



SAFETY DIRECTOR BULLETIN



CDL: MAINTAINING ENTRY LEVEL DRIVER TRAINING (ELDT) TRAINING PROVIDER STATUS

The Federal Motor Carrier Safety Administration (FMCSA) Training Provider Registry (TPR) listing is critical for all entities offering Commercial Driver License (CDL) Entry-Level Driver Training (ELDT) to their employees. Your active status is based on your initial self-certification that you meet all Federal and State requirements. Failure to maintain compliance can lead to the invalidation of all training records and removal from the TPR. To ensure your continued eligibility and avoid enforcement action, your TPR status must be managed in accordance with two key requirements: the mandatory Biennial Update and the active avoidance of the 12-Month Inactivity Notice.

Mandatory Biennial Update: Federal regulation (§ 380.719) requires that you update your registration information at least every two years.

- You must biennially update the Entry-Level Driver Training Provider Registration Form, confirming all information is accurate.
- The update is mandatory even if your information has not changed.
- The system monitors this date from your initial registration. Failure to update will result in a Notice of Proposed Removal from the TPR.
- You must also report any changes to key information (address, phone, training types offered, State licensing status) within 30 days of that change occurring.

The 12-Month Inactivity Notice: The FMCSA actively monitors all listed training locations for activity. Inactivity can trigger a Notice of Proposed Removal from the TPR.

- **Trigger:** A notice is sent to any location that has not submitted driver-trainee completion certifications within a continuous 12-month period.
- **Risk:** If you receive this notice, your TPR listing is at imminent risk of removal. Any training conducted after a formal removal date will be considered invalid.

Resolving a Notice of Proposed Removal

If your training location receives an Inactivity Notice or a Notice of Proposed Removal for any reason, a formal written response to the FMCSA is required within 30 days to contest the removal or state your plan for corrective action.

To address a proposed removal, you must be prepared to submit documentation to prove your current and ongoing compliance:

- **Demonstrate Activity:** Submit a certification for a completed driver-trainee immediately, if possible, to counter the inactivity claim.
- **Verify Self-Certification:** Provide documentation for all eligibility criteria:
 - Current copy of your State-issued license or certification to provide training.
 - Documentation of instructor qualifications (CDLs, experience logs, State certifications).
 - Current curriculum and lesson plans that meet all Federal ELDT requirements.
 - Proof that all vehicles and facilities comply with applicable safety and operational regulations.
 - **Commit to Correction:** State your intent to comply with the regulations and complete all corrective actions specified in the notice no later than 60 days after the notice was issued.