

To Whom it May Concern,

I am writing in regards to key recommendations made for Texas Department of Licensing and Regulations. A key point of contention is:

“Eliminate pre-license and continuing education requirements for driver education instructors.”

The TDLR Charter states that they exist to ensure the safety of the public through licensing and regulating Texas business'. Removal of the continuing education requirement for Driving Instructors is in direct conflict with this charter. Continuing Education exists to make sure that licensees are aware of and adhering to new laws and best practices regarding vehicular safety and education techniques. Without this requirement instruction can become "stale" and instructors will not be encouraged to innovate and develop techniques to keep current and reach modern teens.

Recent examples of this can be seen in the implementation of Texas Move Over Law and changes in seatbelt and car-seat safety. Texas driver safety is a fluid environment and changes in law and best practices must be absorbed by instructors.

Further, this recommendation directly effects my business model. My school, Central Texas Driving School, has been in business for nearly a decade. As a certified teacher and principal, I used my experience and degrees to write Instructor Development Courses, Supervising Teacher Courses, and Continuing Education Courses. These courses represent a significant portion of my small business income. I have worked to make these programs accessible online at an affordable price point. Removal of these requirements would cause an undue burden on my business. I would encourage the Sunset Committee to adopt a policy of "do no harm" when recommending sweeping changes to an industry. While removing the continuing ed and instructor development courses would increase the efficiency of TDLR, it would also cause undue harm to Texas Businesses and water down the quality of Texas Driver Education.

Our research shows that states which have stricter driver education programs require 2-8 hours per year of continuing education. Our neighboring state, Louisiana, requires 8 hours of continuing education each year. Texas sits at 4 hours per year. This requirement maintains standards and a value to certification and the industry. If processing of the documents in a timely manner is a problem at the TDLR level, I would remind the committee that the Texas Education Agency (TEA); who was formerly in charge of Driver's Education; was able to complete the task in a timely and efficient manner with half the staff of TDLR.

When the Sunset Committee recommended moving Driver Education from TEA and placing it under TDLR, it should have been noted that it would take time for TDLR to staff up and learn the industry before developing an efficient and effective strategy for maintaining industry management. Stripping the industry of safeguards and quality protocols to increase the efficiency of a state agency should never be considered.


There is room for improvement in industry certification. Instructor development courses could certainly be modified to reflect the changes to the drivers' education industry. As an example,

training courses require classroom observations prior to obtaining a Teaching Assistant certification. (Teaching Assistants provide in-car training only.) If an instructor only provides in-car instruction, they should not be required to observe a classroom environment (current requirement 16 hours). Further, it can be argued that due to the overwhelming rise of parent-taught online courses, many schools are adapting to only offer in-car lessons. This reduces the opportunity for potential employees to obtain certification and creates an unnecessary barrier to entry.

When laws and rules are in place, private industries develop and grow. This growth adds to the Texas economy. Removing safety requirements to ease the burden on a state agency, (TDLR) is not in Texas' best interest. As I have shown, by evaluating and adapting certification requirements instead of removing the requirements entirely, the industry will maintain its integrity, Texas' roads will be safer and TDLR can maintain its regulatory role over the certification process.

If you have any questions or would like further clarification, please feel free to contact me at 254-751-1000 or tonya@centraltexasdrivingschool.com.

Thank you,

A handwritten signature in black ink that reads "Tonya Dansby". The signature is written in a cursive, flowing style.

Tonya Dansby, MS Edu, BSAS, ST
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Cornerstone Excursions, LLC