

Delaware Update to Entry Level Driver Training



We are nearly a year into the “new” Entry-Level Driver Training (ELDT) and many local agencies have sorted out their approach, but there remains some pain, struggling, and confusion here and there.

If you have employees that require a Commercial Driver’s License (CDL) to carry out their work, you are aware of the ELDT requirements for new licensure that took effect February 7, 2022.

The training is substantial and we wanted a better understanding of where Delaware local agencies are in meeting these requirements. The Delaware League of Local Governments (DLLG) was also receiving inquiries, so we teamed up with them in July to put out a short survey to local agencies. In October, we invited survey respondents to a roundtable forum, joined by Delaware’s Division of Motor Vehicles, and we had a great discussion over lunch.

At the roundtable, seemingly everyone brought a little something to the table. Some had questions, some had solutions, some had news the rest of us hadn’t heard. In short, lunch was good, but the discussion was even better. And now, this seems like a good place to step back and catch everyone up.

We’ll start out by dispensing with the obligatory complaining. Most of us agree that training of drivers is a good thing, even if the @#\$\$% information sometimes leaves us a bit unsure of the rules. There, feel better?

Bless their hearts, the Federal Motor Carrier Safety Administration (FMCSA) has done their best to map out the requirements, but they are imperfect and some of us in the regulated world will read way too far into just about everything and sail right past the answer. Our roundtable discussions showed that on one or two topics, we still had varying understandings of requirements, so it may be helpful to go back through it and clarify a couple areas where misunderstandings may result.

We’ll start with some fundamentals. First, what is a Commercial Motor Vehicle (CMV)? There are three classes and if you’re not driving one of those, you’re not driving a CMV. FMCSA defines the three classes below. Class A vehicle examples are tractor trailers, dump trucks pulling heavy trailers and equipment, and trailer buses (Passenger endorsement required). Class B vehicle examples include box trucks, garbage trucks, dump trucks, cement trucks, and buses (Passenger endorsement required).

Next, how do you obtain a CDL? It is important to note that while the FMCSA establishes the regulatory framework, actual licenses are obtained through your state division of motor vehicles. But while the particulars can vary, the framework is generally consistent. You begin by obtaining your state’s CDL Manual (Delaware’s is available free and [on-line](#)) and next you need to determine which class of vehicle you want to be licensed for. The three classes discussed above are accompanied by optional endorsements that leverage you for things like school buses, tanker trucks, hazardous materials, and so on; we won’t go that far into the

Classes of License and Commercial Learner's Permits (CLP)

Pursuant to Federal standards, States issue CDLs and CLPs to drivers according to the following license classifications:

Class A*: Any combination of vehicles which has a gross combination weight rating or gross combination weight of 11,794 kilograms or more (26,001 pounds or more) whichever is greater, inclusive of a towed unit(s) with a gross vehicle weight rating or gross vehicle weight of more than 4,536 kilograms (10,000 pounds) whichever is greater.

Class B*: Any single vehicle which has a gross vehicle weight rating or gross vehicle weight of 11,794 or more kilograms (26,001 pounds or more), or any such vehicle towing a vehicle with a gross vehicle weight rating or gross vehicle weight that does not exceed 4,536 kilograms (10,000 pounds).

Class C: Any single vehicle, or combination of vehicles, that does not meet the definition of Class A or Class B, but is either designed to transport 16 or more passengers, including the driver, or is transporting material that has been designated as hazardous under 49 U.S.C. 5103 and is required to be placarded under subpart F of 49 CFR Part 172 or is transporting any quantity of a material listed as a select agent or toxin in 42 CFR Part 73.

weeds here.

Obtaining a Commercial Learners Permit (CLP) enables you to practice on public roads as long as you have a qualified CDL holder with you in the vehicle. ELDT is next in line and we'll explore that some more below. More knowledge and skills tests follow to complete your CDL. Along the line you will need medical clearance via a DOT physical and your past driving record will be examined. You will need to register with the FMCSA Drug and Alcohol [Clearinghouse](#). If you need further endorsements, those can bring other requirements and other training, but for our purposes here, we will stick with your garden variety Class A or B CDL.

Let's drill down into some particulars about the "new" [ELDT](#). Who has to go through it? Simple. If you already have a CDL and are not looking to go from a Class B to a Class A or adding an endorsement (school bus, hazardous materials, etc.), you are done. You do not need to enroll in ELDT. If you are new, you do. If you are upgrading, you do.

FMCSA maintains the Training Provider Registry ([TPR](#)), a database of CDL applicants that have completed ELDT. The TPR is also where training providers can register and CDL applicants can connect with them. The "Find a Training Provider" link on the TPR page leads you to a mapping page where you can search by location and find providers for in person or online training. A particularly useful alternative on that page is the "Download all Training Locations" link just above the map. Clicking there will allow you to download an Excel spreadsheet that you can easily (with drop down headers) sort by state, in-person versus traveling versus online, public or private availability, type of training provided, and so on, along with all the contact information to get you started.



Let's stop there and clarify the difference between training providers and instructors. Training providers are organizations, public or private, that register with FMCSA (and state DMVs where required) to provide the training. Instructors are the individuals (carbon-based life forms) that actually present training to CDL applicants. Instructors do not register with the

FMCSA directly. It is the responsibility of the training provider to ensure that the instructor is properly credentialed to do so, along with providing a suitable environment for classroom and behind the wheel training.

What does ELDT cost and how long does it take? Super good questions. FMCSA cannot be clearer that there is no minimum number of classroom hours for the training. They say it 30 different ways in 22 different locations (we didn't actually count). That said, [Appendix A](#) to Part 380 (more formally, Title 49, Subtitle B, Chapter III, Subchapter B, Part 380, Appendix A) is the Class A CDL Training Curriculum and as you can see, it goes on for pages and pages with details for each aspect. You will find a similarly detailed curriculum at [Appendix B](#) to Part 380, the Class B CDL Training Curriculum. The required curricula include both Theory and Behind-The-Wheel (BTW) instruction.

Clear Roads (a national research consortium funded by 38 member agencies) developed a set of training [materials](#) that can be used by public agencies for free and they closely follow these curricula. Clear Roads has estimated that the Theory classroom materials require 70 hours of instruction and the BTW materials require 44 instructor hours.



Delaware Technical Community College provides the [training](#) as part of their comprehensive Commercial Driver's License Certification at the Georgetown campus as 45 classes over nine weeks, totaling 347 contact hours. These examples should give you an idea of the level of commitment that may be necessary for both CDL applicants and instructors.

The current cost for Delaware Tech's course is \$4,995, which is generally consistent with published costs for private sector providers you will also find in the FMCSA spreadsheet.

You will find on FMCSA's spreadsheet online options that promise to deliver training in one day for about \$100. We can't discount this approach, because FMCSA does not explicitly say you cannot go this route. However, it is unclear exactly which training you receive in some instances, so be a good consumer. Obviously, you cannot receive the Behind the Wheel training online and simulators are specifically not allowed to substitute for BTW training.

That aside, the cost of training can lead some agencies to wonder if they can cost effectively provide the training themselves. The short answer is that you probably can.

Let's stop and be clear that we are focusing on public agencies that wish to train their own CDL applicants. Any training provider wishing to provide commercial driver training for a fee must comply with Delaware Title 21, [Chapter 83](#), Commercial Driver Training School Licensing. However, we have verified with Delaware DMV that public agencies that are training their own staff do not need to obtain a license from DMV (however, if they are charging the public to provide that training they would need to obtain the CDTs License).

Returning our focus to Delaware public agencies wishing to train their own staff without charging a fee, the requirement to be an instructor is simplified. FMCSA maps out the [qualifications](#) in 49 CFR 380.605 and in their frequently asked questions section, as excerpted below. For both Theory and BTW, the instructor must hold a CDL of the same or higher

What qualifications do the ELDT regulations require of training instructors?

The following requirements are established in 49 CFR 380.605.

Theory instructors must:

1. 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.
2. Meet all applicable State qualification requirements for CMV instructors. (*Exception:* This is not required if providing theory instruction exclusively.)
3. Meet one of these:
 - a. Have a minimum of two years' experience operating a CMV requiring a CDL of the same (or higher) class, or the same endorsement; or
 - b. Have previously held a CDL of the same (or higher) class; or
 - c. Have a minimum of two years' experience as a BTW CMV instructor.

Behind-the-Wheel (BTW) instructors must:

1. 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.
2. Meet all applicable State qualification requirements for CMV instructors.
3. Meet one of these:
 - a. Have a minimum of two years' experience operating a CMV requiring a CDL of the same (or higher) class, or the same endorsement; or
 - b. Have a minimum of two years' experience as a BTW CMV instructor.

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class, with all the necessary endorsements to operate the CMV applicable to the CDL applicant. They must have at least two years' experience operating the same class CMV as above (with the exception that a Theory instructor may have previously held the CDL of the same or higher class). Finally, the instructor must meet all applicable state qualification requirements for CMV instructors. But, as previously discussed, Delaware DMV allows public agencies training only their own staff to proceed without further requirements.

The result is that a Delaware local agency can choose to register as a training provider and CDL drivers on staff that meet the minimal qualifications we just discussed can be designated as instructors. It perhaps goes without saying that you'll want those instructors to possess the characteristics of a patient and thorough teacher as well.

However, it is essential that instructors that take this on are allowed adequate time to cover the extensive Theory and BTW instruction, so the cost comparison may not be as drastic as you first think. As noted above, one avenue for such instructors is to utilize the Clear Roads curriculum, which is quite thorough.

Whichever approach your agency takes, the ELDT requirements can require even more lead time for licensure preparation than in the past, so your staffing approaches should adapt accordingly. Your pathway to train CDL applicants may vary over time and you can always change your approach down the line. But if you have a need for CDL drivers on your staff and you haven't thought about these requirements, it's time to take some sitting and thinking time to come up with the approach that's right for you.