



**MEMO**

**TO:** Licensed/Registered Schools, State Board of Private Licensed Schools  
**FROM:** Nicole Campbell, Chief, Division of Postsecondary Proprietary Training  
**DATE:** May 15, 2025  
**RE:** Private Licensed Schools Policy Memorandum #93 (rev 5.15.2025)

**PROPOSED**  
**Commercial Truck Driving Programs**

This memo revises and replaces Board Policy Memorandum #93, issued on May 18, 2023.

**The State Board of Private Licensed Schools, at the meeting held on May 15, 2025, approved the following policy under the authority of 24 P.S. §6504 (a).**

**The Private Licensed Schools Act (Act) mandates that a school or classes operated for profit or tuition, that provides resident instruction to prepare an individual to pursue an occupation in the skilled trades, industry or business, or systematic instruction by distance education in a field of study, must obtain a license from the State Board of Private Licensed Schools (Board). This includes Commercial Truck Driving Programs and specifically Entry-Level Driver Training (ELDT) Programs.**

**If, at any time, the Board determines that an ELDT Program is advertising, soliciting, collecting fees, or conducting courses or programs to residents of this Commonwealth in exchange for tuition and/or fees, the Federal Motor Carrier Safety Administration (FMCSA) will be notified and the ELDT Program will be required to cease and desist its unlicensed activity until licensure is obtained.**

**New Programs**

In addition to all other State Board of Private Licensed School New Program Application requirements, the items requested on the CDL Program worksheet within the New Program Application must be submitted by schools applying to offer Entry-Level Driver Training (ELDT).

## Board-Approved Programs

Effective March 1, 2022, in addition to all other State Board of Private Licensed School License/Registration Renewal Application requirements, the items requested on the CDL Program worksheet within the License/Registration Renewal Application must be submitted by schools offering Entry-Level Driver Training (ELDT).

### Administration

- The school must demonstrate that it employs qualified personnel with prior experience in commercial truck driver training. The school must have at least one member of administration/personnel with a minimum of 2 years' experience with Entry-Level Driver Training (ELDT) or other involvement in the training of commercial truck drivers and provide a list of all commercial truck driving programs/facilities with which they have been affiliated.
- Provide the name of the qualified staff member who is the Designated Employer Representative and who has received the U.S. Department of Transportation Drug and Alcohol Supervisor Training.
- Provide a signed statement by the owner/director that the school agrees to abide by all applicable US Department of Transportation FMCSA regulations (CDL Owner/Director Attestation).
- Provide the school's FMCSA ELDT Training Provider Registry (TPR) ID number.  
*Note: Newly approved programs will be 'approved pending' to allow the school the opportunity to register their program in the TPR. TPR is then confirmed after the initial approval during the school's licensure/registration renewal.*

Individuals or entities that have not yet received a license to operate a private licensed school should indicate 'private enrollment' on the ELDT TPR. Such individuals and entities may only train their employees free of charge or conduct contract training whereby an employer pays them to train their employees.

### Instructor Qualifications

**Behind-the-wheel (BTW) instructor:** Provides training involving the actual operation of a commercial motor vehicle (CMV) by an entry-level driver on a range or a public road and meets one of these qualifications:

- A copy of a valid, unexpired Commercial Driver's License (CDL) of the same (or higher) class and with all endorsements necessary to operate the commercial motor vehicle for which training is to be provided. *Note: New PA residents with an out-of-state CDL must obtain a PA CDL within 30 days of establishing Pennsylvania residency.*
- Evidence of at least 2 years of experience driving a CMV requiring a CDL of the same (or higher) class and the same endorsements necessary to operate the CMV for which instruction is to be provided.

#### OR

Evidence of at least 2 years of experience as a BTW CMV instructor requiring a CDL of the same (or higher) class and the same endorsements necessary to operate the CMV for which instruction is to be provided.

**Exception:** A BTW instructor who provides training solely on a range which is not a public road is not required to 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, as long as the instructor previously held a CDL of the same (or higher) class and with all endorsements necessary to operate the CMV for which training is to be provided, and complies with the other requirements set forth.

**Note:** If an instructor's CDL has been cancelled, suspended, or revoked due to any of the disqualifying offenses, the instructor is prohibited from engaging in BTW instruction for 2 years following the date his or her CDL is reinstated.

- A copy of a valid and unexpired medical examiner certificate.
- A copy of a full Motor Vehicle Report.
- The date of the most recent DOT drug test.
- Evidence that an FMCSA Drug and Alcohol Clearinghouse query finds the instructor 'Driver Not Prohibited'. *Note: The query must be dated within one month prior to submission.*

**Theory classroom-only instructor (no BTW 'safety sensitive' instruction):** Provides knowledge instruction on the operation of a CMV and meets one of these qualifications:

- A copy of a valid, unexpired CDL of the same (or higher) class and with all endorsements necessary to operate the commercial motor vehicle for which training is to be provided.
- Evidence of at least 2 years of experience driving a CMV requiring a CDL of the same (or higher) class and the same endorsements necessary to operate the CMV for which instruction is to be provided.

#### **OR**

Evidence of at least 2 years of experience as a BTW CMV instructor requiring a CDL of the same (or higher) class and the same endorsements necessary to operate the CMV for which instruction is to be provided.

**Exception:** An instructor is not required to 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, if the instructor previously held a CDL of the same (or higher) class and complies with the other requirements.

**Exception:** Training providers offering online content exclusively are not required to meet State qualification requirements for theory instructors.

**Note:** If an instructor's CDL has been cancelled, suspended, or revoked due to any of the disqualifying offenses, the instructor is prohibited from engaging in theory instruction for 2 years following the date his or her CDL is reinstated.

## **Admission**

- Indicate within the Admission/Enrollment Requirements whether a student must possess a Commercial Learner's Permit upon admission or if this is obtained during the program.
- Provide a copy of the Consumer Protection Policies and Disclosures to include the following:
  - Obtain a signed student attestation agreeing that they will abide by all applicable US Department of Transportation Federal Motor Carrier Safety Regulations, including the FMCSA Drug and Alcohol Clearinghouse.

- List the requirements to obtain the required physical qualification examination and provide the required Medical Examiner's Certificate.
- List the restrictions for students regarding interstate driving for CDL holders under the age of twenty-one.
- Indicate whether the student will be trained using vehicles with automatic and/or manual transmission and list the employment opportunity restrictions for students regarding automatic transmissions (if applicable).
- List any charges for additional hours and how these charges are calculated.
- Obtain a signed student disclosure during the enrollment process, that informs students of the English Language Proficiency requirements applicable to CDL drivers issued by the FMCSA and publish the requirements in the student catalog.

## **Equipment**

- A description of the equipment maintenance program and how it impacts student training.
- A description of each vehicle (i.e., year, make, model, mileage, automatic or manual transmission, synchronized or unsynchronized transmission, airbrake, number of axels, day/sleeper cab, etc.).
- A description of each trailer (i.e., year, make, type, number of axels, length, etc.).
- Proof of ownership or lease agreement for each piece of equipment that includes the owner's/lessor's name and contact information.
- Proof of state-required (tractor/trailer) insurance that includes the insurer's name, address, contact information, policy type, policy number and expiration date.

## **Program**

- Complete the CDL Program bridge worksheet that identifies where in the school's curriculum and policies the individual FMCSA ELDT Training Requirements are offered and how the students' knowledge and skills will be assessed.

## **Facility**

- The classroom and remote facilities/locations must comply with all applicable Federal, State, and/or local statutes and regulations.
- The classroom and remote facilities/locations must be identified, including:
  - Certificate of occupancy or equivalent statement for classroom facilities.
  - Floor plans for classroom facilities, including square footage and indication of the placement of equipment and amenities.
  - Zoning permit or equivalent statement for driving range.
  - Ariel photo or drawing depicting the use of the driving range, including dimensions and safety features. Ranges must be free from obstruction and have adequate sight lines, enabling the driver to maneuver safely and free from interference from other vehicles and hazards.

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If you have questions about the information provided in this memorandum, please email Board staff at [ra-pls@pa.gov](mailto:ra-pls@pa.gov).