

Understanding the Entry-Level Driver Training Requirements

May 8, 2023, 2:00-3:00 PM ET

National RTAP
Rural Transit Assistance Program

nadtc
National Aging and Disability Transportation Center

FTA
U.S. Department of Transportation
Federal Transit Administration

Speakers



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Knowledge and Resource Manager
National RTAP



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Communications Manager
NADTC



Matthew Marrin
Minnesota Division Administrator
FMCSA



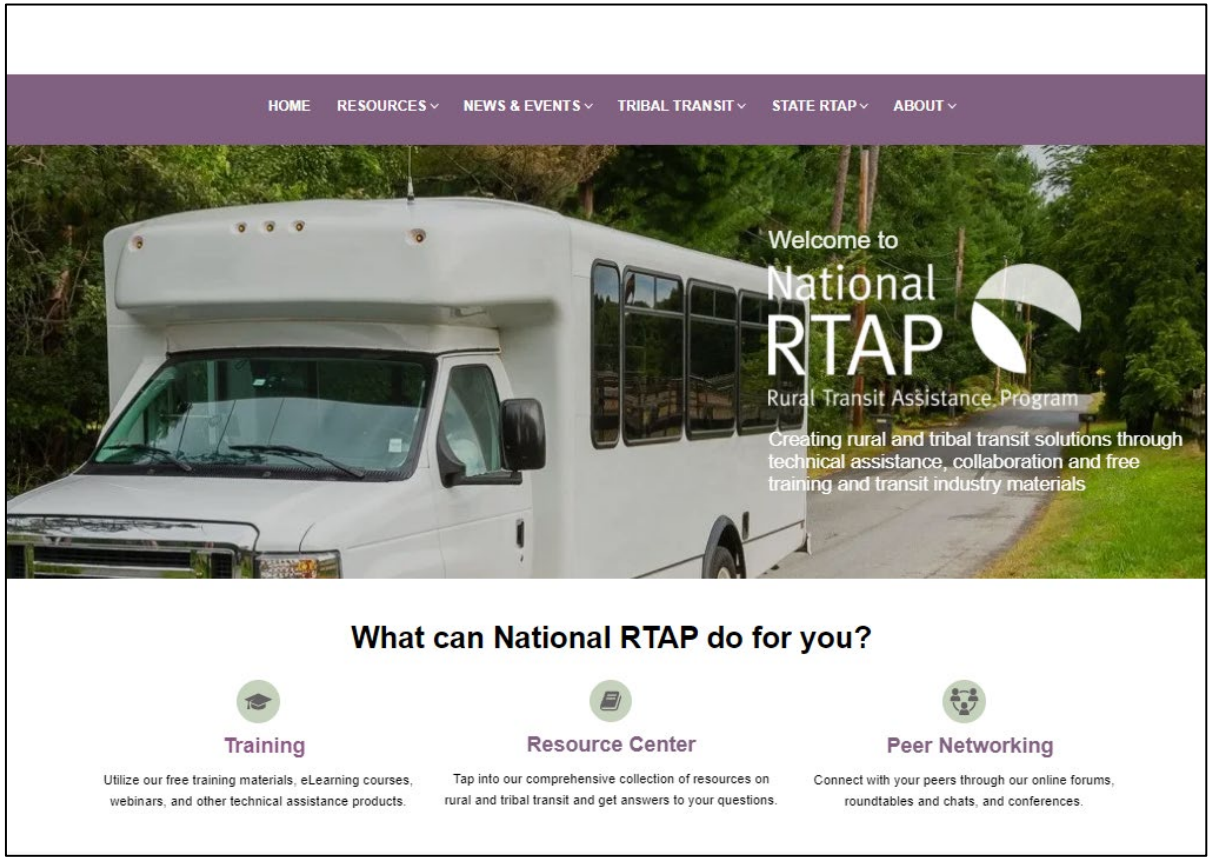
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National Rural Transit Assistance Program

- Technical assistance center funded by FTA through the Section 5311 Program
- Provides free training materials and technical assistance to rural and tribal transit providers and State RTAPs
- Review Board – 14 state DOT and rural and tribal transit agency staff from across the country
- Learn more at nationalrtap.org



What is TACL?



http://transportation-tacl.org

The Transportation Technical Assistance Coordination Library (TACL) provides a sustainable methodology and platform for access and findability of rural and tribal transit coordination resources across a diverse range of transportation technical assistance centers and the Federal Transit Administration (FTA).

The FTA-funded technical assistance centers participating in this ongoing work are:

- National Aging and Disability Transportation Center (NADTC)
- National Center for Applied Transit Technology (N-CATT)
- National Center for Mobility Management (NCMM)
- National Rural Transit Assistance Program (National RTAP)
- Shared-Use Mobility Center (SUMC)
- Transit Workforce Center (TWC)

National Aging & Disability Transportation Center



Jeremy Johnson-Miller
NADTC at Easterseals

MISSION:

To promote the availability of accessible transportation options that serve the needs of **Older Adults**, **People with Disabilities**, **Caregivers** and their **Community**

MAJOR OBJECTIVES:

Technical assistance and information
Education & Training
Partnership & Coordination
Community Grants & Coalitions

nadtc
National Aging and Disability Transportation Center

USAging easterseals

Matthew Marrin

Minnesota Division Administrator
Federal Motor Carrier Safety Administration

Various Updates

May 2023

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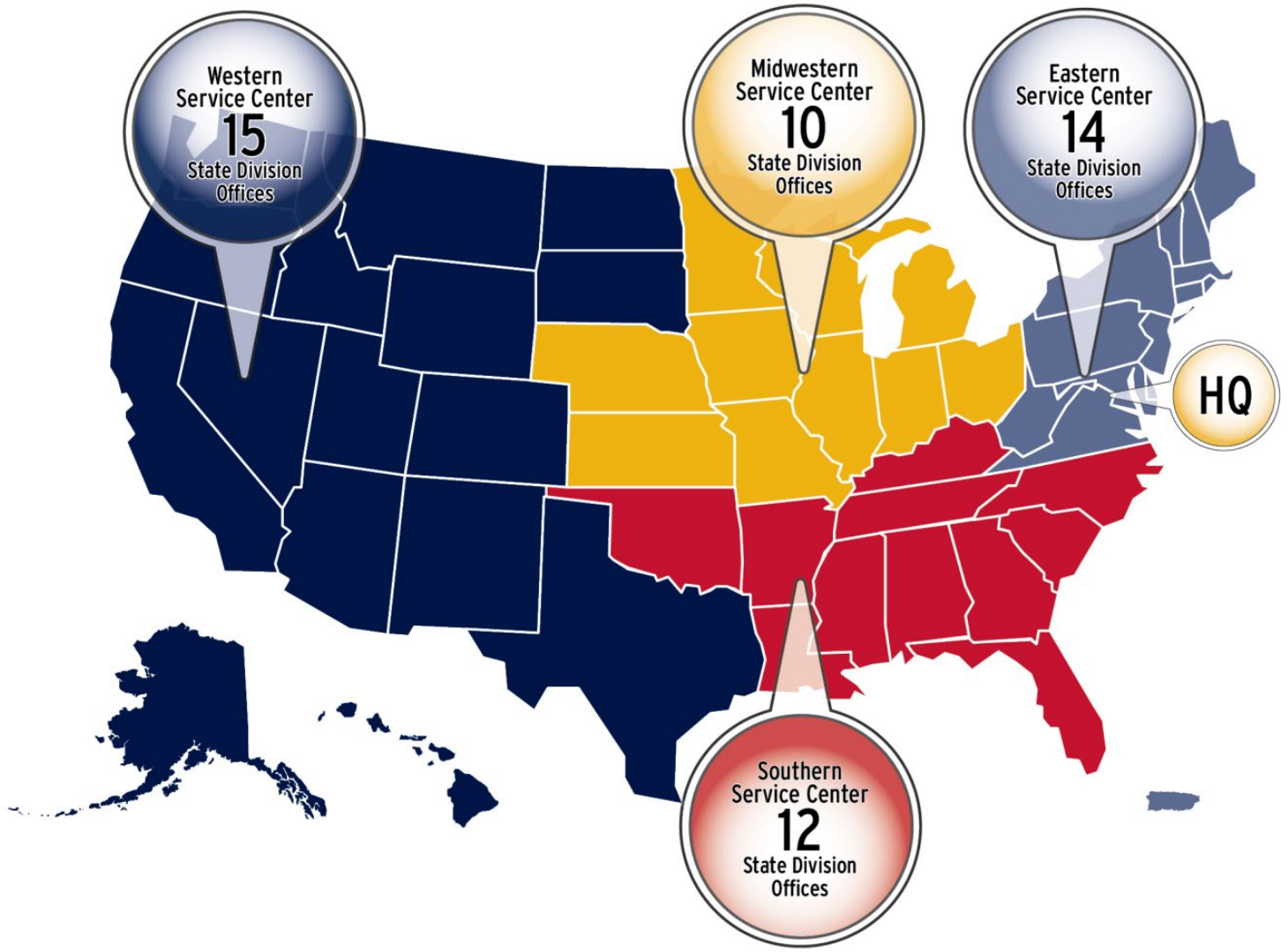


FMCSA Agenda:

- About FMCSA
- Program Update: ELDT
- Q & A – Open Discussion
- Various Updates *(As times Allows)*

FMCSA

The Federal Motor Carrier Safety Administration (FMCSA) is the Federal agency within the U.S. DOT responsible for safety oversight of commercial motor vehicle (large truck and bus) operations.





FMCSA: Our Mission

- Placing ***safety*** as our highest priority.
- Reduce crashes, injuries, and fatalities involving CMV transportation through education, innovation, regulation, enforcement, financial assistance, partnerships, and full accountability.

U.S. DOT Strategic Plan

National Roadway Safety Strategy :

This Department-wide Safe System Approach focuses on five key objectives:

1. safer people,
2. safer roads,
3. safer vehicles,
4. safer speeds, and
5. post-crash care

* These *objectives directly align with the work FMCSA and its partners do everyday*!

Who We Regulate

Approximately 800,000+ Active Interstate Motor Carriers

- 12,000 Passenger Carriers
- 11,000 Hazardous Materials Carriers
- 4,500 Household Goods Carriers

Approximately 5 ‘Active’ Million Commercial Motor Vehicle Drivers

- Active Minnesota CLP/CDL-Holders Approximately 215,000+

12 Million Large Trucks and Buses Driving Over 300+ Billion Miles

FMCSA Primary Activities

Commercial Drivers' Licenses:

- FMCSA develops standards to test and license commercial motor vehicle drivers

Regulatory Compliance and Enforcement:

- The Administration operates a program to improve safety performance and remove high-risk carriers from the Nation's highways

TRAINING PROVIDER REGISTRY

Minimum Training Requirements
for
Entry-Level Commercial Motor Vehicle Operators

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

May 2023







Entry-Level Driver Training (ELDT) Final Rule

- Published in 2016, mandated by Moving Ahead for Progress in the 21st Century Act (MAP-21) Legislation
- Set a Federal standard for mandatory training of entry-level drivers
  - Establishes minimum training requirements entry-level drivers and training providers must meet
  - States may have requirements that exceed Federal requirements
- Established the need for the Training Provider Registry (TPR)
- Compliance Date: February 7, 2022

[Located in 49 CFR Part 380]

Entry-Level Drivers – Who Is Covered?

The ELDT regulations establish new minimum training standards for entry-level drivers. This includes individuals applying for:

A (1) **Class A** or (2) **Class B** commercial driver's license (CDL) for the *first time*

An (3) **upgrade** of an existing Class B CDL to a Class A CDL

A (4) **hazardous materials (H)**, (5) **passenger (P)**, or (6) **school bus (S)** endorsement for the *first time*

Key: First Time – Those individuals who have "previously" held the same class of CDL or endorsements; this must be verifiable within Minnesota's driver's license history record (i.e., Minnesota's FAST Drivers' License system).

Military: Rule does ***not*** cover individuals for whom States have waived the CDL skills test under 49 CFR 383

Entry-Level Drivers – Accessing the Information?

- **Who will access information from the Training Provider Registry?**
  - Entry-level **drivers*** will **SEARCH** for a training provider using the list on the Training Provider Registry website.
  - Registered training **providers*** will **SUBMIT** driver certification information to FMCSA after a driver successfully completes training.
  - **States*** will **VERIFY** a driver's completion of required training using data made available by the Training Provider Registry before administering relevant tests.

Drivers *do not need to register for the Training Provider Registry.* ***Only*** *training providers will register and provide information to the registry.*

When registering, ***training providers*** *must* ***self-certify*** *that they meet all requirements in ELDT regulation requirements.*

Training Requirements

- **Entry-level drivers: Must receive training and demonstrate "proficiency" in the following areas:**



THEORY TRAINING

- Lectures, demonstrations, computer-based, online learning, etc.
- May use a simulator
- No minimum number of hours; must score at least 80% on assessment
- Training topics include: *(See 49 CFR Part 380)*
  - Basic Operation
  - Safe Operating Procedures
  - Advanced Operation Procedures
  - Vehicle Systems and Reporting Malfunctions
  - Non-Driving Activities (e.g., Hours of Service)



BEHIND-THE-WHEEL (BTW) TRAINING

- Actual operation of a CMV
- Takes place on a range or public road
- May not use a simulator to meet requirements
- No minimum number of hours, training provider will determine driver's proficiency
- Basic vehicle control skills and mastery of basic maneuvers

Training Requirements

- Theory and BTW trainings ***may be*** delivered by different training providers
  - Both training providers must be registered and listed on the Training Provider Registry
  - Both training providers would submit driver training information to FMCSA
- BTW range ***and*** BTW public road trainings must be provided by the same training provider

Training Requirements

- **What is an Entry-Level Driver Training (ELDT) training provider?**
  - An entity that is listed on the FMCSA Training Provider Registry
  - This includes:

Training schools

Educational Institutions

Rural Electronic Cooperatives

Motor Carriers

State and Local Governments

School Districts

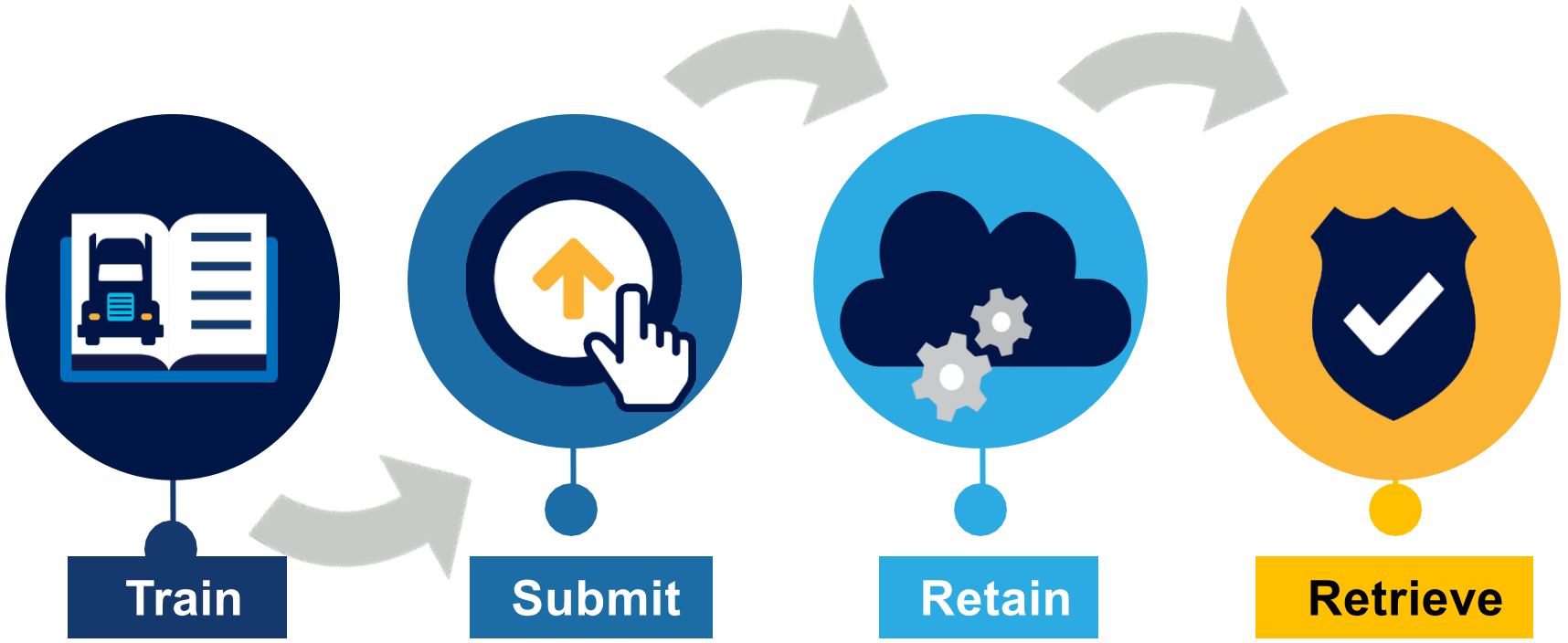
Joint Labor Management

Owner-Operators

Individuals

How does the Training Provider Registry support ELDT?

- How does the Training Provider Registry support ELDT?



Entry-Level Driver Training (ELDT) – Tidbits

Entry-Level Driver Training (ELDT): Data-Entry Sample

Training Type:	Location:	Date/By:	Score/Hours:	Edit/Delete
Class-A CDL				
Theory	Provider Name and Location	4/15/2022 By Jane Doe	91%	
Range	Provider Name and Location	4/15/2022 By Jane Doe	30 Hours	
Public Road	Provider Name and Location	4/15/2022 By Jane Doe	20 Hours	

Training Type:	Location:	Date/By:	Score/Hours:	Edit/Delete
Class-B CDL				
Theory	Provider Name and Location	4/15/2022 By Jane Doe	93%	
Range	Provider Name and Location	4/15/2022 By Jane Doe	27 Hours	
Public Road	Provider Name and Location	4/15/2022 By Jane Doe	25 Hours	

Entry-Level Driver Training (ELDT): Data-Entry Sample

Passenger	Read Highlighted Note Below			
Theory	Provider Name and Location	4/15/2022 By Jane Doe	95%	
Range	Provider Name and Location	4/15/2022 By Jane Doe	25 Hours	
Ranger *OR* Public Road - "NOT BOTH"				
Public Road	Provider Name and Location	4/15/2022 By Jane Doe	23 Hours	

Training Type:	Location:	Date/By:	Score/Hours:	Edit/Delete
School Bus	**Read Highlighted Note Below**			
Theory	Provider Name and Location	4/15/2022 By Jane Doe	89%	
Range	Provider Name and Location	4/15/2022 By Jane Doe	29 Hours	
Ranger *OR* Public Road - "NOT BOTH"				
Public Road	Provider Name and Location	4/15/2022 By Jane Doe	25 Hours	

Training Type:	Location:	Date/By:	Score/Hours:	Edit/Delete
Hazardous Materials				
Theory (only)	Provider Name and Location	4/15/2022 By Jane Doe	90%	

Entry-Level Driver Training (ELDT): Q&A

Question: What qualifications do the ELDT regulations require of training instructors?

FMCSA Response: The following requirements are established in 49 CFR 380.605.

Theory instructors must:

- Hold a CDL of the same (or higher) class, and with all endorsements necessary, to operate the commercial motor vehicle (CMV) for which training is to be provided.
- Meet all applicable "State qualification" requirements for CMV instructors. (Exception: This is not required if providing theory instruction exclusively.)

Meet one of these:

- Have a minimum of two years' experience operating a CMV requiring a CDL of the same (or higher) class, or the same endorsement; or
- Have previously held a CDL of the same (or higher) class; or
- Have a minimum of two years' experience as a BTW CMV instructor.

Entry-Level Driver Training (ELDT): Q&A *(Continued)*

Question: What qualifications do the ELDT regulations require of training instructors?

FMCSA Response: The following requirements are established in 49 CFR 380.605.

Behind-the-Wheel (BTW) instructors must:

- Hold a CDL of the same (or higher) class, and with all endorsements necessary, to operate the CMV for which training is to be provided.
- Meet all applicable "State qualification" requirements for CMV instructors.

Meet one of these:

- Have a minimum of two years' experience operating a CMV requiring a CDL of the same (or higher) class, or the same endorsement; or
- Have a minimum of two years' experience as a BTW CMV instructor.

Range and Theory Instruction: *(Definition)*

- **Range means** an area that must be free of obstructions, enables the driver to maneuver safely and free from interference from other vehicles and hazards, and has adequate sight lines.
- **Theory instruction means** 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.

ELDT – Recordkeeping Requirements

Driver Training – Part 380: Entry-level driver training (ELDT)

380.725(c) Retention of records: Training providers listed on the TPR must retain the records identified in paragraph (b) of this section for a minimum of ***three years*** from the date each required record is generated or received, unless a record, such as a BTW instructor's CDL, has expired or been canceled, in which case the most recent, valid CDL should be retained, if applicable. The provisions of this part do not affect a training provider's obligation to comply with any other local, State, or Federal requirements prescribing longer retention periods for any category of records described herein.

Retention Period: 380.725(c)

Retention Location: Personnel or Driver Qualification file

Entry-Level Driver Training (ELDT): Q&A

Question: The assessment for **BTW** is that 80%?

FMCSA Response: No. Training providers must determine and document that the driver-trainee has *demonstrated "proficiency" in all elements of the (BTW curriculum)*, unless otherwise noted. The assessment of a driver-trainee's proficiency in performing required driving maneuvers is based on the training instructor's professional judgment.

Under the final rule, training instructors maintain the flexibility to determine the extent to which the successful repetitive performance of required skills **demonstrates proficiency for individual driver-trainees on a case-by-case basis**.

Entry-Level Driver Training (ELDT): Q&A

Question: Although a person may be subject to ELDT, are they subject to all of it or just Passenger and School Bus *if they just need endorsements*?

FMCSA Response:

- The extent to which the driver-trainee is subject to ELDT requirements depends on whether the individual already holds a CDL.
- On or after February 7, 2022, *CDL holders seeking a P or S endorsement on their existing CDL **must** complete the theory and BTW portions of the P and/or S endorsement curricula* prior to taking the State-administered skills test in a representative passenger vehicle.
- Individuals obtaining a Class A or Class CDL for the first time would need to complete the theory and BTW portions of Class A or Class B curriculum, in addition to the theory and BTW portions of the P and/or S endorsements.

Entry-Level Driver Training (ELDT): Q&A

Question: What will prompt an audit from FMCSA? Will it be random? Too many skills testing failures from a particular site?

FMCSA Response: One of the requirements that training providers must meet in order to be listed on the TPR is to *allow an audit* or investigation of their operations conducted by FMCSA or its authorized representative (§ 380.719(a)(6)).

Training providers must also ensure that all required documentation is available upon request by FMCSA or its authorized representative.

FMCSA intends to conduct *periodic audits* and to investigate any training provider when the Agency receives a **complaint** or other information concerning the quality or legitimacy of the training provider's operations.

Another example is a State notifying FMCSA that a training provider in the State does not meet applicable State requirements for CMV instruction. States are *required* to notify FMCSA as outlined in 383.73(p).

Entry-Level Driver Training (ELDT): Q&A

Question: The ELDT regulations require training providers to follow a curriculum meeting the applicable criteria set forth in 49 CFR part 380, Appendices A-E. Can a ***State*** require a training provider to offer additional training topics or impose other additional requirements on the provider?

FMCSA Response: Yes. As provided in 49 CFR 380.703(a)(5)(i), training providers *must* comply with **additional requirements imposed by a State** in which the provider offers ELDT.

For Example: Truck Driving Schools in Minnesota are required to have a driving range at least 90,000 square feet for just two CMV's. If adding another CMV, their needs to be another 45,000 square feet. Big challenge!

Entry-Level Driver Training (ELDT): Q&A

Question: Is there a mandatory sequence that the specific theory and behind-the-wheel (BTW) training must be taken in?

Response: There is *no* mandatory order in which the theory, behind-the-wheel (BTW)-range, and BTW-public road training must be administered, nor does the rule require that *theory training* must be completed before obtaining a commercial learner's permit (CLP).

Entry-Level Driver Training (ELDT): Q&A

Question: Will the Federal Motor Carrier Safety Administration (FMCSA) provide any training materials for any of the various entry-level driver training (ELDT) curricula in the final rule?

Response: The Federal Motor Carrier Safety Administration (FMCSA) **does *not* intend to provide written or electronic training materials for any of the curricula set forth in the final rule**, nor will the Agency endorse specific materials or vendors. The Agency anticipates that there will be variations in entry-level driver training (ELDT) curricula based on a training provider's presentation preferences and the needs of the driver trainees they serve.

In addition, training providers are permitted to add additional curriculum elements they deem appropriate.

Entry-Level Driver Training (ELDT): Q&A

Question: Do individuals need to train in a commercial motor vehicle (CMV) equipped with a manual transmission to meet the Entry-Level Driver Training (ELDT) requirements?

Response: No. The ELDT regulations do not require ELDT to occur in a CMV equipped with a manual transmission. The regulations state that drivers need to train on manual transmissions only "if appropriate," i.e., when the driver-trainee expects to operate a manual transmission CMV after obtaining a commercial driver's license (CDL) and is being trained in a vehicle equipped with a manual transmission.

Key: If you Skills Test in a CMV equipped with an automatic transmission, a ***restriction*** will be placed on the CDL 'no manual transmission' (E) restriction

Updated : January 07, 2022

Entry-Level Driver Training (ELDT): Q&A

Question: If a driver wants to remove the "no air brake" (L), "no full air brake" (Z), or the "no manual transmission equipped CMV" (E) restriction from their CDL, are they required to complete entry level-driver training?

Response: No. Drivers applying for a *removal of a restriction* from their CDL in accordance with 49 CFR 383.135(b)(7), which includes the no air brake (L), no full air brake (Z), and no manual transmission (E) restriction, *are not subject* to the Entry-Level Driver Training regulations.

Updated : January 27, 2022

Entry-Level Driver Training (ELDT): Q&A

Question: Must training providers comply with State-based training requirements to be listed on the Training Provider Registry?

Response: Yes. As part of the self-certification process for listing on the Training Provider Registry, training providers ***must*** attest, under penalties of perjury, that they comply with the requirements set forth in 49 CFR part 380, subpart G.

As part of this attestation, providers ***must*** confirm their compliance with applicable ***State-based requirements*** in order to be eligible for initial and continued listing on the Training Provider Registry.

Entry-Level Driver Training (ELDT): Q&A

Question: May an individual applying for a commercial driver's license (CDL) schedule their CDL skills test *before* they complete the required entry-level driver training?

Response: Yes. A State *may* schedule a CDL skills test before the entry-level driver has completed the required training.

A State *may* also choose to require completion of entry-level driving training prior to scheduling a skills test.

In any event, the State *may not administer the skills test or knowledge test until a driver-trainee completes the training* for the CDL or endorsement for which he or she is applying.

Entry-Level Driver Training (ELDT): Part 380

Part 380—Special Training Requirements: ELDT

- **Subpart F—Entry-Level Driver Training Requirements on and *After* February 7, 2022**

  §***380.600*** Compliance date for training requirements for entry-level drivers.

  §380.601 Purpose and scope.

  §380.603 Applicability.

  §380.605 Definitions.

  §380.609 General entry-level driver training requirements.

Part 380—Special Training Requirements: ELDT

- **Subpart G—Registry of Entry-Level Driver Training Providers**

  §380.700 Scope.

  §380.703 Requirements for listing on the training provider registry (TPR).

  §380.707 Entry-level training provider.

  §380.709 Facilities.

  §380.711 Equipment.

  §380.713 Instructor requirements.

  §380.715 Assessments.

  §380.717 Training certification.

  §380.719 Requirements for continued listing on the training provider registry (TPR).

  §380.721 Removal from training provider registry: factors considered.

  §380.723 Removal from training provider registry: procedure.

  §380.725 Documentation and record retention.

Part 380—Special Training Requirements: ELDT

Appendix A to Part 380—Class A CDL Training Curriculum

Appendix B to Part 380—Class B CDL Training Curriculum

Appendix C to Part 380—Passenger Endorsement Training Curriculum

Appendix D to Part 380—School Bus Endorsement Training Curriculum

Appendix E to Part 380—Hazardous Materials Endorsement Training Curriculum

Other FMCSA Updates



FMCSA Medical Exemptions: Diabetes

Insulin Treated Diabetes Mellitus (ITDM) Assessment, Form MCSA-5870

- As a part of the medical certification process for insulin treated diabetes mellitus (ITDM) individuals, the Federal Motor Carrier Safety Administration requires that the Insulin Treated Diabetes Mellitus Assessment Form (ITDM), MCSA-5870, be completed by the ITDM individual's Treating Clinician attesting that the individual has a stable insulin regimen and properly controlled diabetes.
- ITDM individuals are required to provide the ITDM Assessment Form, MCSA-5870, to the Certified Medical Examiner within 45 days of completion by the Treating Clinician.

FMCSA Medical Exemptions: Vision

Vision Evaluation Report, Form MCSA–5871

- The Qualification of Drivers; Vision Standard final rule (87 FR 3390, Jan. 21, 2022) requires that at least annually, an individual who does not satisfy, with the worse eye, either the distant visual acuity standard with corrective lenses or the field of vision standard, or both, must be medically examined and certified by a Medical Examiner as physically qualified to operate a commercial motor vehicle.
- The Medical Examiner must *receive* a completed Vision Evaluation Report, Form MCSA–5871, that is signed and dated by an ophthalmologist or optometrist before each required physical qualification examination.
- The examination conducted by the Medical Examiner must begin not more than 45 days after an ophthalmologist or optometrist signs and dates the Vision Evaluation Report, Form MCSA–5871.

FMCSA Medical Exemptions: Federal Hearing Exemption Application

The Exemption Process:

- To grant a Federal medical exemption, FMCSA must ensure that each exemption would maintain a level of safety equivalent to, or greater than, the level achieved without the exemption. In addition, the recipient must operate in interstate commerce.
- To process an application, the Agency must carefully evaluate the information submitted and, as required by 49 CFR U.S.C.31315(b), publish a Federal Register notice requesting public comment on the application for each exemption. The public is provided 30-days to comment, and the Agency must consider and respond to all comments received when making a final determination whether to grant or deny the exemption.
- Once a decision has been made, you will be notified in writing of the decision.
- If you have questions, contact the Medical Programs Division at 202-366-4001.

FMCSA Medical Exemptions: Federal Seizure Exemption Application

The Exemption Process:

- To grant a Federal medical exemption, FMCSA must ensure that each exemption would maintain a level of safety equivalent to, or greater than, the level achieved without the exemption. In addition, the recipient must operate in interstate commerce.
- To process an application, the Agency must carefully evaluate the information submitted and, as required by 49 CFR U.S.C. 31315(b), publish a Federal Register notice requesting public comment on the application for each exemption. The public is provided 30-days to comment, and the Agency must consider and respond to all comments received when making a final determination whether to grant or deny the exemption.
- Once a decision has been made, you will be notified in writing of the decision.
- If you have questions, please contact the Medical Programs Division at 202-366-4001.

FMCSA Medical Exemptions:

Diabetes Package:

This package has been removed due to the update of the Diabetes Standard. For more information, please visit the New Diabetes Standard Overview Webinar.

Vision Package:

This package has been removed due to the update of the Vision Standard. For more information, please visit the New Vision Standard Overview Webinar.

Hearing Package:

Federal Hearing Exemption Application **(NEW)**

Federal Hearing Exemption Application **(RENEWAL)**

Medical Release Form (Hearing) SAMPLE

Medical Release Form

Seizure Package:

Federal Seizure Exemption Application **(NEW)**

Federal Seizure Exemption Application **(RENEWAL)**

Medical Release Form (Seizure) SAMPLE

Medical Release Form

FMCSA CDL Rulemaking: Upcoming Compliance Dates

August 22, 2024: Exclusive Electronic Exchange – Final Rule

- FMCSA codifies the statutory requirement that State driver licensing agencies (SDLAs) implement a system and practices for the exclusively electronic exchange of driver history record (DHR) information through the Commercial Driver's License Information System (CDLIS), including the posting of convictions, withdrawals, and disqualifications
- No paper

November 18, 2024: Drug and Alcohol Clearinghouse (DACH) – Final Rule

- Connectivity between DACH, CDLIS and SDLA so the SDLA will downgrade a driver's CDL who has a prohibited status in DACH.

June 23, 2025: National Registry of Medical Examiners (NRII) – Final Rule

- This action is being taken to provide FMCSA time to complete certain information technology (IT) system development tasks for its National Registry of Certified Medical Examiners (National Registry) and to provide the State Driver's Licensing Agencies (SDLAs) sufficient time to make the necessary IT programming changes after the new National Registry system is available.
- Note: FMCSA is working with AAMVA to develop the IT specifications

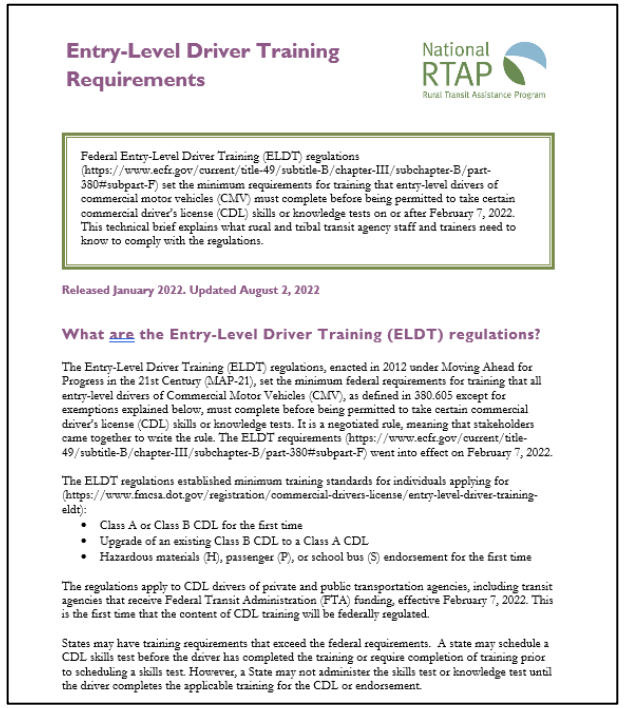
Matthew Marrin

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National RTAP's ELDT Requirements Technical Brief

- Available at https://cloud.nationalrtap.org/Resource-Library/Advanced-Search/fid=1249 and on our technical brief page at https://www.nationalrtap.org/Resource-Center/technical-briefs
- Updated in August 2022. Contributions by FMSCA, Oregon DOT, Minnesota RTAP, Florida RTAP, Colorado Association of Transit Agencies (CASTA), and transit agency managers and SMEs
- Summarizes requirements, exemptions, required training (focusing on Class B drivers and Passenger (P) Endorsement), funding, technical assistance, State DOT and State RTAP resources, and a bibliography



Entry-Level Driver Training Requirements

National RTAP
Rural Transit Assistance Program

Federal Entry-Level Driver Training (ELDT) regulations (https://www.ecfr.gov/current/title-49/subtitle-B/chapter-III/subchapter-B/part-380#subpart-F) set the minimum requirements for training that entry-level drivers of commercial motor vehicles (CMV) must complete before being permitted to take certain commercial driver's license (CDL) skills or knowledge tests on or after February 7, 2022. This technical brief explains what rural and tribal transit agency staff and trainers need to know to comply with the regulations.

Released January 2022. Updated August 2, 2022

What are the Entry-Level Driver Training (ELDT) regulations?

The Entry-Level Driver Training (ELDT) regulations, enacted in 2012 under Moving Ahead for Progress in the 21st Century (MAP-21), set the minimum federal requirements for training that all entry-level drivers of Commercial Motor Vehicles (CMV), as defined in 380.605 except for exemptions explained below, must complete before being permitted to take certain commercial driver's license (CDL) skills or knowledge tests. It is a negotiated rule, meaning that stakeholders came together to write the rule. The ELDT requirements (https://www.ecfr.gov/current/title-49/subtitle-B/chapter-III/subchapter-B/part-380#subpart-F) went into effect on February 7, 2022.

The ELDT regulations established minimum training standards for individuals applying for (https://www.fmcsa.dot.gov/registration/commercial-drivers-license/entry-level-driver-training-eldt):

- Class A or Class B CDL for the first time
- Upgrade of an existing Class B CDL to a Class A CDL
- Hazardous materials (H), passenger (P), or school bus (S) endorsement for the first time

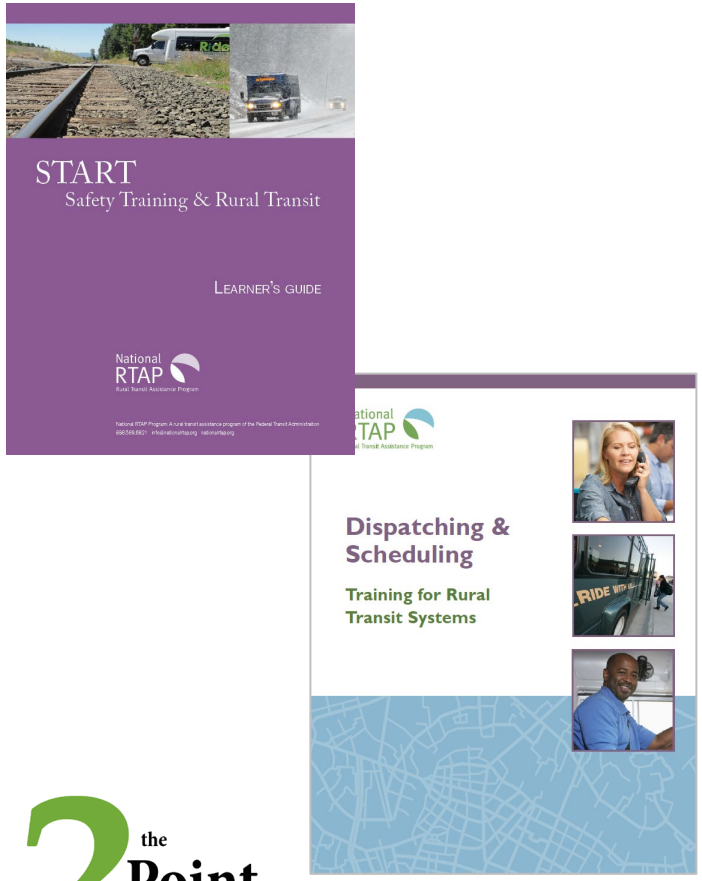
The regulations apply to CDL drivers of private and public transportation agencies, including transit agencies that receive Federal Transit Administration (FTA) funding, effective February 7, 2022. This is the first time that the content of CDL training will be federally regulated.

States may have training requirements that exceed the federal requirements. A state may schedule a CDL skills test before the driver has completed the training or require completion of training prior to scheduling a skills test. However, a State may not administer the skills test or knowledge test until the driver completes the applicable training for the CDL or endorsement.

National RTAP's ELDT Advice from Trainers

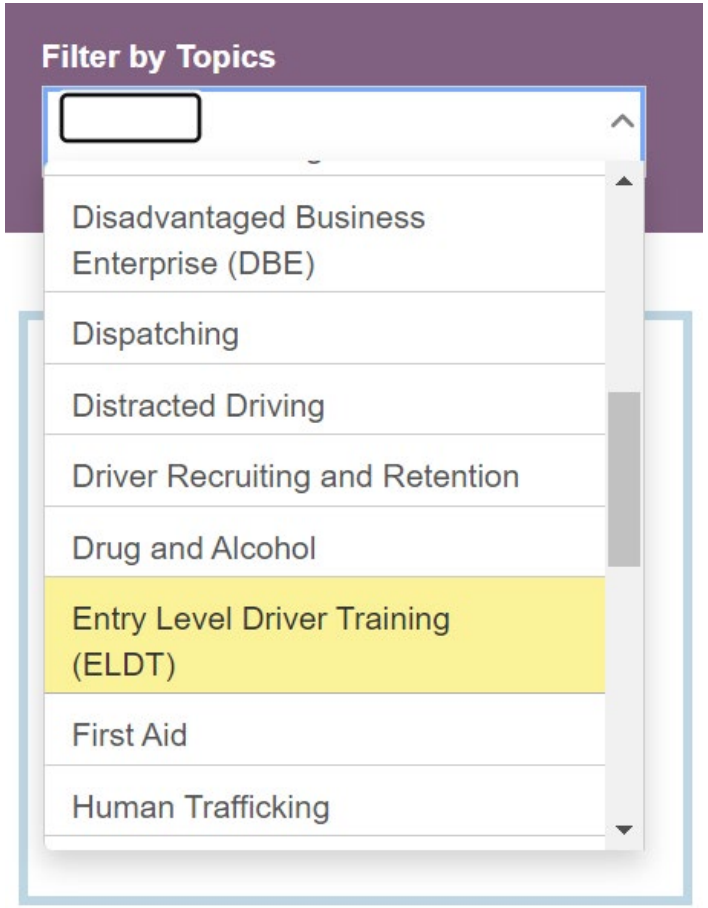
- Trainers should look closely at Appendix B and C in the ELDT regulation to align their curriculum with training requirements.
- Keep in mind that training requirements differ by state, bus weight, and number of passengers.
- Note that range instructors do not need to have a current CDL
- FMCSA may send personnel to training sites to perform audits, so keeping accurate documentation records is critical.
- Trainers should complete their curriculum as early as possible, keeping in mind that the ELDT requirements are likely to evolve.

National RTAP's ELDT Advice from Trainers (continued)



- Trainers should work with the client and the area to find a suitable range, such as a school, church, or store parking lot, for the range component of the training.
- Training sessions can be customized and can take place over a single day or the course of a few weeks.
- Use many free National RTAP training modules, such as START: Safety Training in Rural Transit, Dispatching and Scheduling Training, 2 The Point Training, etc. Our trainings are available in eLearning, print, disc, and thumb drive.

National RTAP's Directory of Trainers



- National RTAP does not endorse or recommend any specific trainers, but we list trainers in our Directory of Trainers at https://www.nationalrtap.org/Training/Directory-of-Trainers. This link is included in the ELDT technical brief.
- National RTAP does not verify that trainers listed in our Directory are in the FMCSA Training Provider Registry (TPR). Please do not assume they are – check the TPR.

ADA Training Resources

May 8, 2023

nadtc
National Aging and Disability Transportation Center



Access Matters, video series

- NADTC Publication, Revised version January 2023
  - Created to train drivers to be more sensitive to the needs of people who are blind, deaf or have other disabilities who rely on public transportation.
  - (1) What Does Access Mean? (2) Communication (3) Various Disabilities (4) Service Animals (5) Different Types of Assistance

https://www.nadtc.org/resources-publications/resource/access-matters-video-series/

ADA Requirements for Section 5310 Recipients

- NADTC Publication, Released April 2022
  - Highlights the required elements of operating a 5310 program, outlined in USDOT 49 CFR, Parts 27, 37 and 38
  - Personal Care Attendants, Accessible Vehicles, Equivalent Services, Mobility Devices, Service Animals, Communication, Reasonable Modification to Policy and Driver Training

https://www.nadtc.org/resources-publications/resource/2021-section-5310-spotlight-americans-with-disabilities-act-ada-requirements-for-section-5310-recipients/

ADA Complaint Process

- NADTC Publication, Released March 2017
  - Highlights the requirements of 5310 providers, outlined in USDOT 49 CFR, Parts 27.13 and 37.17
  - Fair and equitable complaint process, advertised to the public
  - Collecting information/data, maintaining records
  - Common FTA Compliance Review Findings

https://www.nadtc.org/resources-publications/resource/2017-trends-report-topic-spotlight-ada-complaint-process/

ADA No-Shows and Cancellations

- NADTC Publication, Released June 2018
  - Highlights the requirements of 5310 providers, outlined in USDOT 49 CFR, Part 37 *(specifically, 37.125(h))*
  - Fair and equitable No-Show Policy, advertised to the public
  - Must include and define “no-show” and “pick-up window”
  - Reasonable penalties must establish a pattern, based upon use by that rider
    - (ex: someone who rides 3x per week is not the same as someone who rides 1x per month)

https://www.nadtc.org/resources-publications/resource/2017-trends-report-topic-spotlight-ada-no-shows-and-cancellations/

Minnesota's Entry-Level Driver Training (ELDT) Resources

5/8/2023

Melinda Estey | Minnesota State RTAP Manager
Mariah Kathan | DRB Consulting, Contract Project Manager for Minnesota RTAP

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Resources Available

Minnesota RTAP ELDT Resources

For Class A, Class B, Class B to A, and Passenger Endorsement Only:

1. Theory Curriculums (PowerPoints)
2. Tests and Answer Keys
3. Behind-the-Wheel Checklists
4. Model for coordination for agencies who need assistance with training.

Resources Page with all documents and information on the Minnesota RTAP website: https://www.mnrtap.us/eldt-training/

Minnesota's ELDT Response

- Representatives from over 15 agencies in Minnesota met for 6 months to create and review these resources
- Rural, small urban, and metro area transit agencies all worked together
- Agencies have continued to meet to share best practices, tips, and collaborate on training since the requirement took effect.

Step-By-Step Guide to ELDT

- Step-by-step "start here" guide for transit managers: new and experienced
- Provides a simplified walk-through to help agencies assess if they can complete the training in-house
- All resources in the following slides can only be used for training purposes if Step 1 is "Yes" otherwise they can be supplemental, but training must take place with a certified trainer.

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STEP-BY-STEP ENTRY-LEVEL DRIVER TRAINING (ELDT) PROCESS

You have just hired a new driver and they do not possess a current CDL or the necessary endorsement that they will need to drive for your agency…

— STEP 1 —

Check if you have a person on staff who meets the following requirements to be an ELDT trainer:

This person must hold a current license or endorsement for the license or endorsement their driver is seeking.

AND at least one of the following two options:

At least 2 years of experience driving vehicle requiring the same license or endorsement their driver is seeking.

OR

At least 2 years of experience as a behind-the-wheel CMV instructor

If No, email support@mnrtap.net to set your driver up to take training at another agency via virtual meeting.

If Yes, continue

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Frequently Asked Questions Document

- Common questions from transit systems
- Continuously updated

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ENTRY-LEVEL DRIVER TRAINING (ELDT) FAQ

**This document will be continuously updated as questions are received. To ask a question not listed here, please email support@mnrtap.net.*

What training materials do people training for a Class C CDL and passenger endorsement need to use?

All materials marked "Passenger Endorsement" or "Passenger Endorsement Only." There is no FMCSA ELDT requirement for Class C CDLs. If your driver is receiving a Class C CDL and a passenger endorsement, they only need to complete the curriculum and tests for passenger endorsement.

Who can certify that a driver has completed ELDT training (theory, behind-the-wheel, or both) in the TPR?

You'll want to designate someone at your agency to set you up as a training provider in the TPR. This can be anyone: the transit director, trainer, or someone else you designate. The instructors can provide a list of drivers who have completed ELDT training to the person designated on your team to certify the drivers in the TPR. The ELDT trainers do not have to be the people assigned to certify the drivers in the TPR.

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Theory Curriculum PowerPoint

- Theory Curriculum for Class A, Class B, Class B to A, and Passenger Endorsement Only

- PowerPoints can be used and adapted by agency trainers



Theory Curriculum PowerPoint

- Theory Curriculum type noted in upper left corner



- Subparts of the federal register noted at the bottom of each section so you can check the correlation

Unit 1.1 Orientation

This unit satisfies FMCSA's ELDT requirements for units A1.1.1, BA1.1.1, and B1.1.1, and C1.3.

Tests and Answer Keys

- Scoring guide provided
- Answer keys available on request (must be a public transit or nonprofit agency)

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Last Updated: February 4, 2022

ELDT KNOWLEDGE TEST – PASSENGER ENDORSEMENT ONLY

This test is for those only required to have ELDT for Passenger Endorsement, (e.g., Class C CDL with Passenger Endorsement).

Answer 30 of the 37 questions correctly to pass with a score higher than 80%.

Name: _____ Date: _____

1. T F It is preferred to fuel your bus with passengers on board.
2. T F It is important to not let your vehicle idle whenever possible.
3. Which topic should be included as part of the safety briefing?
   a. Where to stow hot beverages
   b. Using a seatbelt, when one is available
   c. Turning off cellphones during travel
   d. Time limits for passenger use of the restroom
4. Which is a best practice for unloading passengers on a street?
   a. Park, open the exit door, and start working on paperwork
   b. Park with the vehicle exit facing traffic
   c. Ask for a passenger volunteer to supervise luggage removal
   d. Check the area and keep four-way flashers on the entire time
5. T F The ADA is an extensive civil rights law designed to remove barriers that prevent individuals with disabilities from enjoying the same opportunities that are available to persons without disabilities.
6. The ADA covers:
   a. Any public entity that provides designated public transportation or intercity or

Behind-the-Wheel Checklists

- Guides for trainers performing behind-the-wheel training
- Keep this for when/if your program is audited/reviewed by FMCSA

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Driver: _____

Date of completion: _____

Behind-the-Wheel Checklist for Passenger Endorsement

Once this training is complete, you must submit it in the TPR by midnight of the second business day since the driver completed the training

This training can take place on a range or a public road.

Trainer Checklist

First, please confirm that you, the trainer, are eligible to perform this training

- ❑ I'm registered in the Training Provider Registry (TPR): https://tpr.fmcsa.dot.gov/Provider
- ❑ I hold a CDL with a passenger endorsement
- ❑ This training is taking place in a vehicle whose operator requires a passenger endorsement

AND at least one of the following two options:

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Inter-Agency Coordination

1. When you have a new driver, transit agency emails Minnesota RTAP that they need training
2. Transit Agency helps that driver to obtain their CLP
3. Minnesota RTAP sends email to agencies who have indicated that they are willing to participate in inter-agency training
4. Minnesota RTAP will coordinate that driver joining an upcoming ELDT training via virtual or in-person meeting
5. The training agency will train, test, and certify that driver in the TPR
6. Minnesota RTAP will send out a trainer who is certified in the TPR to do behind-the-wheel training if the transit agency needs behind-the-wheel training assistance
7. That trainer will certify the driver in behind-the-wheel in the TPR
8. The driver will take their road test and obtain their CDL

Minnesota's ELDT Resources

All these resources are available for your use here:

https://www.mnrtap.us/eldt-training/

Questions?

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Thank You

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