

October 31, 2023

Sen. Adrian Dickey, Chair  
Jack Ewing, Administrative Code Editor and Senior Legal Counsel  
Tyler Heeren, Legal Counsel  
Iowa Legislative Services Agency  
Ground Floor, State Capitol Building  
Des Moines, IA 50319

**Re: Minor Driver's License Interim Study Committee**

Dear Sen. Dickey, Mr. Ewing, and Mr. Heeren:

On behalf of the National Association of Mutual Insurance Companies (NAMIC),<sup>1</sup> thank you for the opportunity to participate in Iowa's important review and consideration of Minor Driver's License issues and potential reforms. I very much enjoyed the committee's robust discussion earlier this month and look forward to the in-person meeting on November 13 in Des Moines.

Despite decades of efforts all across the country to better protect youthful drivers, vehicle crashes remain the leading cause of preventable death for teens – in 2021, 3,058 teenagers died and 203,256 young drivers were injured in motor vehicle crashes.<sup>2</sup> While these numbers are dire, it is important to remember how far we have come – in the early 1980's prior to the widespread adoption of graduated drivers licensing (GDL) laws, some years saw more than 10,000 teenage lives lost to car crashes. While a 70% reduction in fatalities over this time is cause for cautious optimism, the national fatal crash rate *per mile driven* for 16 to 19 year-olds stubbornly remains nearly 3 times the rate for drivers over the age of 20, with risk identified as being the highest at ages 16 to 17.<sup>3</sup> The National Highway Traffic Safety Administration (NHTSA) puts it simply: "Teen drivers have a higher rate of fatal crashes, mainly because of their immaturity, lack of skills, and lack of experience. They speed, they

---

<sup>1</sup> NAMIC membership includes more than 1,500 member companies. The association supports regional and local mutual insurance companies on main streets across America and many of the country's largest national insurers, including 7 of the top 10 auto insurers in the country. NAMIC member companies write \$357 billion in annual premiums. Our members account for 69 percent of homeowners, 56 percent of automobile, and 31 percent of the business insurance markets. Nearly 300 NAMIC members write \$5 billion in annual premiums in Iowa, including 65.2% of the auto insurance market.

<sup>2</sup> <https://crashstats.nhtsa.dot.gov/Api/Public/ViewPublication/813492>

<sup>3</sup> <https://www.iihs.org/topics/fatality-statistics/detail/teenagers>



Iowa Interim Minor Drivers License Study Committee  
October 31, 2023

make mistakes, and they get distracted easily – especially if their friends are in the car.”<sup>4</sup> The Centers for Disease Control further explains that “teens are more likely than older drivers to underestimate or not be able to recognize dangerous situations. Teens are also more likely than adults to make critical errors that can lead to serious crashes.”<sup>5</sup>

NAMIC is committed to collaborating with Federal and State policymakers to promote and enhance road safety, including supporting strong GDL regimes, which are proven to reduce teen crashes to the benefit of all policyholders and society writ large. The converse is also true – we oppose efforts to weaken programs that have a proven connection to road safety. Expansions to exemptions or limitations on programs that have the effect of decreasing road safety also increase the likelihood of crashes and insured losses; these ultimately also put cost pressure on auto coverage and premiums for *all* drivers, not just the youthful drivers and their parents.

While at this point, all 50 states and the District of Columbia have adopted some form of a GDL program, they vary widely in detailed features. The main provisions generally fall into eight (8) categories: (1) Minimum age for a learner permit; (2) Mandatory waiting period before applying for an intermediate license; (3) Minimum number of hours of supervised driving; (4) Minimum age for an intermediate license; (5) Nighttime restrictions; (6) Passenger restrictions (age and quantity); (7) Cellular telephone use restrictions; and (8) Minimum age for full licensing. Rigorous academic studies are ongoing around the effectiveness of these features both individually and collectively; the most comprehensive meta-analysis of GDL programs was commissioned by NHTSA in 2015 and found a 16% reduction in crashes for 16 year olds and an 11% reduction for 17 year olds – 14 and 15 year olds were not studied at the time.<sup>6</sup> Recent related studies have focused on the effectiveness of improving formal state funded drivers education programs, the impact of parent focused intervention in teen driving<sup>7</sup>, and evaluating the effects of the Massachusetts GDL program on teen citations and registrations.<sup>8</sup> Researchers at the Insurance Institute for Highway Safety have developed a GDL calculator tool that uses institute research to show how changes to GDL features might affect collision claims and fatal crash rates among young drivers, which estimates that Iowa could see as much as a 30% reduction in collision claims and a 55% reduction in fatal crashes by adopting what IIHS deems it’s “best” GDL provisions.<sup>9</sup> All of this is to say that there are many eyes, hearts, and very intelligent minds hard at work in this area.

---

<sup>4</sup> <https://www.nhtsa.gov/road-safety/teen-driving>

<sup>5</sup> [https://www.cdc.gov/transportationsafety/teen\\_drivers/teendrivers\\_factsheet.html](https://www.cdc.gov/transportationsafety/teen_drivers/teendrivers_factsheet.html)

<sup>6</sup> <https://www.nhtsa.gov/sites/nhtsa.gov/files/812211-metaanalysisgdllaws.pdf>

<sup>7</sup> <https://pubmed.ncbi.nlm.nih.gov/26112737/>

<sup>8</sup> <https://www.sciencedirect.com/science/article/abs/pii/S0022437516302997>

<sup>9</sup> <https://www.iihs.org/topics/teenagers/gdl-calculator>



Iowa Interim Minor Drivers License Study Committee  
October 31, 2023

NAMIC supports state-based regulation of insurance as well as registration, licensing, and operation of vehicles on the road; we appreciate the critical need to tailor programs and rules appropriately for local road features and populations. Parts of the aforementioned GDL programs that work for New York, California, or even Iowa's neighboring states may not necessarily work for Iowa. Nuance and attention to detail is imperative for the committee's considerations. We are sensitive to Iowa's extensive efforts to enhance its workforce and create opportunities for younger workers. Allowing teenagers to enjoy the dignity of work and creating opportunities for full participation in their schools and communities is laudable, but the attendant tradeoffs and potential consequences must be very carefully evaluated. At the same time, the Committee will be well served to avoid unnecessary bureaucratic complexity that makes compliance more challenging for all involved, particularly parents trying to help their children navigate the rules and the law enforcement community that will be tasked with fairly executing the laws agreed upon.

The mutual insurance industry is built on the foundations of community and dedication to policyholders. We believe strongly that those communities and the insurance ecosystem are both better off when roads are safer because drivers, passengers, and pedestrians are all safer. We, along with the rest of the road safety community, are all still trying to figure out how to best make teens into safer drivers; research and experience to date seems to indicate that the best way is to limit the amount of exposure inexperienced teen drivers have to the highest risk driving situations. To the extent possible, I encourage the committee to keep that in mind as a central theme as we move forward. Thank you again for the opportunity to participate on the committee; I hope to serve as a valuable contributor and resource now and into the future as Iowa continues to develop its motor vehicle laws.

Sincerely,

A handwritten signature in black ink that reads "Tony J. Cotto".

Tony Cotto, Esq.  
Director of Auto and Underwriting Policy