**Minimum Level of Effort Standards for CMV Entry-Level Driver Training**

**Three Approaches**

**5/27/15**

**Option A**

**Performance only.** Require that each Training Provider, as a condition of its registration as an FMCSA Training Provider, teach the specified curriculum to all students and administer a knowledge/road/range performance assessment to each student to measure that student’s proficiency in the knowledge/road/range portions of instruction.

**Option B**

**Hybrid Performance and Level of Effort Specification.** Stipulate that off-Road/Range training shall consist of a minimum of ***[x]*** of skills training in a vehicle of the type and class for which the student will be licensed. The exercises completed shall be based on the skills described in the road and range portion of the curriculum standards.

During Off-Road/Range exercises, trainees shall be required to demonstrate the skills presented in the Range portion of the FMCSA required Core Curriculum including, but not limited to:

|  |  |  |
| --- | --- | --- |
| * Vehicle Inspection
 | * Straight Line Backing
 | * 45 & 90 Degree Alley Dock Backing
 |
| * Off-Set-Backing
 | * Parallel Parking Blind Side
 | * Parallel Parking Sight Side
 |
| * Coupling/Uncoupling\*
 | * Turning Left & Right
 | * Shifting
 |

On-Road training shall consist of a minimum of ***[y*]** road trips in a vehicle of the type and class for which the student will be licensed, and shall average not less than 50 minutes in duration.

During the On-Road training trips, trainees shall be required to demonstrate the driving skills presented in the theory portion of the FMCSA required Core Curriculum along with skills required in the BTW/Road. These skills include but are not limited to:

|  |  |  |
| --- | --- | --- |
| * Pre/Post trip Inspection\*
 | * Coupling/Uncoupling\*
 | * Backing/Docking\*
 |
| * Vehicle Controls
 | * Left Turns
 | * Right Turns
 |
| * Lane Changing
 | * High Speed Curves
 | * Shifting/Transmission\*\*
 |
| * Communication/Signaling
 | * Hazard Perception
 | * Railroad Crossing
 |
| * Night Operation\*\*
 | * Extreme Driving Conditions\*\*
 | * Visual Searching
 |
| * Speed and Space Management
 | * Safe Driver Behavior
 | * Hours of Service
 |

Documentation of On-Road Training shall/may consist of an On-Road training report indicating the skills demonstrated during each trip.

\*Denotes skill used to verify knowledge learned in off road/range. If same Off-Road training vehicle is used for On-Road training, pre-trip inspection in Off-Road will qualify.

\*\*Denotes that individual demonstration requirements may be based on vehicle type and/or feasibility

*(if accepted, will be* *added to both Core Curriculum & Certification Eligibility Requirements*)

**Option C (might be combined with Options A or B) [Agreed]**

raining providers to fill out – and retain -- trip sheets for each range and road trip (or else a master trip sheet covering all range/road trips) for each student they train.  The sheet(s) would track the skills covered in our model curriculum and allow for written documentation that the instructor has observed the student proficiently demonstrate each demonstration skill on the range/road portion of the curriculum “x” number of times.  (The sample form selects the number 5 as “x”).

Training providers would be required to prepare and maintain these trip sheets to document the training of each student. The trip sheets would record name of student, name of instructor(s), number of trips, miles traveled on each trip, and the skills demonstrated.[[1]](#footnote-1)

Training trip sheets are common practice, currently, in the ELD training community but they differ significantly in format and topic coverage, making apples-apples comparisons difficult for audit purposes. To facilitate discussion of this approach, the Facilitator prepared the attached sample master trip sheet which might be used to document skills covered on range and road sessions combined.

1. Trip sheets are already common practice in the training community so this requirement would simply codify best practice.  Requiring preparation and retention of student trip sheets would assist FMCSA audits and enforcement by enabling the FMCSA, during a site visit, to simply pull up a CDL number at random from the pool of CDLs listed as having graduated from that training program, and ask to see the trip sheets for that student.  Diploma mills who have no trip sheets – or manifestly incomplete ones -- would be immediately exposed. [↑](#footnote-ref-1)