



SDLA Frequently Asked Questions

The questions were submitted by SDLAs to FMCSA during the ELDT/TPR Check-In Webinars.

Applicability

Will any drivers be “grandfathered in” to the ELDT requirements?

Drivers issued a Class A CDL, Class B CDL, or a passenger (P), school bus (S), or hazardous materials (H) endorsement before February 7, 2022, are not required to comply with this subpart pertaining to that CDL or endorsement.

Individuals who obtain a CLP before February 7, 2022, are not required to comply with this subpart if they obtain a CDL before the CLP or renewed CLP expires.

Once they have completed the entry-level driver training, is there no requirement for recertification?

Yes, the concept is a “one and done,” once the driver completed the applicable training they do not need to take it again.

For the Hazardous materials (H) endorsement, is the driver required to complete the training before they complete the knowledge test?

Yes. Per § [380.605](#), the driver must complete ELDT prior to the knowledge test for the H endorsement, and per § [383.71\(a\)\(3\) & \(b\)\(11\)](#), the SDLA must verify that the applicable training was completed before administering the knowledge test.

Is a State required to accept training certification information for training that was conducted and completed in a different State?

Yes. As discussed in the 2016 final rule, any ELDT requirements that may exist in the licensing State (i.e., the applicant’s State of domicile) would not be applicable to the driver-trainee who obtained skills training outside that State, even if the he or she returns to the licensing State to take the skills test (as permitted under § [383.79](#)). Consequently, an applicant’s State of domicile must issue a CDL to him or her, even if the BTW training requirements imposed by the training State do not conform with those in the State of domicile, as long as the applicant obtained the training from a provider listed on the TPR.

Training Provider Requirements and Self-Certification

How would a State report to FMCSA a training provider that has failed to meet State requirements?

States will submit detailed information to FMCSA about the training provider that requires investigation. FMCSA will provide an online form States can use and will route information received to the appropriate FMCSA Division Office.

How will training providers that are not required to be licensed in a State verify that they meet State requirements?

Registering with FMCSA as a training provider will include a self-certification step, in which providers attest to the fact that they meet all Federal requirements, as well as any applicable State requirements. Training providers are also subject to FMCSA investigations or audits, which would determine when a training provider is not meeting Federal or State requirements, and be subject to removal from the Training Provider Registry.



What are the repercussions for the State if it administers a test and issues a CDL or endorsement to a driver who has not completed training from a registered training provider?

Per 49 CFR § [383.73\(e\)\(9\)](#), States must electronically verify that the applicant completed the appropriate entry-level driver training before administering a skills test for a driver applying for a Class A or Class B CDL, or a passenger (P) or school bus (S) endorsement, and before administering a knowledge test for the hazardous materials (H) endorsement.

If FMCSA finds that the State has issued a CDL or endorsement to a driver who has not completed the required training from a registered training provider, then FMCSA will determine on a case-by-case basis whether the State failed to comply with the requirements of § [383.73\(b\)\(11\)](#), or is otherwise subject to a finding of non-compliance under [part 384](#). If FMCSA determines that a State is not in compliance with the ELDT regulations, the State may be subject to in partial withholding of Federal-aid highway funds, as specified in § 384.401.

If a training provider is determined to be fraudulent, what are the repercussions for the driver, and what are the State's responsibilities? In addition to making a driver ineligible for a skills or knowledge test, would it have an impact on the State's CDL issuance procedures?

Per 49 CFR § [380.723\(c\)\(1\)\(iii\)](#), if a training provider is removed from the Training Provider Registry, any training conducted *after the removal* is not valid. Further, once a training provider is removed from the Registry, they cannot access the Registry to submit driver training certification information.

In instances of fraud or other criminal behavior by a training provider in which driver-trainees have knowingly participated, FMCSA reserves the right, on a case-by-case basis, to retroactively invalidate training conducted under [part 380](#). In such cases, if FMCSA determines the fraudulent activity impacts the validity of a driver's CDL, the Agency will work directly with the SDLA to determine appropriate next steps.

Therefore:

If	Then
A driver completes ELDT <i>before</i> the training provider is removed from the Training Provider Registry...	The State's issuance of the CDL is valid, as long as the State verified completion of the appropriate training before administering the skills test, in accordance with § 383.73(b)(11)
A driver completes ELDT <i>after</i> the training provider is removed from the Training Provider Registry...	The State will not be able to verify that the driver completed ELDT and cannot conduct the skills or knowledge test, therefore no CDL or endorsement will be issued

Training Provider Registry Data

Are States required to store ELDT data received from the Training Provider Registry?

The Training Provider Registry will retain that information. The State is not required to, but nothing prohibits a State from doing so.



How long is the driver training certification information in the Training Provider Registry valid? For example, would an applicant who completed their training three years ago be eligible for a skills or knowledge test?

The driver's ELDT certification information remains valid indefinitely. The ELDT regulations do not establish an expiration date for the driver's ELDT certification information, nor is there a specified time frame in which applicants who have completed ELDT must take the skills or knowledge tests.

Are there any checks and balances against the driver data prior to them uploading to the Training Provider Registry?

FMCSA will not be validating that information submitted by the training provider. The system will validate the data for data entry issues, such as including special characters, and plan on helping providers with CDL entry by giving them tips. The system will prompt them if the format they are entering is not what was expected for that State, but the system will still allow them to submit whatever they enter.

Training providers will also certify that the information they are submitting is accurate and complete; the Training Provider Registry will allow training providers to edit information that has been entered incorrectly due to human error.

How can drivers confirm their ELDT requirements are complete before arriving for their test appointment?

We are planning to offer a feature that allows drivers to enter some identifying information and view/verify their own data in the Training Provider Registry. If the information is incorrect, drivers can contact the training provider to resolve the discrepancy before arriving for their scheduled test.

Note: The State cannot accept this driver check, they will need verify that the ELDT requirements have been met by retrieving data from the Training Provider Registry using their State's IT system before administering the skills or knowledge test.

Retrieving Data from the Training Provider Registry

How can a SDLA determine the best solution for retrieving data from the Training Provider Registry?

This is a case-by-case scenario. It depends on your procedure in your State, and how much of your test scheduling is currently done in CSTIMS. States are encouraged to contact AAMVA and FMCSA's TPR Technical Team to learn more about the options and determine which works best for them. States can also learn more about the "direct to TPR Web Service" option on the TPR website at <https://tpr.fmcsa.dot.gov/DeveloperToolkit>.

What can States expect to see when requesting driver data from the Training Provider Registry?

The TPR Web Service will send a response that will include a "Yes" or "No" for each type of training. It will also include all the details outlined in the [TPR Web Services Development Handbook](#). If using the "direct to TPR Web Service" option, the State's IT group can make use of this data and determine which information to present to the State users. We wanted to make the TPR as flexible as possible for what the States need.



Is there going to be any time when any of the TPR services are going to be charge SDLAs a fee to query data?

There is no charge for States to use the “direct to TPR Web Service” option for retrieving data.

Can you speak more about FMCSA's ability to keep States informed about potential system down times, maintenance windows, etc.?

FMCSA is committed to providing updates and being available. The way the system is going to be structured, down time should be kept to a minimum. It is structured in a way that theoretically there shouldn't be any down time. In the event there is down time, FMCSA would inform users by posting a message on the Training Provider Registry site. Whenever possible, FMCSA will also send email bulletins about planned system maintenance outages (usually scheduled on evenings or weekends).

Stakeholder Outreach

Will FMCSA provide standard language and outreach materials that States can use in communicating the ELDT requirements to drivers or training providers?

Yes. Resources for SDLAs, and their FMCSA Division counterparts, is available on the SLDA Resources page: <https://tpr.fmcsa.dot.gov/Resource/Open/SDLA-resources>.

Is there a preferred link we can put on our State website to point people to info on ELDT Federal side?

Yes, please direct stakeholders to FMCSA's TPR website: <https://tpr.fmcsa.dot.gov/>.

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For more information about the ELDT regulations or the Training Provider Registry:

- Visit the Training Provider Registry website: <https://tpr.fmcsa.dot.gov/>
- Read the public frequently asked questions: <https://tpr.fmcsa.dot.gov/FAQ>
- Contact the TPR Team: <https://tpr.fmcsa.dot.gov/#contact>

For information about connecting to the Training Provider Registry via CSTIMS or ROOSTR, please contact phadwin@aamva.org.