

Statement for the Record

Submitted to the Pennsylvania Senate Transportation Committee

Public Hearing on “Commercial Vehicle Safety and Nondomiciled CDLs”

Cindy Smith, Co-Founder, PECAAS

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Chair Ward and Members of the Senate Transportation Committee:

Thank you for the opportunity to submit testimony regarding commercial vehicle safety and the administration of Commercial Driver’s Licenses (CDLs) in the Commonwealth of Pennsylvania. As demand for qualified commercial drivers continues to grow, it is vital that our licensing and training systems maintain the highest standards of safety, fairness, and accountability. The goal must be to support a skilled workforce while ensuring that every driver operating on Pennsylvania’s roads is properly trained, thoroughly evaluated, and fully capable of understanding the rules and responsibilities required to safely operate a commercial vehicle. After working closely with CDL applicants, training providers, and employers, I respectfully offer the following recommendations to strengthen Pennsylvania’s current CDL training and testing processes.

Section 1

1. Improve safety by standardizing language requirements for CDL Knowledge and Skills Testing.

Pennsylvania currently allows the CDL permit test to be taken in 32 languages. While well-intentioned, this practice introduces preventable safety risks. Commercial motor vehicles require the ability to read and respond to roadway signage, hazard warnings, and instructions—nearly all of which are written in English.

To ensure drivers can safely operate throughout the Commonwealth and across state lines, I recommend:

- Requiring that the CDL knowledge test be administered in English only, consistent with federal expectations for safe interstate operation.
- Reaffirming that English proficiency must include the ability to read, write, and converse in English, ensuring drivers can understand road signs, communicate with law enforcement and safety officials, complete required documentation, and respond appropriately in emergency situations.
- Developing a standardized English proficiency assessment for CDL applicants that specifically includes comprehension of Pennsylvania and federal roadway signs, safety placards, and written driving instructions.
- Providing supplemental study resources to help ESL applicants achieve the necessary proficiency before sitting for the exam.

These changes do not restrict access to employment opportunities; rather, they ensure that every CDL holder possesses the language competency necessary and required to safely respond to real-world driving conditions.

2. Standardize Curriculum Across All Pennsylvania CDL Training Programs

CDL training quality varies greatly from one program to another. Without a standardized curriculum, learner preparedness is inconsistent, and employers often bear the burden of retraining new drivers to meet industry and safety expectations.

I recommend the Commonwealth adopt a uniform, state-approved curriculum for all CDL training providers that aligns with federal Entry-Level Driver Training (ELDT) standards yet includes Pennsylvania-specific components such as:

- A minimum number of hours required over-the-road, setting Pennsylvania apart from other states.
- Defensive driving skills tailored to Pennsylvania's terrain and weather patterns
- Hazard recognition and mitigation
- Pre-trip inspection standards consistent across all schools
- Ethical and accountability expectations for professional drivers

A standardized curriculum will ensure every applicant receives comprehensive, consistent training and that Pennsylvania's CDL graduates are among the safest and most reliable drivers on the road.

3. Increase Transparency and Fairness in the CDL Skills Testing Process

Applicants, training providers, and employers frequently express concerns about the lack of detailed feedback following a CDL road test. Currently, drivers receive only a pass/fail result with point totals, without explanation of why specific points were added or deducted.

To improve fairness, accountability, and training outcomes, I recommend the adoption of an examiner comment sheet that includes:

- Identification of each maneuver graded
- Notes indicating the reason for point deductions or additions
- Space for examiner observations about driver performance
- A copy provided to the applicant and the training provider

This reform enhances transparency, helps applicants correct errors, and ensures training programs can address gaps in instruction. It also protects examiners by documenting their decisions in a clear and objective format.

4. Strengthen Enforcement Against Unlicensed CDL Training Providers and Improve Whistleblower Protections

A growing and deeply concerning issue within the commercial driver training industry is the presence of unlicensed and unauthorized CDL training providers operating within the Commonwealth. These entities frequently bypass state oversight, compromise training quality, and endanger public safety by placing inadequately trained drivers on Pennsylvania roadways.

Equally troubling is that individuals who report these illegal operations have faced harassment and even death threats, creating a dangerous environment for whistleblowers and discouraging legitimate reporting of safety violations.

I respectfully recommend that the Commonwealth:

- Direct PennDOT, the Division of Private Licensed Schools, and law-enforcement agencies to identify and shut down unlicensed CDL training providers operating without proper state approval or ELDT certification.
- Increase penalties for operating an unlicensed training program to deter illegal activity.

- Establish robust whistleblower protections, including anonymity safeguards, retaliation prohibitions, and clear reporting pathways that protect individuals who speak out about unsafe or unlawful practices.
- Coordinate with law enforcement to investigate and prosecute threats or intimidation aimed at whistleblowers.

Ensuring that only fully licensed, state-compliant training providers operate in Pennsylvania is critical to protecting students, employers, and the driving public. No individual reporting illegal conduct should ever fear for their safety.

5. Develop Clear, Enforceable Rules for Contract Training Programs

Another area in need of urgent clarification is the inconsistent oversight of Contract Training within the CDL industry. Many companies operate under the premise of “Contract Training” to avoid regulation, skirt the requirements of the Division of Private Licensed Schools, and continue offering CDL instruction without meeting state standards.

This loophole undermines consumer protection, training quality, and public safety.

I recommend the Commonwealth:

- Develop clearly defined rules and criteria for what constitutes permissible Contract Training in the CDL industry.
- Require Contract Training programs to operate under meaningful oversight from the Division of Private Licensed Schools (PLS).
- Mandate that all Contract Training follow the same standardized curriculum required of licensed CDL schools to ensure consistent training quality.
- Establish routine audits or inspections to prevent misuse of Contract Training as a shield for unlicensed instruction.

Closing this regulatory gap will prevent companies from exploiting Contract Training to circumvent licensing requirements and will ensure that all CDL instruction in the Commonwealth meets uniform safety and quality standards.

Conclusion

These recommendations- standardized English-only testing without interpreters and the addition of road signs, standardized training curricula, increased transparency in skills testing, and stronger enforcement against unlicensed training providers with enhanced whistleblower protections—will meaningfully strengthen Pennsylvania’s CDL system.

Together, they improve public safety, support industry integrity, and help ensure that every commercial driver on our roads is trained responsibly and tested fairly.

I appreciate the Committee’s dedication to reviewing these important issues and your continued commitment to safeguarding Pennsylvania’s roadways. Thank you for considering these proposals. I would be pleased to provide additional information or answer any questions.

Respectfully submitted,

Cindy Smith

Cindy Smith, Founding Member
 Post-Secondary Education Consultant and Administrative Solutions
 Phone: 724-777-8936
 Phone: 240-580-3138
www.pecaas.com