

**Date:** June 13, 2025  
**Bulletin:** All Driver Education School Owners, Operators, and Instructors  
**From:** Business Licensing and Compliance Division  
**RE:** Driver Education Industry Representatives 5/27/25 Meeting Minutes

### **PURPOSE**

To provide feedback to the industry regarding the agenda items presented by the participants in this meeting.

### **ATTENDANCE**

DEAM – Kelly Sisk, John Wright  
MPDEA – April Jackson, David Resnick  
NON-ASSOCIATION – Sasheen Maples, Andrea Smeltzer  
MVA – Kristin Orlando-Dillahunt, Timothy Batts, William Kraft

### **DEAM AGENDA:**

#### **1. MVA Windshield Stickers for New or Repaired Vehicles**

- a. In situations where a driving school training vehicle is new or has had its windshield replaced - and the MVA is out of stock of the required windshield stickers - what interim solution is available, given that the vehicle cannot be used for a skills test without the sticker?
  - i. Presence or absence of window sticker should not impact ability to test. If these issues are encountered, please contact our office as soon as possible.
  - ii. New stickers are on order and as soon as they are completed, we will notify the industry.
- b. What are the reasons behind the MVA running out of these stickers? Are the shortages related to funding, vendor issues, or logistical delays?
  - i. There is no specific reason, we simply ran out in the normal course of business. New stickers are on order, but this is special stock and takes time to produce. These are only produced every 4 or 5 years.
- c. Would the MVA consider the use of reusable placards or other alternatives to the windshield sticker to prevent disruptions in training and testing?
  - i. The absence of a window sticker should not cause any disruption in the use of the training vehicle
  - ii. Notify our office if this occurs
  - iii. Alternatives will be considered
  - iv. This has not come up as an issue before. If schools experience these issues, please let us know and we take appropriate action to resolve. Issues experienced at the branches should be reported to our office as quickly as possible.

#### **2. Compliance Inspector Ride-Alongs and Liability**

- a. Does the MVA provide any form of insurance coverage - such as workers' compensation or liability protection - for its compliance inspectors when they ride with a student and instructor for observation? In the event of an accident or if the inspector is injured (or worse), who would be held liable, especially given that some policies only cover the instructor and student?
  - i. MVA staff are on duty, in the normal course of their duties, and covered by state insurance as all employees are.
- b. What actions should an instructor take if a parent of a student objects to the presence of an inspector in the vehicle during the lesson?
  - i. Reach out to us so we can discuss on a case-by-case basis that way we can document and track to see if there are trends with a specific school, instructor, etc.
  - ii. There is no need to cancel the session, however you must report the incident to our office as soon as possible so that we may interact with the parent.
- c. How frequently do these ride-a-longs occur across licensed schools, under what circumstances or criteria are they being initiated, and what is the primary purpose or scope of the inspector's presence during these sessions?
  - i. Observations of both classroom instruction and BTW are in the normal course of the enforcement of regulations
  - ii. These are unannounced per COMAR
  - iii. There is no set frequency or schedule
  - iv. Inspectors may be coming to the office for multiple reasons not just a ride-along. They might inspect the office, paperwork, operating hours, etc.
  - v. Random, unannounced classroom and behind the wheel observations are empowered by regulations.

### **3. HB 463 Implementation (Changes to 3-Hour ADEP to Roadway Safety Driving Education Program) – Clarification, Timeline, and Industry Readiness**

- a. Does the October 1, 2025, effective date of {Governor Signed} HB 463 require full implementation of the revised curriculum by that date, or does it simply authorize the MVA to begin development at that time?
  - i. October 1, 2025, is the “go live” date.
  - ii. Program is written and under review for plain language now
- b. When can providers expect clear, actionable guidance from the MVA regarding curriculum specifications, training requirements, and overall implementation procedures?
  - i. There will be multiple training sessions offered virtually, as needed.
  - ii. The content is generally a combination of the Driver Improvement Program (DIP) curriculum and 3 Hr Alcohol and Drug Education Program (3HRADEP) curriculum. As a result, providers and instructors will be familiar with the content.
  - iii. MVA's customer engagement team is reviewing the draft curriculum for plain language and is expected to complete its review by the end of June. This timeline will give the schools time to train and become prepared with the curriculum.
- c. What is the anticipated timeline for schools to rewrite, recertify, and distribute the updated 3-Hour program content, including availability of translated versions?
  - i. Plain Language Review is anticipated to be completed by 6/30/25. Once completed, we plan on distributing the updated curriculum to the industry.
  - ii. There will be a minimum of 8 training sessions, and this program goes live in the field on October 1<sup>st</sup>.
- d. What instructor training requirements will be associated with the revised program, and how will scheduling for that training be handled?
  - i. A minimum of 8 virtual training sessions are planned.
  - ii. Does the MVA plan to use the same program for DIP and 3hour.

1. The DIP and 3HRADEP are not the same program. While we did include information from the DIP program in the curriculum required by HB 463, they are not identical.
- iii. Will a final test be required? Right now, a test is not required to pass, COMAR may need to be updated.
  1. COMAR does outline an end of program test. We will review to see if the verbiage needs more clarification to specify a passing score.
- e. Can the MVA provide background on the legislative origin of HB 463, including why the survey was conducted and whether a specific request(s) from the industry (or other stakeholders) was made to make these changes?
  - i. The bill was supported by the Administration
  - ii. The need for these enhancements has been discussed for many years, the limitations of the existing program and the need for a better program that included more rules for the road.
  - iii. We anticipate that 3-hour certificates will eventually be paperless. MPDEA prefers the electronic process but only if the student already has an MDID. It is tougher for them to provide the required documentation to get the MDID. Another participant stated that in her opinion it is easy because she requests for the information from the student before taking the class.
  - iv. Business Licensing will speak to Field Operations to get their process for customers without an MDID and whether we can issue the customer an MDID during the initial transaction.
- f. Does COMAR need to be updated to reflect the changes? If so, how will this affect the timeline for implementation?
  - i. The new program still meets the requirements of COMAR. Content was limited by statute, and that has been changed.

#### **4. Status Update and Rollout Timeline for Revised Driver Education Curriculum**

- a. Has a working group been established for this review, and will there be opportunities for input from associations and other industry stakeholders?
  - i. The new curriculum was developed by members of both associations, as well as non-association members. They are the working group.
  - ii. All 10 units are now under review for plain language but 3hour has taken priority because of new legislation. MVA's Organizational Development and State Highway Safety Office teams will also review the curriculum.
- b. What is the current anticipated rollout date for the revised driver education curriculum, given the initial projection of mid-to-late February 2025?
  - i. The rollout has had a slight delay by the need to create and ensure we have the new program required by HB 463 ready to be implemented by 10/1/25. The initial phase of creating the new curriculum has been completed and now up for plain language review.
  - ii. Will additional trainings occur?
    1. Yes, we will conduct 8 training sessions
  - iii. What are the major changes to the curriculum?
    1. An overview of the major topics and updates/changes to the program was provided. This was done as a group with multiple people providing feedback and input.
  - iv. Is the MVA willing to pilot the program.
    1. Most of the group spoke up and sounded like they would be in favor of having a pilot program in order to provide feedback in the actual use of the new curriculum.
    2. We will discuss this request.

- c. What is the status of the plain language review and translation process for the updated curriculum?
  - i. The curriculum has been submitted to the group for the plain language review. The 3 Hour Roadway Safety Driving Education (3HrRSDE) program will be completed concurrently but the Drivers education curriculum will take more time due to the length of the program compared to the 3HrRSDE. No completion date is available at this time.
    - 1. It is under review, but the main focus right now is the 3hour program.
- d. Will a professional third party be involved in the final review of the curriculum, as previously requested by the Associations?
  - i. The curriculum will be reviewed by a specialist within our Organizational Development Division.
  - ii. This group is who trains the MVA employees so they will be reviewing and making suggestions. After that it will be translated to Spanish.
- e. How and when will schools receive access to the updated curriculum materials?
  - i. The new curriculum will be distributed via the same secure server as the existing curriculum
    - 1. MVA will provide training sessions sufficient to reach the entire industry. MVA will consider the request for a pilot program.
- f. Are there any training sessions or instructional guidance planned for instructors to prepare for the transition to the revised curriculum?
  - i. There will be numerous training sessions conducted for all instructors. These will be conducted virtually.
  - ii. The current plan is to provide a minimum of 8 training sessions.

## **5. Review of the Proposed/Pending Behind-the-Wheel (BTW) Data Reporting Process (in the Business Portal)**

- a. Ongoing concerns from schools regarding the accuracy, timing, and workload associated with the proposed/pending daily BTW data submission to occur in the business portal.
  - i. Has the Administration considered the operational and staffing burdens that the daily data entry (of every service item, i.e. every classroom attendance day, every btw session, etc.) imposes on schools, and are accommodations being explored?
    - 1. These issues have been closely coordinated with senior management and alternatives are being explored. This is an ongoing conversation, and we will keep you advised as any further decisions are made.
    - 2. We are considering sending out a quarterly update to the schools so that they can see where they stand with the report. Long term goal is still to give the schools access to real time data, but this will require additional software development.
  - ii. What sort of data will be provided? They would like to know what sort of data to track and monitor/report to ensure what we are providing will assist in their review of their data entry.
    - 1. We will provide an update quarterly to include the previous 3 months of daily data entry in a spreadsheet along with each school's current standings in both BTW Specific - this is the data that defines the hours owed specifically for the drivers education program that we began collecting in May 2024 with this new data collection system - and Total hours of BTW- to include the total amount of hours owed prior to May 2024 to current.
    - 2. Quarterly update via a bulletin for the industry as a whole.
- b. Is the Administration open to considering alternative reporting frequencies (such as weekly or monthly) to reduce errors, improve efficiency, and ease the administrative burden on schools?
  - i. Numerous other options are being explored at this time. There is no imminent rollout planned.

- ii. One participant stated that this is very time-consuming for the schools, and it seems like if the effort is not worth it then would the MVA be open to not collecting this anymore. It was explained that this is a lot of work and data collection for our teams as well and that this report is used as a trigger to continue further investigations/audits to determine whether or not a school is in compliance with regulatory requirements. MVA representatives explained the difference between the two separate reports because one of them filters out the hours that are extra hours versus actual BTW hours for drivers' education.
- c. Can the MVA clarify the enforcement timelines, reporting expectations, and follow-up protocols associated with the daily BTW submission requirement?
  - i. Other options are being explored.
  - ii. We can see time stamp on the data so we will review and can see when the data was actually submitted. First you get a reminder, then a warning letter. If there is an error or a mistake, contact us and we can review the data entries.
  - iii. There could be an IT issue with the data coming over to our system. If you receive a letter and you think it was an error, please contact us and we can review.
  - iv. It has been a while since MVA issued a fine for someone not submitting data. MVA is consistently receiving data from all active driving schools. Participants were advised that the data collection alone is not sufficient to warrant the imposition of administrative sanctions, but instead it prompts the conducting of extensive audits. Those audits have generated administrative sanctions.
  - v. A participant voiced concern about the system tracking or making note if a letter was sent in error how would the system make note of that.
  - vi. Participants wanted to make sure that the new process is still on hold in the portal- Kristin stated that we are speaking with the executive team about the industry concerns and we are having internal discussions about the program.
  - vii. We are still reviewing data transfer systems and other possible ways of getting this data and we understand that some schools do not currently use an electronic system.

## **6. Behind-the-Wheel (BTW) Historical Data Access**

- a. When will historical behind-the-wheel data - originally displayed in the previous tracking spreadsheet and promised for restoration after May 2024 - be made available and viewable in the 'current' {online form} tracking system for driving schools?
  - i. We do not have an update as to when this data will be available, we are continuing to monitor and discuss opportunities to enhance our current process and explore other feasible ideas.
  - ii. Discussed with items in #5
- b. How is the MVA addressing discrepancies in compliance notifications - such as instances where certified letters are issued for non-reporting despite existing data submissions by schools?
  - i. All discrepancies are fully investigated and resolved.

## **7. Review of Instructor Training and Apprentice Instructor Program**

- a. Update on the planned 2025 review of the instructor training process.
  - i. Has a working group been established for this review, and will there be opportunities for input from associations and other industry stakeholders?
  - ii. Just as with the curriculum working group, this group will be comprised of Advanced Instructor trainers from both associations, as well as Advanced Instructor Trainers that are non-association members.
  - iii. This will be reviewed but it will be after the 3hour and the driver education program curriculum.
- b. What is the projected timeline for the implementation of any proposed revisions to the instructor training or certification process?

- i. We do not have a timeline yet as this project has not begun. We will be able to give a better timeline once we are able to start this project.
  - ii. We are reviewing but no timeline right now.
- c. What is the scope, objective, and anticipated outcome of the planned 2025 review of the instructor training process, including the Apprentice Instructor certification pathway?
  - i. These are not yet established, will be able to give a more descriptive view of what the plans are once we have started this project and met with the group that will be assisting with completion.
  - ii. This will be a working group with the industry to create a more streamlined method of training/teaching
- d. Are specific changes being considered - such as allowing more flexibility in the testing sequence (e.g., permitting progression despite a failed knowledge test) or revising evaluation standards to improve consistency across training programs?
  - i. All suggestions/recommendations are considered.
  - ii. We are open to different ways of providing this training
- e. How does the MVA plan to address the current challenges schools and training providers are facing with the instructor training and apprentice certification process?
  - i. That is what the instructor development project will determine.
  - ii. A participant mentioned that it is a problem that people are getting the apprentice permit but only for a short time period to get through the busy season and then those people do not actually continue the process to become a licensed instructor.
  - iii. The group seemed to believe that having the split license option will help with having more licensed instructors.
- f. What steps are being taken to improve communication transparency and ensure alignment between MVA leadership and the Associations throughout this review?
  - i. The industry will be involved in this process just as they were for the driver's education curriculum re-write. There will be ongoing discussions, and all feedback will be taken into consideration. This is being created and developed by the industry

## **MPDEA AGENDA:**

### **1. Compliance Inspection Challenge**

- a. Please elaborate on any inspection challenges you may have had or need us to address.
- b. It was stated that inspectors are not on the same page with each other. One of them told the school to make changes to the refund policy but then the next inspector had a different viewpoint on the refund policy.
- c. Inspectors are coached bi-weekly on various topics, to include refund policy requirements.

### **2. School Fees & Refund Policy**

- a. Fees are not set by the Administration.
- b. Fee schedules and refund policies must be consistent with each other.
- c. A participant asked if a school can show how/why the cost is higher than they can justify different refund amounts. We confirmed that yes, if they can justify the difference in costs then it is acceptable.
- d. A participant asked about the timeframe for updated COMAR- We do not have a timeframe, but we are working on it with the executive team.

### **3. Behind the wheel instruction (remedial training vs private lessons)**

- a. Remedial training hours are an extension of the driver education program and are empowered in COMAR 11.23.02.08A(10).
- b. A participant asked about doing private lessons. We explained that you are allowed to do additional/remedial training for driver education students needing additional instruction, but “practice” driving is not part of the driver education program. Practice driving falls under the

- graduated licensing system Yes, schools can provide this, but they need to provide a written/documented and structured program that we approve as the MVA.
- c. One participant was asked if they are providing private lessons, and if so, how is it being documented and tracked. If they are charging a fee, then it is using their business license, and we have to document and hold that in compliance as the MVA.
  - d. Participants related the fact that some schools are tricking students into needing more private lessons in order to complete BTW. But the program has to be documented and approved
  - e. A participant suggested that we send out communication as a bulletin explaining the process private lesson process so that everyone understands the information from the MVA directly.
  - f. It was reported that students come to schools saying other schools denied them access to start BTW until they have at least 20 hours of driving. This was offered as an example. This requirement is prohibited by the Administration as it is not a requisite of the driver education program.
  - g. Practice hours are part of the GLS, but not part of driver education. To provide “practice” hours, the school would have to have a program approved under COMAR 11.23.01.05. No school has applied for approval.
4. **Schools training students simultaneously (2 students in the car each driving for 1 hour)**
- a. There is no regulatory prohibition against this, however, a start and stop time must be recorded for each student and the parent must be made aware that one hour of their student’s time will not count as training.
    - i. Observation does not count as part of the 6 hours of BTW required.
    - ii. School must document the exact time that each student started behind the wheel and when they stopped. Only the student actually behind the wheel receives credit. They don’t both get credit.
5. **Skills testing (hitting cones, white lines, yellow lines, stopping on stop lines, etc.)**
- a. This does not come under Business Licensing and Compliance. If you would like to email over your questions, we can reach out to Drivers Services to assist you with this response.
  - b. Need to speak with Field Operations or Drivers Services. We asked if there are specific branches. Participants stated that it is all branches.
  - c. A participant said she had seen someone hit a cone but did not fail the test.
6. **Apprentice testing process (all phases conducted at the school- school that is employing the apprentice complete the testing process in place of the administration)**
- a. This presents a conflict of interest and is not being considered at this time.
  - b. A participant asked for all phases of the test to be at the school.
  - c. The next division project is restructuring the instructor training process, including the apprentice process. Just as with the curriculum project, this will a joint project with the industry.
7. **Updated Version of the Driver Education Association Data Request Report (see attachment)**
- a. The systems supporting this report were discontinued with the advent of Customer Connect. To request this report would require a PIA request.
  - b. A participant stated that they would like us to put some information from the old report in our current reporting to include the apprentice instructor pass/fail rates.

If you have any questions, please contact us at 410-787-2952 or [mvabldisd@mdot.maryland.gov](mailto:mvabldisd@mdot.maryland.gov).