SERVICE OKLAHOMA

CDL School Auditing

CDL Drive Schools

3-17-2025

Revision History

Effective Date of SOP: 3/24/2025	**SOP Number:** SOP F.03
Functional Area Name: Drive Schools	**Division Name:** CDL
Last Review Date: 2/21/2025	**Last Reviewer:** Amanda Casebier, CDL Supervisor
Next Review Date: 2/21/2026	**Next Reviewer:** CDL Supervisor
Executive Approval Date: 3/17/2025	**Approved By:** Alyson Sorenson, CDL Manager

Overview

This standard operating procedure (SOP) covers the process of conducting annual audits of CDL Drive Schools

Purpose

This SOP provides CDL Auditors with a step-by-step overview of how conduct full and component audits of CDL Schools

Policy Statement

These procedures apply to instructors at all CDL Drive Schools in Oklahoma except:
- Schools giving driver training lessons without charge
- Schools maintained by employers without charge for their employees only
- Schools or classes conducted by high schools, colleges, universities, vocational schools, or private schools for regularly enrolled, full-time students as a part of the normal program for such institutions.

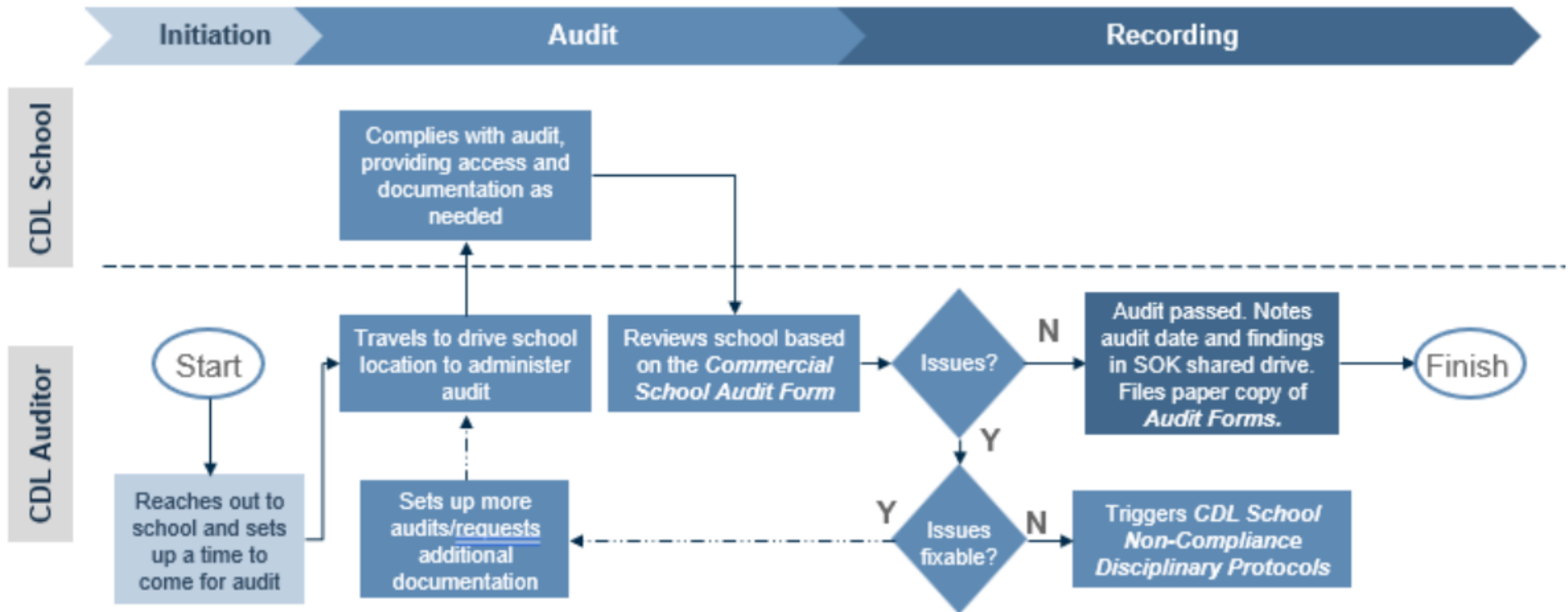## Compliance

OAC 670:15-33 – Truck Driver Training

Systems

System	Function
SOK Shared Drive	Internal shared drive used by CDL employees to share files. CDL team used the CDL Admin Folder.
Commercial Skills Test Information Management System (CSTIMS)	American Associated of Motor Vehicle Administrators (AAMVA)-sponsored tool to

	track CDL schools, instructors TPEs, and student test results

Roles

Role	Responsibilities
CDL Drive School	State-certified school that offers CDL training services for people in Oklahoma.
CDL Auditor	CDL team member who carries out most day-to-day functions related to CDL School, Instructors, and TPEs, including certification, renewal, and auditing.
CDL Supervisor	CDL team supervisor who is available to assist with CDL auditor functions as needed and may be called on to answer questions, settle disputes, or handle non-compliance escalation.
Third-Party Examiner	Individual who is certified by SOK to conduct CDL tests for students. Often also an instructor for a CDL school.

Process Map – CDL School Auditing Procedures – Overt – Announced

Initiation | **Audit** | **Recording**

CDL School

Complies with audit, providing access and documentation as needed

CDL Auditor

Start

Reaches out to school and sets up a time to come for audit

Travels to drive school location to administer audit

Sets up more audits/requests additional documentation

Reviews school based on the *Commercial School Audit Form*

Issues? — **N** → Audit passed. Notes audit date and findings in SOK shared drive. Files paper copy of *Audit Forms.* → Finish

Y

Issues fixable? — **Y** → (back to Sets up more audits)

Issues fixable? — **N** → Triggers *CDL School Non-Compliance Disciplinary Protocols*

Note: This process map shows an overt, announced full audit, just one of many audit types/methods used by CDL Auditors

Procedures

Process #1: CDL School Full Audit

Purpose: To check all majors areas of CDL School operations for compliance with Oklahoma Code and best practices.

Background:

A "full audit" of a CDL drive school is a combination of all the area-specific audits into one comprehensive check of a school's compliance. The full audit is scored on the Commercial School Audit Form, but audit functions outside of this checklist, such as drive test route surveillance and co-scoring, may also be conducted at the time of full audits to make the check truly comprehensive. The CDL team tries to conduct at least one full audit of each CDL School each year, though this is not mandated by statute or code.

Full audits can either be announced (school is warned of audit date) or unannounced (no contact with school prior to audit). Parts of a full audit can be either covert or overt, such as drive test route surveillance, where a CDL Auditor may observe a test with or without the Third-Party Examiner being aware.

This example will follow an overt, announced audit.

Process Step-by-Step:

1. First, a CDL Auditor will reach out to a CDL School to set up a time to come out for a full audit.

    Note: Or, for a semi-announced audit, an Auditor may provide a range of dates and times they may show up. Full audits can also be entirely unannounced.

2. On the day of the audit, the CDL Auditor will travel out to the CDL School location to administer the audit, bringing all necessary audit forms with them (See reference section). The CDL School will provide access to their facility, fleet, records, and classroom sessions as needed.

3. The CDL Auditor will review the school, checking compliance against all audit forms being used that day, including the Commercial School Audit Form.

    a. If there are no issues identified, the CDL School has passed their audit. Proceed with uploading findings to the CDL Admin Drive (See "F.05 - CDL School Instructor Initial Certification" SOP for instructions on navigating the CDL Admin Drive)

    b. If there are issues identified with some area(s) of the audit, the CDL Auditor may want to schedule an additional audit or request more specific documentation (See Appendix B). If the CDL Auditor uncovers a compliance issue that is persistent and the CDL School in unable to fix, this may trigger CDL School Non-Compliance Protocols.

4. After any audit is conducted (pass or fail), the CDL Auditor will upload findings to the CDL Admin Drive and file paper copies with the CDL School's file.

5. The CDL Auditor should print and file the schools audit record in the school's paper file, completing the audit process.

Note: Remember to conduct a follow-up audit on any issues found in the full audit to ensure concerns have been addressed (See Appendix A).

Appendix

Appendix A: Types of Partial Audits

The following audit types may be used to supplement a full audit as needed.

Facility – An inspection of the school's customer service area and classroom must be inspected prior to certification and whenever additionally needed. Use the portion(s) of the Commercial School Audit Form that apply.

Fleet Inspection – Any new school vehicle must be inspected and approved for use before a school utilizes it for instructional purposes. Use the Vehicle Inspection Request form to solicit vehicle information remotely or use the Vehicle Inspection Form to track vehicle information while on site at a school. See Appendix C for an example of written fleet information.

Records – An inspection of a school and student records, outside of the full audit, whenever an auditor feels it is necessary to determine regulatory compliance. Use the Commercial School Student Records Audit Form

Drive Route - Surveillance of a CDL School's test route can be conducted to ensure the school's TPE's are compliant in not using the SOK-approved test route to conduct training.

Appendix B: Non-Compliance Letter Example

This is an example of the sort of letter that should be sent to a CDL School when an issue is found during an audit. The letter is direct, polite, and printed on the SOK letterhead. The letter clearly explains the issues with the school's vehicles, gives instructions on how to correct them, and provides a timeline for an unannounced audit in the future.

American Truck Training
5204 W I-240 Service Road
OKC. OK. 73128

Hello Mr. Redmond

CDL Auditor Harris and I visited your facility on October 14, 2024, and ATT was found not in compliance per: OAC 670:14 -33-14 Prohibited acts; Conduct. No school owner, agent, instructor or employee shall: (1) instruct on or near the skills examination route used by Service Oklahoma. Instructor Robert Ford Jr was witnessed operating Fleet #1414 on the test route with 3 different students.

CDL Supervisor Amanda Casebier was then notified of the violation. Mr. Redmond, Mr. Ford, Auditor Harris and I had a phone meeting with Mrs. Casebier. As Mrs. Casebier stated over the phone, Mr. Ford was given a verbal warning, and this is to be understood as a written warning, if Mr. Ford has other infractions, he will be placed on a 30 day suspension and any future infractions could lead to removal from the CDL Program per 670:14-33-15.

We also discussed the unsafe conditions of Fleet Vehicle 1414 being used without enough seats or seatbelts for all passengers within the vehicle. It also came to our attention, while we were on the lot, that Fleet Vehicle 1414 speedometer did not function. All mention items for Fleet Vehicle 1414 is considered unsafe to be on the road with and must be working before returning that vehicle to service. The condition of the vehicle violates 670:15-33-10 and ATT will be given 30 days to correct the safety violations. One of the CDL Auditor team will return to inspect Fleet Vehicle 1414 after the 30 day mark at a future unannounced visit.

If you have any questions, please do not hesitate to contact myself or a member of the CDL Auditing team.

Sincerely,

Myra Pearson CDL Auditor
Service Oklahoma

Appendix C: Fleet Inspection Example

American·Truck·Training·Fleet·Inspection·¶

July·16,·2024¶
Location:·ATT·yard,·OKC¶
Auditors:·Amanda·Casebier,·Yolanda·Morris¶
¶
¶
¶
Truck·#·1414···Tag:·47C773·exp:·3/25···VIN:4508¶
Trailer·#·2406·········Tag:BQ7184················VIN:1376¶
- → Right·Rear·tractor·tire·not·at·least·2/32.¶
- → Test·route·in·truck,·truck·not·secured.¶
- → AB·test·first·attempt·lost·20+·pounds·without·foot·then·an·additional·7-8·pounds·with·foot·applied·1·minute.·Second·attempt·air·held·steady.·¶
¶
Truck·#·1407···Tag:·476747·exp:·12/24···VIN:8458¶
Trailer·#············Tag:BQ7182················VIN:1385¶
- → Broken·step,·passenger·side¶
- → Right·rear·tractor·tire·x2·not·at·least·2/32¶
- → Back·seat·has·broken·seat·belts.¶
- → AB·test·resulted·in·air·leak·with·10-15·pound·pressure·drop·in·1·min.¶
¶
Truck·#·1409···Tag:·47C741·exp:·4/25···VIN:7624¶
Trailer·#············Tag:6499LA················VIN:3760¶
- → Driver·steer·tire·large·chunks·and·not·4/32¶
- → Left·front·trailer·tire·not·2/32¶
- → Right·rear·trailer·tire·with·huge·chunks¶
- → Passenger·steer·tire·large·chunks·and·below·4/32¶
- → Private·trailer·tag·with·commercial·tractor·tag¶
¶
Truck·#·1406···Tag:·47C746·exp:·12/24···VIN:6943¶
Trailer·#·4839·····Tag:7405P2················VIN:1964¶
- → No·mudflap·Left·side·trailer¶
- → Private·trailer·tag·with·commercial·tractor·tag¶
¶
Truck·#·1411···Tag:·NE·APP·W31378·exp:·2025····VIN:4713¶
Trailer·#············Tag:2569KE·················VIN:5597¶
- → Driver·steer·tire·large·chunks¶
- → Need·lease·agreement·(warner)¶
- → Left·rear·trailer·tire·separation¶
- → Paper·registration·in·truck·stated·trailer·should·have·tag·7401P2·(private·trailer),·need·commercial·non-expiring.¶
- → Passenger·steer·tire·large·chunks¶
- → Right·rear,·inside,·trailer·tire·large·chunks¶
- → YM·showing·private·trailer·tag·7401P2·5/25·needs·non·exp·trailer·tag.¶
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References

1. List of links relevant to CDL Auditing

      a. [Oklahoma Administrative Code](#)

2. List of forms relevant to CDL Auditing

      a. COMMERCIAL SCHOOL AUDIT FORM.docx

      b. Commercial School Student Records Audit Form.docx

      c. Fleet Inspection Example - American Truck Training Fleet Inspection. July 16 2024.docx

      d. vehicle inspection request.docx

      e. Vehicle Inspection Form.docx