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Thank You for Joining Us!

- This webcast will cover ...
 - A regulatory overview
 - Best practices in compliance
 - A case study in implementation
 - Question & Answer session
- You will be muted during the event.
- Please use the Q&A feature to send in questions. We'll try to answer them during the Q&A period if they are not covered in the presentation.
- The slides and recording will be posted within 7 days at:
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Meet Your Speakers




Gary Petty
President & CEO
National Private Truck Council



Tom Moore, CTP
Executive Vice President
National Private Truck Council



Tom Bray
Industry Business Advisor
J. J. Keller & Associates, Inc.



Edwin Reardon, CTP
Sr. GM Safety and Compliance
CF Logistics, LLC

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Training Regulations

Tom Bray

J. J. Keller & Associates, Inc.




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Training Requirements in the Regulations

- Required
 - ELDT – Part 380 of FMCSA regulations
 - Hazardous materials Parts 172 and 177 of HMRs
- Implied
 - Part 390 – Driver shall be instructed regarding all applicable regulations
 - Part 391 – By virtue of training and experience
 - Part 393 and 396 – Employees must be knowledgeable of and comply with the requirements



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ELDT

- Basic requirement:
 - Driver cannot take CDL Class A, Class B, Passenger, School Bus, or Hazardous Materials test unless the driver has complete required theory and behind the wheel training through an entities on FMCSA's Training Provider Registry
 - No completion paperwork in file with FMCSA, no test
 - States are required to verify before testing



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Key Point

- ANY entity can be on the TPR
 - Schools
 - Carriers
 - Private companies



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To be on the TPR Curriculum

- Use curriculum matching the requirements in Part 380
 - Class A – Appendix A
 - Class B – Appendix B
 - Passenger Endorsement – Appendix C
 - School Bus Endorsement – Appendix D
 - Hazardous Materials Endorsement – Appendix E



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To be on the TPR - Instructors

- Use instructor meeting the definition of an instructor in §380.605
 - Theory: Two years of experience and currently or previously licensed for that type of vehicle
 - BTW Range: Two years of experience and currently or previously licensed for that type of vehicle
 - BTW Road: Two years of experience and currently licensed for that type of vehicle
- Meets and applicable state licensing/certification requirements



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To be on the TPR - Facilities

- Must meet all applicable Federal, State, and/or local statutes and regulations (§380.709)



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To be on the TPR - Vehicles

- All vehicles must (§380.711):
 - Comply with applicable Federal and State safety requirements
 - Be in the same group and type that driver-trainees intend to operate for their CDL skills test



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No Time Requirement – Pass and Proficiency

- To pass the training, the learner must:
 - Pass testing on the required theory topics with a score of 80 percent or more
 - 30 topics (Class A)
 - Prove proficiency to the instructor in the required skills
 - Proficiency – can repeatedly perform the skill as required
 - 7 Range skills
 - 12 Road skills



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Must be on the TPR

- Complete application
- Self-certify
- Input completion information within 2 days
 - Completion of theory
 - Completion of BTW
- TPR entity must maintain records of training
 - Curriculum and materials used in training
 - Instructor qualifications
 - Certification of compliance from learner
 - Copy of learner's CLP/CDL
 - Learner's performance and assessment records



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State Requirements

- FMCSA's rules do NOT preempt state laws/regulations
 - Must comply with both if state has laws/regulations covering your type of training operation



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Old to New Carrier Requirements

- Driver hired prior to February 7, 2022
 - Driver must have completed 4-point ELDT training
 - DQ
 - HOS/fatigue
 - Health and wellness
 - Whistleblower protections
 - Carrier must have ELDT certificate on file
- Driver hired after February 7, 2022
 - No carrier requirements unless you want to do ELDT
 - Hiring drivers with a CDL = hiring drivers that have had ELDT



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FREE WHITEPAPER... ASK HOW J. J. KELLER CAN HELP!

Comply with the New Entry-Level Driver Training Rule

J. J. Keller Makes It Easy!

Our services include:

- Certified Drivers Training Program delivers onsite certification of your trainees to train entry-level drivers according to the FMCSA's ELDT rule.
- ELDT Training Program Assessment reviews your entry-level driver training program to verify that it meets or exceeds the new rule.
- ELDT Curriculum provides your company with our best-in-class ELDT program.

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Training Statistics

Tom Moore, CTP

National Private Truck Council



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The Case for Training

- The bottom line – properly trained drivers lead to fewer:
 - Accidents
 - Freight claims
 - Injuries
 - Customer complaints
 - Image issues
 - Fines/penalties
 - Vehicle downtime
- And...
 - Increased productivity
 - Better morale
 - Lower turnover
 - Improved customer satisfaction
 - Lower insurance costs
 - Better retention results

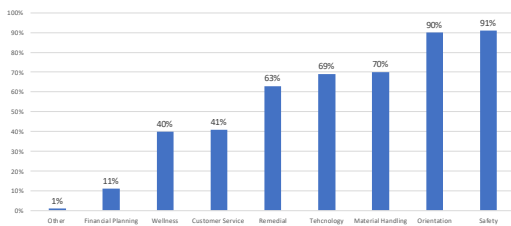


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Driver Training



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Elements of Effective Training

- Get buy-in from the top
- Assess current state (trainee knowledge, job responsibilities, job hazards, policies, standards)
- Set the budget
- Select skilled trainers
- Develop engaging training materials
- Determine students' learning style and adapt to the student
 - Delivery: visual, auditory, hands-on
 - Content: pure information, hands-on activities, problem solving activities
- Test for knowledge



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Types of Training

- On-boarding/orientation
- Ongoing
- On the job
- Recurring
- Remedial
- Life skills



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Identifying the Need

- Government regulations (FMCSA, OSHA, EPA, IRS, Homeland Security, USDA, FDA, etc.)
- Company policies
- Metrics
 - Safety
 - Fuel economy
 - Customer service
- Employee surveys, exit interviews, discipline and social media
- New employee orientation



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Who Is to Be Trained?

- Know the individual learning type
 - Hands-on
 - Visual
 - Auditory
- Try to use all three for standardized or group training



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Training Delivery Options

- Classroom
- Individual
- Web-based training
- On-board computer
- Newsletter
- Safety/operational meetings
- DVD, CD, recorded message



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Barriers to Effective Training

- No support from top management
- Trying to do too many things
- Poor execution
- No tracking of results
- Lack of training resources
 - Capital and Time
 - Staffing
 - Facilities



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A Fleet’s Perspective
Edwin Reardon, CTP
CF Logistics, LLC.



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Overview of CF Logistics, LLC.

- Participating Fleet Member in the National Private Truck Council
- Our private fleet of commercial vehicles includes:
 - 85 Class 8 Power units (Sleeper units and Daycabs)
 - 7 Class 6 Straight Trucks
 - 1 Class 7 Straight Truck
 - 108 Refrigerated Trailers.
- All units are domiciled out of three locations:
 - Blandon, PA
 - Toughkenamon, PA (Chester)
 - Rock Tavern, NY



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Overview of CF Logistics, LLC.

- **Hiring Protocol (Qualifications)**
21 years of age with a Class A CDL. No more than 2 moving violations in 3 years and no more than 1 accident in 2 years. Must pass DOT drug test. Third Party checks VOE, Criminal Bkg. and MVR. Prefer 24 months of experience but will accept recent training school graduates for entry into post graduate training program. Referrals are given preference, if qualified. An electronic Driver Qualification System was built and is maintained for CF Logistics, LLC along with expiring credentials.
- **Safety Training**
Initial training includes: Smith System Decision Driving Course, Backing, Load Securement, Dock-Door backing, Coupling/Uncoupling, Weight Distribution, Scaling, Sliding Tandems, HOS, Vehicle Inspection, Safety Manual- Policy/Procedures, Shuttle work/ Terminal yard duties, and Road training with experienced trainer. Accident Plan is an app used by the drivers to report incidents and reviewed by an Accident Review Board, then submitted to PHMA. Retraining on computer, and Safety Skills are being rolled out this year.
- **Telematics**
Nexttag (A Michelin Connect Fleet company) is used for Elogs- (Tablet Based-Driver Hours of Service), DVR, Inward/Outward Facing Cameras, and a Driver Matrix Portal for driver coaching. Truck technologies used are: Collision Mitigation system, Lane Assist, Lane Departure, Adaptive Cruise Control, Automatic Transmissions, and Automatic Airing systems for tire inflation on the Trailers. Drivers and Dispatch personnel are trained on the system.



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Part 380 of the FMCSR ELDT Discussion

Subpart F- Entry-Level Driver Training Requirements On and After February 7, 2022.

Question: What are the impacts of this recent regulation change?

Answer: This established the definitive word on training requirements for prospective CDL drivers, applying for and obtaining a CDL License. It is very specific to Part 380.601 that the requirements apply to all entry-level drivers.

This rule pertains to those individuals seeking to train, test, and obtain a CDL drivers' license (CLP), however it can be the blueprint for training after hiring. The previous version of this regulation required the training be given after passing the CDL examination, normally by the motor carrier, and was vague at best.

So now, what do we at CF Logistics, LLC do with it?



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Part 380 of the FMCSR ELDT Discussion

Let's look at how Part 380 and other Parts of the regulations are helping to shape the training programs being offered by our fleets:

Part 40- Procedures for Transportation Workplace Drug and Alcohol Testing Programs and Part 382- Controlled Substances and Alcohol Use and Testing is something that most trainees rarely see. They are not exposed to it in training schools, except for the pre-admission drug test to begin training. We can now open a discussion to allow the trainee see the **what and why's** of the Drug an Alcohol testing procedures, not only for their success in the industry, but for the company compliance mandates. It gives them a look into the 5 normal testing procedures and gives the motor carrier an opportunity to discuss the importance of staying off the PROHIBITED status in the Drug and Alcohol Clearinghouse and the meanings of SAP and RTD.



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Part 380 of the FMCSR ELDT Discussion

Part 383- Commercial Driver's License Standards and Part 391- Qualifications of Drivers and Longer Combination Vehicle (LCV) Drivers: it's giving us, the motor carrier, the platform to talk about protecting their CDL, protecting the general driving public, and protecting the motor carrier. Trainees are taught that unsafe drivers, who operate commercial motor vehicles will become disqualified drivers. Good-bye CDL, good-bye paycheck. Hello unemployment. The conversation just got serious. These are all new conversations that reap huge benefits.



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Part 380 of the FMCSR ELDT Discussion

Now, let's look at who can be an ELDT Training Instructor at CF Logistics, LLC
There are two types of instructors defined in the regulations:

1. Classroom or Theory Instructors (if not online) and;
2. Skills Instructors (Behind the Wheel BTW)

This is also a good structure for our program. When the trainee starts in the program, their training instructor (most trainees call them Coach), is the most important person in their world until turned over to dispatch. Remember: the instructors are getting them ready for dispatch and first seat upgrades. This is a stressful time!



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Part 380 of the FMCSR ELDT Discussion

Utilize driver training instructors that meet the criteria and will give everything they have to the success of the trainee (Company Ambassadors)

Our Driver Trainer may very well be the most powerful tool that our program has. Train your trainers to respect, research, and have empathy with the trainee. If your trainer respects the trainee's efforts, the trainee will respect the trainers' knowledge and experience. Having the knowledge and experience and a proven way to present it is crucial to the trainee's success.



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Part 380 of the FMCSR ELDT Discussion

A Look at the Training Program

Follow the curriculum set forth in Part 380 of the FMCSR (Appendices A through E)- It's a very good curriculum!

For a trainee to be successful, focus on very specific topics in the training program. Concentrate on:

Pillars that our program is to be built upon are: (Safety, Compliance, Decision Making, G.O.A.L, and acceptable Skills level). These topics are interwoven into each exercise that is taught and graded accordingly. DOCUMENT, DOCUMENT, DOCUMENT. Teach the basics and avoid the "truck stop stories". Examples of greatness are much more effective than great examples of failure!



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Part 380 of the FMCSR ELDT Discussion

Utilize facilities that meet the criteria set forth in Part 380 of the FMCSR (380.709)

The new trainee will be out in the yard, doing pre-trips, coupling and uncoupling, backing, and learning yard etiquette. We make them wear proper attire and high visibility vests. Set the standard up front. Provide a safe and unobstructed area to train in. Set the parameters for what is unsafe in the yard. Observe every move that the trainee makes in the vehicle and critique unwanted behavior immediately. Choose skill level appropriate routes when going on the road. Lots of turns, on-ramps and off-ramps, city and highway, and traffic signals. You get what you accept, not what you expect... only accept safe.



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Part 380 of the FMCSR ELDT Discussion

Utilize vehicles that meet the criteria set forth in Part 380 of the FMCSR (380.711)

Putting a brand new, power unit with side skirts and cab extenders installed, in the hands of a rookie, is probably not a great idea. However, the training vehicle needs to be safe and in good working condition. It has to be clean, maintained, and be legal. We try to get the trainee involved in maintaining the upkeep and cleanliness of the vehicle for the next class of trainees coming in. This will get them use to post-trip inspections, which few drivers seem to do anymore. Heck, it's tough to get them to do pre-trips. Build this into each day's schedule.



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Part 380 of the FMCSR ELDT Discussion

Motor Carrier Perspective...

For years, motor carriers have, by any means available to them, tried to make the training process more cohesive, more seamless, and more uniform for all motor carriers involved in hiring newer, less experienced drivers into their fleets. It has generally been a fruitless effort, since not all motor carriers viewed the training process in quite the same way as other motor carriers.

Now, with the advent of Part 380 FMCSR (after February 7, 2022), motor carriers have a blueprint for how all new entrants into the CDL environment should be trained. This has also set up a structure for designing and conducting a Registered Apprenticeship training program for the transportation industry. Currently, our truck drivers, who have always met the definition of a skilled tradesman, still are without a mandatory apprenticeship program for continuation in the industry. This must change and I feel that Part 380 of the FMCSR is a great start towards that goal.



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Send Your
Questions



Gary Petty
President & CEO
National Private Truck Council



Tom Moore, CTP
Executive Vice President
National Private Truck Council



Tom Bray
Industry Business Advisor
J.J. Keller & Associates, Inc.



Edwin Reardon, CTP
Sr. GM Safety and Compliance
CF Logistics, LLC

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More Questions?



Tom Bray
Sr. Industry Business Advisor
J. J. Keller & Associates, Inc.
tbray@jjkeller.com



Tom Moore, CTP
Executive Vice President
National Private Truck Council
tmoore@nptc.org



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