

Entry-Level Driver Training:

The Requirements for Driver Training Schools



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On December 8, 2016, the Federal Motor Carrier Safety Administration (FMCSA) published its long-awaited entry-level driver training rule. The rule, the result of a negotiated rulemaking process, is based on consensus recommendations made by a committee comprised of a cross-section of motor carrier interests.

The entry-level driver training rule establishes minimum training standards for drivers:

- Applying for their initial CDL;
- Upgrading their current CDL; or
- Obtaining a passenger, school bus, or hazardous materials endorsement for the first time.

An entry-level driver must, prior to taking the skills test, successfully complete a prescribed program of theory and behind-the-wheel instruction provided by a school or other entity listed on FMCSA's Training Provider Registry (TPR).

An entry-level driver must successfully complete theory and behind-the-wheel instruction before taking the CDL skills test.

This final rule differs greatly from the current entry-level driver training rule, which prescribes instruction for drivers with less than one year of experience operating a CDL vehicle in interstate commerce. This instruction consists of four areas or topics: driver qualification, hours of service, driver wellness, and OSHA's whistleblower protection regulations. The current rule remains in effect until February 7, 2020. On that date compliance with the new requirements is required.

Theory Instruction — Class A and Class B CDL

The rule does not include a minimum number of hours that driver-trainees must spend on theory (knowledge) instruction.

Theory instruction is defined in the rule as “knowledge instruction on the operation of a CMV and related matters provided by a theory instructor through lectures, demonstrations, audio-visual presentations, computer-based instruction, driving simulation devices, online training, or similar means.”

The rule prescribes specific topics for each of five areas of instruction. The instructor must cover all of the topics in the curriculum. The five areas of instruction, including the training topics, are as follows:

1. Basic Operation

- Orientation
- Control Systems/Dashboard
- Pre-Trip Inspections and Post-Trip Inspections
- Basic Control
- Shifting/Operating Transmissions
- Backing and Docking
- Coupling and Uncoupling (Class A only)

2. Safe Operating Procedures

- Visual Search
- Communication
- Distracted Driving
- Speed Management
- Space Management
- Night Operation
- Extreme Driving Conditions

3. Advanced Operating Practices

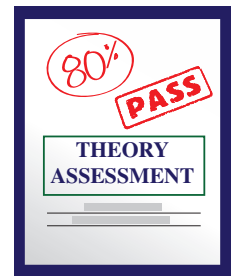
- Hazard Perception
- Skid Control/Recovery, Jackknifing, and Other Emergencies
- Railroad-Highway Grade Crossings

4. Vehicle Systems and Reporting Malfunctions

- Identification and Diagnosis of Malfunctions
- Roadside Inspections
- Maintenance

5. Non-Driving Activities

- Handling and Documenting Cargo
- Environmental Compliance Issues
- Hours-of-Service Requirements
- Fatigue and Wellness Awareness
- Post-Crash Procedures
- External communications
- Whistleblower/Coercion
- Trip Planning
- Drugs/Alcohol
- Medical Requirements



**Driver-trainees must receive
an overall score of
80 percent or better
on the theory assessment**

An assessment must be used to determine the driver-trainee's proficiency for each unit of instruction. Driver-trainees must demonstrate their understanding of the material by achieving an overall minimum score of 80 percent on the theory assessment.

Behind-the-Wheel Instruction — Class A and Class B CDL

The rule does not require a minimum number of behind-the-wheel (range and over-the-road) instruction hours. The instructor must cover all topics listed in the behind-the-wheel curriculum. The training topics are as follows:

1. Range

- Vehicle Inspection Pre Trip/En Route/Post Trip
- Straight Line Backing
- Alley Dock Backing (45/90 Degree)
- Off-Set Backing
- Parallel Parking Blind Side
- Parallel Parking Sight Side
- Coupling and Uncoupling (Class A only)

2. Public Road

- Vehicle Controls Including: Left Turns, Right Turns, Lane Changes, Curves at Highway Speeds, and Entry and Exit on the Interstate or Controlled Access Highway
- Shifting/Transmission
- Communications/Signaling
- Visual Search
- Speed and Space Management
- Safe Driver Behavior
- Hours-of-Service Requirements
- Hazard Perception*
- Railroad-Highway Grade Crossing*
- Night Operation*
- Extreme Driving Conditions*
- Skid Control/Recovery, Jackknifing, and Other Emergencies*

*These topics must be discussed during public road training, but not necessarily performed. Driver-trainees are not required to demonstrate proficiency in these skills.

The training must be completed in a vehicle of the same group or type that the driver-trainee intends to use for the CDL skills test.

During behind-the-wheel, public road training, the instructor must engage in active two-way communication with driver-trainees during all active behind-the-wheel public road training sessions.

The proficient completion of the behind-the-wheel training is based solely on the instructor's assessment of each driver-trainee's performance of the required elements of behind-the-wheel training on the range and public road.

This determination of proficiency is based on the instructor's professional judgment. In its final rule, FMCSA states that it "believes that demonstrated proficiency requires some level of successful repetition of the required behind-the-wheel curricula elements, as determined by the instructor. In other words, performing each required maneuver correctly one time does not mean that the trainee has demonstrated proficiency."



Proficient completion of behind-the-wheel training is based on the instructor's professional judgment.

Instructors must document the total number of clock hours each driver-trainee spends to complete the behind-the-wheel curriculum.

The total number of clock hours spent completing behind-the-wheel training must be documented.

Passenger and School Bus Endorsements

A specific curriculum that includes theory and behind-the-wheel instruction must be completed in order to obtain a passenger or school bus endorsement.

The rule does not include a minimum number of hours that driver-trainees must spend on theory instruction. The driver-trainee must be complete a theory assessment and receive a score of at least 80 percent.

There is no required minimum number of instruction hours for behind-the-wheel training for the passenger or school bus endorsement, but training providers must determine whether driver-trainees have demonstrated proficiency in all elements of the behind-the-wheel curriculum.

The training must be conducted in a vehicle of the same vehicle group as the applicant intends to drive.

The instructor must engage in active communication with driver-trainees during all behind-the-wheel training sessions. The instructor must document the total number of clock hours each driver-trainee spends to complete the behind-the-wheel curriculum.

Hazmat Endorsement

A specific curriculum that includes theory instruction must be completed in order to obtain a hazardous materials endorsement.

Theory instruction must be completed to obtain a hazmat endorsement.

The instructor must cover all the following topics:

- Basic Introductory Hazardous Materials Requirements
- Operational Hazardous Materials Requirements
- Reporting Hazardous Materials Crashes and Releases
- Tunnels and Railroad-Highway Grade Crossing Requirements
- Loading and Unloading Hazardous Materials
- Hazardous Materials on Passenger Vehicles
- Bulk Packages
- Operating Emergency Equipment
- Emergency Response Procedures
- Engine (Fueling)
- Tire Check
- Routes and Route Planning
- Hazardous Materials Safety Permits

There is no required minimum number of instruction hours for theory training, but the driver-trainee must complete a theory assessment and receive a score of at least 80 percent.

The Training Provider Registry (TPR)

In order to provide entry-level driver training, a training provider must be listed on FMCSA's Training Provider Registry (TPR). To be eligible for listing on the TPR, the training provider must:

- Follow a curriculum that meets the criteria listed in Part 380, Appendices A through E;
- Use classroom and range facilities that comply with all federal, state, and/or local statutes and regulations;
- Use vehicles in behind-the-wheel training that comply with all federal, state, and/or local statutes and regulations, and are in the same group or type that driver-trainees intend to operate for their CDL skills test;
- Use theory instructors who meet the definition in §380.605;
- Use behind-the-wheel instructors who meet the definition in §380.605; and
- Be licensed, certified, registered, or authorized to provide training in accordance with the applicable laws and regulations of any state where in-person training is conducted.

A training provider must meet specific criteria in order to be listed on the Training Provider Registry.

Facilities and equipment must comply with all applicable federal, state, and/or local statutes and regulations.

FMCSA has made a draft version of the TPR registration form available to review. The form is intended to give potential training providers notice of the type of information they will be required to provide (electronically) in order to be listed on the TPR.

We have included pages 7 through 10 of the form in Appendix A. The entire form (including instructions) is available at [here](#).

Instructor Requirements

Theory and behind-the-wheel instructors must hold an appropriate class of CDL (including appropriate endorsement(s)) and have either:

1. A minimum of two years of experience driving a commercial motor vehicle requiring the CDL (including appropriate endorsement(s)); or
2. A minimum of two years of experience as a behind-the-wheel commercial motor vehicle instructor.

These individuals must also meet all applicable state qualification requirements for commercial motor vehicle instructors.

There are exceptions to these requirements for theory and behind-the-wheel range instructors who previously possessed a CDL, but no longer possess a CDL. There are also

prohibitions for theory and behind-the-wheel range instructors who have had their CDL cancelled, suspended, or revoked per the disqualification provisions in §383.51.

Certification/Recordkeeping

After an individual completes training administered by a provider listed on the TPR, that provider must, **by midnight of the second business day after the driver-trainee completes the training**, electronically transmit training certification information through the TPR website.

FMCSA has made a draft version of the training certification form available. The form is intended to give training providers notice of the amount and type of information that will be required to complete (electronically) the training certification form.

We have included a draft of the certification form in Appendix B. The form is also available [here](#).

All training providers on the TPR must retain the following records:

- Self-certifications by all accepted applicants for behind-the-wheel training, attesting that they will comply with the regulations in Parts 40, 382, 383, and 391, as well as state and/or local laws, related to alcohol and controlled substances testing, age, medical certification, licensing, and driver records;
- A copy of the driver-trainee's commercial learner's permit (CLP) or CDL, as applicable;
- Instructor qualification documentation indicating driving and/or training experience, as applicable, for each instructor, and copies of CDLs and applicable endorsements held by behind-the-wheel instructors or theory instructors, as applicable;
- The Training Provider Registration Form submitted to the TPR;
- The lesson plans for theory and behind-the-wheel (range and public road) training curricula, as applicable; and
- Records of individual entry-level driver training assessments

Training providers listed on the TPR must keep training-related records for at least three years from the date each required record is generated or received. If a record, such as a behind-the-wheel instructor's CDL, has expired or has been canceled, the most recent, valid CDL should be kept.

Note that if local, state, or federal requirements prescribe longer retention periods for any category of records described, the records should be kept under those guidelines.



Training-related records must be kept for at least three years.

Important Dates and Resources

FMCSA expects the TPR registration form and training certification form to be available, electronically, in late 2019. Compliance with the requirements is required as of February 7, 2020.

The 72-page final rule may be accessed via the Federal Register [website](#).

The first part of the document (pages 88732-88790) provides the background and analysis of the requirements. The actual regulations and curriculum (Part 380, Subparts E, F, and G and Appendix A, B, C, D, and E to Part 380) begin on page 88790.

Also, additional resources addressing the entry-level driver training rule are available via FMCSA's [website](#).



is the deadline for compliance with the requirements



About the Author

Jill Schultz, J. J. Keller & Associates, Inc.

Jill joined J. J. Keller in 1993 with a background in journalism and experience as a news reporter and anchor. At J. J. Keller, she specializes in both the Federal Motor Carrier Safety Regulations

and state intrastate safety regulations, covering topics that include driver qualification, hours of service, and alcohol and controlled substance regulations. Jill is the editor of seven J. J. Keller transportation safety and regulatory-related publications, and her work has also been published in industry trade journals and association publications. She is the author of a number of transportation-related whitepapers. Jill serves on the board of the National Association of Publicly Funded Truck Driving Schools and is a charter member of Women in Trucking.

About J. J. Keller & Associates, Inc.

Since its beginning as a one-man consulting firm in 1953, J. J. Keller & Associates, Inc. has grown to become the most respected name in safety and regulatory compliance. Now over 1,400 associates strong, J. J. Keller serves over 600,000 customers — including over 90% of the Fortune 1000® companies. The company's subject-matter expertise spans nearly 1,500 topics, and its diverse solutions include ELogs and mobile technology; training via online courses, streaming video, Video Training Book or DVD; online management tools; managed services; consulting services; online and print publications; forms and supplies.

Transportation professionals rely on J. J. Keller's in-house expertise and wide selection of products and services to reduce risk and improve regulatory compliance, performance management, and operational efficiency. For more information, visit JJKeller.com.

How We Can Help

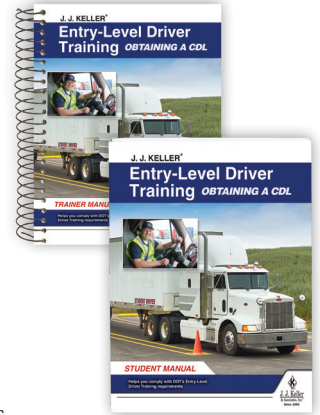
As the nation's leader in regulatory compliance and best practices expertise, J. J. Keller is your reliable source for help complying with motor carrier safety requirements, reducing violations, and preventing crashes. In addition to DOT, we cover OSHA, EPA, DOL, and other agencies.

Entry-Level Driver Training Manual: Obtaining A CDL Student Manual

Written by J. J. Keller® transportation regulatory experts, these manuals help you meet the Entry-Level Driver Training requirements for new drivers. With easy-to-understand language and full-color images, the manual's 35 chapters cover key topics such as:

- Backing and docking
- Distracted driving
- Communication
- Hours of Service (with ELDs)
- Human trafficking
- Roadside inspections

Trainer Manual includes a complete reprint of the student manual and a USB drive with PowerPoint® presentations for each chapter, quizzes with answers, short video snippets to reinforce training content, and more.

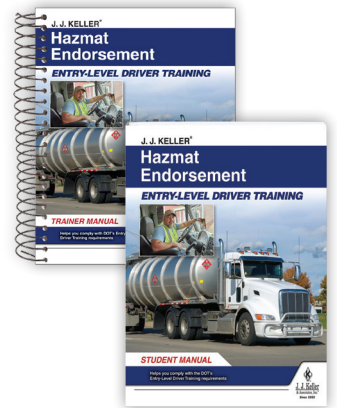


Hazmat Endorsement: Entry-Level Driver Training Manuals

These manuals explain the safety and compliance information drivers need to know to obtain their hazmat endorsement. The manuals 12 chapters include:

- Basic Introductory and Operational HM Requirements
- Reporting HM Crashes and Releases
- Tunnels and Railroad-Highway Grade Crossing Requirements
- Loading and Unloading HM
- HM on Passenger Vehicles

Trainer Manual also available separately.

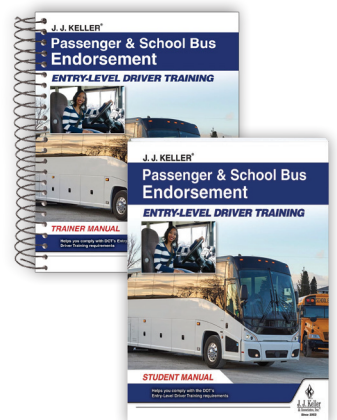


Passenger & School Bus Endorsement: Entry-Level Driver Training Manuals

Use this set of manuals to help meet the training requirements for drivers pursuing their passenger and school bus endorsements. Key topics covered include:

- | Passenger | School Bus |
|-------------------------|-----------------------------------|
| • Post-Crash Procedures | • Danger Zones and Use of Mirrors |
| • Vehicle Orientation | • Loading and Unloading |
| • Fueling | • Emergency Exit and Evacuation |

Trainer Manual also available separately.



[For More Information Go To JJKeller.com/entrylevel](http://JJKeller.com/entrylevel)

Laws, regulations, and best practices change. The observations and comments drawn today may not apply to laws, regulations, or best practices as they may be in the future. J. J. Keller & Associates, Inc. cannot and does not assume responsibility for omissions, errors, or ambiguity contained in this white paper. Individuals needing legal or other professional advice should seek the assistance of a licensed professional in that field.

TPR Registration Form

View the complete form at <https://www.regulations.gov/document?D=FMCSA-2007-27748-1395>.

FMCSA Entry-Level Driver Training Provider Registration Form

| Reason for Filing (mark only one) | |
|--|---|
| <input type="checkbox"/> New Request for Listing on the Training Provider Registry (TPR) | <input type="checkbox"/> Biennial Update or Changes |
| <input type="checkbox"/> Out of Business Notification | <input type="checkbox"/> Reapplication (After Removal from TPR) |
| Training Provider Business Information | |
| <input type="checkbox"/> I do not want my contact information publicly displayed on the Training Provider Registry | |
| 1. Legal Name: | |
| 2. Doing Business As: | |
| 3. Location of Business (Street, City, State, and Zip Code): | |
| 4. Mailing Address (Street or P.O. Box, City, State, and Zip Code): | |
| 5. Principal Telephone Number: | 6. Principal Fax Number: |
| 7. Website: | 8. E-mail Address: |
| Training Facility Information (fill out if different from the above information for each facility) | |
| 9. Legal Name: | |
| 10. Location of Training Facility (Street, City, State, and Zip Code): | |
| 11. Mailing Address (Street or P.O. Box, City, State, and Zip Code): | |
| 12. Principal Telephone Number: | 13. Principal Fax Number: |
| Training Provider Registration Information | |
| 14. Dun & Bradstreet Number (if applicable): | 15. IRS/Taxpayer Identification No.: |

TPR Registration Form

View the complete form at <https://www.regulations.gov/document?D=FMCSA-2007-27748-1395>.

| | | | | | |
|---|---|---|--|--|--|
| 16. Training Provider Registry Identification No. (if applicable): | 17. USDOT Identification No. (if applicable): | 18. State Motor Carrier Identification No. (if applicable): | 19. Federal Transit Administration, National Transit Database (NTD) Transit Agency ID No. (if applicable): | 20. U.S. Department of Education, National Center for Education Statistics (NCES), Public School NCES District ID No. (if applicable): | |
| 21. Training Provider Type (Answer ALL four questions marking either "Yes" or "No". More than one "Yes" response will usually apply) | | | | | |
| <u>In-House</u> Yes: <input type="checkbox"/> No: <input type="checkbox"/> | <u>Not In-House</u> Yes: <input type="checkbox"/> No: <input type="checkbox"/> | <u>For-Hire</u> Yes: <input type="checkbox"/> No: <input type="checkbox"/> | <u>Not-for-Hire</u> Yes: <input type="checkbox"/> No: <input type="checkbox"/> | | |
| 22. Types of CDL Training Offered | | | | | |
| CDL Class or Endorsement (Check all the applicable boxes) | Class A Theory: <input type="checkbox"/> BTW: <input type="checkbox"/> | Class B Theory: <input type="checkbox"/> BTW: <input type="checkbox"/> | Passenger (P) Theory: <input type="checkbox"/> BTW: <input type="checkbox"/> | School Bus (S) Theory: <input type="checkbox"/> BTW: <input type="checkbox"/> | Hazardous Materials (H) Theory: <input type="checkbox"/> |
| 23. Third-Party Affiliations Is this training location a member of one or more third-party certification or accreditation organizations (check all that apply): | | | | | |
| National Association of Publicly Funded Truck Driving Schools (NAPFTDS) | | | <input type="checkbox"/> | | |
| Commercial Vehicle Training Association (CVTA) | | | <input type="checkbox"/> | | |
| Professional Truck Driver Institute (PTDI) Certified Course | | | <input type="checkbox"/> | | |
| Other accreditation or certification organizations (please specify) | | | <input type="checkbox"/> | | |
| Name: _____ | | | | | |
| Government Oversight (Identify any Federal (Department of Education), State or local government oversight that your training program is subject to, e.g., a State education department, State or local professional and/or vocational licensing board, or a SDLA, etc.): | | | Joint Labor-Management or Union Oversight (Identify any Union oversight your program is subject to): | | |

TPR Registration Form

View the complete form at <https://www.regulations.gov/document?D=FMCSA-2007-27748-1395>.

24. Additional Information

a. Total number of theory training hours:

☐ 0-20 ☐ 21-40 ☐ 41-60 ☐ 60-80 ☐ 80+

b. Theory Training Materials (Check all that apply)

☐ videos ☐ lectures ☐ handbooks/textbooks ☐ simulation devices

c. Range type

☐ private ☐ public parking lot ☐ warehouse ☐ abandoned area ☐ other

d. Total number of BTW (range and public road) training hours

☐ 0-10 ☐ 11-15 ☐ 16-20 ☐ 21-30 ☐ 31+

e. Average tuition cost (\$)

☐ 0-2000 ☐ 2001-3000 ☐ 3001-4000 ☐ 4001+

f. Number of students trained per year:

☐ 0-50 ☐ 51-100 ☐ 101-150 ☐ 151-200 ☐ 201+

g. Number of BTW instructors

☐ 0-10 ☐ 11-20 ☐ 21-30 ☐ 31+

TPR Registration Form

View the complete form at <https://www.regulations.gov/document?D=FMCSA-2007-27748-1395>.

25. Enter Name(s) of Authorized Officials for the Training Provider (e.g., president, treasurer, general partner, limited partner):

| | |
|----------|---------|
| 1. _____ | _____ |
| (Name) | (Title) |
| 2. _____ | _____ |
| (Name) | (Title) |
| 3. _____ | _____ |
| (Name) | (Title) |
| 4. _____ | _____ |
| (Name) | (Title) |

26. Training Provider Certification Statement
(to be completed by authorized official)

I, _____, certify that I am knowledgeable of FMCSA's Entry-Level Driver Training regulations under 49 CFR Part 380, will deliver training that covers all the required modules in the applicable FMCSA curriculum, that the training entity I represent meet all applicable eligibility requirements, and that I can document compliance with such requirements to the Agency upon request. _____ (Insert name of entity) agrees to allow FMCSA or its representatives to: visit my training facilities and observe theory, range, and/or road instruction; interview current and former students concerning the quality of the training provided; and review and copy records that I am required to maintain. I understand that failure to deliver training that covers the required modules in the FMCSA's curriculum; meet the requirements of 49 CFR 380 Subpart G, Registry of Entry-Level Driver Training Providers; and allow FMCSA or its authorized representatives to have access to my facilities, students, and records, could result in removal from the Training Provider Registry.

I declare under penalty of perjury under the laws of the United States of America that I have knowledge of the information on this form and that the information on this form is true and correct. I understand that providing false information can violate federal felony statutes, including 18 United States Code Section 1001, which is punishable by up to 5 years imprisonment and a fine of up to \$250,000.

Signature: _____ Printed Name: _____

Title: _____ Date: _____

Name of Entity/Training Provider: _____

Appendix B

Entry-Level Driver Training Certification Form

View the complete form at <https://www.regulations.gov/document?D=FMCSA-2007-27748-1396>.

Form MCSA-XXXX
OMB Control Number: 2126-00XX

Expiration Date



U.S. Department of Transportation
Federal Motor Carrier
Safety Administration

Training Certification Information

1. Training provider's business name:

2. Training Provider's Registry Identification Number:

3. Driver-trainee's name:

4. Driver-trainee's date of birth

5. Driver-trainee's State of licensure:

6. Driver-trainee's driver license number:

| Type of Training Completed (Enter Completion Date For All that Apply) | Total number of BTW clock hours | Completion Date (DD/MM/YYYY) |
|---|---------------------------------|------------------------------|
| Class A (Theory & BTW) | | |
| Class A (Theory Only) | | |
| Class A (BTW Only) | | |
| Class B (Theory & BTW) | | |
| Class B (Theory Only) | | |
| Class B (BTW Only) | | |
| Passenger (Theory & BTW) | | |
| Passenger (Theory Only) | | |
| Passenger (BTW Only) | | |
| School Bus(Theory & BTW) | | |
| School Bus (Theory Only) | | |
| School Bus (BTW Only) | | |
| Hazardous Materials (Theory Only) | | |