**Introduction:** On March 4, 2016 the Federal Motor Carrier Safety Administration released proposed modifications to their Entry-Level Driver Training requirements. Currently, Commercial Driver’s License (CDL) holders must obtain instruction in the driver qualification requirements, the hours of service rules, driver wellness and whistleblower protections within their first year of driving. Under the proposal, anyone seeking a CDL must complete an approved Entry-Level Driver Training course before they are allowed to take the CDL skills test.

**Who must complete Entry-level Driver Training?** Under the proposal, anyone seeking a CDL for the first time must complete an approved Entry Level Driver Training Course before they take their CDL skills test. Former CDL holders whose CDLs have lapsed but who are seeking reissuance are not required to complete ELDT. If a driver has had his or her CDL canceled or revoked for a highway-safety related reason (e.g. violations listed under 49 CFR §385(b) through (e)) however, he or she must complete an abbreviated ELDT course, called “Refresher Training.”

**What is included in an ELDT Course?** FMCSA has outlined specific curriculum for approved ELDT courses. All courses are comprised of two primary components: theory instruction, and behind the wheel (BTW) training.

*Theory Instruction:* The theory portion of an approved ELDT course can be taught either online or in a classroom. The primary components of the theory portion are: Basic Operations; Safe Operating Procedures; Advanced Operating Procedures; Vehicle Systems; and Non-Vehicle Activities.

*Behind the Wheel Training:* This portion of an approved ELDT course is where the driver begins to learn and hone the skills necessary for the safe operation of a commercial motor vehicle. BTW training is subdivided into range instruction and road instruction.

*Range instruction* is conducted on a closed “driving range” or on streets, roads or lots that are “free from obstruction and provide adequate sight lines.” It focuses on development of basic skills and maneuvers like backing, parking, coupling and uncoupling, and pre, post, and en-route inspections.

*Road instruction* occurs in regular traffic and is focused on safe driving behavior, interaction with traffic, and accident avoidance.

**How will students be evaluated?** Like any preparatory course, students would be periodically tested during the theory portion to ensure they understand the federal regulations and have the knowledge necessary to pass the CDL knowledge test. At the end of the theory portion, students would receive a written knowledge assessment which would provide a litmus test of their competence in this area of instruction.

The proposed rule established a hybrid approach that does not stipulate that training providers must require repetitive demonstrations of specific driving maneuvers, but it does afford flexibility for instructors to focus on particular skills for which a student requires additional training.
**How long would a training course take?** The proposed rule does not outline a specific number of hours necessary for a student to spend in classroom instruction. The proposal does, however, lay out minimum number of hours spent in behind the wheel instruction. Specifically, the rule requires a minimum of 30 hours spent BTW for those seeking a Class A CDL. This includes a minimum of 10 hours spent driving on the range and 10 hours of on-road instruction (or 10 trips of no less than 50 minutes each). Students seeking a Class B CDL would be required to spend 15 hours in BTW instruction with a minimum of seven hours of on-road driving.

**What is “refresher training?”** FMCSA has proposed requiring “Refresher Training” for persons who have had their CDL canceled or revoked for a highway-safety related reason. “Refresher Training” is an abbreviated ELDT course that drivers would have to complete before retaking the CDL skills test in order to have their CDLs reinstated. Refresher training would include elements of both theory and BTW training.

**Are there special trainings elements for those seeking specific vehicle endorsements?** Yes, those seeking a passenger, school bus, or hazardous materials endorsement would be required to have additional training as part of the ELDT proposed rule.

**Who is allowed to provide ELDT?** Anyone who complies with the training provider requirements proposed in this rule can become a registered trainer. Training providers, in-house or school trainers, would be required to self-certify their programs to FMCSA and, upon request, provide documentation that their curricula comply with the requirements. The trainers must also consent to audits by FMCSA. While they must provide substantially similar training programs, small training providers (e.g. those who train three drivers or fewer annually) would have additional flexibility in the documents they can use to fulfill their self-certification requirements.

**How would I know that a training provider is certified?** The proposed rule calls for the creation of a National Training Provider Registry, which would work similar to the National Registry of Certified Medical Examiners. FMCSA has proposed establishing a website that trainees and potential employers could query to verify that their preferred provider is certified.

**How would the DMV know a driver has successfully completed ELDT?** Once a driver successfully completes the required training, they would be issued a training certificate. This certificate would also be electronically transmitted to their State Driver’s License Agency and would be added to the driver’s CDL record. If a driver has not passed ELDT, the State Licensing Agency would not allow him or her to take the CDL skills test.

**Would these new rules improve safety?** In its proposal, FMCSA acknowledges a lack of data directly linking training to improvements in safety outcomes. As a result, FMCSA’s Regulatory Impact Analysis asserts that strengthened ELDT requirements must result in an elimination of over 1,000 crashes per year in order for the proposed rule to be cost neutral. However, convention wisdom and the prevalence of active driver training programs indicate stronger ELDT requirements would improve driver safety.

**When would this rule take effect?** The ELDT rule is only in the proposed rule stage. ATA expects it to take about a year for FMCSA to accept public comments, analyze them, and finalize the rule. The final rule, once published, would probably have a three year implementation deadline. At the earliest, new prospective drivers will be required to complete ELDT beginning in early 2020.

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