



**NAPT STATEMENT ON
"UNDER THE HOOD" ISSUE**

Background

In 2021, FMCSA issued a temporary moratorium on the requirement for CDL candidates to successfully complete an 'under the hood' (more precisely, the engine compartment portion of the pre-trip inspection skills test) element of their CDL road test.

Under the waiver or exemption, CDL candidates would not be required to perform the engine compartment element of their CDL road test. This meant that they would not have to complete the engine compartment portion of the pre-trip vehicle inspection skills test which includes oil level; coolant level; power steering fluid/belt/gear; water pump belt/gear; alternator belt/gear; air compressor (belt/gear) or hydraulic master cylinder; and leaks/hoses.

Current Situation

Currently, the FMCSA has authorized a two-year exemption of the so-called 'under the hood' inspection requirement for successfully completing the road test for attainment of a CDL. This exemption was granted at the request/petition for a five-year waiver submitted by the NSTA.

While states have the option of utilizing this exemption, they must offer driver candidates with the option of taking either the limited test or the complete/full test. This affords the driver candidate the flexibility inherent in the full test.

The current exemption took effect on November 27, 2022, and will expire on November 27, 2024. Efforts will be underway to engage with FMCSA to continue the waiver indefinitely or at least for an extended period.

NAPT Position on the "Under the Hood" Exemption

NAPT wants to make clear our positions and opinions in relation to the current exemption. NAPT does not oppose the current moratorium on this component of the CDL test. We understand the need to remove potential barriers to training and hiring drivers. In our effort to ensure that it achieves its intended effects and benefits, we offer the following:

- NAPT appreciates that there are realistic limitations on licenses issued under the exemption, i.e., licensees can only drive passenger vehicles or school buses (P or S endorsement) with this license and can only drive intrastate.
- NAPT seeks information from FMCSA, the states or state associations to determine the extent to which this element of the test has contributed to failure rates, and whether and to what extent this waiver has improved success rates.
- NAPT seeks information on the number of states that have adopted the moratorium for testing in their states.
- NAPT seeks information on the extent to which potential drivers have abandoned their pursuit of a CDL because of the 'under the hood' requirement (as well as other ELDT requirements). It is important to know this to determine the extent to which it affects the on-going driver shortage.
- NAPT encourages efforts by FMCSA and state testing agencies to ensure more consistent testing practices nationally.
- NAPT believes that the industry should consider advocacy for a waiver on other testing elements if we believe they are contributing to the continuing shortage of drivers.
- NAPT will work collaboratively with our industry partners on this issue as the next steps evolve.