

# NASASPS Webinar



## **The Role of State Administrators and Supervisors of Private Schools in Implementing New Federal Truck Driver Training Rules**

March 14, 2023

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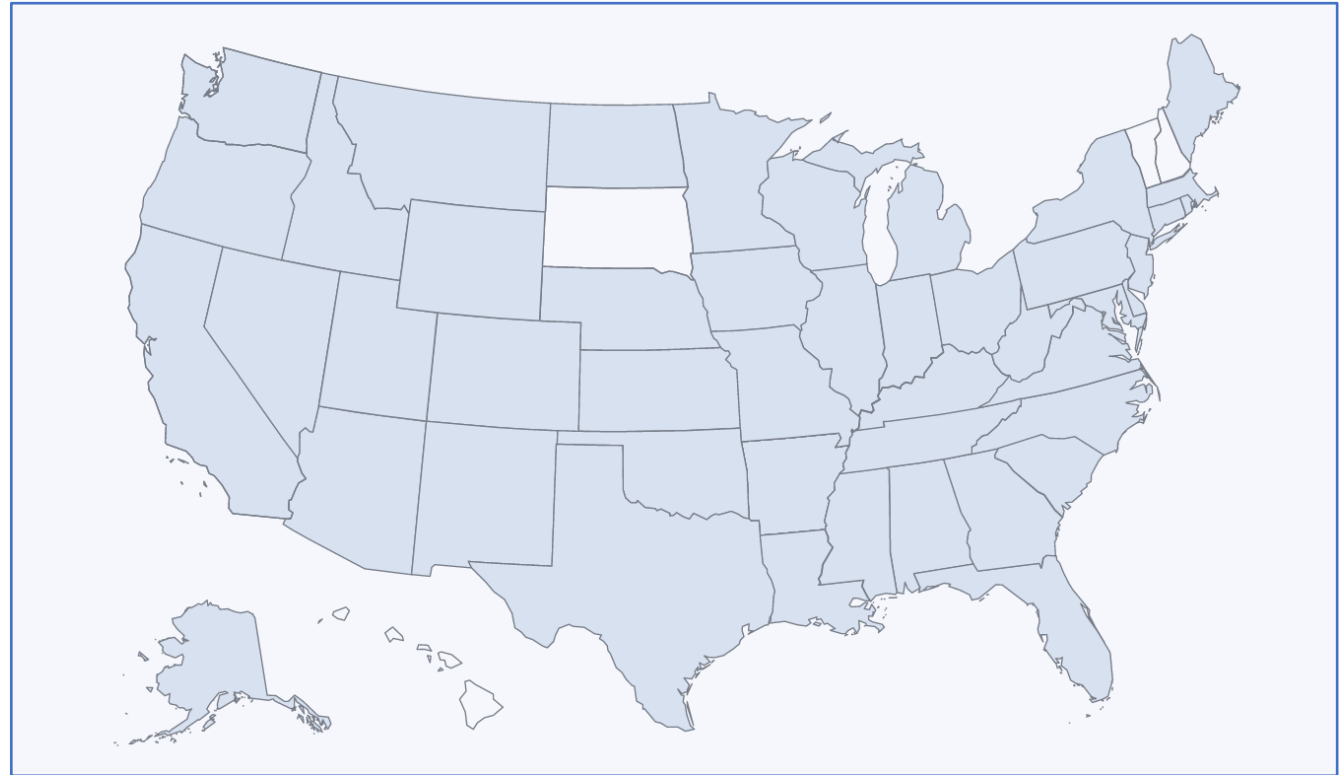
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# What is CVTA?



- Largest association of truck driver training programs in the U.S.
- 95 member schools with 395 training locations across 46 states
- Train 100,000 new truck drivers each year



# What is the Entry-Level Driver Training (ELDT) Final Rule?



- Minimum standards for the training of new truck drivers
- Enforced by Federal Motor Carrier Safety Administration (FMCSA)
- Requires that trainees demonstrate “proficiency” in the skills that lead to safer driving
- Creates a nationwide Training Provider Registry (TPR)
- ELDT-compliant training is now a prerequisite for CDL Skills Exam

# ELDT Improves Highway Safety



FMCSA estimates ELDT will have the following safety impacts over 10 years:

- Save 115 lives
  - Avoid 2,364 injuries
  - Prevent 7,857 property damage only crashes
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- ELDT increases number of drivers receiving adequate training
  - ELDT separates training providers that provide safe training from those who operate unsafe CDL mills

# CVTA Members Observe Two Categories of ELDT Noncompliance



## Unlicensed Training Providers:

- ELDT requires that training providers meet state requirements, including state licensure.
- CVTA members report active training providers that are not state licensed.

## Curriculum Violations:

- ELDT requires trainees demonstrate “proficiency” in required curriculum.
- CVTA members have observed flagrant curriculum violations: “one-day” training programs.
- Training providers with “material deficiencies to program” should be removed from TPR.

# How Does ELDT Impact State Licensure?



**49 CFR 383.73(p)** requires that, “[a]fter February 7, 2022, the State must notify FMCSA that a training provider in the State does not meet applicable State requirements for CMV instruction.”

# How Does ELDT Impact State Licensure?



- ELDT requires that training providers registered on the TPR **meet all state requirements**, including applicable requirements to **maintain state licensure or registration**.
- FMCSA **relies on states to report** noncompliance with state requirements.
- Training providers that fail to meet state licensure or registration requirements are **removed from the TPR**.
- Students trained by noncompliant training providers are **not eligible to take CDL skills exam**.

# Challenges with ELDT Enforcement of Licensure Requirements



- CVTA engagement with state licensure agencies.
- Agencies describe issues with reporting noncompliance to FMCSA:
  - Unknown FMCSA point(s) of contact
  - Unclear what noncompliance information is required to prompt FMCSA removal actions
  - FMCSA putting burden on states and noncompliant training providers to enforce compliance with federal rules

# Role for NASASPS Members in ELDT Enforcement



- CVTA actively engaged with FMCSA to improve ELDT enforcement.
- CVTA requested that FMCSA provide guidance to states to clarify reporting requirements and processes.
- CVTA recommended amending TPR application to collect state licensure/registration information.
- NASASPS members can contact CVTA to report enforcement problems in their states:

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# Questions?



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# Thank You!



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