

Effective: February 7, 2022

New Information

On and after February 7, 2022, Federal Regulations require a commercial driver license (CDL) applicant, including those participating in the Employer Testing Program (ETP), to provide proof of entry level driver training (ELDT) prior to the administration of a CDL skills test. Those applicants include:

- An original CDL (Class A or B)
- Upgrading an existing Class B CDL to a Class A CDL
- Adding a school bus (S) or a passenger (P) endorsement

California CDL Applicant Requirements

In addition to the federal requirements, state law requires California residents applying for an original CDL (Class A or B) **to** complete:

- A minimum of 15 hours of behind-the-wheel training and submit a *California Commercial Driver Behind The Wheel Training Certification* (DL 1236). See Attachment A for a sample of the DL 1236.
 - The Department of Motor Vehicles (DMV) field offices will provide applicants a blank DL 1236 with each California commercial learner's permit (CLP).

To avoid delaying the issuance of a CDL, the completed DL 1236 must be uploaded to DMV's Virtual Field Office (VFO) website at least 24 hours prior to the customer visiting the field office and submitting a Certificate of Driving Skill (DL 170 ETP).

An applicant should follow the steps below:

1. Go to the VFO website at: <https://Virtual.dmv.ca.gov>
2. Select the link entitled "Submit your California Commercial Driver Behind The Wheel Training Certification (DL 1236) form" and follow the prompts to upload the DL 1236.
3. Bring the completed DL 1236 when visiting a CDL field office when finalizing their CDL application.

Training Provider Requirements

Providers must register with the Federal Motor Carrier Safety Administration (FMCSA) via the Training Provider Registry (TPR). CDL applicants **must** complete ELDT from a TPR provider to take the required CDL skills or knowledge tests.

ETPs that provide training **must** register as a training provider. ETPs that use a third-party training provider must ensure the provider is listed on the TPR. For more information go to: <https://tpr.fmcsa.dot.gov/Provider>.

Who Is Required to Complete ELDT?

The chart below determines if a CDL applicant is required to complete ELDT.

<i>If an applicant</i>	<i>Then the applicant</i>
Holds a valid CLP issued before February 7, 2022.	<ul style="list-style-type: none">Is not required to complete ELDT, if the applicant obtains a CDL before the CLP expires. However, if the CLP expires before the CDL is issued the applicant must complete the required ELDT.
Was issued a CDL or added an S or P endorsement before February 7, 2022.	<ul style="list-style-type: none">Is exempt and not required to complete ELDT for the previously issued CDL or endorsement, even if expired.
Obtains a CLP on or after February 7, 2022.	<ul style="list-style-type: none">Must complete the required ELDT.
Held a CDL prior to February 7, 2022 and applies for an upgrade to a higher class of CDL or adds an S or P endorsement for the first time .	<ul style="list-style-type: none">Must complete the required ELDT for the class of CDL to which the applicant is upgrading or the endorsements for which the applicant is applying.

Frequently Asked Questions

Below you will find answers to the most frequently asked questions regarding ELDT for applicants and training providers:

Q1. What is ELDT?

A1. Entry Level Driver Training is baseline classroom and/or behind-the-wheel training requirements for individuals who on or after February 7, 2022, are:

- Obtaining a Class A or Class B CDL for the first time;
- Upgrading an existing Class B CDL to a Class A CDL; or,
- Obtaining a school bus (S), passenger (P), or hazardous materials (H) endorsement for the first time.

Q2. Why is DMV implementing ELDT?

A2. Federal law, Title 49, Code of Federal Regulations (CFR) §383.73, requires DMV to electronically verify CDL applicants have successfully completed ELDT before administering a skills test, or before administering a hazardous materials knowledge test.

Q3. Does California have specific or additional ELDT requirements for CDL applicants?

A3. Yes. Pursuant to California Vehicle Code §15250.1(b), California Class A or B CDL applicants are required to complete 15-hour behind-the-wheel training.

Q4. How does a CDL applicant comply with the California specific training requirements?

A4. Submit a completed *California Commercial Driver Behind The Wheel Training Certification* (DL 1236) to a field office prior to the issuance of the CDL. Section 2 of the DL 1236 must be completed by a certified training provider.

Q5. Can a California CDL applicant complete ELDT in another state?

A5. Yes.

Q6. If an applicant receives a CLP prior to February 7, 2022, will they be required to take the ELDT training?

A6. No. CDL applicants are not required to complete ELDT if they have a valid CLP that was issued before February 7, 2022, as long as the applicant obtains their CDL before their CLP expires. However, ELDT is required if these applicants upgrade to a higher class (i.e. Class B to Class A) or add a passenger, school bus, or hazardous materials endorsement after February 7, 2022.

Q7. How do I register to be a training provider under the new ELDT requirements?

A7. For training provider information, visit the FMCSA website at: <https://tpr.fmcsa.dot.gov>.

Q8. Will a driver whose CDL has been expired, be required to complete ELDT?

A8. No as long as they can provide proof they previously held a CDL of same class.

Q9. Will there be an exception or grace period if an applicant has not completed ELDT on or after February 7, 2022?

A9. At this time there is no exception or grace period.

Q10. What elements must be included in the [ELDT training curriculum](#) for a California applicant?

A10. A combination of Theory and Behind-the-Wheel (BTW) Training.

Theory:

- Lectures, demonstrations (computer based, online learning, etc).
- May use a simulator\.
- No minimum number of hours; must score at least 80% on assessment.
- Training topics include:
 - Basic Operation.
 - Safe Operating Procedures.
 - Advanced Operation Procedures.
 - Vehicle Systems and Reporting Malfunctions.
 - Non-Driving Activities (e.g., Hours of Service).

BTW:

- Minimum of 15 hours (10 of those hours must be on a public road).
- Actual operation of a CMV.
- Takes place on a range or public road.
- May not use a simulator to meet requirements.
- Basic vehicle control skills and mastery of basic maneuver.

Q11. Can a CDL applicant schedule an appointment to take a CDL skills test or hazardous materials knowledge test prior to completing ELDT?

A11. Yes. However, applicants must complete ELDT prior to the scheduled appointment date.

Q12. How will a CDL applicant submit their DL 1236 to DMV?

A12. Applicants will submit their DL 1236 form through DMV's Virtual Field Office (VFO) portal. Detailed instructions regarding the VFO submission process and a link to the electronic DL 1236 will be given to applicants at the time they receive their CLP.

Background

Federal Motor Carrier Safety Regulations (FMCSR) requires DMV to electronically verify CDL applicants have successfully completed ELDT before administering a skills test, and before administering a hazardous materials endorsement knowledge test.

California Vehicle Code requires the course of instruction for entry-level drivers to require an applicant for a Class A or B CDL to complete a minimum of 15 hours of behind-the-wheel training.

References

FMCSR, Title 49 §§383.73, 380.603 and 380.703

California Vehicle Code §15250.1(b)

California Code of Regulation §26.03

Contact

Questions regarding this memo may be directed to Commercial Licensing Policy (916) 657-6550.

Attachment A



**CALIFORNIA COMMERCIAL DRIVER
BEHIND THE WHEEL TRAINING CERTIFICATION**

A person applying for their first Class A or first Class B commercial driver license must submit this completed form to the Department of Motor Vehicles prior to being issued a commercial driver license. California Vehicle Code (CVC) §15250.1 requires a minimum of 15 hours of behind the wheel training, at least 10 of which shall be on a public road. Every 50 minutes of driving time is deemed an hour training.

SECTION 1 — APPLICANT INFORMATION

TRUE FULL NAME (LAST, FIRST, MIDDLE, SUFFIX)	DRIVER LICENSE NUMBER	CLASS OF LICENSE APPLIED FOR	
ADDRESS		DATE OF BIRTH (MM/DD/YYYY)	
CITY	STATE	ZIP CODE	

SECTION 2 — BEHIND THE WHEEL TRAINING LOG (CVC §15250.1)

Training Date	Class License (A or B)	Training Hours (Public Property)	Training Hours (Private Property)	Training Hours Total	Instructor's Printed Full Name and Address (Street, City, State, Zip Code)	Instructor's Commercial Driver License Number and State of Issuance
Example: 06/05/2020	A	0.0	0.0	0.0	John Doe, 123 Main St., Anytown, CA 99999	A1234567 / CA
		TOTAL (PUBLIC)	TOTAL (PRIVATE)	TOTAL HOURS		

SECTION 3 — CERTIFICATION

I certify (or declare) under penalty of perjury under the laws of the State of California that the foregoing is true and correct. I further certify (or declare) under penalty of perjury that I have met the behind-the-wheel training requirements of CVC §15250.1.

APPLICANT'S SIGNATURE X	DATE
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