

**Date:** November 2, 2023  
**Bulletin:** Driving School Owners and Operators  
**From:** Business Licensing and Compliance Division  
**RE:** Driver Education Association October 25, 2023, Meeting Overview

Below is a listing of the items discussed in the October 25, 2023, meeting DEAM and MPDEA representatives, one representative of the driver education industry not associated with either association, and MVA representatives. This reflects the topic of discussion and any outcome of that discussion.

#### Agenda Item 1 – **Attendance at the Quarterly Meetings**

- Associations put forth a recommendation to allow 2 – 3 people from each association to attend.
  - *Administration agrees to allowing 2, possibly 3 people from each association. In addition, each association is permitted to have 1 lobbyist attend.*
  - *The Administration will invite 2, possibly 3 members of the driver education industry that are not a member of either association to attend. This invitation will be extended on a rotational basis to those known to the Administration to not be members of either association.*

#### Agenda Item 2 – **Changes to the MVA Website listings of education providers**

- Associations feel that the appearance of the current website listing is inequitable.
  - *The Administration has already submitted the appropriate request (SQR) to make the change suggested by the associations. The Administration will advise monthly on the progress of that correction. Anticipated completion date is unknown.*

#### Agenda Item 3 & 4 – **Status of DE Curriculum update working group and Instructor Training curriculum update working group.**

- *Target date for first meeting is November 15, 2023.*
- *Target Completion date is February or March 2024.*
- *Target date for start of Instructor Training curriculum working group is immediately following completion of the DE curriculum update.*
- *Target for completion of instructor training curriculum update is the end of 2024.*

#### Agenda Item 5 – **Interim Apprenticeship Testing Procedure – changes**

- Discussion on changes
  - *Apprentice test is no longer interim.*

- *Bulletin regarding finalized testing process was distributed last week (10/18/23).*
- *Discussion moved to the difficulty hiring instructors and the impact of criminal history checks.*
  - *Any criminal history that would threaten the public trust is considered cause for denial of a license.*

#### Agenda Item 6 – **Sale or Transfer of Ownership**

- **If allowed, what is the process?**
  - *School assets may be sold or transferred, but the driver school license may not.*
    - *Per COMAR 11.23.01.03C and COMAR 11.23.02.04D neither the license nor the certification may be sold, assigned, or transferred without written approval of the MVA.*
    - *New owner must apply for new license.*
    - *Student files may only be transferred from one owner to another with the expressed written permission of the student or the student’s parent or guardian if the student is a minor.*

#### Agenda Item 7 – **Instructor Licensure and Certification**

- **Split licensure and certification for classroom and BTW.**
  - *Would require regulatory change.*
  - *Would require in-depth training on classroom curriculum content.*
  - *Would require comprehensive testing method for classroom curriculum, need to ensure knowledge for the classroom portion is proficient to consider split licensure.*

#### Agenda Item 8 – **Monthly and Annual Reports**

- **Inquiry into possibility of linking BTW tracking form and annual report to have one populate the other.**
  - *Would require programming change to put BTW tracking report into e-services portal and create the link*
  - *Feasibility unknown at this time.*

#### Agenda Item 9 – **BTW Backlog**

- **Seeking recommendations to reduce backlog**
  - *Only two ways to reduce backlog*
    - *Increase number of BTW lessons*
    - *Decrease enrollments*

#### Agenda Item 10 – **School Vehicle Requirements**

- **Can an extension be granted due to supply chain issue secondary to autoworker strike.**
  - *Recommendation forwarded to senior management for decision*
  - *Will notify when decision is made.*

#### Agenda Item 11 – **Owner “Conference” procedures**

- **Meeting with schools individually versus town hall meetings**
  - *Town Hall meetings for training purposes only*

- *Individual conferences for individual school concerns*
- **School Policy Concerns**
  - *If policy violates regulation, correction is required*
  - *If policy constitutes questionable or unfair business practice, but is not a violation of regulations, issue will be discussed, and alternatives suggested.*

**Agenda Item 12 – COMAR Changes**

- Number of classes a student can miss and continue
  - *No change being considered at this time*
- Skills Test scheduling requirements. Require completion of DE prior to scheduling skills test.
  - *Would require programming change.*

**Agenda Item 13 – Clarification of the Digital Driver’s License**

- Can a digital learner’s permit be accepted.
  - *Digital driver’s licenses cannot be presented to law enforcement in lieu of the actual license.*
  - *Must have physical driver’s license in possession to operate a motor vehicle.*

**Agenda Item 14 – Compliance Inspector Duties**

- *Notify Administration if issues arise*
- *In general, their role is to assure regulatory compliance as it relates to any business licensed or certified by the Business Licensing and Compliance Division.*

**Additional information:**

- New apprentice 25 question test
  - *Has been updated in the law room*
  - *Content limited to COMAR and the driver’s manual*
  - *Knowledge test administered in the law room only*
- BTW current standings – 18-week status – statewide average is 16 weeks

<b>18 Week Report</b>	
<b>Category</b>	<b># of Schools</b>
Total # of Schools	151
Total Reporting	107
18 weeks or less	75
19 - 30 weeks	19
31 - 50 weeks	10
over 50 weeks	3
Highest # of weeks	98
Lowest # of weeks	1