

September 5, 2014

Reginald A. Flythe  
Driver Education Consultant  
North Carolina Department of Public Instruction  
6301 Mail Service Center  
Raleigh, NC 27699-6301

Dear Mr. Flythe:

Thank you for the opportunity to be a part of North Carolina's efforts for improving driver education for new teen drivers. On July 2, 2014 technical assistance was requested to the Association of National Stakeholders in Traffic Safety Education (ANSTSE). The request was to lend guidance in preparation for a full National Highway Traffic Safety Administration (NHTSA) assessment of the North Carolina driver education program.

A technical assistance team (Team) consisting of Dr. Allen Robinson and Mr. Troy E. Costales were selected to respond to your request. Dr. Robinson and Mr. Costales received materials, web links to articles and reports, as well as a phone call prior to their arrival. The Team was on site in Raleigh, North Carolina, from Monday, August 18 through Wednesday, August 20, 2014. During that time the Team was able to meet many of the key players of the driver education program.

During this time recommendations about the best way to prepare for the full NHTSA assessment, or peer review, were shared with Mr. Reginald A. Flythe, Mr. Connie Sessoms and Mr. Chuck Lehning. In addition the Team offered some guidance on specific program criteria as found in the national Novice Teen Driver Education and Training Administrative Standards (Standards).

In preparation for the full assessment, the Team offers this list of recommendations:

- Once the funding for the full assessment is secured or identified, the NC Governor's Highway Safety Program should request the assessment through the NHTSA Region Office. The sooner the better as NHTSA is already scheduling other topical assessments for the 2015 federal fiscal year.
- Be sure anyone involved in the assessment has a copy of the Standards prior to the assessment. The Standards can be found on-line at [www.anstse.info](http://www.anstse.info).
- Review the full Standards document and complete a self-assessment using the individual standards (e.g. 1.1.6 adopt an instructor certification renewal process). Utilize the information sharing system self-assessment tool to determine which standards you meet. Go to [www.anstse.info](http://www.anstse.info) and click on information sharing system.
- It is possible to request a copy of this pre-briefing self-assessment document from other states that have completed the driver education assessment (Oregon and Vermont are good examples).
- Use the membership of the NC Driver Education Advisory Committee to help complete this self-assessment. It would be good to have at least two people working on each response. This helps to identify where there are differences of opinion.

- After completing this self-assessment capture the responses for each individual standard so they can be forwarded to the full assessment panel as a pre-briefing report.
- Add copies of laws, rules, policies, forms and informational flyers to the documentation whenever possible to assist the full assessment panel in their pre-assessment briefing. If there are instructions for completing these forms that are available, include those pages as well.
- Coordinate the responses through Mr. Flythe.
- Review documents about the NHTSA assessment on the NHTSA website to find out more information: <http://www.nhtsa.gov/DriverEducationProgram>.

During the Team's visit, Dr. Robinson and Mr. Costales also witnessed and received information about the North Carolina driver education program for a small set of the individual guidelines that are in the Standards document. These were specifically in the areas of Program Administration and Instructor Qualifications. In addition to the guidance for the upcoming assessment the Team offers these observations for your consideration.

### **Program Administration**

Standard 1.1.1 have a single agency, or coordinated agencies, informed by an advisory board of stakeholders and charged with overseeing all novice teen driver education and training programs. That agency should have authority and responsibility for the implementation, monitoring, evaluation, and enforcement of these standards. This agency should also be charged with developing and executing communication strategies to inform parents and the public about driver education and training issues. In addition, the agency should inform providers in a timely fashion about changes to laws, regulations, and procedures.

***Comments: The two main agencies working in teen driver education, Department of Public Instruction and Division of Motor Vehicles, operate in a coordinated and collaborative manner. The North Carolina Driver Education Advisory Committee is comprised of representatives from around the state and from different programs (public, private and state agencies). There is a very positive energy between the two lead organizations. The point staff that have taken the helm for teen driver education have worked hard to make improvements in communication, evaluation and the management of the entire program.***

Standard 1.1.2 have a full-time, funded State administrator for driver education and training. This individual should meet or exceed the qualifications and training required by the State for a novice teen driver education and training instructor and/or school owner or possesses equivalent experience or qualifications. This administrator should be an employee of the agency that has oversight of driver education and training.

***Comments: The Department of Public Instruction has a full-time Driver Education Consultant on staff. This position has been in existence for years but until 19 months ago the leadership and direction has been sub-standard. The leadership, technical knowledge and program depth has been extremely strong for the past year and a half. North Carolina has made very strong progress over the last 19 months. Many of the task items identified by the legislative body have been addressed and are headed in a positive direction.***

Standard 1.1.3 have standardized monitoring, evaluation/auditing, and oversight procedures to ensure that every driver education and training program uses a curriculum with written goals and objectives.

***Comments and Recommendations: Monitoring and on-site audits have yet to be completed as the focus has been on responding to the needs of the broader community from the years of lack of attention. The work in monitoring can be done by state staff, temporary staff or under a contract. The forms, check lists and scheduling of the on-site reviews should be set by the Department of Public Instruction in cooperation with the North Carolina Driver Education Advisory Committee.***

***A report from the legislative Program Evaluation Division was shared and discussed during this brief visit. North Carolina should be recognized for the strong and thorough program changes that have taken place this past year. An overwhelming majority of the measures and program improvements requested by the legislative body in 2010 have been implemented. The program improvement efforts, student data reporting, coordination through the North Carolina Driver Education Advisory Committee and the North Carolina Driver Education Strategic Plan represent a tremendous amount of effort that represents one of the most dramatic improvements anywhere in the country in driver education. The legislative branch requested change in their 2010 evaluation and this work was reflected in the report printed in March 2014. The North Carolina driver education community has marched on in continuous improvement and there are quite a few additional items that can be added to the March 2014 report.***

## **Instructor Qualifications**

Standard 3.1.1 require the following prerequisites for instructors receiving certification and recertification:

- a) possession of a valid driver's license, as recognized by the State.
- b) have an acceptable driving record as determined by the State.
- c) pass a Federal and State criminal background check.
- d) meet health or physical requirements as determined by the State.
- e) achieve a minimum academic education requirement as determined by the State.
- f) meet a minimum age requirement as determined by the State.

The North Carolina State Board of Education Policy Manual states the following in .0302 Non-Certified Instructor Status:

To qualify for non-certified instructor status, a person must, as a minimum:

- (1) be at least 21 years of age and have graduated from a high school or hold a high school equivalency certificate;
- (2) be of good moral character;
- (3) not have had convictions of moving violations totaling seven or more points in the three years preceding the date of application;
- (4) have at least four years' experience as a licensed operator of a motor vehicle;
- (5) not have had a revocation or suspension of his or her driver's license in the four years immediately preceding the date of application; and
- (6) have completed the licensed instructor course offered through the community college system and approved by the Department and Division of Motor Vehicles.

The North Carolina State Board of Education Policy Manual states the following in .0301 Drivers Training:

- (9) Driver education instructors must possess a valid North Carolina driver's license and must have a driving record acceptable to the local board of education. In addition, instructors hired for driver education shall either:
1. hold a driver education certificate issued by the SBE; or
  - (B) have non-certified status according to minimum standards established by Rule .0302 of this Section.

***Comments and Recommendations: These stated policies clearly require a non-certified instructor to complete instructor courses offered through the community college system and approved by the Division of Motor Vehicles. Clearly the Policy Manual needs to be updated to reflect how non-certified instructors are trained in North Carolina.***

Standard 3.1.2 require instructors to complete approved standardized instructor training that applies to instructors and teachers in all public and private driver education and training programs. This preparation should include a course of study that is no less than 120 hours of preparatory time. (See Attachment B, Instructor Qualifications Statement)

The North Carolina Private or Commercial School Requirements states the following in 19A NCAC 03I .0501 REQUIREMENTS:

- (6) have completed the 80-contact-hour, community-college course for driver education teachers; an equivalent course approved by the commissioner, or an Instructor Training Program conducted by an approved Commercial Driver Training School within four years prior to application;

***Comments and Recommendations: The North Carolina Division of Motor Vehicle School Bus and Traffic Safety Section provides an 80-contact-hour course for driver education teachers. The course outline and the Curriculum Guide for Commercial Driver Training Schools was provided to us.***

***We have reviewed the materials and make the following recommendations:***

- 1. The DMV School Bus and Traffic Safety Section should:***
  - a. Compare the content of this 80-contact-hour course to the standardized program of driver education in Article 14 Driver Education 115C – 215 Administration of Driver Education Program by the Department of Public Instruction.***
  - b. Compare the content to nationally recognized standards for teacher training established by the Association of National Stakeholders in Traffic Safety Education (ANSTSE). Currently the Novice Teen Driver Education and Training Administrative Standards describes instructor training in Section 3: Instructor Qualifications, as well as Attachment B: Instructor Qualifications Statement.***

Teacher training is a critical element in the success of a driver education training program. Teachers must be well trained to deliver the driver education content in today's driver education courses. Utilization of these nationally developed materials will greatly enhance your program goals and objectives.

## **General Findings and Recommendations from the Onsite Technical Assistance Visit**

A report from the Program Evaluation Division presented at the Driver Education Advisory Committee was very informative and should be used to guide program evaluation.

It was noted by the presenter that the data collected was the 2010 Program Evaluation Division North Carolina Accountability Review Findings. Since that time several of the negative findings have been corrected. This is a demonstration of what can happen when you have state leadership in driver education.

*Comments and Recommendations: There are two findings that should have careful analysis. One is the high failure rates by students on the licensing test. While this is true, there are some unanswered questions.*

- 1. What is the validity and reliability of the licensing test?*
- 2. How do the test questions compare to the content of the required course of instruction?*

*The second is Exhibit 11. It is certainly positive that teen fatality rates have declined; however, it is difficult to compare this decline to other states due to the variables that exist between states. This self-analysis will be beneficial in the states preparation for a full driver education assessment review.*

We share these recommendations and program observations as a primer to the full assessment that should be requested and scheduled soon. By no means is this letter representative of what would be part of the full assessment document. However our hope is that these notes fulfill the original request for pre-assessment guidance and also add in some programmatic pieces that are characteristic of what a full report would contain.

The community involved in the North Carolina driver education program should be pleased with what they have accomplished in the past year and a half. They should also be proud of what happens day in and day out all across the State as young adults are given the knowledge and experience in the start of their lifelong driving careers. You are making a difference every day, with every young adult, with every family. Keep up the effort.

Sincerely,



Brett Robinson  
ANSTSE Secretariat  
Highway Safety Services, LLC

cc: Jim Wright, NHTSA  
ANSTSE Members