



# CDL School Non-Compliance Disciplinary Protocol

CDL Drive Schools

3-17-2025



## Revision History

<b>Effective Date of SOP:</b> 3/24/2025	<b>SOP Number:</b> SOP F.04
<b>Functional Area Name:</b> Drive Schools	<b>Division Name:</b> CDL
<b>Last Review Date:</b> 2/21/2025	<b>Last Reviewer:</b> Amanda Casebier, CDL Supervisor
<b>Next Review Date:</b> 2/21/2026	<b>Next Reviewer:</b> CDL Supervisor
<b>Executive Approval Date:</b> 3/17/2025	<b>Approved By:</b> Alyson Sorenson, CDL Manager

## Overview

This standard operating procedure (SOP) covers the steps for addressing and escalating instances of noncompliance with statutes, codes, or Service Oklahoma (SOK) rules by a CDL Drive School.

## Purpose

This SOP provides a detailed process for identifying, documenting, and addressing non-compliance by a Drive School, including the steps for escalating the issue to higher authorities if necessary.

## Policy Statement

These procedures apply to all instances of noncompliance by Drive Schools with relevant statutes, codes, or SOK rules. The goal is to ensure consistent and fair handling of infractions, maintaining the integrity of the examination process.

## Compliance

**OAC 670:15-33** – Truck Driver Training

## Systems

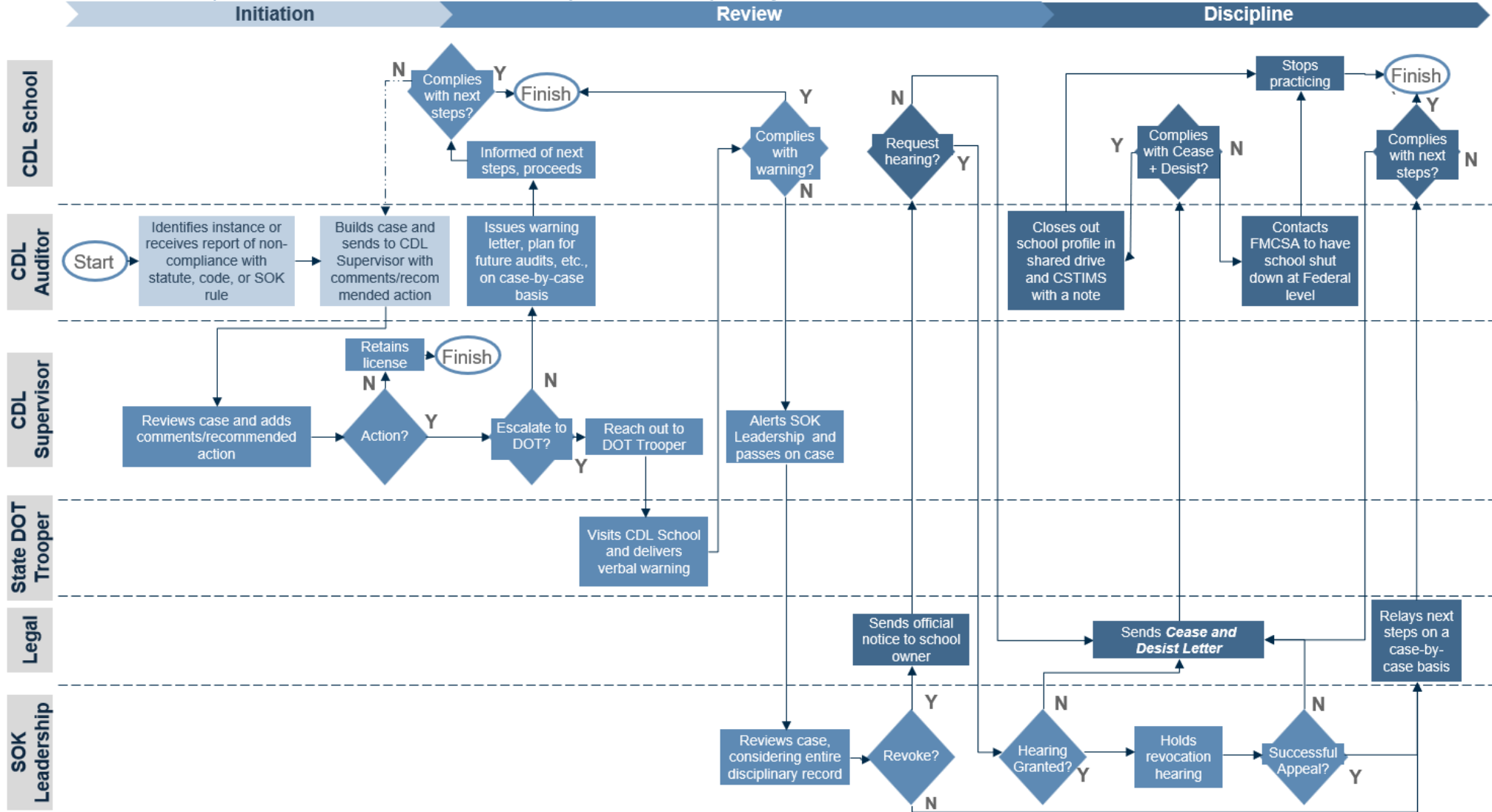
System	Function
SOK Shared Drive	Internal shared drive used by CDL employees to share files. CDL team used the CDL Admin Folder.
Commercial Skills Test Information Management System (CSTIMS)	American Associated of Motor Vehicle Administrators (AAMVA)-sponsored tool to

	track CDL schools, instructors TPEs, and student test results
Federal Motor Carrier Safety Administration (FMCSA) Registry	National Registry tracking all truck schools certified to operate in the U.S.

## 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.
State DOT Trooper	State Trooper with expertise in DOT/SOK policy and procedure. Helps to enforce SOK orders with CDL schools.
SOK Legal Team	In-house counsel at SOK that communicates sensitive legal matters with CDL schools.
SOK Leadership Team	Rotating leadership team that makes final decisions on CDS license revocation and conducts hearings.
Federal Motor Carrier Safety Administration (FMCSA)	Federal agency that regulates trucking. Can shut down state CDL schools if they do not comply with Cease-and-Desist orders.

# Process Map – CDL Drive School Non-Compliance Disciplinary Protocol



## Procedures

### Process #1: CDL School Non-Compliance Disciplinary Protocol

**Purpose:** This process provides detailed steps for identifying, documenting, and addressing non-compliance by a Drive School, including the steps for escalating the issue to higher authorities if necessary.

**Background:**

**Process Step-by-Step:**

1. Once a CDL Auditor becomes aware of an instance of non-compliance, they will document the incident in the CDL School's shared drive folder. This includes compiling evidence, adding comments, and recommending a course of action before bringing the case to the attention of the CDL Manager.
2. The CDL Manager reviews the case and adds their input/comments. Based on their understanding of the case, the CDL Manager can take one of three steps:
  - **No Action:** If the infraction was minor, the CDL Manager may simply decide to leave a note on the CDS's file to keep a record of something to watch for in future audits. This would mark one end to the CDL School Disciplinary Protocol.
  - **Conduct an Audit:** This could come in the form of a full audit, facility audit, vehicle(s) audit, records audit, classroom instruction audit, drive route audit, or some combination of the above, depending on the nature of the issue. If the school complies and corrects their practices, this marks the end of the CDL School Disciplinary Process. If not, further review may be required.
  - **Escalate to Leadership:** For serious or persistent infractions, the CDL Manager may escalate the case to a State DOT Trooper to enforce compliance. This may still involve intermediary communication with the school owner, such as warnings or next steps.
3. After being contacted by the CDL Manager, a State DOT Trooper will visit the CDL School to deliver a verbal warning to the school owner that their compliance issue is being taken seriously by the state and further non-compliance will result in suspension or revocation of their certification.
  - If the school listens to the Trooper and complies with the warning, their case will not be escalated and, following an audit from a CDL auditor to confirm continued compliance, this will be the end of the school's disciplinary process.
  - If the school does not listen to the Trooper and continues to violate statute or code, the CDL leader will alert SOK Leadership of a serious, persistent infraction and recommend that they move forward with a suspension or revocation of the school's certification.
4. If a case is escalated, SOK Leadership will review the case along with the recommended actions from the CDL Auditor/CDL Manager. The leadership team may include General

Counsel, the Chief Development and Support Officer, and, if necessary, the CEO and COO. Leadership will convene to decide whether to revoke the school's license.

- If leadership chooses NOT to revoke, a CDL Auditor will communicate disciplinary action with the school and note the leadership review and disciplinary action in the school's shared drive folder.
- If leadership decides to revoke the school's license, the CDL school has the right to request a hearing. Legal will send the school official notice of intent to revoke by mail explaining their next steps, including right to a hearing.
  - If the school does not request a hearing, the SOK legal team will send them a cease-and-desist letter ([See Appendix](#)).
  - If the school requests a hearing, leadership can choose to grant or deny it.
    - If leadership denies the hearing, the SOK legal team will send them a cease-and-desist letter.
    - If the leadership grants a hearing, the process will continue with a disciplinary hearing for the CDL school.

**Note:** A school has 20 days from the date of notice to respond with a request for a hearing

5. If a hearing is granted, the SOK leadership, the legal team, and members of the CDL team will conduct a hearing for the CDL School Owner where the owner will hear the details of their infraction and make a case for themselves. Leadership will consider the appeal.
  - If the school's appeal is denied, the SOK legal team will share this result with the owner and send them a cease-and-desist letter ([See Appendix A](#))
  - If the school's appeal is successful, leadership will share this result with them. A successful appeal, however, still may require disciplinary action such as further audits to ensure continued compliance, which will be communicated by a CDL Auditor or the legal team.
    - If upon further check-ups post-appeal, the school is found to have correct their compliance issues, this marks the end of the disciplinary protocol.
    - If the school does not comply with the next steps agreed upon at the hearing, they will be sent a cease-and-desist letter ([See Appendix A](#))

**Note:** For a full description of hearing procedures, roles, and regulations, see OAC 670:15-33-16. - Hearings.

6. Once a school has received a cease-and-desist letter, they have three (3) days to contact SOK and acknowledge receipt.
  - If the school acknowledges the cease-and-desist letter, they will cease operations until they can come back into compliance with statute and code.



- If the school does not comply with the cease-and desist, SOK will contact the FMCSA to have the school removed from the national Training Provider Registry ([See Appendix B](#)).
7. After either a federal shutdown or voluntary cease-and-desist compliance, a CDL auditor will close out the school's folder in the SOK shared drive with a write-up of what happened in the disciplinary protocol.

**Note:** SOK will not accept any training or tests taken by students dated after a school has been notified of a cease-and-desist or removed from the national registry.

## Appendix

### Appendix A: Example Cease and Desist Notice

To whom it may concern,

Service Oklahoma, Driver License Operations is responsible for monitoring companies listed on the Federal Motor Carrier Administration, Training Provider Registry for the State of Oklahoma. Your company is listed on the Training Provider Registry as providing truck driver training for Entry Level Driver Training (ELDT) in Oklahoma. The State of Oklahoma has regulations that govern our Commercial Driver License Program that must be met before such training can be conducted in the state by a truck driving school or entity.

As of today January 28, 2025, it is your responsibility to cease all operations in Oklahoma until such time we can determine that your company is eligible to perform such training. You must make contact with me by phone or return this email with the type of ELDT your company offers in our state and where that training is conducted within 3 business days, if you don't, the State of Oklahoma will find it necessary to report to FMCSA that you have not met the State of Oklahoma's ELDT requirements and ask that you be removed from the Training Provider Registry immediately.


I look forward to hearing from you.

Per our conversation we will test Stacy Stefanatos, Joseph Stefanatos and Tasha Stefanatos however, any training conducted from this date forward will be denied. You will receive a secondary email with the information of how to become compliant.


Amanda L. Casebier, 2601



## Appendix B: Guidelines for Reporting Schools to FMCSA



**TRAINING  
PROVIDER REGISTRY**




U.S. Department of Transportation  
Federal Motor Carrier Safety Administration

### Checklist for Reporting Training Providers That Do Not Meet State Requirements


The Federal Motor Carrier Safety Administration (FMCSA) values its partnership with States, which is essential in promoting safety, efficiency, and excellence in the motor carrier industry. FMCSA encourages States to remain proactive in identifying and reporting training providers that do not meet applicable State requirements to deliver Entry-Level Driver Training (ELDT). This document provides guidance to States requesting the removal of training providers from the Training Provider Registry (TPR). FMCSA recommends that States submit all documentation and correspondence available concerning a training provider. FMCSA will handle complaints that are not State based through its regular complaint handling process.

**What should a State do prior to contacting FMCSA?**

 Before reaching out to FMCSA, the State should:


- ☐ Send the training provider a signed letter and/or notice directing the training provider to take action required by the State (e.g., register with the State, pay appropriate filing fees) within an identified timeframe; and
- ☐ Send its letters and notices with proof of delivery to the training provider (e.g., Certificates of Service, proof of delivery tracking).

**What information should a State submit for FMCSA to investigate a training provider that does not meet applicable State requirements?**

 A State should provide, at a minimum, the following information:

- ☐ The name and address of the training provider;
- ☐ The applicable State laws, regulations, or other requirements that the training provider does not meet, such as requirements to be licensed, certified, registered, or authorized to provide training; and
- ☐ Copies of any signed letters and/or notices directing a training provider to take action required by the State (e.g., register with the State, pay appropriate filing fees).


**What information should a State submit for FMCSA to issue an immediate or emergency removal against a training provider?**

 In addition to the items listed above, States should submit the following supporting documents to substantiate its complaint:

- ☐ Any additional supporting documents or communication to and from the training provider (e.g., cease and desist orders, show cause orders, any responses from the training provider);
- ☐ Proof of delivery of the State's letters and/or notices to the training provider;
- ☐ Confirmation that the State's requested timeline to the training provider has passed; and
- ☐ Any proof that the training provider is still operating in the State.

Based on evidence provided, FMCSA retains the right to determine the appropriate level of action.  
States may submit their documents to [StatesTPR@dot.gov](mailto:StatesTPR@dot.gov).

May 2024







## References

1. List of links relevant to CDL Schools
  - a. [Oklahoma Administrative Code](#)
  - b. [FMCSA Website](#)
2. List of forms relevant to CDL Schools
  - a. [C+D Email Example.png](#)