

The Washington State

DRIVER TRAINING SCHOOLS

ANNOUNCEMENT

*A publication of the Washington
State Driver Training Schools Program*

November 8, 2018

As a result of the **proposed rule change**, the program has put together 3 tables to help clarify the changes to **WAC 308-108-150**. You will see audit related changes as well as potential risks and our response to these related changes.

Proposed rule change only applies to WAC 308-108-150

WAC 308-108		
308-108-070	Background check & fingerprint	No change
308-108-080	Instructor's license	No change
308-108-090	Instructor training	No change
308-108-100	Place of business	No change
308-108-110	TSE vehicle	No change
308-108-120	Administration & school policy	No change
308-108-130	Inspection & review	No change
308-108-140	Reporting requirements	No change
308-108-150	Curriculum schedule/Course requirements	Change, see table below
308-108-160	BTW instruction & observation	No change
308-108-165	Wireless communication	No change
308-108-170	Student accomplishment	No change
308-108-180	Disciplinary action	No change

The purpose of the table below is to identify the changes in the audit items. Note: Item number 5 will no longer be required to be submitted for approval but will be required to have on site as part of your course. The auditor will look to ensure you have these items at your location.

WAC 308-108-150		
Audit Item	Status	WAC
1. Complementary and Integrated	Cease to Audit	308-108-150 (1)
2. More than 3 absences	Cease to Audit	308-108-150 (2)
3. Lesson held in contiguous weeks	Cease to Audit	308-108-150 (4)
4. 6 hours of video make-up lessons	New audit item	308-108-150 (5) (6)
5. Not required to submit local curriculum, comprehensive exam, flow chart (still required to maintain at school location).	Revised Audit	308-108-150 (8)

The purpose of the table is to identify potential risks and response to related changes in the proposed language.

Change	Risks	Response
1. No longer regulating course structure to be complementary and integrated.	School might schedule all classes first followed by drives. Some fear this model may negatively affect student learning.	<ul style="list-style-type: none"> No studies or data validate this fear/belief Regulating course structure does not measure student outcomes Other states offer separate classroom and behind the wheel courses
2. No longer regulating maximum allowance of absences.	<ul style="list-style-type: none"> Schools may choose to allow unlimited misses. Schools may fail to identify and communicate their policy for missed classes. 	<ul style="list-style-type: none"> If a school allows for a student to miss, they will need to arrange for student to participate in an equivalent class make-up using the same information that was missed in class. Schools must ensure students are on the same lesson. This will prevent self-paced and open enrollment. All make-up classes must be the equivalent of regularly scheduled instruction.
3. No longer regulating lessons be held in contiguous weeks.	School might extend classes for the maximum duration stated in the school policy. Some fear this model may be an imposition on the student or and/or may negatively affect student learning.	<ul style="list-style-type: none"> If the consumer is aware of the school’s policy and course schedule, and agrees to it, then this matter becomes between the business and consumer. Instructors in direct contact with students, rather than DOL, are best equipped to determine when students are ready to advance.
4. No longer requiring schools to submit their local curriculum, comprehensive exam, or flow chart	<ul style="list-style-type: none"> A school may not have an effective comprehensive exam in place during this transition time (between now and when we finalize 1481 audit WAC). A school may neglect to inform the consumer of their planned course schedule (aka flowchart). 	<ul style="list-style-type: none"> We now have a singular required curriculum that instructors are required to teach. Schools will no longer have the disincentive to update their support materials (formerly called “local curriculum”), as they will no longer be required to submit any updates to DOL. Schools currently have unique comprehensive exams of varying rigor and length. The exams are still required, but we are not going to be reviewing them during the short interim between

Change	Risks	Response
		<p>WAC writing.</p> <ul style="list-style-type: none"> Flowcharts are still required as part of the course. We soon intend to amend 308-108-120 to require flow charts to also be a required part of a school's policies.

Skip a trip – go online: www.dol.wa.gov

We are committed to providing equal access to our services.
For information visit dol.wa.gov/access. (TDD/TTY call 711).

Washington State Driver Training Schools Program		Department of Licensing	
Mailing address: PO Box 9027 • Olympia, WA 98507-9027		E-Mail: tse@dol.wa.gov	
Phone: (360) 664-6692	Fax: (360) 570-4976	Web site: www.dol.wa.gov/business/drivertraining	