



Illinois Fertilizer & Chemical Association

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A Comprehensive Look into the ELDT Mandate and Becoming a Training Provider

Entry Level Driver Training (ELDT) requirements went into effect on February 7, 2022. Currently, all Department of Motor Vehicles (DMVs) are required to check the Driver Training Registry to verify that any driver wanting a Class A or B CDL or seeking a Hazardous Material, School Bus or Passenger endorsement has completed training with a registered training provider.

All other endorsements (tanker, air brakes, etc.) and temporary restricted Class B licenses are not affected by the ELDT mandate.

Do you understand the regulation and your responsibility as an employer?

All state DMVs are only required to check the registry prior to the driver performing the skills or road testing for a Class A & B CDL, School Bus and Passenger endorsements. Taking the knowledge test does not require a registry check or any formal training. The actual test given at the DMV will not change or cover any of the additional topics listed in the FMCSA training requirements. This is a key factor to understanding ELDT. The test provided at the DMV did not change after Feb. 7, 2022.

For a company who wants to train their own drivers, it is important to understand that the individual has the capacity to achieve a valid CLP before investing time and resources in training.

What are your options to comply with ELDT?

- Send the driver to a Registered Training Provider (RTP) for the full 160-hour course requirement in Illinois
- Register your company to be a private RTP
- Have the driver receive theory instruction online and find a BTW to give driving instruction
- Send your driver to a public RTP in any other state to meet the requirements

A common question asked is whether drivers can still take the CDL A or B, school bus, or passenger knowledge test at the DMV BEFORE enrolling with a registered training provider. The answer is yes, an individual can still receive his or her Commercial Learners Permit (CLP), which is valid for one year BEFORE they register or complete theory and behind-the-wheel training from a registered training provider.

***Hazardous Materials Endorsement** applicants are treated differently as they must complete the theory training from a Registered Training Provider (RTP) prior to the knowledge test at the DMV. The hazardous materials endorsement does not have a driving or skills testing requirement.*

What makes the ELDT requirement complicated is the fact the FMCSA has two sets of rules that training providers must meet, and it is dependent on who and how they are training students. Within the rule, the FMCSA states that all training providers must register on the Training Provider Registry (TPR).

FMCSA also allow states to be more restrictive than the federal guidelines regarding training provider requirements, but not less. In Illinois, we have extremely complicated and restrictive rules for anyone providing CDL training for compensation (state funded schools or private instruction companies), but the laws are silent on private driver training where there is no direct compensation to the training provider.

If your company registers as a private trainer in Illinois, you must follow only the federal rules for training providers, not the state. Registering to become a training provider requires that you go to <https://tpr.fmcsa.dot.gov/> and follow the instructions to register.

Any registered training provider anywhere in the United States can train a CDL driver for ELDT. The training is not dependent on the instruction occurring in the same state that the driver will take the test. In other words, a person can receive CDL training online or in another state and still take the driving test in Illinois so long as the training provider they used is registered on the TPR.

You cannot train anyone for compensation. What FMCSA does allow is for you to train your own drivers if you have registered and have met the federal guidelines. This is explained in more detail below.

Interpreting the new rules

For the new rules for Illinois-based companies, you (your company) can register with FMCSA to become a private ELDT training provider in Illinois. You will only follow the federal guidelines for training and do not have to follow the state guidelines for CDL schools. The registration is free, and has no cost associated at this point. Also, registering does not include any type of automatic audit process but does require biannual filing requirements. The FMCSA will not be showing up to audit your curriculum or behind-the-wheel trainers randomly based on the fact you registered as a training provider. There is also no requirement that you be required to train

any number of drivers within a given time. For example, you could both register and never train a specific person without any impact.

But what if you do not want to register for all licenses or endorsements that require training? The answer is that you do not have to, as you can register as a trainer for only the categories you choose to provide. If you choose to only train drivers for hazmat endorsement, then that is all you register for. If you do not need a passenger or school bus endorsement, you will not be required to register to provide that training. Simply register for only the training you choose to perform.

Where it starts to become confusing is that you can register to only perform the theory instruction, but not the behind-the-wheel training. The problem with registering this way is you will have to find another registered training provider to give the behind-the-wheel training. Unfortunately, there are currently no schools in Illinois that will provide behind-the-wheel without providing the theory curriculum first.

All behind-the-wheel driver trainers must have 2 years of experience driving with the credentials they are training and have a valid CDL license with appropriate endorsements for the instruction. Registering to be a training provider requires you to go to <https://tpr.fmcsa.dot.gov/> and follow the instructions to register.

A large misunderstanding of the ELDT training is that the theory instruction has virtually nothing to do with successful operation of the CMV. The theory training is designed to educate the driver on all responsibilities and applicable rules for operating a commercial motor vehicle. This includes understanding the drug and alcohol testing, Clearinghouse registration, hours of service rules and any specific rules regarding a driver's responsibilities.

What are the curriculum requirements?

This is where you will have to dedicate time and resources to become a training provider. There currently exists free training material on the internet that covers topics within the required curriculum, however it is difficult to verify whether they are deemed comprehensive enough to use for a Class A & B, Passenger or School Bus endorsement. Click the following link to view the required standard curriculum:

<https://tpr.fmcsa.dot.gov/content/Resources/ELDT-Curriculum-Summary.pdf>

Interestingly, there is no time requirement or extensive testing requirement. You need only to verify that the required topics were in fact covered, and the student has retained the knowledge by scoring at least 80% on your 'tests', which can be paper or electronic. There is no mandated format on how detailed or the volume of questions required in each topic area. You can cover theory topics as you deem necessary for the trainee.

There are certain topics that may not be applicable to your operation, but you will still be required to cover them. Topics include hours of service, whistleblower, post-accident procedures and the Clearinghouse driver requirements. You will be required to cover only what

the trainee needs to understand under the topics as a driver, not what your company has to do. The key to all this is document, document, document each of the theory required topics.

What are the time requirements for training?

This will depend on the needs of your company and the ability of the trainee to retain the information. For example, if you operate only in short haul or ag exempt hours-of- service, then it will be important to your company that the trainees understand how they will use those exemptions. Overall, you are going to have to give the driver a basic knowledge of all topic areas listed, but you will spend more time making sure they understand the exemptions they will be working under, regardless of ELDT. There are a few companies that have created curriculum that you can purchase, but none we can recommend that will meet the needs of every individual company. You may already do this now with new drivers and have much of the required curriculum via your driver onboarding process.

The BTW training has no set time or hour requirement, only that your trainer signs off that they conducted the training, and that the student can complete the skills outlined. The facilities requirement only state that the area be large and free of obstructions for the trainee to complete the tasks. The BTW training requires that the trainer document the trainees' abilities and that they can complete the task topics listed.

Once the trainee has completed the required training, you have two business days to upload and update the student's training progress and for them to complete the skills and driving testing at the DMV.

What about Covered Farm Vehicle (CFV) drivers?

If someone is only going to drive a farm-plated vehicle, then they do not have to acquire a Class A or B CDL. Illinois has a Class A license that is farm designated known as J51. J51 Class A licenses and regular Class B licenses do not have to follow ELDT regulations as they are not a federally administered license. They have no endorsements because endorsements are part of CDL, not state issued licenses. A J51 Class A or Regular B license holder cannot drive any commercial motor vehicle that does not have a farm designated plate. CFV drivers can travel anywhere within the state of Illinois and up to 150 air miles from their base of operation traveling out of state.

If you have more questions regarding ELDT, please do not hesitate to reach out to the IFCA staff at 309- 827-2774.