



# Oregon

Kate Brown, Governor



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DEPARTMENT OF  
EDUCATION

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**Colt Gill**

Director of the Oregon Department of Education

**Oregon Department of Education  
Pupil Transportation & Fingerprinting Unit**

***TO: Transportation Directors, Training Staff, and associated Contractors***

***RE: Entry Level Driver Training (ELDT) Theory Instruction Requirements and Corresponding Core Curriculum Components***

Federal rulemaking of the Moving Ahead for Progress in the 21<sup>st</sup> Century Act (MAP-21) laid out requirements for new commercial driver license (CDL) applicants, effective February 7, 2022. The Oregon Department of Education's Behind The Wheel Instructor program has been adjusted to satisfy the federal requirements for range/road driving instruction, requiring recertification of current Behind The Wheel Instructors as described in [our October 25, 2021 bulletin](#). However ODE's 8 hour Core 04 curriculum or 4 hour Core Refresher curriculum will not be sufficient alone to meet the new federal theory instruction requirements, though we may publish revisions in the future.

This document compares the contents of required education described in the federal rule and the existing Core curriculum for operations that choose to incorporate Core instruction into their ELDT Theory requirements. Please note that many operations' applicant stream may not logistically allow for group learning, since most recruits arrive one at a time. It is recommended for Core curriculum to be taught in a group setting rather than individually for the most effective implementation. Still, this table may assist for operations that wish to satisfy both federal and state requirements with one set of presentations, and ODE's Core program may be offered either before or after licensure. Keep in mind that this table is not a substitute for comprehensive review of an operation's compliance plan.

Note: not all drivers will require ELDT, such as those with an existing valid CDL or class C drivers. However, drivers with an existing CDL that lack the necessary endorsements ("P" or "S") will need to complete ELDT to acquire these endorsements.

Federal regulations require that ELDT instructors meet state requirements for driver trainers, in addition to the federal requirements. For this reason, ensure that your instructor presenting ELDT is a certified Core Instructor that may present training to school bus drivers. It is also important to note that while Oregon's qualifications for Core Instructor do not include commercial driving experience, an ELDT Theory Instructor must have experience in driving the type of vehicle about which they are educating driver candidates.

For complete federal requirements, review [49 CFR 380](#). Appendices B, C & D list complete ELDT curriculum requirements applicable to school bus drivers. For more information on Oregon's approach to supporting school bus operations in federal compliance for ELDT training, see [our March 3, 2021 bulletin](#) sent to our pupil transportation listserv. Contact [Brock Dittus](#) with any questions.

### ***Training Resources***

If a third party curriculum provider for ELDT theory instruction is desired, several companies provide resources that may assist your operation in fulfilling the federal theory requirements. These programs are not a substitution for the 8 hour Core 04 class required to meet ODE's requirements, but may provide a curriculum if your operation chooses to offer the 8 hour Core class *after* the driver completes the licensure process.

Some third party curriculum providers offer a program you may use to present theory instruction offered by your federally registered training provider location while others operate online as a registered training provider and will submit your candidate's training certification to the State Driver Licensing Agency, Oregon's Driver & Motor Vehicle Services (DMV). Either approach will yield compliance, but it is important to recognize which party will be responsible for instruction and certification.

*Potential Curriculum Providers:*

- [School Bus Safety Company](#)
- [Pupil Transportation Safety Institute](#)
- [J. J. Keller & Associates, Inc.](#)
- Other compliant content providers and/or training centers
- Your private school bus company, if it has curriculum in place
- Your own training operation, if it has created a curriculum plan

*Note: The Oregon Department of Education does not endorse or recommend any particular content provider; this list provided for reference purposes only and operations should conduct their own due diligence to ensure any third party products address their needs adequately.*

<b>ELDT Theory Section (49 CFR 380)</b>	<b>Description</b>	<b>Core Curriculum may match:</b>	<b>ELDT content not addressed</b>
	<b>Commercial Driver License, Class B</b>		
Unit B1.1.1	Orientation	Core Unit I, Advance Unit A	hazard recognition, overhead clearance, FMCSRs, hazardous materials regulations, federal driver disqualifications, weigh stations, coupling/uncoupling
Unit B1.1.2	Control Systems/Dashboard	<i>not addressed</i>	Compare contents of BTW manual for potential source material p12-27, 50-58
Unit B1.1.3	Pre- and Post-Trip Inspections	Core Unit II	en route inspections; Compare contents of BTW manual for potential source material p27-68
Unit B1.1.4	Basic Control	Core Refresher	Compare contents of BTW manual for potential source material p83-126
Unit B1.1.5	Shifting/Operating Transmissions	Core Refresher, Advance Unit F	fuel economy; Compare contents of BTW manual for potential source material p70-73, appendices 7-10
Unit B1.1.6	Backing and Docking	Core Unit II, Core Refresher	combination vehicle, G.O.A.L. (“get out and look”); Compare contents of BTW manual for potential source material p80-83, 107-108

<b><i>ELDT Theory Section (49 CFR 380)</i></b>	<b><i>Description</i></b>	<b><i>Core Curriculum may match:</i></b>	<b><i>ELDT content not addressed</i></b>
Unit B1.2.1	Visual Search	Core Refresher	distracted pedestrians & drivers, personal security/general awareness of surroundings; Compare contents of BTW manual for potential source material p105-106
Unit B1.2.2	Communication	Core II, Core Refresher	eye contact with all types of road users
Unit B1.2.3	Distracted Driving	not addressed	
Unit B1.2.4	Speed Management	Advance Unit B	
Unit B1.2.5	Space Management	Advance Unit B	Compare contents of BTW manual for potential source material p74-77
Unit B1.2.6	Night Operation	Advance Unit B	
Unit B1.2.7	Extreme Driving Conditions	Advance Unit B	
Unit B1.3.1	Hazard Perception	Core Refresher, Advance Unit B	Compare contents of BTW manual for potential source material p105
Unit B1.3.2	Skid Control/Recovery, Jackknifing, and Other Emergencies	Advance Unit B	jackknifing, "unsafe acts"
Unit B1.3.3	Railroad-Highway Grade Crossings	Core Unit II, Core Refresher	emergency notification systems; Compare contents of BTW manual for potential source material p111

<b><i>ELDT Theory Section (49 CFR 380)</i></b>	<b><i>Description</i></b>	<b><i>Core Curriculum may match:</i></b>	<b><i>ELDT content not addressed</i></b>
Unit B1.4.1	Identification and Diagnosis of Malfunctions	Advance Units E & F	coupling systems; Compare contents of BTW manual for potential source material p12-67
Unit B1.4.2	Roadside Inspections	not addressed	
Unit B1.4.3	Maintenance	Advance Units C, E & F	preventative maintenance & emergency repairs; Compare contents of BTW manual for potential source material p27-67
Unit B1.5.1	Handling and Documenting Cargo	not addressed	
Unit B1.5.2	Environmental Compliance Issues	not addressed	
Unit B1.5.3	Hours of Service Requirements	Advance Unit D	non-school bus requirements
Unit B1.5.4	Fatigue and Wellness Awareness	Core Unit II	
Unit B1.5.5	Post-Crash Procedures	Core Unit IV	controlled substances/alcohol
Unit B1.5.6	External Communications	not addressed	
Unit B1.5.7	Whistleblower/Coercion	not addressed	
Unit B1.5.8	Trip Planning	Core Unit II, Advance Unit D	
Unit B1.5.9	Drugs/Alcohol	Core Units I & II	federal requirements beyond state school bus regulations
Unit B1.5.10	Medical Requirements	Core Unit I	federal requirements beyond state school bus regulations

<b>ELDT Theory Section (49 CFR 380)</b>	<b>Description</b>	<b>Core Curriculum may match:</b>	<b>ELDT content not addressed</b>
	<b>Passenger Endorsement (P)</b>		
Unit C1.1	Post-Crash Procedures	Core Unit IV	
Unit C1.2	Other Emergency Procedures	not addressed	
Unit C1.3	Vehicle Orientation	not addressed	Compare contents of BTW manual for potential source material: size p11, GVWR 106, orientation p12-66
Unit C1.4	Pre-Trip, Enroute, and Post-Trip Inspection	Core Unit II, TSWSN	enroute inspections, restrooms, interior luggage compartments, security inspections; Compare contents of BTW manual for potential source material p27-68
Unit C1.5	Fueling	not addressed	
Unit C1.6	Idling	not addressed	
Unit C1.7	Baggage and/or Cargo Management	Advance Unit D	hazardous materials
Unit C1.8	Passenger Safety Awareness Briefing	not addressed	
Unit C1.9	Passenger Management	Core Unit III	
Unit C1.10	Americans With Disabilities Act (ADA) Compliance	TSWSN	non-school bus operations
Unit C1.11	Hours of Service (HOS) Requirements	not addressed	
Unit C1.12	Safety Belt Safety	not addressed	

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<b>ELDT Theory Section (49 CFR 380)</b>	<b>Description</b>	<b>Core Curriculum may match:</b>	<b>ELDT content not addressed</b>
Unit C1.13	Distracted Driving	not addressed	
Unit C1.14	Railroad (RR)-Highway Grade Crossings and Drawbridges	Core Unit II, Core Refresher	Drawbridges; compare BTW manual p111
Unit C1.15	Weigh Stations	not addressed	
Unit C1.16	Security and Crime	Advance Unit D	recognizing risk
Unit C1.17	Roadside Inspections	not addressed	
Unit C1.18	Penalties and Fines	not addressed	
	<b>School Bus Endorsement (S)</b>		
Unit D1.1	Danger Zones and Use of Mirrors	Advanced Reference Points	“dart-outs” Compare contents of BTW manual for potential source material p13-15, appendices 2-5
Unit D1.2	Loading and Unloading	Core Unit II, Core Refresher	
Unit D1.3	Vehicle Orientation	not addressed	Compare contents of BTW manual for potential source material : size p11, GVWR 106, orientation p12-66, overhead p79
Unit D1.4	Post-Crash Procedures	Core Unit IV	interaction with law enforcement
Unit D1.5	Emergency Exit and Evacuation	Core Unit IV, Core Refresher, TSWSN Section 5	Compare contents of BTW manual for potential source material p19
Unit D1.6	Railroad-Highway Grade Crossings	Core Unit II, Core Refresher	Compare contents of BTW manual for potential source material p111

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<b><i>ELDT Theory Section (49 CFR 380)</i></b>	<b><i>Description</i></b>	<b><i>Core Curriculum may match:</i></b>	<b><i>ELDT content not addressed includes:</i></b>
Unit D1.7	Student Management	Core Unit III, Core Refresher	
Unit D1.8	Special Safety Considerations	Core Unit II, Advance Unit B	strobe lights, high winds; Compare contents of BTW manual for potential source material p9-10, 92-93, 97, 112-115
Unit D1.9	Pre- and Post-Trip Inspections	Core Unit II	en route inspections; Compare contents of BTW manual for potential source material p27-68
Unit D1.10	School Bus Security	Advance Unit D	threats, prevention, response, reporting, hijacking & attacks
Unit D1.11	Route and Stop Reviews	Core Unit II	route planning, distraction on the road, local procedures for reporting hazards