

## Third-Party Administration of Driving Examinations Audit Report 201112-18

October 30, 2012

### Executive Summary

The Department of Highway Safety and Motor Vehicles (Department) is authorized in Section 322.56, Florida Statutes (F.S.) to use third-party administrators to conduct the written and driving skills portions of examinations for all classes and types of driver licenses. The Department uses third-party administrators for motorcycle endorsements, commercial driver licensing (CDL), Class E licensing and the Driver Education Licensing Assistance Program.

The purpose of this audit was to examine the third-party administration of driving examinations. The specific objective was to determine if monitoring of the third-party administration of driver license examinations is in compliance with Department policy and Florida Statutes. The Driver Education Licensing Assistance Program was not included in the scope of this review because fieldwork was conducted while schools were on summer break.

During our evaluation, we identified the following issues that require management attention:

- Two Florida Rider Training Program (FRTTP) regional coordinators monitor third-party administrators where they have conflicts of interest.
- The FRTTP policies and procedures do not adequately define requirements for management and oversight of the third-party administrators.
- The FRTTP and some third-party administrators are not maintaining accurate lists of RiderCoaches.
- The FRTTP and some third-party administrators did not have documentation of RiderCoach recertification or signed Codes of Conduct for RiderCoaches.
- Some third-party administrators were not maintaining driver license record checks for RiderCoaches.
- Some CDL section and third-party administrator files for testers did not include all required documentation.

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- Some third-party administrators were using primary and alternate road test routes that differed from the road test routes on file with the CDL section.
- Third-party administrator and third-party administrator tester certificates were not displayed by some third-party administrators.
- Six Class E third-party administrator websites do not contain some of the specific statements required by the Third-Party Driver License Testing Service contract.

Motorist Services management generally agreed with the findings and recommendations and has begun corrective action.

## **Background and Introduction**

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Each year, the Office of Inspector General identifies and ranks areas of potential risk in the Department. Based on the results of the Fiscal Year 2011-2012 risk assessment, third-party administration of driving examinations was selected for audit.

The Department of Highway Safety and Motor Vehicles (Department) is authorized in Section 322.56, F.S. to use third-party administrators to conduct the written and driving skills portions of examinations for all classes and types of driver licenses. The Department uses third-party administrators for motorcycle endorsements, CDL, Class E licensing and the Driver Education Licensing Assistance Program. The Department is responsible for monitoring these third-party administrators.

### **Motorcycle Endorsement**

Motorcycle riders must have a valid Florida driver's license with a motorcycle endorsement to legally ride a motorcycle on public streets and highways. To obtain a motorcycle endorsement, the rider is required to pass a knowledge test, complete a motorcycle safety class and pass a rider skills test administered by a third-party administrator.

Section 322.0255, F.S. required the Department to establish a Motorcycle Safety Education Program. The Department's program is the FRTP. Section 322.0255, F.S. also required the Department to establish and administer motorcycle safety courses and adopt or include courses, curricula or materials developed by the Motorcycle Safety Foundation (MSF) or by other comparable traffic safety groups. The FRTP uses MSF safety standards and curricula as a basis for its motorcycle training.

Ranges used for the skills test must be approved by the MSF and may be located either at the third-party administrators' main or off-site locations. There are 76 third-party administrators and 117 ranges throughout the state. Third-party administrators must teach MSF approved material and follow all MSF approved rules and regulations when administering the examinations.

FRTP Regional Coordinators monitor the third-party administrators to confirm MSF guidelines are being followed. The FRTP also oversees third-party administrator instructors, RiderCoaches, who provide motorcycle training in Florida. RiderCoaches are required to complete a 50 hour training course to be certified by the MSF. The RiderCoaches must also have a valid Class E license with a motorcycle endorsement and recertify every two years.

### **Commercial Drivers License**

The Department began outsourcing CDL testing in 1991 with 25 third-party administrators. The Department contracts with more than 60 third party administrators that employ approximately 321 third-party testers. Third-party testers administer the

pre-trip/basic skills and driving tests. These tests are administered in accordance with guidelines set by the Federal Motor Carrier Safety Administration. Presently, third-party administrators conduct approximately 90% of all commercial driver license basic skills and driving tests given in the state and the Department conducts the remaining 10%. Some third-party administrators represent private companies and are not open to the public but offer CDL testing for their companies' employees.

Compliance Officers monitor third-party administrators through on-site visits to review testing curriculum and documentation.

### **Class E**

A Class E driver license is required to operate any non-commercial motor vehicle with Gross Vehicle Weight Rating less than 26,001 pounds, including passenger cars, 15 passenger vans including the driver, trucks or recreational vehicles and two or three wheel motor vehicles 50 cc or less, such as mopeds or small scooters. A Class E license is required before obtaining a commercial driver license or a motorcycle endorsement.

The Department has contracted with eight third-party administrators to conduct on-line testing for the knowledge portion of Class E examinations. Third-party administrators are required to use the Department's driver license testing web service for all Class E license testing activity.

## **Findings and Recommendations**

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During our evaluation, we identified issues involving FRTP, CDL and Class E licensing that require management attention. These issues are detailed below.

### ***Florida Rider Training Program***

#### *Conflicts of Interest*

Management Policies 3.08, *Ethics and Personal Responsibility*, and 5.03, *Dual Employment and Compensation*, provide guidance regarding the acceptance of other employment which may create a conflict of interest or impair the independence of judgment in the performance of members' public duties.

The Bureau of Personnel Services *Procedures for Dual and Secondary Employment* states:

1. If a member is to accept secondary employment outside state government, the member will request approval from their supervisor in writing prior to the start date of employment.

2. When a supervisor receives a request for secondary employment outside state government they will verify that such employment does not conflict with the member's state employment or with the Department's procedures limiting such outside employment. The supervisor shall advise their respective Bureau Chief/Troop Commander of the request. If a conflict is found to exist, secondary employment will be reviewed by the Chief Ethics Officer.
3. During the course of the member's secondary employment the Department may make reasonable inquiries of the member to ensure that the member's continued secondary employment does not constitute a conflict of interest or interfere with the member's primary duties, including on-call assignments.

The FRTP has a regional coordinator who is a corporate officer of a third-party administrator he is assigned to monitor and another regional coordinator who is a RiderCoach for a third-party administrator he is assigned to monitor. The FRTP did not have documentation of written approval for either regional coordinator's secondary employment.

### **Finding 1**

Two FRTP regional coordinators monitor third-party administrators where they have conflicts of interest.

### **Recommendations**

We recommend the FRTP take corrective action for the two regional coordinators employed by third-party administrators they are assigned to monitor and review all regional coordinators' secondary employment for conflicts of interest.

We also recommend the FRTP comply with Management Policies 3.08, 5.03 and Department *Procedures for Dual and Secondary Employment* requiring members to request approval from their supervisor in writing prior to the start date of secondary employment.

### **Division Response**

The Bureau has taken corrective action by requiring the two members to cease with outside employment immediately and provide a confirmation document attesting to their understanding of conflict of interest and dual/secondary employment. The member that served as a corporate officer with a motorcycle sponsor school has also received a written reprimand on 9/14/2012, for violation of DHSMV Management Policy 3.08, Ethics and Personal Responsibility. The Bureau has also required all members of FRTP to sign an attestation regarding Management Policies 3.08, Ethics and Personal Responsibility, and 5.03, Dual Employment and Compensation. The Bureau will no longer allow an FRTP employee to serve in any capacity with sponsor schools that are under the regulatory purview of FRTP.

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*Policies and Procedures*

Although the CDL and F RTP programs are similar in many ways, compared to the CDL program, the F RTP lacks documented guidance for oversight.

<b>Comparison of CDL to F RTP</b>	
<b>CDL</b>	<b>F RTP</b>
CDL section established a compliance officer manual which provides detailed job requirements and instruction for monitoring third-party administrators.	F RTP does not have a regional coordinator manual (Driver Education Licensing Assistance Program is moving to the same Bureau as F RTP which will add additional responsibilities to regional coordinators).
CDL compliance officers are required to visit each third-party administrator annually.	F RTP does not have a specific requirement to visit each third-party administrator annually.
CDL Administrator contract provides detailed descriptions and timeframes for maintenance of required documentation	F RTP and MSF forms do not provide detailed descriptions and timeframes for maintenance of required documentation
CDL Administrator contract requires third-party administrators to notify the Department in writing within ten calendar days of changes in third-party administrator testers.	F RTP and MSF forms do not provide specific instructions or timeframes to notify the Department of the employment status of RiderCoaches.

**Finding 2**

The F RTP policies and procedures do not adequately define requirements for management and oversight of the third-party administrators.

**Recommendation**

We recommend the F RTP develop policies and procedures similar to the CDL section to clarify requirements for the F RTP, third-party administrators and RiderCoaches.

### **Division Response**

The Bureau is creating a detailed Operations and Procedures Manual (OPM) for each position classification within FRTP. These OPMs will outline the detail and expectations of each position classification and clearly define the requirements for the management and oversight of the motorcycle sponsor schools. The OPMs will specify and quantify the Bureau expectations on site visits and provide reporting mechanisms on addressing deficiencies that are discovered at sponsor schools. The OPMs will define site visits and will incorporate a thorough review of required documentation to be maintained by each sponsor school with checklists to be maintained in the sponsor school file.

#### *RiderCoach Lists*

The FRTP provided lists of RiderCoaches for seven third-party administrators selected for review. The lists were compared to each third-party administrator's list of RiderCoaches. Three of the seven third-party administrators' lists of active RiderCoaches did not agree with the FRTP's list of RiderCoaches. A total of 61 differences between the FRTP's list and the third-party administrators' lists of RiderCoaches were noted.

OIG staff requested a copy of the master list of RiderCoaches from the MSF. The MSF agreed to provide the master list of RiderCoaches; however, it was not provided.

### **Finding 3**

The FRTP and some third-party administrators are not maintaining accurate lists of RiderCoaches.

### **Recommendation**

We recommend the FRTP develop a process to ensure its list of RiderCoaches and the third-party administrators' lists of RiderCoaches are accurately maintained.

### **Division Response**

The Bureau is creating a WRAP Request to allow identified FRTP employees access to each sponsor school's list of RiderCoaches within the Online Data Exchange (ODE). Additionally, FRTP will be requesting a detailed list of current RiderCoaches from each sponsor school in an effort to update the ODE. The Bureau is creating a RiderCoach Action Document that is required to be completed by the sponsor school when a RiderCoach is added or removed from their active RiderCoach listing within ten (10) calendar days of the action.

*Recertification and Codes of Conduct*

Chapter 15A-12.007, Florida Administrative Code (F.A.C.), requires RiderCoaches to:

- Recertify with the MSF on-line every two years and forward proof of recertification to third-party administrators; and
- Sign and abide by the F RTP RiderCoach Rules of Professional Conduct.

Most of the third-party administrators reviewed did not maintain documentation of RiderCoach recertification or signed Codes of Conduct for RiderCoaches.

**Finding 4**

The F RTP and some third-party administrators did not have documentation of RiderCoach recertification or signed Codes of Conduct for RiderCoaches.

**Recommendations**

We recommend the F RTP maintain documentation of RiderCoach recertification and signed Codes of Conduct for all RiderCoaches.

We also recommend the F RTP require third-party administrators to maintain documentation of RiderCoach recertification and signed Codes of Conduct for their RiderCoaches.

**Division Response**

Currently the RiderCoach recertification and codes of conduct documentation for each RiderCoach is maintained in the Tampa location. The Bureau will transfer these files to Tallahassee for electronic storage and ease of retrieval. The future recertifications and codes of conduct documentation will be stored in an electronic file and maintained by the F RTP Staff Assistant. The files will be cross referenced to the updated Online Data Exchange to ensure that each RiderCoach file is current and accounted for. The sponsor schools will be provided a detailed checklist of the required documentation to be maintained by the school on each employee and these files will be reviewed as part of the site visit inspections.

*RiderCoach Driver License*

The RiderCoach Apprentice Program Application requires the RiderCoach Apprentice or third-party administrator to provide documentation of a valid driver license. Chapter 15A-12.007, F.A.C., requires RiderCoaches to maintain a valid driver license. Seven third-party administrators reviewed did not have RiderCoach driver license documentation.

## **Finding 5**

Seven third-party administrators were not maintaining RiderCoach driver license documentation.

### **Recommendation**

We recommend the FRTP and third-party administrators maintain current documentation of each RiderCoach driver license.

### **Division Response**

The Bureau will utilize the updated listings of all RiderCoaches to flag each active RiderCoach in Motorist Maintenance with a code 88, School Instructor Certification. This will ensure that FRTP is notified when any RiderCoach receives a sanction or their license status changes. In addition, FRTP will provide each sponsor school the Driver License Check, <https://services.flhsmv.gov/DLCheck/>, and request that the sponsor school perform license checks quarterly on each RiderCoach to ensure that their license is valid.

## ***Commercial Driver License (CDL) Section***

### *Tester Documentation*

The CDL Tester contract requires each third-party administrator maintain, as a condition of continued certification, the following qualifications:

- Approved Tester Contract
- Documentation of Tester Qualifications
  - Driver's License Check
  - Background Check
  - Documented Training Class Attendance
  - Copy of the TPA Tester Certificate

CDL section files did not contain complete documentation of tester qualifications for 14 of 45 (31%) testers reviewed. Missing documentation included driver's license checks, background checks and documented training class attendance.

The CDL Administrator contract requires third-party administrators to maintain a file for each of their third-party testers. The contract also requires each third-party administrator tester file include documentation of the official state driver record, current within the past six months. Third-party administrators did not maintain current driving records for six of 45 (13%) testers reviewed.

## **Finding 6**

Some CDL section and third-party administrator files for testers did not include all required documentation.

### **Recommendations**

We recommend the CDL section update its third-party administrator tester files to include all documentation required by the CDL Administrator and CDL Tester contracts.

We also recommend the CDL section ensure each third-party administrator maintains current documentation of each third-party administrator tester's driver record.

### **Division Response**

The CDL and Third Party Testing unit has revised its contract file system to replace paper files with electronic format documents. All contract paperwork now being submitted is either sent as email attachments or scanned when received for storage in electronic folders on a network drive. Paper files on contracts developed before this change are being scanned into this same electronic filing system. These changes should resolve this issue to the extent it was due to losing or misplacing the paper file documents.

We also note that the review was based on current contract documentation requirements. However, we found that most specific instances of missing documents were from older contract files, developed before the document in question was required. This cause of missing documents will resolve itself over time as long-time third party administrators and testers drop out of the program and are replaced under the newer documentation requirements.

The issue of some driver records missing from third party administrators' (TPAs) records will be resolved by an upcoming change in procedures. The requirement for TPAs to maintain recent paper copies of their testers' driver records originated in a time when Department CDL program monitors all worked from home offices and did not have their own ready access to those documents. Requiring TPAs to maintain this document was for the monitors' convenience when doing on-site audits. Compliance Officers (monitors) now have electronic access to these records at their workstations via the Motorist Maintenance application. The contractual requirement for TPAs to maintain this document will be replaced with a procedural change in site audit procedures requiring the Compliance Officer to conduct electronic records checks. A proposed future enhancement is to have GHQ program administrators proactively notified of significant changes in testers' driver records.

*Approved Road Test Routes*

The CDL Administrator contract requires the third-party administrator to maintain an approved road test route and one or more alternate routes.

Six third-party administrators' primary and alternate road test routes differed from the primary and alternate road test routes on file with the CDL section.

One third-party administrator does not have an approved alternate road test route required by contract.

**Finding 7**

Some third-party administrators were using primary and alternate road test routes that differed from the primary and alternate road test routes on file with the CDL section.

**Recommendation**

We recommend the CDL section update its file of third-party administrator primary and alternate road test routes to accurately reflect the road test routes currently approved and in use by the third party administrators.

**Division Response**

All current CDL Third Party Administrator and Third Party Tester contracts are to be replaced over the next year with new contracts meeting recently revised federal standards. In the course of this update we will ensure that all new contract files include current copies of the approved primary and alternate road test routes.

*Third-Party Administrator and Third-Party Administrator Tester Certificates*

The CDL Administrator contract requires third-party administrators to prominently display the authorized third-party administrator certificate in the approved third-party testing sites.

Although not required by contract, the CDL section provides guidance in its *Record Keeping and Site Requirements for Third-Party Administrators and Testers Memorandum* for TPAs and testers. The memorandum requires the third-party administrators to post TPA tester certificates.

One third-party administrator was not displaying its third-party administrator certificate and four third-party administrators were not displaying the third-party administrator tester certificates.

## **Finding 8**

Third-party administrator and third-party administrator tester certificates were not displayed by some third-party administrators.

### **Recommendation**

We recommend the CDL section ensure third-party administrators display third-party administrator and third-party administrator tester certificates.

### **Division Response**

This issue will be resolved by removing the certificate display requirement from CDL Third Party Administrator and Third Party Tester contracts during the revision process described under Finding 7. This is another contractual requirement that has been made obsolete by improving technology. At the time it was created, paper credentials of this nature were one of the means for establishing a tester's authority and removing it when necessary. That function involved a physical process of either issuing or recovering the tester's certificate, ID card, and paper waiver forms. This is now done through granting or removing electronic credentials in the Third Party (Paperless) Waiver System, and the certificate itself has only ceremonial value. They will continue to be issued for that purpose but without any requirements for their display.

## ***Class E - Third-Party Driver License Testing Services***

### *Contractual Pre-Test Statements*

The Third-Party Driver License Testing Service contract requires third-party administrators' websites to contain specific statements required by the Third-Party Driver License Testing Service contract.

Six third-party administrator websites did not contain specific statements required by the Third-Party Driver License Testing Service contract.

## **Finding 9**

Six Class E third-party administrator websites do not contain some of the specific statements required by the Third-Party Driver License Testing Service contract.

### **Recommendations**

We recommend the Third-Party Driver License Testing Service ensure the Class E third-party administrator websites include specific statements required by the Third-Party Driver License Testing Service contract.

We also recommend the Third-Party Driver License Testing Service conduct annual reviews of third-party administrator websites to ensure contract compliance.

### **Division Response**

The Bureau will be contacting each of the third party administrators through written correspondence providing a detailed listing of the inaccuracies within the website. The Bureau will require each administrator to make the necessary corrections within 30 days of the date of the letter and send confirmation of the corrective action. The Bureau is creating a detailed website checklist and will be conducting website reviews on each administrator periodically to ensure contractual compliance. The checklist will be included in the contract file and maintained within the Bureau of Motorist Compliance.

### **Acknowledgements**

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We would like to thank the FRTP, CDL and Class E sections, and the third-party administrators for their cooperation and assistance during the audit.

## **ATTACHMENT 1 - Purpose, Scope and Methodology**

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The purpose of this audit was to examine the third-party administration of driving examinations.

The specific objective was to determine if monitoring of the third-party administration of driver license examinations is in compliance with Department policy and Florida Statutes.

The scope of this audit included the third-party administration of driving examinations during Fiscal Year 2011-2012. The Driver Education Licensing Assistance Program was not included in the scope of this review because fieldwork was conducted while schools were on summer break.

Our methodology included:

- Reviewing Florida Statutes and Florida Administrative Code;
- Reviewing Department policies and procedures;
- Interviewing Department staff;
- Reviewing contracts and agreements;
- Reviewing applicant documentation;
- Reviewing tester documentation; and
- Reviewing other applicable documentation.

**ATTACHMENT 2 - Audit Team and Statement of Accordance**

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**Engagement Team**

Nick Anadiotis, Auditor  
Megan Frink, Auditor  
Doane Rohr, Auditor  
Ronnie Atkins, CPA, CIA, CMA, Audit Director

**Statement of Accordance**

Section 20.055, Florida Statutes, requires the Florida Department of Highway Safety and Motor Vehicles' Inspector General to review, evaluate and report on policies, plans, procedures, accounting, financial and other operations of the Department and to recommend improvements.

This audit engagement was conducted in accordance with applicable *International Standards for the Professional Practice of Internal Auditing* published by the Institute of Internal Auditors and Principles and Standards for Inspectors General published by the Association of Inspectors General.

**ATTACHMENT 3 - Addressee and Distribution List**

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Julie L. Jones, Executive Director  
Boyd Walden, Director of Motorist Services

Copies distributed to:

Diana Vaughn, Deputy Executive Director  
Stacy Arias, Chief of Staff  
Steven Fielder, Deputy Director of Motorist Services  
David Helton, Chief of Commercial Vehicles & Driver Services  
Julie Gentry, Chief of Motorist Compliance

Melinda M. Miguel, Chief Inspector General  
David W. Martin, Auditor General

ATTACHMENT 4 - Management Response



Julie L. Jones  
Executive Director

2900 Apalachee Parkway  
Tallahassee, Florida 32399-0800  
www.flhsmv.gov

MEMORANDUM

DATE: October 23, 2012  
TO: Ronnie Atkins, Audit Director  
FROM: Boyd Walden, Division Director *cbw*  
SUBJECT: Management Response to the Third-Party Administration of Driving Examinations Audit (201112-18)

The following is our response to the findings and recommendations presented in the report.

**Finding 1**

Two FRTP regional coordinators monitor third-party administrators where they have conflicts of interest.

**Recommendations**

We recommend the FRTP take corrective action for the two regional coordinators employed by third-party administrators they are assigned to monitor and review all regional coordinators' secondary employment for conflicts of interest.

We also recommend the FRTP comply with management policies 3.08, 5.03 and Department *Procedures for Dual and Secondary Employment* requiring members to request approval from their supervisor in writing prior to the start date of secondary employment.

**Division Response**

The Bureau has taken corrective action by requiring the two members to cease with outside employment immediately and provide a confirmation document attesting to their understanding of conflict of interest and dual/ secondary employment. The member that served as a corporate officer with a motorcycle sponsor school has also received a written reprimand on 9/14/2012, for violation of DHSMV Management Policy 3.08, Ethics and Personal Responsibility. The Bureau has also required all members of FRTP to sign an attestation regarding Management Policies 3.08, Ethics and Personal Responsibility, and 5.03, Dual Employment and Compensation. The

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Bureau will no longer allow an FRTP employee to serve in any capacity with sponsor schools that are under the regulatory purview of FRTP.

**Finding 2**

The FRTP policies and procedures do not adequately define requirements for management and oversight of the third-party administrators.

**Recommendation**

We recommend the FRTP develop policies and procedures similar to the CDL section to clarify requirements for the FRTP, third-party administrators and RiderCoaches.

**Division Response**

The Bureau is creating a detailed Operations and Procedures Manual (OPM) for each position classification within FRTP. These OPM's will outline the detail and expectations of each position classification and clearly define the requirements for the management and oversight of the motorcycle sponsor schools. The OPM's will specify and quantify the Bureau expectations on site visits and provide reporting mechanisms on addressing deficiencies that are discovered at sponsor schools. The OPM's will define site visits and will incorporate a thorough review of required documentation to be maintained by each sponsor school with checklists to be maintained in the sponsor school file.

**Finding 3**

The FRTP and some third-party administrators are not maintaining accurate lists of RiderCoaches.

**Recommendation**

We recommend the FRTP develop a process to ensure its list of RiderCoaches and the third-party administrators' lists of RiderCoaches are accurately maintained.

**Division Response**

The Bureau is creating a WRAP Request to allow identified FRTP employees access to each sponsor school's list of RiderCoaches within the Online Data Exchange (ODE). Additionally, FRTP will be requesting a detailed list of current RiderCoaches from each sponsor school in an effort to update the ODE. The Bureau is creating a RiderCoach Action Document that is required to be completed by the sponsor school when a RiderCoach is added or removed from their active RiderCoach listing within ten (10) calendar days of the action.

**Finding 4**

The FRTP and some third-party administrators did not have documentation of RiderCoach recertification or signed Codes of Conduct for RiderCoaches.

**Recommendations**

We recommend the FRTP maintain documentation of RiderCoach recertification and signed Codes of Conduct for all RiderCoaches.

We also recommend the FRTP require third-party administrators to maintain documentation of RiderCoach recertification and signed Codes of Conduct for their RiderCoaches.

**Division Response**

Currently the RiderCoach recertification and codes of conduct documentation for each RiderCoach is maintained by Ray Zurenda in the Tampa location. The Bureau will transfer these files to Tallahassee for electronic storage and ease of retrieval. The future recertifications and codes of conduct documentation will be stored in an electronic file and maintained by the FRTP Staff Assistant. The files will be cross referenced to the updated Online Data Exchange to ensure that each RiderCoach file is current and accounted for. The sponsor schools will be provided a detailed checklist of the required documentation to be maintained by the school on each employee and these files will be reviewed as part of the site visit inspections.

**Finding 5**

Some third-party administrators were not maintaining driver license documentation for RiderCoaches.

**Recommendation**

We recommend the FRTP and third-party administrators maintain current documentation of each RiderCoach driver license.

**Division Response**

The Bureau will utilize the updated listings of all RiderCoaches to flag each active RiderCoach in Motorist Maintenance with a code 88, School Instructor Certification. This will ensure that FRTP is notified when any RiderCoach receives a sanction or their license status changes. In addition, FRTP will provide each sponsor school the Driver License Check, <https://services.flhsmv.gov/DLCheck/>, and request that the sponsor school perform license checks quarterly on each RiderCoach to ensure that their license is valid.

**Finding 6**

Some CDL section and third-party administrator files for testers did not include all required documentation.

**Recommendations**

We recommend the CDL section update its third-party administrator tester files to include all documentation required by the CDL Administrator and CDL Tester contracts.

We also recommend the CDL section ensure each third-party administrator maintains current documentation of each third-party administrator tester's driver record.

**Division Response**

The CDL and Third Party Testing unit has revised its contract file system to replace paper files with electronic format documents. All contract paperwork now being submitted is either sent as email attachments or scanned when received for storage in electronic folders on a network drive. Paper files on contracts developed before this change are being scanned into this same electronic filing system. These changes should resolve this issue to the extent it was due to losing or misplacing the paper file documents.

We also note that the review was based on current contract documentation requirements. However, we found that most specific instances of missing documents were from older contract files, developed before the document in question was required. This cause of missing documents will resolve itself over time as long-time third party administrators and testers drop out of the program and are replaced under the newer documentation requirements.

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**Finding 7**

Some third-party administrators were using primary and alternate road test routes that differed from the primary and alternate road test routes on file with the CDL section.

**Recommendation**

We recommend the CDL section update its file of third-party administrator primary and alternate road test routes to accurately reflect the road test routes currently approved and in use by the third party administrators.

**Division Response**

All current CDL Third Party Administrator and Third Party Tester contracts are to be replaced over the next year with new contracts meeting recently revised federal standards. In the course of this update we will ensure that all new contract files include current copies of the approved primary and alternate road test routes.

**Finding 8**

Third-party administrator and third-party administrator tester certificates were not displayed by some third-party administrators.

**Recommendation**

We recommend the CDL section ensure third-party administrators display third-party administrator and third-party administrator tester certificates.

**Division Response**

This issue will be resolved by removing the certificate display requirement from CDL Third Party Administrator and Third Party Tester contracts during the revision process described under Finding 7. This is another contractual requirement that has been made obsolete by improving technology. At the time it was created, paper credentials of this nature were one of the means for establishing a tester's authority and removing it when necessary. That function involved a physical process of either issuing or recovering the tester's certificate, ID card, and paper waiver forms. This is now done through granting or removing electronic credentials in the Third Party (Paperless) Waiver System, and the certificate itself has only ceremonial value. They will continue to be issued for that purpose but without any requirements for their display.

**Finding 9**

Six Class E third-party administrator websites do not contain some of the specific statements required by the Third-Party Driver License Testing Service contract.

**Recommendations**

We recommend the Third-Party Driver License Testing Service ensure the Class E third-party administrator websites include specific statements required by the Third-Party Driver License Testing Service contract.

We also recommend the Third-Party Driver License Testing Service conduct annual reviews of third-party administrator websites to ensure contract compliance.

**Division Response**

The Bureau will be contacting each of the third party administrators through written correspondence providing a detailed listing of the inaccuracies within the website. The Bureau will require each administrator to make the necessary corrections within 30 days of the date of the letter and send confirmation of the corrective action. The

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Bureau is creating a detailed website checklist and will be conducting website reviews on each administrator periodically to ensure contractual compliance. The checklist will be included in the contract file and maintained within the Bureau of Motorist Compliance.

Cc: Julie M. Leftheris, Inspector General