**Entry Level Driver Training Advisory Committee**

**Curriculum Discussion Notes**

**February 19, 2015**

1. Performance-based versus hours requirements
2. Classroom
3. Behind the Wheel (BTW)
   1. On a training range versus on a public road.
      1. 2007 NPRM – proposed BTW definition was either conducted on public or private property.
   2. Passenger carriers and school bus – there is a difference between BTW with an instructor and BTW with a bus full of passengers or students and an instructor. Pre-CDL BTW supervised driving would not include passengers/students.
   3. Purely performance-based approach:
      1. Would allow flexibility for evolution in methods of teaching skills.
      2. Might not allow testing of all conditions to which a driver may be exposed and for which the driver should experience.
      3. How would FMCSA determine if a training program is actually implementing the required curriculum?
      4. Would allow flexibility to require less hours for CDL applicants who have experience driving exempt vehicles.
   4. Additional hours-based requirements along with performance-based element:
      1. Would guarantee exposure to a multiple types of scenarios.
      2. Hard to justify safety benefits for a minimum hours requirement.
      3. Hours requirements are common in many other safety-related skills training programs (e.g., airline pilots).
      4. May not be necessary if required curriculum is detailed enough.
         1. For a training provider to communicate all the knowledge detailed in the required curriculum and allow practice for the required skills would presumably take a minimal number of hours.
      5. Privately owned schools and many State statutes are prescriptive re: classroom and BTW minimum hours requirements.
      6. There would be financial aid implications if FMCSA specified a minimum number of hours; could cut off tuition aid for accredited institution.
   5. All members agree that a qualifying ELDT program should involve some performance-based element (not just minimum hours).