administrators (AAMVA) has pointed out that the examiner should not attempt to be an expert in vision testing (which implies diagnostic skills) but should be skilled in vision screening, which merely indicates whether an applicant has met certain vision standards under certain conditions. The examiner should be qualified and hold licensure to operate all vehicle types for which he issues licenses.

Special materials have been prepared for training examiners to screen license applicants for signs and symptoms of medical conditions that may limit their ability to drive safely.<sup>3</sup> Such training is important, since the licensing station is the major source of referrals for medical evaluation.

The examiner should also be well trained in state laws governing driver licensing. Of particular importance is training on how to deal with the wide

<sup>1</sup>Waller, P.F., Li, L.K., Hall, R.G. and Stutts, J.C. Driver Performance Tests: Their Role and Potential. University of North Carolina Highway Safety Research Center. March, 1978.

<sup>2</sup>Basic Training Program for Driver License Examiner. Course Guide, Instructor's Lesson Plans, Trainee Study Guide. National Highway Traffic Safety Administration. August, 1971.

<sup>3</sup>Screening for Driver Limitation. A Review Manual to Aid Driver License Examiners in Recognizing Signs and Symptoms of Medical Conditions That May Limit Safe Driving Ability. National Highway Traffic Safety Administration, October, 1976.

variety of people the examiner will meet in serving the public. Finally, it is essential that the examiner understands the reasons for having a licensing program. Whatever procedures are developed for license testing it must be remembered that ultimately the success of the program lies in the hands of the individual examiner. If that examiner is not convinced of the importance of the tests or does not clearly understand and appreciate the procedures for administration and scoring, the testing cannot be expected to provide useful information.

The examiner's role is one of public service. On the one hand he has the responsibility to safeguard the public using the highways by insuring that applicants are physically and mentally fit to drive and have the necessary knowledge and skill. On the other hand he has the obligation to treat each applicant with courtesy and respect regardless of the person's driving ability or station in life and to assist the applicant in overcoming any deficiencies if at all possible.

In addition to initial training all examiners should receive regular in-service training at least annually to gain updated information on traffic laws, administrative policies, and new approaches to the execution of their duties.

#### B. Driver Improvement Analyst

The driver improvement analyst (DIA) works with the driver who has experienced excessive or unusual difficulty with his driving. Because many of these drivers are troubled in areas other than their driving, the DIA must have exceptional ability to work with people and show sensitivity to their feelings. At the same time the DIA must be able to avoid becoming too involved in the driver's problems but rather must help the driver to attain some perspective on his driving difficulties. To do this the DIA must assist the driver in becoming

more aware of his problems, understanding the causes of his problems, and developing effective approaches for correcting or controlling the problems.

The DIA should have training in human relations and psychology as well as interviewing and communication techniques. He should have a thorough understanding of traffic law and the state's system of identifying drivers for driver improvement actions. He should understand the variety of factors that affect a person's driving performance as well as the factors associated with crashes.<sup>1</sup>

The DIA is dealing with many drivers whose problems go beyond their driving performance. A well trained DIA can provide important service by offering information on resources within the community that can help remedy some of the driver's problems. Of course the major role of the DIA is to help the driver understand and improve his driving difficulties, but many times other types of assistance may be of more help in improving driver performance than anything that the Department of Motor Vehicles can offer.

### C. Hearing Officer

While the DIA is primarily concerned with aiding and assisting the driver in understanding and improving his performance, the hearing officer is concerned with applying the laws to the particular case under consideration. There are obviously similarities in the two roles, but the emphases and primary purposes are different. Ideally the person who conducts a hearing with the driver should not be the same person who serves as a DIA. However, in less affluent and/or rural jurisdictions it may be necessary to combine the two roles. In such cases the person serving as DIA knows that he may later have to sit in judgment on the

<sup>1</sup>Basic Training Program. Driver Improvement Analyst. Course Guide, Instructors' Lesson Plans, Student Study Guide. National Highway Traffic Safety Administration. July, 1973.

same driver. The DIA/Hearing Officer should be very clear concerning the separation of roles, and the driver should be clear as to which role the DIA/Hearing Officer is fulfilling at the moment.

The hearing officer must be thoroughly knowledgeable concerning driver licensing, traffic laws, the court system, and traffic records. Due process must be observed with the officer showing complete impartiality. He should prepare a written summary of the hearing that may be used should the driver seek later recourse in the courts. The hearing officer must also be knowledgeable about the public safety issues and take these into consideration in arriving at decisions regarding sanctions. Finally, the hearing officer must be able to establish rapport with his clients and treat them with respect. To the extent that the driver feels he has been treated fairly, he is likely to observe whatever sanctions are imposed and benefit from the hearing experience. Thus the hearing officer must have some expertise in three major areas, namely, legal, public safety, and interpersonal relations.<sup>1</sup>

<sup>1</sup>Inservice Training Seminar for the Driver Licensing Administrative Hearing Officer. Instructor and Participants' Manuals. National Highway Traffic Safety Administration. DOT HS 803 072. March, 1978.



## X. FACILITIES AND EQUIPMENT

The state driver licensing agency has the responsibility for providing and maintaining facilities and equipment required for performing its duties. The licensing stations should be distributed so that citizens throughout the state are within reasonable distance of an examination station. Where the demands are high there should be permanent facilities, but where the testing load is lighter it is permissible to have stations that are open less frequently. In the case of these part-time facilities, mobile examining units may be desirable. In all cases the physical facility should be adequate to accommodate the number of applicants using the station. The arrangement of the licensing offices should be such that applicants can be tested in relative privacy and that waiting applicants cannot overhear the correct responses to items on either the vision or the knowledge tests. No applicant should feel as if he is under the close scrutiny of other applicants.

The station should include the equipment necessary for vision, knowledge, and performance testing. There are a number of different standardized vision testing units that are available to states commercially. Although these units have the capability of testing static visual acuity, color vision, depth perception, and/or peripheral vision, other visual skills such as dynamic visual acuity may be more important for safe driving.

Some states have automated knowledge testing. Automation may be used for administrative reasons but it does not necessarily result in a better test. Ultimately a test is no better than the test items that go into it. Good test items may be administered using automated equipment or paper and pencil.

Special testing equipment may be an important consideration in the case of examiners who move from one station to another and must carry it with them. Heavy or unwieldy equipment will cause difficulties in transportation, as will

equipment that is highly sensitive to motion. Such issues must be addressed in the acquisition of licensing equipment.

Examination for Class A or Class B license and for motorcycle operator endorsement may include an off-street performance test. It is not necessary that all stations provide facilities for such testing, but it should be available within reasonable distance from any part of the state. It is important to remember that both off-street and in-traffic testing of drivers of heavy vehicles should be conducted on facilities that can withstand the weight of these vehicles. The same paved area that will suffice for off-street performance testing of motorcycles and passenger cars may deteriorate rapidly if heavy vehicles are routinely used on it as well. Likewise, the roads surrounding examination stations where Class A performance testing occurs need to meet certain minimal requirements. If a state is shifting to a classified licensing system for operators of heavy vehicles, the licensing agency should consult with the state highway department to identify which stations are located in areas where the roads can withstand the repeated use of these vehicles.

All examination stations should maintain regular schedules that are well publicized. Stations should also provide adequate parking space, restrooms, and waiting space. All accommodations should be clean, orderly, and well lighted.

## XI. PROGRAM COORDINATION

The driver licensing function is intimately related to a number of other programs and activities. To achieve maximum benefit from all these programs it is essential that they be well coordinated. The activities of concern include both intrastate and interstate.

### A. Coordination With Other Intrastate Activities

1. Driver education. The driver licensing agency should work closely with the driver education program to insure that each activity reinforces the other. If driver education instructors emphasize the importance of safety belt usage, the non-use of safety belts by the license examiner administering the road test can undermine the benefits of the driver education instruction. Likewise, if young applicants persistently fail certain portions of the license examination, such information should be communicated to the driver education instructor so that greater emphasis on those elements can be built into the driver education program.

2. Enforcement agencies. After initial licensure, almost all driver improvement actions are based on driver records. Violation convictions and crash entries on these records come from reports of enforcement agencies and courts. If there is not close cooperation and coordination between the licensing agency and state and local enforcement agencies, the driver record will not be current or complete and driver improvement activities will lose their impact. The licensing agency must communicate to the police appropriate information on license suspensions and revocations so that these licensing actions can be monitored closely.

3. Judicial system. The accuracy and usefulness of a driver record depends to a large degree upon how promptly and completely the courts report traffic convictions to the licensing agency. In the case of serious offenses, such

as driving under the influence of alcohol, the courts frequently conduct a pre-sentence investigation of the accused which includes a review of the prior driving record. Obviously for both the court and the licensing agency it is important that there be close coordination.<sup>1</sup>

4. State health department. The licensing agency should work closely with the state health department on matters concerning the physical and mental fitness of drivers. The health department may have a reporting system for certain physical conditions known to affect driving, e.g., epilepsy. The department also frequently administers treatment programs for persons with drinking problems. Through closer liason with the state health department the licensing agency can often help persons convicted of driving under the influence acquire appropriate treatment.

5. State vital statistics. The licensing agency should receive information from the state vital statistics agency on deaths in the adult population so that driver records can be purged.

6. Governor's Highway Safety Program. The state office of highway safety needs to work closely with the licensing agency as well as other agencies both to collect relevant information and to inform the agency about new improved methods developed elsewhere.

7. Other activities. There may be other state programs where it is beneficial to have closer coordination with the licensing agency. One example referred to previously is the organ donor program. Because most healthy organs become available as a result of highway crashes and because the driver license is usually the first source of identification sought, it makes good sense to combine these two programs. Other state programs may also benefit through

<sup>1</sup> The Uniform Traffic Ticket System, referred to earlier is one means of achieving close coordination among the police, courts, and driver licensing agencies.

coordinating activities with driver licensing. For example, health screening programs or other programs concerned with delivery of health services may use the driver licensing station to reach many persons who would not otherwise be reached.<sup>1</sup> The use of the oral driver knowledge test is probably the best single indicator of functional illiteracy in the adult population and drivers taking the oral test can be offered tutoring services to teach reading skills.<sup>2</sup> Another possibility is combining voter registration with licensing. The fact that the driver licensing program has routine contact with the majority of the adult population offers many opportunities for combining functions of different state agencies with mutual interests.

#### B. Coordination with Out-of-State Jurisdictions and Activities

1. National Driver Register (NDR). As described earlier, the NDR is the only national compilation of drivers with record of license suspension or revocation. This information is important to all jurisdictions, but the information is useful only to the extent that states regularly submit information to the file and routinely check it before issuing license. While the NDR is being considered for a number of improvements, even in its current form it is heavily used and identifies a large number of ineligible license applicants.

2. Driver License Compact. Each state should be a member of the Driver License Compact whereby information on traffic convictions committed outside of

<sup>1</sup>Waller, P.F. Driver Licensing and Public Health: A Proposal for Collaborative Efforts. University of North Carolina Highway Safety Research Center, 1978.

<sup>2</sup>Waller, P.F. and Hall, R.G. Literacy and Driving. Can State Programs Remedy a Problem? University of North Carolina Highway Safety Research Center, 1979.

the driver's home state is exchanged between the relevant states.<sup>1</sup> Because jurisdictions generally recognize and accept driver licenses issued by each other and because driving is an interstate activity, it is essential that states exchange this information on convictions so that driver records are complete.

3. Non-Resident Violator Compact. Each state should be a member of the Non-Resident Violator Compact (NVC). The NVC has as its primary objectives: (1) the reduction of enforcement time spent processing the violations of non-resident motorists; (2) increased collection of fines by courts; and, (3) moderation of the inconvenience and hardship experienced by non-resident motorists cited for less serious traffic violations. Under the provisions of the NVC a non-resident receiving a traffic citation may proceed on his way without having to post collateral or face a mandatory appearance before a local traffic official. Instead, he may continue his trip or return home with the knowledge that if the terms of the citation are not met, his home jurisdiction may suspend his driver license.

The use of the NVC has been shown to reduce enforcement time spent in processing citations for non-residents and increase citation compliance by non-residents. Each participating state should establish through its motor vehicle administrator procedures for implementing and complying with the NVC. Model legislation has been developed and is available to the states.

4. Uniform Vehicle Code.<sup>2</sup> The Uniform Vehicle Code (UVC) has been developed and is updated periodically by the National Committee on Uniform

<sup>1</sup>Traffic Laws Commentary. The Driver License Compact and the Uniform Vehicle Code. National Committee on Uniform Traffic Laws and Ordinances. May, 1970.

<sup>2</sup>See footnote above.

Traffic Laws and Ordinances. Driving is an interstate activity and uniformity in codes and laws greatly simplifies the task for both drivers and enforcement personnel. In addition, uniformity promotes safety and efficiency in highway transportation. To the extent practicable, each state licensing agency should strive to see that the rules of the road and driver licensing laws under which it operates conform to the UVC.

## XII. EVALUATION

Every driver licensing program should include an evaluation component. Historically, evaluation has not been considered an integral part of a driver licensing program, and when evaluation has occurred it has been primarily as an afterthought or at best as a fringe benefit. In the face of decreasing resources combined with increasing demands, evaluation is often a prime candidate for elimination. However, it is precisely in times of shrinking budgets and cost allocation problems that evaluation becomes most useful. Limited funds make it more important than ever that scarce dollars be expended where they are likely to do the most good. Furthermore, many of the most important evaluation measures cannot be conducted adequately unless they are included in the early planning for a program activity. A competent administrator will recognize that evaluation is a tool which can provide valuable assistance in making better decisions.

There are three major kinds of evaluation. The first, namely, clinical evaluation, is probably the one that is most frequently used, but it is also the least reliable. Clinical evaluation simply refers to the use of subjective judgment in deciding whether a program is worthwhile. Unfortunately administrators have to make many decisions in the absence of anything sounder than subjective judgment. However, they should be alert to any possibilities for developing a better basis for making decisions. All too often administrators, as well as others influencing highway safety policies, are heard to say, "If a program saves one life, then it is worth it." Such a philosophy would be acceptable if there were unlimited funding for highway safety. In a world of finite resources the administrator must ask, "Would the same amount of money save more lives if applied somewhere else?" To answer this question usually requires more stringent evaluation.



A second type of evaluation consists of monitoring activities to determine whether and to what extent they are occurring. If a licensing agency implements new procedures for testing applicants, it is important to know the extent to which those procedures are being observed. For example, an agency may recognize that vision changes occur rapidly during the teenage years and a decision may be made to administer the vision test both at the time of application for a learner's permit and again at the time the permit is exchanged for a license. The agency should have some way of finding out whether the examiners are actually including the vision testing at this second stage and which stations or examiners are failing to do so. Most state agencies perform this type of ongoing monitoring, although the records that are maintained do not always allow for identification of specific problems.

The third kind of evaluation, namely, outcome or effectiveness evaluation, is by far the most difficult to perform. It is probably also the most important. Many licensing agencies will not have the in-house expertise to conduct adequate outcome evaluation. However, if a program modification entails high costs to implement and maintain, it may be worthwhile for the agency to contract for the necessary expertise to conduct an adequate outcome evaluation before any final decision about implementation is made. An example may be a question of whether a state should routinely administer a performance test for renewing a motorcycle operator endorsement. The performance test is the most costly component of the examination to administer, and any significant increases in performance testing would of necessity require additional manpower. On the other hand, many drivers who have obtained a motorcycle endorsement maintain it over the years even though they may stop riding for extended periods of time. Since inexperience, as well as riding a new or borrowed motorcycle, have been shown to be related to a marked increase in crash risk, routine performance

testing for license renewal might be expected to have an effect on this subgroup of riders. Clearly, an outcome evaluation would be useful to any administrator faced with making this decision.

If evaluation is so useful, why isn't it conducted more often? There are very real obstacles to sound evaluation. Probably the most important one is simply a lack of appreciation for what evaluation can do. Most driver licensing activities are based on the best judgment of persons responsible for the programs, and programs continue because they have come to be accepted and expected by the public. Whether the program or its components are effective or how the program can be made more effective is seldom asked. Because there is little evaluation research concerning the basic elements of licensing programs, they have become targets of legislators seeking ways to cut budgets. Without evidence based on sound evaluation, an administrator may have difficulty defending his program in the face of such onslaughts.

A second reason evaluation is not performed is that administrators are already convinced that what they are doing is best. Indeed the person who becomes most involved in the program almost has to believe that what is being done is worthwhile. Therefore, there is really no need for evaluation since we already know how good the program is.

Another major reason evaluation is not performed is that administrators, like the rest of us, are fearful of having their programs subjected to careful scrutiny. If a study fails to show that the program is effective, the administrator is much more vulnerable than had there been no evaluation at all. Because it is often difficult to demonstrate the effectiveness of programs in highway safety, many administrators feel that evaluation is at best a waste of time and at worst a serious threat to their programs.

Other reasons adequate evaluations are not performed include a lack of sufficient knowledge about how to conduct a satisfactory evaluation and a lack of adequate tools for conducting a valid study. Unfortunately, the first of these, the lack of adequate knowledge, has not prevented studies from being performed. There are far too many research reports that arrive at totally invalid conclusions because the evaluation design was inappropriate.

Perhaps the single most frequent problem with these studies concerns a phenomenon called "regression to the mean". All this term refers to is the fact that any time you select a group on the basis of very atypical or extreme behavior, you will find that subsequently the performance of that group will move toward the population average or mean, that is, the group will become more like the overall population from which it was selected. An example is the selection of drivers for driver improvement procedures. Clearly, such drivers are not like most drivers or we would not be concerned about them. However, when we select them because they are so different from most drivers and then apply remedial treatment, they are going to look much better following treatment. The problem is that they would have looked much better anyway even if we had not applied any driver improvement measures. To find out what our program really did, we have to include a similar group of extreme drivers that are not given the special treatment. Although both groups will show improvement, if the treated group shows more improvement there may be some basis for concluding that the treatment was effective.

Finally, good evaluation may not be possible because real world conditions are such that the requirements of an evaluation cannot be met. For example, if a state implements a special licensing program for operators of heavy trucks and wants to determine how effective it is in reducing subsequent traffic violations for this group, there may be problems with identifying from the driver record

what kind of vehicle was involved in a violation. Another problem is that most of these drivers accumulate much of their mileage out-of-state so that in-state records are far from complete. A third problem in evaluating such a program would be that the numbers of persons receiving the treatment would probably be too small to detect any significant effect of the program. In many states a very real obstacle to evaluation design is the inability to use random assignment of drivers to different treatments. State laws may not allow differential treatments and even when it is possible many administrators are reluctant to subject themselves to any possible risk of liability by applying different measures to drivers with similar problems.

Nevertheless, some administrators have found it possible to operate within existing constraints and have sponsored useful studies that have assisted decision makers in deciding how best to allocate their limited resources. For the administrator who is interested in using evaluation as a tool to improve his decision making, there are resources available to assist.

Basically, a sound evaluation includes four major steps. First there must be a clear concise statement of the goals of the program to be evaluated. If the goals of a new program are described as "promoting highway safety," then it is unlikely that the program can be subjected to evaluation. The goals must be specified in precise measurable terms. The more specific the goals, the more readily they can be measured and hence the more likely the evaluation will result in useful information.

Second, an evaluation must include a valid experimental design. There are a number of designs available, and which one is used depends upon the particular study in question. The selection of an appropriate design requires the assistance of someone who is knowledgeable about research methodology and should not be left to the best judgment of whoever is in charge of the program unless that person has adequate research skills.

Third, an evaluation requires that, on the basis of the evaluation results, an inference or judgment be made as to whether the program was effective. This judgment is based on statistical analysis of the data and ultimately involves statements of probability. In addition, the person responsible for arriving at judgments based on the data should be well versed in the two major kinds of errors that are made in arriving at such decisions. The first error is concluding that the program was effective when it actually was not. The second error is concluding that the program was not effective when it actually was. Because of some of the special characteristics and problems associated with highway safety programs, including licensing programs, it is customary to exercise greater care than is exercised in most scientific studies to avoid the second kind of error.

Finally, an evaluation must include conclusions and recommendations to the program administrator. These conclusions and recommendations should be written in language understandable to someone who is not trained in research methodology. Furthermore the recommendations should make sense in the real world context in which the program operates.

The interested administrator is referred to an excellent overview of evaluation of highway safety programs, prepared by Griffin, et al.<sup>1</sup> Because evaluation is so crucial to responsible administration, and because highway safety programs, including driver licensing programs, have been subjected to so much poor evaluation, it is recommended that unless a licensing agency has the capability of conducting sound evaluation, outside expertise should be sought in undertaking most outcome evaluation activities. Most states can turn to their university systems to locate the necessary help.

<sup>1</sup>Griffin, L.I. III, Powers, B., and Mullen, C. Impediments to the Evaluation of Highway Safety Programs. UNC Highway Safety Research Center, June, 1975.

## APPENDIX A

### Contents of Driver Records System

Table A1. Application Form

- \* Name in full (first, middle, last, in that order and validated from acceptable documents: The "full name" should be the name given at birth or as later changed through marriage or court order.)  
Any other names ever used
- \* Date of application
- \* Mailing address
- \* Residence address (if different)
- \* Social security number (verified from documentation)
- \* Class of permit or license applied for
- \* Endorsements applied for, e.g., motorcycle, school bus
- \* Date of birth (month, day, year, in that order)
- \* Place of birth
- \* Sex
- \* Race
- \* Height
- \* Weight
- \* Eye color
- \* Medical or physical conditions that may affect driving
- Name of high school (or elementary school) attended
- Year of last attendance at that school
- Location of school
- Mother's first and family (maiden) name and where she grew up
- \* Certification statement that the information is true
- \* Signature
- \* Parent-guardian certification (if applicant is a minor)  
Crash history
- Violation convictions
- License restrictions
- License suspensions or revocations
- Pending actions related to driving
- \* State(s) of previous licensure within past four years and license number(s) if available
- \* Previous mailing address
- Estimated mileage driven during previous year

\*Minimal requirements

Table A2. Driver history - brief file.

File Contents

- \* Name (first, middle, last)
- \* Address, mailing  
Address, residence
- \* Permit or license number
- \* Social security number
- \* Date of birth (month, day, year)
- \* Race and sex
- \* Permit or license expiration date
- \* Restriction(s)
- \* Permit or license class (including endorsements)
- \* Code for
  - Crash(es) (yes/no)
  - Convictions (yes/no)
  - Driver improvement measures (yes/no)
  - Stop issue
- \* Special access code for
  - medical information (current, previous, or none)
  
- \* Minimal requirements



Table A3. Research subfile.

File Contents

Estimated annual mileage

Type of license test(s) taken and scores

Type of driver training

Form of knowledge test (oral, written, foreign language)

Table A4. Restrictions subfile.

File Contents

- \* Corrective lenses
  - \* Speed, permitted hours, permitted locality
  - \* Equipment (e.g., hand controls)
  - \* Other restrictions
- 
- \* Minimal requirements

Table A5. Crash subfile.

File Contents

\* Date of crash

\* Accident severity (property damage only, injury, fatality)

\* Report number

Associated violation (conviction) type, if any

Vehicle type operated at time of crash

\* Minimal requirements

Table A6. Driver improvement subfile.

File Contents

- \* Convictions
  - \* Date of violation
  - \* Violation type and associated points
    - Whether crash related
    - Citation number
  - \* Date of conviction
  - \* Court of conviction
- \* Driver Improvement Actions
  - \* Advisory letters
  - \* Type and date
  - \* Meetings with driver improvement analyst
  - \* Type and date
  - \* Assignment to driver improvement school
  - \* Date
  - \* Assignment to other rehabilitative program
  - \* Type and date
  - \* Suspension/Revocation
  - \* Duration
- \* Minimal requirements

Table A7. Alcohol/drug subfile.

File Contents

Arresting charge with date

Test(s) administered

Reason for failure to test

Test results

Adjudicated charge with date

Disposition

No! pros

Prayer for judgment continued

Aquittal

Conviction - Type and date

Subsequent actions

Fine - Amount

Jail sentence - Duration

License suspension/revocation

Duration

Limited license

Suspended sentence - Duration

Rehabilitation action

Table A8. Medical subfile.

File Contents

- \* Date(s) of referral(s) for medical evaluation
  - \* Date(s) of medical reports received and source  
(Physician, Medical Board)
  - \* Medical condition(s)
  - \* Action(s) taken  
(Restrictions)
  - \* Re-examination interval
  - \* Purge file date (after x years, as advised by the Medical Board)
- 
- \* Minimal requirements

Table A9. Medical file (hard copy)

File Contents

- \* Name
- \* Date of birth
- \* Address
- \* Race and sex
- \* Permit or license number
- \* Social security number
- \* Restrictions
- \* Permit or license class
- \* Permit or license expiration date
- \* Driver license examiner's report
- \* Physician(s) report(s)
- \* Medical Advisory Board report(s)

- \* Minimal requirements