

Date: October 30, 2024
Bulletin: All Driving School Owners and Operators
From: Business Licensing and Compliance Division
RE: Driver Education Program, 18-Week Compliance Status

PURPOSE

As you are aware, all driver education schools are required to provide behind the wheel training within 18-weeks consistent with COMAR 11.23.02.34, unless an accommodation by the student is requested. MVA has been actively working to ensure more timely compliance and reporting of data related to this issue to ensure that our customers are receiving the timely training they are owed.

OVERVIEW OF MVA'S 18-WEEK COMPLIANCE PROGRAM

Starting May 1, 2024, MVA implemented a new, online way to report behind-the-wheel (BTW) data for driving schools. For the first time, we asked schools to report separately the BTW hours owed to students enrolled in their driver education program and the BTW hours owed to those not enrolled in their school's program (for example, students who transferred to another school for the BTW portion of the program and students who purchased additional hours outside of the program). The BTW hours owed to enrolled students will ultimately be used to calculate compliance with the 18-week requirement, while the combined total of BTW hours owed provides insight into each school's BTW training capacity.

Once we implemented the reporting tool, we quickly saw a significant increase in the number of schools reporting BTW data. Now, all schools have submitted the data for May – August 2024.

To determine the total BTW hours each school owes, we added each school's total BTW hours owed as of April 30, 2024, to the total BTW hours owed data submitted after May 1, 2024, and converted the total number of hours owed into weeks owed. We are reviewing the data, identifying any possible data entry errors (for example, an obviously incorrect number of students starting the program), and meeting with schools reporting more than 18 weeks of BTW owed. If the school is not in compliance after correcting any data entry errors, we require a corrective action plan detailing how they will meet this requirement.

The reporting tool also identifies data anomalies. For example, a school reporting more BTW hours owed to individuals who are not enrolled in the school's program than hours owed to individuals enrolled in the program will be flagged. We also plan to notify schools with data anomalies, starting with schools that are not in compliance with the 18-week requirement.

We also formalized our process to notify schools of missing reports and assess fines for failing to report BTW data. Each school must submit BTW data by the 10th day of the next month. If we do not receive the prior month's data by the 15th day of the next month, we send a warning notice and request the prior month's data. If we do not receive the missing data by the 10th day the following month, we issue an administrative fine and

request the data again. A school that does not pay the fine will be referred to the State's Central Collection Unit for collection of the administrative fee and service charges.

BTW DATA

This data is based on the aggregated data received from driving schools as of October 29, 2024.

Total BTW Hours Owed

This table shows the number of schools reporting and the number of schools in each week range. The total number of BTW hours owed includes hours owed to students enrolled in schools' driver education programs and hours owed to students not enrolled in schools' programs. This table includes BTW hours owed prior to May 1, 2024.

Total BTW Hours Owed*	
Category	# of Schools
Total # of Schools	137
Number of Schools Reporting Data	136*
18 weeks or less	89
19 - 30 weeks	28
31 - 50 weeks	12
over 50 weeks	7

* The one school that is not reporting has not yet provided any classes. Their first report is due November 10, 2024.

BTW Hours Owed to Students Enrolled in Driver Education Program

Starting May 1, 2024, schools began reporting hours owed to students enrolled in schools' driver education programs separate from their total BTW hours owed. This table below shows the number of schools reporting and the number of schools by week range. It does not include BTW hours owed before May 1, 2024, because we did not collect this specific data before May 1, 2024.

18-Week BTW Hours Owed	
Category	# of Schools
Total # of Schools	137
Number of Schools Reporting Data	136*
18 weeks or less	127
19 – 30 weeks	5
31 – 50 weeks	2
over 50 weeks	2

* The one school hat is not reporting has not yet provided any classes. Their first report is due November 10, 2024.

NEXT STEPS

We appreciate the industry embracing this new reporting mechanism and patience as we make adjustments to improve the reporting process.

As explained above, we are currently using the total BTW hours owed to determine compliance with the 18-week requirement. As we collect more data on the BTW hours owed to students enrolled in the schools' driver

education programs, we will transition to using only this data to determine compliance. In the meantime, however, we will review and report both data sets.

We recognize the impact on our customers if the 18-week compliance deadline is not met and ask for your continued cooperation on this issue. In the near future, we will be activating reporting solution within your business portal in Customer Connect. This will provide additional security and efficiencies not currently available in the current online reporting process. Before we transition from the current online reporting processing to Customer Connect, we will provide instructions and training.

If you have any questions, please contact us at 410-787-2952 or mvabldisd@mdot.maryland.gov.