

Online End-of-Course Testing Study

2018 Report

**Virginia Department of Motor Vehicles
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EXECUTIVE SUMMARY

During the 2018 General Assembly Session, two bills were introduced to permit DMV licensed driver training schools to conduct remote online end-of-course testing for computer-based driver education courses. DMV supported studying this issue because the agency has minimal experience in administering online testing in remote environments, and needed to better understand the technology necessary to ensure the security and integrity of the test, if remote online testing were permitted. Subsequently, Chairmen of the House and Senate Committees on Transportation charged DMV with studying the feasibility of administering remote online end-of-course testing for computer-based driver education courses, what standards would be needed for such testing, and how to implement standards that would maintain test integrity and security.¹ As a result of the need to study the issue, House Bill 1077 (HB 1077) was left in the House Committee on Transportation and Senate Bill 889 (SB 889) was stricken at the request of the patron.

To fulfill the General Assembly's request, DMV formed an internal team to gather and analyze relevant research and information. DMV convened a study group consisting of the DMV internal team and relevant stakeholders from the Virginia Department of Education (VDOE), the Virginia State Police, the Virginia Sheriffs' Association, representatives from the insurance industry, highway safety advocates, owners and operators of driver training schools licensed to offer driver education courses in Virginia, and representatives from the Virginia Driver Education and Traffic Safety Schools (VADETS). The stakeholders met twice to discuss the General Assembly's directive and whether or not to recommend changes to the current end-of-course testing standards for computer-based driver education courses.

The stakeholder group was provided with information related to the driver education program administered by DMV licensed driver training schools, secure testing and the Standards of Learning (SOL) Assessment Program administered by VDOE, and *Commonwealth of Virginia Technology Risk Management Standards*. DMV and the stakeholder group also considered information related to how and if remote online testing has been administered in other jurisdictions, a measure of the programs' success, issues that arose when implementing such programs, auditing and monitoring methods used to ensure the integrity of the tests, and the overall cost to the licensing agency. Additionally, DMV and stakeholder participants discussed various information technology (IT) security and monitoring methods that would help maintain the security and integrity of end-of-course tests for computer-based driver education courses, should driver training schools be allowed to conduct remote online testing.

After analysis of the relevant research and stakeholder discussion, the study team could not reach a consensus to allow remote online end-of-course testing for computer-based driver education courses. DMV and a majority of the members of the stakeholder group believe the current standards and *Code of Virginia* provisions governing computer-based driver education provide a sufficient level of oversight, protection, and control over the end-of-course test. Though numerous IT security methods and controls were considered by the stakeholder group that would potentially enhance remote online test integrity, DMV and a majority of stakeholders did not feel those controls or methods would provide an equal level of assurance that is demonstrated by the current standards requiring in-person, proctored end-of-course tests. Thus, DMV and the study group recommend no changes be made to the current standards related to end-of-course testing for driver education, believing the current standards are needed to maintain the program security and integrity.

¹ See *Appendix A* for charge letters from Chairmen of the House and Senate Committees on Transportation.

If the General Assembly moves forward with legislation allowing for remote online end-of-course testing for computer-based driver education courses, DMV, in accordance with stakeholder feedback and input, has identified recommended IT security compliance and risk standards. These recommended controls, standards, and methods are included to assist in providing some degree of test integrity, security, and control should remote online testing be authorized. However, DMV and the majority of the stakeholders believe these methods would not eliminate the potential for students to receive or obtain assistance on the final exam, thus, undermining the integrity of the test.

1. INTRODUCTION

1.1 Background

During the 2018 General Assembly Session, two bills were introduced by Delegate Filler-Corn (HB 1077) and Senator Marsden (SB 889) that proposed allowing computer-based driver education providers to conduct remote online end-of-course testing. Current *Code of Virginia* provisions provide the DMV Commissioner with authority to develop testing standards. DMV end-of-course testing standards for computer-based driver education courses require all tests to be administered in a DMV approved driver training school facility, while being proctored by a DMV licensed instructor. HB 1077 (Filler-Corn) and SB 889 (Marsden) proposed amendments to the *Code* that would no longer require all end-of-course tests for computer-based courses, conducted by DMV approved driver training schools, to be completed in-person, proctored by a DMV licensed instructor, at DMV licensed facilities. DMV supported studying this issue because the agency has minimal experience in administering online testing in remote environments, and needed to better understand the technology necessary to ensure the security and integrity of the test, if remote online testing were permitted. As a result of the need to study the issue, HB 1077 was left in the House Committee on Transportation and SB 889 was stricken at the request of the patron.

Chairmen Yancey and Carrico, of the House and Senate Committees on Transportation, requested that DMV study what standards are necessary and how to implement such standards to maintain test integrity and security, should the stakeholder group desire to allow remote online end-of-course testing for computer-based driver education courses. DMV conducted internal team meetings to gather and analyze relevant information to aid stakeholders in making a recommendation regarding computer-based driver education testing standards. In accordance with the study charge, DMV convened an internal team along with a group of key stakeholders including the Virginia Department of Education (VDOE), the Virginia State Police, the Virginia Sheriffs' Association, representatives from the insurance industry, highway safety advocates, owners and operators of driver training schools licensed to offer courses in Virginia, and representatives from the Virginia Driver Education and Traffic Safety Schools (VADETS). DMV's internal group included subject matter experts in driver training school administration, IT security and VITA standards, highway safety, law enforcement, driver's licenses and other DMV issued credentials, and Virginia legislative processes.² The stakeholders examined:

- Current Virginia laws, regulations, and standards governing end-of-course testing for computer-based driver education courses administered by DMV licensed driver training schools;
- Information on the Standards of Learning (SOL) Secure Assessment Program administered by VDOE and the Virginia Board of Education;
- *Commonwealth of Virginia Technology Risk Management Standards* and IT security compliance requirements;
- Proposed secure testing, proctoring, and monitoring methods to ensure test taker identity, and concerns with proposed methods;
- Research of other jurisdictions including:
 - How and if online testing has been administered in other jurisdictions;

² See *Appendix B* for full list of study participants.

- Measures of success in other jurisdictions;
- Issues that arose when implementing such programs;
- Auditing and monitoring methods used to ensure test integrity; and
- The overall cost to the licensing agency.

Two stakeholder meetings were held on July 26th and August 16th at DMV Headquarters. This report encompasses the research and discussions of the stakeholder group, as well as the study group's overall recommendation.

1.2 Statutory Authority

In the Commonwealth, driver's license applicants may satisfy the driver education requirement, required by § 46.2-334 of the *Code of Virginia*, by completing a driver education course in a public or private high school, or by completing such course at a DMV licensed driver training school. Section 22.1-205 of the *Code* directs the Board of Education to develop a standardized driver education program that can be offered through Virginia public school systems. This section requires classroom and behind-the-wheel training. Section 46.2-1702 of the *Code* states that the DMV Commissioner may approve (license) driver education courses offered by driver training schools if he finds the courses are comparable in content to those offered in Virginia public schools.

Chapter 17 of Title 46.2 of the *Code* governs DMV licensed driver training schools in the Commonwealth. This chapter authorizes DMV to license and approve driver training schools to offer both classroom and behind-the-wheel training, to develop regulations to administer the program, and to provide oversight and monitoring of program compliance with the current laws and regulations. This chapter also authorizes DMV to license driver training schools to provide computer-based driver education courses. As required by the *Code of Virginia*, a driver training school must be licensed to offer in-person driver education courses before being eligible to seek approval to offer computer-based courses.

Section 46.2-2-1702 of the *Code* states that:

The Commissioner may establish minimum standards for testing students who have enrolled in computer-based driver education courses. Such standards may include (i) requirements for the test site; (ii) verification that the person taking the test is the person enrolled in the course; (iii) verification of the identity of the student using photo identification approved by the Commissioner; and (iv) maintenance of a log containing the name and title of the licensed instructor monitoring the test, the test date, the name of the student taking the test, and the student's time-in and time-out of the test site.

Current DMV standards governing driver training schools require in-person proctored testing of all students who take the classroom component of driver education in-person or online through driver training schools.

In the administration of driver training schools in Virginia, DMV promulgated regulations related to the licensing, monitoring, management, curriculum approval, equipment requirements, and instructor requirements to deliver a standardized driver education program. These regulations are found in 24VAC20-121 et. seq. of the *Virginia Administrative Code*, and are referenced throughout this report.

2. ADMINISTRATION OF DRIVER EDUCATION OVERVIEW

Based on the *Code of Virginia* provisions governing driver education, DMV considers VDOE and the Board of Education to be its partners in administering a consistent and effective driver education program. All DMV licensed driver training schools authorized to provide driver education must use the VDOE approved curriculum prior to being eligible to seek licensure from DMV. VDOE's process of developing and authorizing the driver education curriculum, used by DMV licensed driver training schools, involves analyzing curriculum content to ensure consistent and quality driver education is being provided in accordance with VDOE's *Curriculum and Administrative Guide for Driver Education* (the *Guide*). The *Guide* provides quality, uniform content and the administrative requirements for state-approved driver education programs. According to the *Guide*, course content, minimum requirements, and administrative guidelines for classroom driver education shall follow the Board of Education's standardized program of instruction, which is outlined throughout the guide.

The *Guide* also includes guidelines related to driver education course assessments. The *Guide* directs VDOE to approve driver education course curricula that require the student to receive both formative and summative assessments of the course material. According to the *Guide*, a formative assessment "continually measures student performance to guide instruction and enhance[s] student learning throughout the course." For driver education courses in Virginia, a summative assessment is a "criterion-referenced final exam [that] is administered in the classroom to measure how well students have mastered the course expectations." The *Guide* directs all summative assessments to be conducted in a classroom. Though the *Guide* does not include guidelines related to online assessments specifically, it is VDOE's current practice to not approve driver education course curricula that permit the student to complete his or her formative or summative assessment through remote online testing.

2.1 Virginia Standards of Learning Secure Assessment Program

DMV considers VDOE to be experts in administering secure testing due to the agency's extensive effort and experience in administering and overseeing the Standards of Learning (SOL) Assessment Program in school divisions across the Commonwealth. Thus, DMV requested that representatives from VDOE present on secure testing and the SOL program in Virginia during a stakeholder meeting, so stakeholders would get a sense of the amount of effort needed to ensure the security and integrity of an assessment program.

The *Regulations Establishing Standards for Accrediting Public Schools in Virginia* require students in middle and secondary schools to take all applicable end-of-course tests following the completion of the course. VDOE administers 12 end-of-course SOL assessments that are used to measure school accountability. In the 2017 – 2018 school year, almost three million SOL tests were completed in the Commonwealth. In 2001, VDOE began administering the assessment program using online technology; however, all assessments, including those for students enrolled in Virtual Virginia and other commercial opportunities for K12 education, are required to be conducted in-person, proctored by a test examiner. All SOL assessments administered by VDOE are conducted in a proctored environment, at the school the student is enrolled.

VDOE provided background on the types and amount of resources and methods that are dedicated to maintain the security and integrity of an assessment program. According to VDOE, a testing and technology component has to be addressed in order to maintain security and integrity for online assessments. Consideration of both of these components is required in the assessment preparation to

ensure that the test administration is successful, appropriate, and secure. There are a number of logistics that need to occur before, during and after a test including (i) test security agreements, (ii) transmittals for secure test materials, and (iii) affidavits after each test session. These procedures help ensure every student in Virginia taking SOL tests has a similar experience so they are not, in any way, advantaged or disadvantaged by the testing environment.

Though VDOE does not administer an end-of-course SOL assessment for driver education courses, formative and summative assessments are conducted in driver education courses administered in the Virginia public schools. DMV looked to VDOE testing requirements when establishing the in-person end-of-course testing standards for computer-based driver education.

3. DRIVER TRAINING SCHOOLS & END-OF-COURSE TESTING

To provide stakeholders a better understanding of where the end-of-course test for driver education is in the standard driver's licensing process, the following steps were presented during stakeholder meetings to demonstrate what requirements a person under 18 years of age must satisfy to be eligible for a standard driver's license. Persons under the age of 18 must:

- Take a knowledge exam and vision test with DMV to receive a learner's permit;
- Complete the driver education classroom course;
- Complete the behind-the-wheel driver education course;
- Complete the 90 minute parent/student course (if required); and
- Attend a licensing ceremony conducted by the courts to receive the license.

3.1 Driver Training School Program Overview

DMV licensed driver training schools are authorized to conduct driver education, which includes both the behind-the-wheel component and the driver education classroom course component. The end-of-course test being discussed throughout this report is the summative assessment of the classroom course component of driver education.

The classroom course component of driver education and behind-the-wheel may be taken simultaneously if they are both administered by the same driver training school. However, if the student elects to complete the classroom course component and behind-the-wheel component of driver education at different driver training schools, he or she must complete the driver education classroom course component as a prerequisite to participating in behind-the-wheel. Although driver's license applicants 18 years and older are not required to complete driver education, they may opt to complete the classroom course and behind-the-wheel in order to waive the 60-day learner's permit waiting period, normally required for driver's license applicants over the age of 18, and have the road skills test administered by a DMV licensed driver training school.

In 2016, the General Assembly passed legislation (HB 748) to allow DMV licensed driver training schools the option to conduct computer-based driver education courses.³ This bill amended § 46.2-1701 of the *Code of Virginia* to provide that upon application of a driver training school licensed in accordance with Chapter 17 of Title 46.2, the Commissioner may license such driver training school

³ HB 748, patroned by former Delegate Greason, ultimately passed both the full House and Senate uncontested.

“using criteria established by the Commissioner pursuant to § 46.2-1702 to provide computer-based driver education courses using curricula approved by the Commissioner.” Driver training schools participating in this stakeholder study noted the convenience computer-based courses provide to students in regards to completing the course requirements. Specifically, computer-based driver education provides students increased flexibility in satisfying the course requirements due to the remote online nature of the course.

Currently, 295 driver training schools are authorized to provide in-person driver education in Virginia, 27 of which are also authorized to offer computer-based driver education courses. For a map displaying the geographical locations of DMV licensed driver training schools authorized to provide both in-person and computer-based driver education courses, see Appendix D.

3.2 Approving Driver Training Schools to Conduct Computer-Based Driver Education

Once a driver training school has been licensed by DMV to conduct driver education in the Commonwealth, and once the school is providing in-person classroom instruction, the school’s owner may apply to be authorized to conduct computer-based driver education courses. To apply for approval, the school’s owner must provide proof that the testing location it uses has adequate infrastructure to conduct end-of-course testing meeting DMV’s current standards and proof of an agreement from the computer-based course vendor indicating a VDOE approved curriculum is being provided. Driver training schools seeking to provide computer-based driver education instruction are subject to the same licensing requirements as driver training schools providing in-person driver education only, aside from the additional licensure fee of \$100 according to §46.2-1701 of the *Code*.

As part of the process of approving driver training schools to conduct in-person and computer-based driver education courses, DMV requires the owners to submit and agree to DMV forms that address driver training school standards and requirements. Driver training schools seeking authorization to conduct computer-based driver education must submit an *Online Driver Education License Application and Agreement* form, otherwise known as a DTS60, to DMV prior to its approval. The DTS60 form ensures a driver training school has an adequate testing location, with sufficient classroom material and internet services, to successfully administer the end-of-course assessment according to DMV standards. Additionally, this form sets out standards related to computer-based course requirements, driver training school business practices, web site services, test site requirements, monitoring instructions, and audit requirements. DMV directs driver training schools on administering and monitoring end-of-course tests for computer-based driver education courses. Driver training schools must comply with test administration directions set out in DMV forms DTS65A and DTS65B.⁴

In addition, an IT security and overall risk assessment of the school is conducted by DMV. DMV considers the *Commonwealth of Virginia Technology Risk Management Standards* as technological compliance requirements for this assessment. The purpose of these standards is to assist Virginia State Agencies in assessing the risks to its sensitive IT systems and data, and protect the resources that support the Commonwealth’s mission. The *Commonwealth of Virginia Technology Risk Management Standards* mainly relate to data hosted and maintained by the Commonwealth for employees and contractors, and maintaining data of current Commonwealth of Virginia contracted vendors. By performing this assessment, DMV will determine if a driver training school has sufficient confidentially controls, the appropriate technology to provide the course, and controls to maintain the student’s privacy. From this

⁴ See *Appendix C* for forms related to end-of-course testing standards for computer-based driver education courses.

assessment, DMV will produce an analysis of the driver training school's overall level of IT security and associated risks.

Driver training schools are given the option to provide computer-based driver education using a VDOE approved curriculum they developed themselves or a curriculum provided through a third party vendor. As discussed prior, all driver training schools are required to use VDOE authorized curricula developed in accordance with the *Curriculum and Administrative Guide for Driver Education* to administer in-person driver education courses. However, driver training schools seeking authorization to conduct computer-based courses must obtain separate approval from VDOE, whether the curriculum is developed by a third party vendor or the driver training school itself. To date, driver training schools approved to conduct driver education courses in Virginia have only opted to use course curricula produced by third party vendors.

3.3 Record Retention and Audit

Upon licensing, a driver training school is permitted to provide training to students. Under current Virginia law, during the tenure of the school's licensure, the school is required to maintain business records pertaining to student training and assessments. To ensure that schools are maintaining the appropriate business and testing practices, driver training schools are required to submit to regular auditing by DMV. DMV conducts three types of auditing to maintain oversight of the driver training school program: (1) initial licensure audits, (2) annual audits, and (3) random audits. These audits are conducted by driver license quality assurance (DLQA) personnel. If, as a result of any one of these audits, DLQA personnel find a deficiency in a school's business practices, DMV may take action to suspend, revoke, cancel, or refuse to renew a school's license. It should be noted, record retention and audit requirements are the same for schools authorized to provide both in-person or computer-based courses.

As it relates to this study, DMV and stakeholders discussed how record retention and audit requirements may be impacted should remote online testing be allowed for computer-based driver education providers. DMV and stakeholders agreed that driver training schools should remain subject to at least the same record retention and audit requirements in place today, should changes be made to the end-of-course testing standards. DMV added that computer-based driver education course providers would become subject to more stringent record retention and audit requirements should remote online end-of-course testing be allowed, to ensure overall integrity and security of the test is maintained. It was noted that increased requirements may cause increases in technological expenditures for driver training schools. DMV's internal cost to audit driver training schools may also be impacted should end-of-course testing be permitted for computer-based driver education courses.

3.4 End-of-Course Test

Driver training schools that provide in-person and computer-based driver education courses must administer the end-of-course test at a DMV licensed location, proctored by a DMV approved instructor. The process for completing end-of-course tests for driver education is outlined in the following section.

On the day of the test for computer-based and in-person driver education courses, the applicant must present valid photo identification to prove identity. If the student is under 18 years old and the course was completed online, he or she must also bring a signed *Parental Consent for Online Driver Education Examination* form; this is not required for in-person driver education courses.⁵ After the

⁵ See *Appendix C* for example of *Parental Consent for Online Driver Education Examination* form.

applicant has completed the end-of-course test for a computer-based driver education course, the applicant and the instructor must sign the *Online Driver Education Examination Monitoring Record*, indicating the time-in and time-out of the test site.⁶ If the applicant passes the exam, he or she will receive a driver education certificate of completion from the driver training school. Upon receipt of the completion certificate, the driver's license applicant would then present the certificate to the driver training school conducting behind-the-wheel instruction. Upon satisfaction of the prerequisite requirements to obtain a driver's license according to § 46.2-334 of the *Code*, the applicant will be issued a temporary license by DMV.

4. PROPOSED SECURE TESTING METHODS

During stakeholder discussions related to potentially allowing end-of-course tests for driver education classroom courses to be completed online and in a remote environment, stakeholders agreed that any recommendation should require the test to be proctored by a licensed driver training school instructor or require the tests to be administered with technology controls to substitute for a proctor's presence. This was agreed upon to further ensure the current integrity of end-of-course tests is maintained, should they be permitted to be administered online, in a remote environment.

DMV and several stakeholders felt remote online testing allows a higher potential for a student to cheat or commit improper behavior because of the lack of control the driver training school would have over the administration of the test. For example, many driver training schools participating in this study feared students may use outside sources, such as another person or additional course material, during the test because online testing environments do not always allow for the adequate level of security or proctor presence. Stakeholders noted that it is critically important that new drivers are tested before being issued a license, and that driver training schools need to possess the same integrity and controls as the high school-based programs.

4.1 Security Methods for Testing Proctoring/Monitoring

DMV and stakeholder participants discussed various IT security and monitoring methods that would help maintain the security and integrity of the end-of-course test for computer-based driver education courses, should driver training schools be allowed to conduct remote online testing. In addition to discussions related to a recommendation that would allow remote online testing but would require it to be proctored by a DMV licensed instructor, several security controls and methods were considered by the group that may help ensure the person enrolled in the driver education course is the correct person taking the remote online test, and that no cheating is occurring during the test. These controls were discussed because information and data protection are key areas that must be considered in order to ensure the integrity of the computer-based driver education program. The following test security methods were discussed:

Video Proctoring. Video monitoring of the online testing environment by a licensed DMV instructor would allow a licensed proctor to observe the test taker from a remote location using web-cam technology. Stakeholders and driver training school survey responses noted several concerns regarding the reliability of this method due to the technological constraints posed on the test proctor. For example, a test proctor may be unable to determine if outside assistance is being used on the test because this

⁶ See *Appendix C* for example of *Online Driver Education Examination Monitoring Record*.

monitoring technology allows the proctor to monitor what is being displayed from the test taker's webcam and not the room entirely. Additionally, several concerns were raised related to the video proctoring of students under the age of 18 and the overall student privacy that may be violated through a proctored test. DMV and stakeholders discussed the potential for improper behavior by both the test taker and test proctor. Retention of video records of students under 18 years was noted as a further concern.

Keystroke Memory Technology. Keystroke logging (memory) technology would be able to recognize a test taker's identity by identifying his or her unique keystroke pattern. This technology identifies an individual by comparing his or her unique keystroke pattern throughout course sessions to the person's keystroke pattern during the end-of-course test. Stakeholders did not feel this method alone would ensure the person enrolled in the course is the correct person taking the test. This is because this technology would only be able ensure that the person completing the course has the same unique keystroke pattern as the person being tested. Stakeholders noted they may be more supportive of this security method if it were required to be implemented in conjunction with other proposed methods.

Security Questions. Pre-established security questions, which would be randomly prompted throughout the end-of-course test, were discussed as a security method to ensure test taker identity. Stakeholders raised several concerns related to the reliability of this security method. Mainly, stakeholders noted the potential for test takers to cheat by sharing their unique security question information and answers. Stakeholders also expressed that they may be more supportive of this security method if it were required to be implemented in conjunction with other proposed methods.

Parent Proctoring. Requiring parent proctoring of end-of-course tests was discussed as a security method to ensure test taker identity. Although signed affidavits indicating the test was administered in accordance with the pre-established guidelines would be required, several stakeholders raised concerns that some parents may potentially aid students during the test administration.

4.2 Compliance Requirements and Testing Environment

DMV considers the *Commonwealth of Virginia Technology Risk Management Standards* in its IT risk assessment and process to approve driver training schools to administer computer-based driver education courses. Stakeholder discussion indicated that any standards moving forward authorizing remote online end-of-course testing would have to require the program to adhere to the *Commonwealth of Virginia Technology Risk Management Standards*.

Additionally, the following information was presented to stakeholders to provide a description of secure testing environments. The level of security found in a testing environment is measured from level one to level four, from least restrictive to most restrictive. The least restrictive environment is referred to as level one. In level one, a test can be administered in either a physical or virtual environment, in an unproctored setting. In this level, there is no oversight from a test instructor or examiner; students are allowed to log-in and out, enter and exit the room, complete the test, and return their answers and other test material without being monitored. Level two requires the test to be administered in a virtual environment; this level is required to be proctored with some technology assurance—for example, technology controls that involve locking the browser so the student is only able to use the testing application and not access the Internet. Level three requires the test to be administered in a virtual environment, while being proctored with virtual controls. This level may require students to have cameras or microphones and may further require students to demonstrate no outside aid is being used on the test by using the camera technology to display the physical environment to the proctor. Level four is the most stringent test environment by requiring the test to be administered in a controlled environment,

while being proctored. At this level, before students enter the room, they are required to empty their pockets and remove all technology, books, and notes; additionally at this level, a proctor is required to be physically present to monitor the test.

Based on the security levels presented, implementation of the proposed 2018 legislation would adjust the level of security from level four to either level two or three.

5. RESEARCH

5.1 Jurisdiction Survey and Research

As part of the study, DMV was charged with researching how and if remote online end-of-course testing for driver education courses has been implemented in other jurisdictions. In doing so, DMV sought information related to the success of these programs, issues that arose when implementing the programs, auditing and monitoring methods used to ensure the test integrity, and the overall costs to implement and maintain the online testing programs. DMV surveyed other North American driver licensing or motor vehicle agencies by using the survey tool provided by the American Association of Motor Vehicle Administrators (AAMVA).⁷ The survey consisted of ten questions to determine if other jurisdictions that require driver education allow classroom instruction through computer-based driver training schools and whether those schools conduct remote online end-of-course testing to evaluate students.

Thirty-two U.S. States and one Canadian province provided a survey response. According to the survey responses, nine jurisdictions allow remote online end-of-course testing for courses equivalent to the classroom component of Virginia's driver education program. For a complete list of jurisdictions that reported allowing remote online end-of-course testing for driver education courses, please see Appendix E. Among the jurisdictions that provided survey responses, the total number of computer-based driver training schools ranges from one to 78, with an average of 29 schools. It should be noted that some jurisdictions do not track or monitor the current number of driver training schools in their jurisdictions. The jurisdictions that reported conducting remote online end-of-course testing for driver education courses have been doing so anywhere from two years to 12 years.

Based on the information provided by survey respondents, remote online end-of-course testing in other jurisdictions is administered in a variety of ways, using several security and monitoring controls. As discussed previously, research on other jurisdictions revealed several methods used to ensure test taker identity. For example keystroke memory technology, pre-established security questions, parent proctoring, "secret shopper" audits, and enhanced record keeping systems were discussed in survey responses to help maintain program security and integrity. Both positive and negative comments were submitted about the reliability of these methods. The survey also requested jurisdictions provide information on how the success and security of the remote online testing program is measured. According to survey respondents, student pass/fail rates, the total number of students completing the

⁷ AAMVA is an organization that represents driver, vehicle, and law enforcement administrators in North America. Its work includes the creation of model policies and best practices on topics of interest to the motor vehicle administrator community.

course, and a student's ability to ultimately pass the DMV administered road test are considered to measure the success, integrity, and security of remote online testing.

5.2 Non-Commercial Driver Training School Survey

As a result of stakeholder group consensus that additional information would be beneficial to making a recommendation, DMV surveyed the non-commercial driver training schools in Virginia. Of the 295 driver training schools, 65 schools provided a survey response. The survey consisted of ten questions to gain input from driver training schools in regards to the overall study topic, appropriate monitoring and auditing methods, and end-of-course test pass/fail rates for both in-person and computer-based courses. The goal of the survey was to gauge driver training schools' opinions on allowing remote online end-of-course testing for computer-based driver education courses and the proposed security methods to ensure test taker identity, if it were allowed.

The driver training school survey results did not reveal a definitive opinion of the overall driver training school market in regards to the study topic, based on the survey questions. While the survey responses did not indicate strong support for changes to the current end-of-course testing standards, responses partially demonstrated support for the proposed proctoring and monitoring methods, if remote online end-of-course testing were allowed. However, comments included in the survey responses noted both positions as it relates to the feasibility of the proposed security methods for ensuring test taker identity. The survey questions requested driver training schools to provide pass/fail rates for computer-based and in-person driver education courses, but the data provided did not reveal conclusive evidence supporting changes to the current computer-based driver education end-of-course test standards. In general, the results of this survey were inconclusive. For the complete survey results, see Appendix E.

6. STUDY RECOMMENDATION

6.1 Portion of Market Desires Online End-of-Course Testing for Driver Education

Though DMV and a majority of the stakeholder group felt the current standards for driver education end-of-course testing provide the Commonwealth a sufficient level of oversight, protection, and control over the test security and integrity, a portion of the group felt allowing remote online testing would be beneficial to the Commonwealth.

The proponents of this study argue that current driver education testing standards create an unnecessary burden for students enrolled in computer-based driver education courses by requiring the student to complete the end-of-course test at a DMV licensed driver training school. As noted by multiple driver training schools that are both supportive and unsupportive of allowing remote online end-of-course testing, computer-based driver education allows a higher level of convenience to students enrolled in the course. This is because computer-based driver education courses allow students to complete the course during any timeframe, from a remote location. According to proponents of allowing remote online testing, by not requiring the end-of-course test to be administered at a DMV licensed driver training school location, DMV standards would be allowing a greater level of convenience to the student enrolled in the course because he or she would be able to complete the final assessment in any location, at any time. DMV and the stakeholder group felt this argument revolved primarily around a measure of convenience

to driver education students versus the overall safety of users on Commonwealth roadways. Stakeholders agreed that safety outweighs the need for convenience.

The advocate for the legislation prompting this study, an owner of a driver training school in Virginia, indicated that significant populations of the driver training school market desire the availability to complete end-of-course driver education tests online, in a remote environment. Additionally, the proponent of the changes to the current laws and standards asserted that sufficient security controls are available to maintain complete integrity and security of the end-of-course test. Though this information was discussed throughout the study, the research and the majority of the stakeholder group did not indicate demand for online end-of-course testing nor indicated strong support for the proposed security methods. Stakeholders believe no changes to the current standards would be in the best interest to the Commonwealth, at this time.

Though the study group recommends maintaining the current end-of-course testing standards, the following items address recommended end-of-course IT security controls, methods, and practices should the General Assembly desire to move forward in allowing remote online testing:

1. A DMV licensed instructor should be required to proctor all end-of-course tests, whether in-person or remote online testing.
2. The required end-of-course test should be administered by DMV licensed driver training school or authorized vendor.
3. Legislation authorizing online testing should prescribe minimum security standards in accordance with the *Commonwealth of Virginia Technology Risk Management Standards*.

6.2 No Changes to Program

Because of current VDOE practices regarding secure assessments and the process of approving driver education curriculum, DMV will not authorize driver training schools to conduct remote online end-of-course testing for computer-based driver education courses. This is because VDOE's current practices do not permit any assessments to be administered in environments where the proctors are not monitoring the testing taker in person, nor do they allow approval of driver education curricula that permits the end-of-course test to be administered in a remote location. To date, DMV has not received a request similar to what was proposed by the legislation prompting the study charge, nor has DMV observed significant public outcry or complaints requesting changes to the driver education testing standards and requirements. From DMV's perspective, the testing standards for the computer-based driver education courses in Virginia do not require further changes for the test to be administered successfully and securely.

DMV and a majority of the members of the stakeholder group believe the current standards, *Code of Virginia* provisions, and regulations governing driver training schools provide a sufficient level of oversight, protection, and control over the driver education end-of-course tests. By requiring all end-of-course tests for driver education to be completed at a DMV approved driver training school facility, while being proctored by a DMV licensed instructor, the current driver training school standards best ensure that the person enrolled in the course is the person taking the test and that no outside aid is being provided to the test taker. Though numerous IT security methods and controls were considered by the stakeholder group that would help enhance online test integrity, DMV and a majority of stakeholders did not feel those controls or methods would provide an equal level of assurance that is demonstrated by the current standards.

As discussed previously, a portion of the driver training school market believes computer-based driver education offers a more convenient option for students compared to in-person courses. However, several stakeholders participating in the study noted the benefits in-person driver education courses provide to students in regards to learning and retaining course material. Stakeholders expressed that the face-to-face interaction between the student and instructor is crucial in ensuring the student is learning and maintaining course material. Though stakeholders felt in-person courses may be more beneficial in relaying driver education course content, many driver training schools have elected to provide computer-based course to remain competitive in the market.

As discussed throughout the stakeholder group meetings, maintaining the integrity of driver education in Virginia is an utmost priority to be considered by the study. There were several factors considered by the stakeholder group that may be affected should the driver education program integrity be negatively impacted. For example, DMV and stakeholders agreed that remote online end-of-course testing for computer-based driver education courses may provide an increased highway safety risk to drivers in the Commonwealth. This is because DMV and stakeholders fear remote online assessments create higher potential for cheating, and thus, there is a concern that this testing would allow students to circumvent the process of demonstrating their knowledge of the driving rules in Virginia. DMV and the study group fear any leniency in the computer-based driver education end-of-course testing standards would decrease highway safety in the Commonwealth.

Additionally, DMV and stakeholders felt the available data and research does not conclusively support a recommendation to allow driver training schools to administer remote online tests for computer-based courses. Although the survey of other jurisdictions, driver training school survey, and additional research related to the study charge yielded information that indicated support for both positions, stakeholders did not feel sufficient and conclusive evidence was provided to recommend changes to DMV standards that would allow remote testing for computer-based driver education.

Because stakeholders could not reach a consensus to allow online remote testing for computer-based driver education courses, DMV and the entire stakeholder group recommends continuing to require in-person, proctored end-of-course testing. Stakeholders agreed that the lack of consensus amongst study participants, the lack of available research and data from other jurisdictions, and the test monitoring method concerns support this recommendation.

APPENDICES

Appendix A: Charge Letters



COMMONWEALTH OF VIRGINIA
HOUSE OF DELEGATES
RICHMOND

DAVID E. YANCEY
POST OFFICE BOX 1163
NEWPORT NEWS, VIRGINIA 23601

NINETY-FOURTH DISTRICT

COMMITTEE ASSIGNMENTS:
TRANSPORTATION (CHAIRMAN)
EDUCATION
COMMERCE AND LABOR

April 13, 2018

Mr. Richard D. Holcomb
Commissioner
Virginia Department of Motor Vehicles
P.O. Box 27412
2300 West Broad Street
Richmond, Virginia 23269

Dear Commissioner Holcomb:

During the 2018 General Assembly session two bills were proposed to amend the *Code of Virginia* to authorize the Commissioner of the Department of Motor Vehicles (DMV) to allow computer-based driver education courses to offer virtual testing for the end-of-course tests, House Bill 1077 patroned by Delegate Filler-Corn and Senate Bill 889 patroned by Senator Marsden. Current law provides in *VA. Code* §46.2-1702 that the Commissioner may approve driver education courses offered by driver training schools if he finds that the courses are of comparable content and quality to that offered by the Commonwealth's public schools under §46.2-334 of the *Code*. The Commissioner may authorize driver training schools to be computer-based driver education providers, and may establish minimum standards for testing students who have enrolled in computer-based driver education courses.

In conversations with both patrons and those advocating for the bills, DMV indicated that it does not currently allow driver training schools to test students in any capacity other than in person testing monitored by a licensed instructor. DMV suggested that since it has no experience with the type of testing proposed by the bills that the agency be allowed to study the issues regarding virtual testing and the standard by which the Commissioner should approve such testing in the Commonwealth. DMV requested to have the opportunity to gather additional data, obtain the input of multiple stakeholders, and have time to investigate any fiscal impact allowing virtual testing may have on the Commonwealth.

Therefore, I respectfully request that the Department of Motor Vehicles study what standards are necessary and how to implement such standards for approving computer-based virtual testing for the end-of-course assessment for driver education courses. The Department

should determine what changes are necessary to maintain the safety of all drivers on Virginia highways. I request that DMV convene a working group of interested parties to conduct such a study. I ask that the group of stakeholders include the Virginia Department of Education, the Virginia Information Technologies Agency, the Virginia State Police, representatives of the Virginia Sheriff's Association, representatives from the insurance industry, highway safety advocates, owners and operators of driver training schools licensed to offer courses in Virginia, representatives from the Virginia Driver Education and Traffic Safety Schools (VADETS) and other stakeholders identified by the Department.

I ask that the working group research how and if such testing has been implemented in other states, the success of those programs, any issues that have arisen with implementing such programs, auditing methods to ensure the integrity of the program, and the cost to the licensing agencies, the insurance industry, and other similar stakeholders in considering standards for approving such testing. I request that you report back to the House Transportation committee in December of 2018 with the results of the study and the working group's recommendations. As part of the report, the working group should provide for each item it proposes an analysis of the feasibility, the cost to the Commonwealth, and its cost-effectiveness. Also include any proposed legislation that would be necessary in order to pursue the recommendations.

Sincerely,



David E. Yancey
Chairman, House Transportation

c: The Honorable Eileen Filler-Corn, Delegate
The Honorable Shannon R. Valentine, Secretary of Transportation

SENATE OF VIRGINIA



C. W. "BILL" CARRICO, SR.
40TH SENATORIAL DISTRICT
ALL OF GRAYSON, LEE, SCOTT, AND
WASHINGTON COUNTIES; ALL OF THE CITY OF
BRISTOL; AND PART OF SMYTH, WISE, AND
WYTHE COUNTIES
P. O. BOX 1100
GALAX, VIRGINIA 24333
(276) 236-0098

COMMITTEE ASSIGNMENTS:
EDUCATION AND HEALTH
PRIVILEGES AND ELECTIONS
REHABILITATION AND SOCIAL SERVICES
TRANSPORTATION

April 13, 2018

Mr. Richard D. Holcomb
Commissioner
Virginia Department of Motor Vehicles
P.O. Box 27412
2300 West Broad Street
Richmond, Virginia 23269

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I ask that the working group research how and if such testing has been implemented in other states, the success of those programs, any issues that have arisen with implementing such programs, auditing methods to ensure the integrity of the program, and the cost to the licensing agencies, the insurance industry, and other similar stakeholders in considering standards for approving such testing. I request that you report back to the Senate Transportation committee in December of 2018 with the results of the study and the working group's recommendations. As part of the report, the working group should provide for each item it proposes an analysis of the feasibility, the cost to the Commonwealth, and its cost-effectiveness. Also include any proposed legislation that would be necessary in order to pursue the recommendations.

Sincerely,

A handwritten signature in blue ink that reads "Bill Carrico". The signature is written in a cursive style.

Charles W. Carrico, Sr.
Chairman, Senate Transportation

cc: The Honorable David W. Marsden, Senator
The Honorable Shannon R. Valentine, Secretary of Transportation

Appendix B: Stakeholders and Study Participants

DMV Internal Team

Richard Holcomb
Commissioner
Department of Motor Vehicles

Karen Grim
Deputy Commissioner for Operations
Department of Motor Vehicles

Millicent Ford
Assistant Commissioner for Driver, Vehicle and Data
Management
Department of Motor Vehicles

Linda Ford
Assistant Commissioner for Legislative Services
Department of Motor Vehicles

John Saunders
Director of Highway Safety
Department of Motor Vehicles

Melissa Velazquez
Director of Legislative Services
Department of Motor Vehicles

Beau Hurley
Director of Risk Management
Department of Motor Vehicles

Anthony Hahn
Law Enforcement Services
Department of Motor Vehicles

Sharon Brown
Director of Driver Services
Department of Motor Vehicles

Jean Dudley
Department of Motor Vehicles

Carol Waller
Department of Motor Vehicles

Dalton Lee
Legislative Services
Department of Motor Vehicles

Cheryl Sanders
Project Coordinator
Department of Motor Vehicles

Ashley Hall
Department of Motor Vehicles

Kathleen Furr
Department of Motor Vehicles

Stakeholders and Other Participants

Ronald Maxey
Virginia State Police

Janet Brooking
DriveSmart

Christopher Lagow
Nationwide, Chubb, AIG, PCI

Tom Pecoraro
I Drive Smart

Martha Meade
American Automobile Association

Georjeane Blumling
AAA-Tidewater

Lisa McDaniels
Department of Education

Sarah Susbury
Department of Education

Janet Ragland
Department of Education

Bobbie Morton
A Better Choice Driving School

Edna Hooker
Patriot Driving School

Henry Hooker
Patriot Driving School

Sandra Burwell
A-Plus Driver Improvement School

Dana Schrad
Virginia Chiefs of Police Association

Appendix C: Forms and Reports



Virginia Driver Training
ONLINE DRIVER EDUCATION
LICENSE APPLICATION AND AGREEMENT
Class B - Passenger Vehicle

Purpose: Use this form to apply for or renew an online driver training school license.

Instructions: Return completed form to the Commercial Licensing Work Center at the above address.

IMPORTANT NOTE: The expiration of the online school license shall coincide with the expiration of the standard driver training school license.

APPLICATION INFORMATION

(check one)	<input type="checkbox"/> Original (first-time application)	<input type="checkbox"/> Renewal	ONE YEAR LICENSE FEE	\$ 100
-------------	--	----------------------------------	----------------------	---------------

OWNER INFORMATION

INDIVIDUAL OWNER NAME (print) (last, first, mi, suffix)				
DMV CUSTOMER NUMBER	HOME/BUSINESS ADDRESS	CITY	STATE	ZIP CODE
HOME TELEPHONE NUMBER ()	FAX NUMBER (if applicable) ()	EMAIL ADDRESS		

REPRESENTATIVE INFORMATION (authorized to act on behalf of the school)

REPRESENTATIVE FULL NAME (print) (last, first, mi, suffix)	TITLE (if applicable)	TELEPHONE NUMBER ()
--	-----------------------	----------------------------

CURRICULUM VENDOR INFORMATION

NAME OF ONLINE CURRICULUM VENDOR

SCHOOL OPERATIONS INFORMATION

SCHOOL FULL NAME							
MAILING ADDRESS	CITY	STATE	ZIP CODE				
SCHOOL LOCATION ADDRESS (if different from above)	CITY	STATE	ZIP CODE				
FEDERAL IDENTIFICATION NUMBER (FEIN/DMV customer number)	SCHOOL TELEPHONE NUMBER ()						
SCHOOL/OWNER CELL PHONE NUMBER ()	SCHOOL/OWNER FAX NUMBER ()						
WEBSITE ADDRESS TO DISPLAY	EMAIL ADDRESS TO DISPLAY						
HELP DESK HOURS	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY	SUNDAY
	___ AM to ___ PM	___ AM to ___ PM	___ AM to ___ PM	___ AM to ___ PM	___ AM to ___ PM	___ AM to ___ PM	___ AM to ___ PM

CERTIFICATION

I/we are applying for an original or renewal Online Driver Training School License and certify that all facts contained in this application are true and valid. If licensed, it is understood that I/we are subject to current statutes and regulations pertaining to the operation of the school(s) and are subject to pre-licensing, initial, random and annual audits by DMV.

I/we certify that I/we will use a curriculum approved by the Department of Education.

I/we further certify and affirm that all information presented in this form is true and correct, that any documents I have presented to DMV are genuine, and that the information included in all supporting documentation is true and accurate. I/we make this certification and affirmation under penalty of perjury and I/we understand that knowingly making a false statement or representation on this form is a criminal violation.

OWNER NAME (print)	OWNER SIGNATURE	DATE (mm/dd/yyyy)
REPRESENTATIVE NAME (print)	REPRESENTATIVE SIGNATURE	DATE (mm/dd/yyyy)

DMV USE ONLY

CLERK STAMP	VERIFICATION OF: <input type="checkbox"/> \$100 Fee paid <input type="checkbox"/> Copy of Vendor Agreement	DECISION: <input type="checkbox"/> Approved <input type="checkbox"/> Denied	School License # <input style="width: 50px;" type="text"/> School Code # <input style="width: 50px;" type="text"/>	Licensed Date (mm/dd/yyyy) <input style="width: 50px;" type="text"/> License Expiration Date (mm/dd/yyyy) <input style="width: 50px;" type="text"/>
REMARKS				

ONLINE DRIVER TRAINING SCHOOL TEST SITES

Enter DMV approved classroom, name and address that will be used to conduct the final examinations. If adding a new test site, you must attach a copy of the contract or agreement authorizing the use of the site to conduct online testing. Document must show expiration date. The site must be inspected prior to use. As a reminder, each site listed below must have the following:

- Desks and chairs
- Working computer(s) with an Internet connection
- No public WiFi; must be a private Internet connection
- Working electrical outlets
- Working printer

DMV USE ONLYNew Site
(yes/no)Date Added
(mm/dd/yyyy)

1	<input type="checkbox"/> YES <input type="checkbox"/> NO	
2	<input type="checkbox"/> YES <input type="checkbox"/> NO	
3	<input type="checkbox"/> YES <input type="checkbox"/> NO	
4	<input type="checkbox"/> YES <input type="checkbox"/> NO	
5	<input type="checkbox"/> YES <input type="checkbox"/> NO	
6	<input type="checkbox"/> YES <input type="checkbox"/> NO	
7	<input type="checkbox"/> YES <input type="checkbox"/> NO	
8	<input type="checkbox"/> YES <input type="checkbox"/> NO	
9	<input type="checkbox"/> YES <input type="checkbox"/> NO	
10	<input type="checkbox"/> YES <input type="checkbox"/> NO	
11	<input type="checkbox"/> YES <input type="checkbox"/> NO	
12	<input type="checkbox"/> YES <input type="checkbox"/> NO	
13	<input type="checkbox"/> YES <input type="checkbox"/> NO	
14	<input type="checkbox"/> YES <input type="checkbox"/> NO	
15	<input type="checkbox"/> YES <input type="checkbox"/> NO	
16	<input type="checkbox"/> YES <input type="checkbox"/> NO	
17	<input type="checkbox"/> YES <input type="checkbox"/> NO	

Copy this page or attach a separate sheet if additional space is needed

VIRGINIA DEPARTMENT OF MOTOR VEHICLES ONLINE DRIVER EDUCATION SCHOOL AGREEMENT

Upon submission of this signed application, the owner or authorized representative of the Online Driver Training School agrees to meet the following requirements.

Online Requirements

1. Submit annual application.
2. Pay annual license application fee.
3. Provide DMV with a copy of contract or agreement (showing expiration date) authorizing use of approved online driver education curriculum from vendor that has been approved by the Department of Education (DOE).
4. Provide approved classroom location for the administration of final examination.
5. Provide computer for each student, where applicable.
6. Comply with driver training school licensing requirements pursuant to Virginia Code Chapter 17 Driver Training Schools and Virginia Administrative Code (Chapter 121 Virginia Driver Training Schools Regulations).

Business Practices

1. Only use online curriculums approved by the Department of Education.
2. Maintain license as a Driver Training School throughout the licensure period.
3. Use name as shown on the license issued by the Department.
4. Test and monitor students at test sites approved by DMV.
5. The Department must be notified in writing, 30 days prior to a change of address for the licensed location of the business office or test site. The Department will issue a revised license reflecting such change. The school must return the current license to the Department when you receive the revised school license. All business office and test sites must be approved by the Department prior to use.
6. Provide DMV with written verification authorizing use of a facility to conduct testing and monitoring throughout license tenure and maintain a copy of verification.
7. Maintain a record of business and student test records for three years.
8. No public WiFi; must be a private Internet connection.

Web Site:

1. Display name of online driver training school.
2. Display working telephone number.
3. Display working email address.
4. Post DMV's toll-free number.
5. Display logo for approved Online Curriculum Vendors.
6. List addresses for all DMV-approved classroom location test sites.
7. Post the school's hours for testing in accordance with "Normal Business Hours" (9:00 a.m. - 5:00 p.m.) of the Department.
8. Post testing procedures.
9. Post valid DMV-issued school license.

Test Site

1. Have DMV-approved test site in the Commonwealth of Virginia.
2. Have at least one DMV licensed Instructor to monitor testing.
3. Testing must be conducted at the scheduled test site. Any changes in testing site must be mutually agreed upon by student, parent (if student is under age 18) and instructor.
4. Comply with all local business license and zoning regulations and with federal, state, and local health, fire, and building code requirements.
5. Seating arrangements and writing surfaces for each student attending at any given time.
6. Have working computer(s) with Internet connection.
7. No student owned computers.
8. Have working printer at each test site.
9. Have working electrical outlets for computer support.
10. Post the school's hours for testing in accordance with "Normal Business Hours" (9:00 a.m. - 5:00 p.m.) of the Department in a conspicuous location.
11. Post testing procedures in a conspicuous location inside the test site.
12. Post DMV-issued school license.
13. Post sign displaying DMV's toll-free number in a conspicuous location inside the test site.
14. Have clean and accessible restroom facilities.
15. Have adequate interior and exterior lighting and adequate parking spaces.

Monitoring Instructor:

1. Maintain DMV-issued license with driver training school throughout the school's licensure period.
2. Ensure that the test is only administered to students that signed up through the school that offered the online course.
3. Prior to testing, Instructor must verify the following:
 - a. Parental Consent for Online Driver Education Examination (DTS 62) granting permission for student to take the final examination online with appropriate signatures.
 - b. Proof that the student successfully completed the online driver education course.
 - c. Proof that student completed the 90-minute Parent/Teen course (**Students under age 18 in Planning District 8** (counties of Arlington, Fairfax, Loudoun and Prince William and the cities of Alexandria, Fairfax, Falls Church, Manassas and Manassas Park) along with a parent or guardian, must participate in an additional 90-minute driver education component as a part of the in-classroom portion of the driver education curriculum.
 - d. Verify student's identity through DMV-issued learner's permit, DMV-issued identification card, school issued identification card, valid passport or military identification.
4. Read DMV-issued testing instructions to students before beginning test.

Advertising/Notice to DMV Requirements

1. Use the words "Licensed by DMV" as the sole reference to the relationship between the online driver training school and DMV. Do not use the DMV logo on any form of advertising.
2. Online school advertisements cannot be placed in the DMV customer service centers.
3. School licenses are not transferable. The license cannot be sold, loaned, bartered or given by a licensee or an agent of a licensee to another school, individual, association, partnership or corporation.
4. A change in owner will require an application for an original license along with the documents and fees required under the Virginia Code, which must be submitted to the department at least 30 days in advance of the effective date of the change. The online school will not operate under the change in ownership until an original license has been issued by the department reflecting the new ownership.
5. In the event of cessation of business, the online school must submit a written statement indicating the business is closing, and forward to the department within 30 calendar days after cessation of business, the online license, all instructors' licenses, student records and any materials furnished to the online school by the department.

Conduct of Instructors

The online school owner shall be responsible for the acts of any instructors while performing within the scope of his/her duties. They shall not conduct themselves in a manner that is not suitable or compatible with school-related activities pursuant to 24VAC20-121-30 (12) of the Virginia Administrative Code (Regulations).

Scheduled and Unannounced Audits

1. Allow DMV to conduct audits with or without prior notice. At least one audit will be conducted per year.
2. Online driver training records must be open and available for inspection by any officer or employee of DMV or any law enforcement officer during normal business hours. DMV may secure and remove these records for the purpose of conducting audits or investigations. The department will return those records after review or at the conclusion of any DMV or related court action, when used for that purpose.
3. DMV will prepare a written report on the results of each inspection and audit, and provide a copy of the report to and review it with the owner or authorized representative of the online driver training school. At the conclusion of the review of the report, the owner or business must sign the documentation that indicates the school has received and reviewed the report.
4. Respond to and/or correct deficiencies/violations noted on audit report within 30 working days as directed.

CERTIFICATION

I/we hereby make application for an online driver training school and certify that all information contained on this application is true. I/we understand that if licensed I/we are subject to the current statutes pertaining to operation of the online driver training school. By signing this document, I certify that I am an owner or designated representative of the school and that I am authorized to enter into binding agreements on behalf of the online driver training school. I agree to abide by the terms and conditions specified above and the current statutes. This agreement shall become effective upon signing and shall expire on the date indicated below. Either party may terminate this agreement by giving written notice within 30 working days. I understand that failure to comply with any of the terms of this agreement or the submission of false or inaccurate information pursuant to this agreement or application may result in suspension, cancellation or revocation of the online school license.

APPLICANT NAME (print)	APPLICANT SIGNATURE	TITLE	DATE (mm/dd/yyyy)
REPRESENTATIVE NAME (print)	REPRESENTATIVE SIGNATURE	TITLE	DATE (mm/dd/yyyy)

ONLINE DRIVER EDUCATION MONITORING INSTRUCTOR EXAMINATION SCRIPT

Purpose: To provide the driver training school Instructors with instructions for monitoring the final examination for the online driver education course.

Instructions: The monitoring Instructor must read the instructions to the students before starting the examination.

EXAMINATION INSTRUCTIONS

General Information:

1. You are here to take the final examination of the online driver education course.
2. No paper testing is allowed.
3. Be sure that you have signed the log sheet prior to taking this examination. Failure to sign the log sheet may result in your not receiving credit for the course and final examination.
4. This is not an opened book examination.
5. Turn off and put away all other personal electronic devices.
6. Do not start the examination until you have been instructed to do so.

To Begin the Examination:

1. Login to the driver training school website where you registered for the online course.
2. Click on the logo of the online course you completed.
3. Locate the instructions for taking the final examination.
4. At the Instructor's prompt, you may begin the examination.

During the Examination:

1. There is to be no talking or disruption during the examination.
2. Once the examination has started, an Instructor will be moving around the classroom to monitor testing environment. If you have any questions during the examination, you must raise your hand. Assistance will be given for technical problems only.
3. You may use headphones to listen to the audio of examination questions and answers. Use the audio player to pause/play, advance/replay, and control the volume of the audio.
4. Do not toggle away from the examination material.
5. If it is discovered that you toggled away from the examination material, your examination will be immediately cancelled and you will have to schedule another examination session.
6. Once the examination begins, there will be no breaks or recess time.

After the Examination:

1. When you finish the examination, exit the examination screen and return to the desktop so that you can log off.
2. If you pass, the online vendor will mail you the certificate of completion as proof of your completion of the online driver education curriculum.
3. If you fail, you will not receive a certificate of completion. You must schedule another examination session.
4. After the examination, you must sign the Online Driver Education Examination Monitoring Record (DTS 63).
5. Are there any questions?
6. You may begin.

Instructions for Administering and Monitoring the Online Driver's Education Course Final Examination

Purpose: To provide driver training instructors with instructions for administering and monitoring the final examination of the Online Driver's Education Course.

Instructions: The monitoring Instructor must follow the instructions to prepare for administering and monitoring the online driver's education course examination.

FINAL EXAMINATION INSTRUCTIONS

At Least a Day Before the Examination:

1. Print the list of students scheduled for testing.
2. Set-up classroom to accommodate the number of students scheduled for testing.
3. Check each computer to ensure they are working and have internet connection.
4. Review the Online Driver's Education Monitoring Instructor Examination Script which must be read at the start of each examination.

Day of Examination:

1. Introduce yourself to the students as the driver training school instructor that will be administering the examination.
2. Verify student photo ID (DMV-issued learner's permit, DMV-issued identification card, school-issued identification card, valid passport or military identification).

Note: If the student does not present an acceptable photo ID he/she will not be allowed to take the examination and must re-schedule examination for another day.

Note: Verify proof of additional 90 minute Parent/Teen course. If the student does not have proof of completion of the 90-minute Parent/Teen course, he/she cannot take the examination and must reschedule the test.

3. Verify proof of completion of the Online Driver Education Course.
4. Check Parental Consent for Online Driver's Education Examination form (DTS 62) against examination schedule to ensure student is scheduled for testing.
5. Complete student information on Online Driver Education Examination Monitoring Record form (DTS 63) and sign-in time.
6. Assign student to available computer.
7. Instruct student to log into the driver training school's website and click on the logo for the online course he/she completed.
8. Instructor must read the Online Driver Education Monitoring Instructor Examination Script (DTS 65) for each examination administered.
9. Instruct student to begin examination.

Monitoring the Examination

Once the examination begins, the monitoring Instructor should walk around classroom to observe students to ensure:

1. All electronic devices have been put away.
2. All study material have been removed from the desktop.
3. Student remains on examination page and not toggle away from website.
4. Student has continuous internet connection.
5. There is no talking during the examination.
6. Complies with examination procedures, if not, Instructor should cancel the examination and direct student to reschedule examination for another day.

After the Examination

1. If the student successfully passes, the curriculum vendor will mail the certificate of completion to the student.
2. If the student fails, advise the student no certificate of completion will be issued and he/she must schedule another examination session.
3. Instructor and all students must sign the Online Driver Education Examination Monitoring Record (DTS 63).
4. The school must maintain a copy of the following documents in the student's file:
 - Proof of completion of the Online Driver Education Course
 - Parental Consent for Online Driver's Education Examination (DTS 62)
 - Online Driver Education Examination Monitoring Record (DTS 63)

PARENTAL CONSENT FOR ONLINE DRIVER EDUCATION EXAMINATION

Purpose: Use this form to give consent for students under age 18 to take the online drivers education examination at the driver training school that offered the online course.

Instructions: The student's parent/guardian must complete this form. The completed form must be submitted to the DMV-licensed driver training Instructor at the test site prior to taking the examination.

STUDENT INFORMATION			
STUDENT FULL LEGAL NAME (print) (last)	(first)	(middle)	(suffix) BIRTH DATE (mm/dd/yyyy)
STREET ADDRESS	CITY	STATE	ZIP CODE

TEST SITE INFORMATION			
SCHOOL NAME			
SCHOOL STREET ADDRESS	CITY	STATE	ZIP CODE
SCHOOL PHONE NUMBER ()	SCHEDULED TEST DATE		

PARENT/GUARDIAN SIGNATURE		
<p>By signing this form, I give consent for my child to take the online driver's education examination at the driver training school that offered the online course. I understand that the examination will be administered and monitored by a DMV-licensed Instructor. I understand that my child must present an acceptable form of identification prior to being allowed to take the test. DMV acceptable identification documents include:</p> <ul style="list-style-type: none"> ● DMV issued Learner's Permit/Identification Card ● School ID ● Passport ● Government issued ID <p>Failure to present proper identification will result in my child not being allowed to take the final examination. I certify and affirm that all information presented in this form is true and correct. I make this certification and affirmation under penalty of perjury and I understand that knowingly making a false statement or representation on this form is a criminal violation.</p>		
PARENT/GUARDIAN NAME (print)	PARENT/GUARDIAN SIGNATURE	DATE (mm/dd/yyyy)

Virginia Driver Training
ONLINE DRIVER EDUCATION
EXAMINATION MONITORING RECORD

Purpose: Use this form to document student attendance.
Instructions: Type or print in ink. Keep this report with the student's records.

Important Information: Online driver education schools must not issue a certificate of completion to a student in Planning District 8 prior to receiving proof of completion of the additional minimum 90-minute parent/teen driver education component pursuant to § 22.1-205 of the Va. Code.

SCHOOL INFORMATION		
SCHOOL NAME	SCHOOL CODE	TEST DATE
INSTRUCTOR NAME (last) (first) (mi)	INSTRUCTOR LICENSE NUMBER	

STUDENT INFORMATION		
Form of Photo ID: <input type="checkbox"/> DMV-Issued Learner's/Identification Card <input type="checkbox"/> Passport <input type="checkbox"/> School ID <input type="checkbox"/> Government-Issued ID (describe)		
STUDENT NAME (last) (first) (mi)	TIME IN <input type="checkbox"/> AM <input type="checkbox"/> PM	TIME OUT <input type="checkbox"/> AM <input type="checkbox"/> PM
Verified completion of 90-minute parent/student driver education component (Planning District 8) (check either YES, NO or N/A): <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A		
If yes, check applicable document <input type="checkbox"/> DTS 90 <input type="checkbox"/> DEC-1		

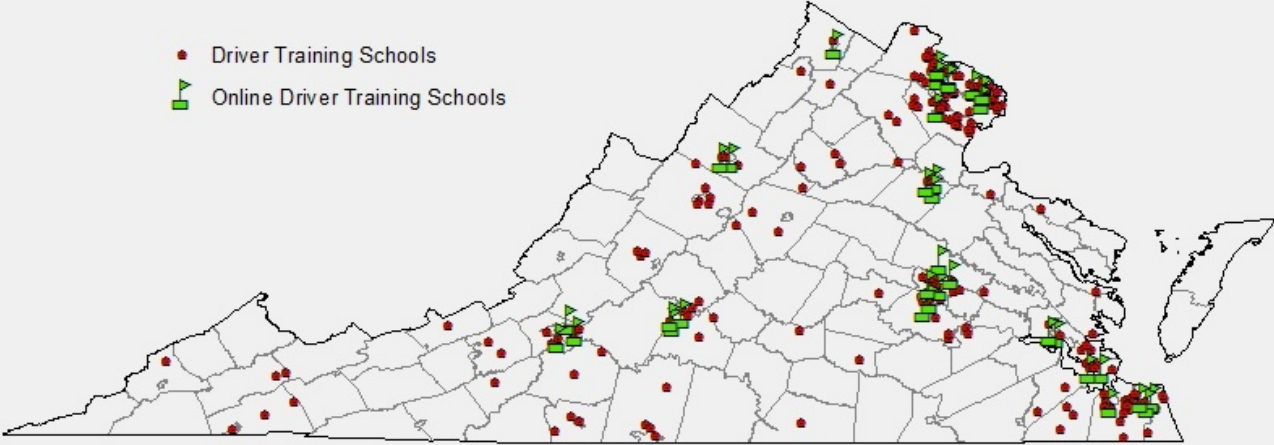
TEST RESULTS
<input type="checkbox"/> Student Passed <input type="checkbox"/> Student Failed

CERTIFICATION		
I certify and affirm that all information presented in this form is true and correct. I make this certification and affirmation under penalty of perjury and I understand that knowingly making a false statement or representation on this form is a criminal violation.		
STUDENT NAME (print)	STUDENT SIGNATURE	DATE (mm/dd/yyyy)
INSTRUCTOR NAME (print)	INSTRUCTOR SIGNATURE	DATE (mm/dd/yyyy)

Appendix D: Driver Training School Locations in Virginia

Locations of Driver Training Schools Licensed in Virginia

- Driver Training Schools
- ▣ Online Driver Training Schools



Appendix E: Survey Results

AAMVA Survey

Jurisdictions that Administer Computer-Based DE	# of Computer-Based Schools in Jurisdiction	Jurisdictions that administer End-of-Course Test Online	Online End-of-Course Test Start Year
Alberta, Canada	2	Yes	2014
California	Unknown*	No	N/A
Colorado	10	No	N/A
Florida	70	Yes	2013
Georgia	65	Yes	2006
Kentucky	1	Yes	2008
Nebraska	Unknown*	No	N/A
North Dakota	4	Yes	Unknown*
Ohio	9	Yes	2015
Pennsylvania	64	Yes	2015
Texas	16	Yes	2009
Utah	2	No	N/A
Wisconsin	78	Yes	2016

*Survey response did not specify.

Driver Training School Survey

1. Do you have any concerns with the current standards and requirements for Driver Training School's end-of-course- testing?

Yes	10.94%	7
No	89.06%	57

Comments:

1. Without a proctored setting there is no way to truly test an individuals knowledge without relying on the honor code. The concern would be someone else would take the test for the student and the student would be able to move on without sufficient knowledge to be safe behind the wheel.
2. Test should be done on laptop or anywhere the student and instructor wants, physical classroom should not be needed.
3. Existing requirement to have students report to a center bottlenecks the process and capacity constrains driver training schools.
4. With technology and security mechanism available in the market, remote testing just like they do it at colleges and universities should be permitted instead of asking driving schools to proctor in person and in a facility. Testing of this type can be done remotely and online highly secured and verifiable.
5. I believe it's more cost effective to allow the schools to test the students after they finish the course.
6. The BRC Knowledge Test is too easy and does not test the student's knowledge.

2. Should remote online end-of-course testing be allowed for computer-based driver education courses?

Yes	62.50%	40
No	37.50%	24

Comments:

1. Providing test is supervised.
2. Only if in a supervised setting.
3. Provides quicker assess to completion records.
1. It is too easy to 'cheat' with online testing of any kind. Besides, driving is far too important to not have the human element involved. New drivers should all be required to go through some type of hand's-on driving instruction by DMV Certified driving instructors.
2. They would find ways to get around the system.
3. Many students have to drive a long distance to take the exam and some are out of state at boarding schools.
4. Easier to monitor with actual eyes on student.
5. With proper security methods.
6. By meeting person to instructor there is important information shared and discuss that would not be done. It also allows questions to be reviewed concerning answers that they got wrong on the test. It also allows discussion on the next step in the licensing process that many of the young drivers are confused about.
7. Yes. There are many technology industry standards in place now that ensures quality, identity of the test taker and privacy for minors and adults. Many high schools, colleges and educational entities have had these measures in place for years. The market wants it.
8. Convenience.
9. It's not cost effective.
10. Without monitoring, anyone can test for the student taking the class.
11. We need to ensure the young people know the information on their own with no help from outside sources.
12. No, students will cheat.
13. It is easy for someone other than the intended applicant to pass the test and then our accidents would increase.
14. Provided the exam is proctored by a licensed professional.
15. This method encourages cheating, and provides a disincentive to take in-person classroom driver education.

3. Video monitoring of the online testing environment has been proposed as a security method to ensure the person taking the test is the person enrolled in the course and there is no cheating on the test. Would your organization be supportive of this monitoring method if remote online testing is allowed for students under the age 18?

Yes	56.25%	36
No	43.75%	28

Comments:

1. Who would be on the other end, watching the videos. And what action would be taken if cheating was identified? Will there be steps in place to stop the test immediately.
2. Parent or Guardian signature only with suffice indicating the child is who the say it is.
1. We feel that driving is far too important to be relegated to computer testing of any kind. Driving requires a huge sense of accountability, and humans can convey that requirement far better than any machine.
2. If required.
3. Skype or video chat something simple and inexpensive.
4. We prefer no remote test taking, but if it does become the norm some sort of monitoring and personal interaction needs to take place.
5. I don't offer online courses.

6. Yes. There are many technology industry standards in place now that ensures quality, identity of the test taker and privacy for minors and adults. Many high schools, colleges and educational entities have had these measures in place for years. The market wants it.
7. Added equipment unnecessary.
8. Reasonable expectation of privacy.
9. Don't believe it.
10. I would like to know more about that video monitoring and how it would work as our audience is very apt to find ways around these.
11. You would have to provide significant technical support for individuals who are not tech savvy to be able to participate.
12. No cost to me.
13. Students under age 18 should have the comfort of having a professional around.

4. Video monitoring of the online testing environment has been proposed as a security method to ensure the person taking the test is he person enrolled in the course and there is no cheating on the test. Would your organization be supportive of this monitoring method if remote online testing is allowed for students age 18 and older?

Yes 57.14% 36

No 42.86% 27

Comments:

1. Same comments apply from previous question
1. Under 18 a parent or guardian signature should be required; over 18, government ID card should be required for final test.
2. All new drivers should be required to interact with humans, as they will no doubt have to do on the road, and not be dependent on computers for their best driving education.
3. Testing remotely opens up all kinds of difficulties with cheating. People will always figure out a way to beat the system.
4. If required.
5. Yes. There are many technology industry standards in place now that ensures quality, identity of the test taker and privacy for minors and adults. Many high schools, colleges and educational entities have had these measures in place for years. The market wants it.
6. Reasonable expectation of privacy.
7. Again I would like to see how it works and what means are in place.
8. Significant tech support has to be available.
9. At no cost for me.
10. Older students require less structure.

5. Keystroke logging (memory) technology is another security method to ensure the person taking the test is the person enrolled in the course and there is no cheating on the test. (Note: Keystroke logging technology would be able to recognize a test taker's identity by identifying his or her unique keystroke pattern.) Would your organization be supportive of this monitoring method if online testing is allowed?

Yes 51.56% 33

No 48.44% 31

Comments:

1. Not sure its cost effective.
1. Would need to see the evidence that supports this technology actually works. Again who would monitor the results?
2. The Tester should log-in the same way they logged in when taking the class, if unable to do so they will not be able to test.

3. WE strongly feel that all driving education should be done in a classroom or in-the-car and on-the-road environment.
4. If required.
5. If it doesn't require an extra expense.
6. Many students would not be able to work with this process. Too complicated.
7. Yes, as part of an entire menu of security applications.
8. The Russians would get hold to the individual's keystrokes.
9. Don't know enough about keystroke to make a positive decision on it.
10. Although one can be taking the test with another proving the answers. It would still be the person...something to consider.
11. At no cost to me.
12. I have no idea how to do that.

6. Requiring pre-established security questions that would be randomly prompted throughout the end-of-course test is a security method to ensure the person taking the test is the person enrolled in the course and there is no cheating on the test. Would your organization be supportive of this requirement if online testing is allowed?

Yes	69.84%	44
No	30.16%	19

Comments:

1. How do you ensure the questions aren't shared to allow another person to cheat on the test but the person.
1. Randomly prompted questions would create a distraction; the security question should be asked prior to beginning the test.
2. WE do not support any online education for new drivers.
3. If online testing is approved, I would support all security measures. But I do not support online testing at home.
4. If required.
5. Only if other security measure aren't being used.
6. The driver could be there to give the security answers but someone else may be taking the test.
7. Yes. As part of a menu of security options.
8. I need more information.
9. I still think that there would be space for cheating as the person can receive assistance and be the real-actual person taking the test.
10. That information is easily shared.
11. Again, this would be tricky to implement technically.

7. Requiring parent proctoring is a security method to ensure the person taking the test is the person enrolled in the course and there is no cheating on the test. Would your organization be supportive of this requirement if online testing is allowed?

Yes	51.56%	33
No	48.44%	31

Comments:

1. Some parents will help their child answered questions, at least they would see firsthand what their child's weaknesses are.
1. Requiring parent proctoring will again create a distraction.
2. We strongly feel that all driving education should be monitored by a DMV licensed instructor in a classroom environment.
3. Parents would not insure fairness.
4. Same reasons as above.

5. Not all parents will be trustworthy.
6. However, this method of security should not be absence from other reinforcing methods already suggested in this survey to be utilized as security method to verify the authenticity of the person taking tests remotely.
7. Let the DMV approved schools handle all testing, including the road skills testing.
8. Relationship is to close.
9. Parents take the test for them, no way.
10. Parents do not like to disappoint their children. Not sure that's as effective.
11. I do think that private schools could proctor themselves, and home school associations might be able to proctor themselves, but not the random parent who is more likely to "help the student".
12. Some parents are cheaters.
13. Establish a tight structure now, then review in a year.

8. If your Driver Training School provides computer-based driver education courses, please enter the number of customers who passed and the number of customers who failed the end-of-course test for "computer-based" driver education courses for each of the following months listed below. (Provide answers in the following format: 150/10) July 2017 - June 2018 Answered: 11

Computer Based – 186 passes; 45 fails.

9. Please enter the number of customers who passed and the number of customers who failed the end-of-course test for the classroom component for the "in-person" driver education courses for each of the following months listed below. (Provide answers in the following format: 150/10) July 2017 - June 2018 Answered: 11

In Person – 104 passes; 2 fails

Comments:

1. No records for final test failure. We correct all chapter quiz mistakes so they are prepared for final exam. If they do fail they will then make corrections and retake exam. I will document in the future.
2. We did not keep records for failures.

10. Please use this space for providing any additional comments you may have about online end-of-course testing for computer-based driver education. Answered: 23

1. We feel that online driving education of any kind is not necessary. Commercial driving schools and DMV licensed driving instructors are the best way for a new driver to get the best and most through driving education possible. Computers don't drive...people do. Therefore, people should administer all testing and provide all driving education for any new driver, no matter the new driver's age.
2. How can I get established to host online classes and end-of-course testing for computer-based education?
3. This is not supported by our school.
4. Test security should be a priority. Also person to person contact and communication is important. Also who will be monitoring the video and what happens when there are issues with the program or computer as happens now.
5. If the student can do 36 periods online, he/she should be able to do the test online as well. He/she should not need to be at a classroom Driver training school just for the test. Test can be done on a laptop anywhere, just like the 36 periods.
6. I think any of those measures would be a good thing. I also believe the 90 minute teen parent class should be allowed online as well.
7. There are many options available in the market that can achieve this goal. This option should be made available since it makes it much easier for students to complete the training on their schedule and at their pace. Parents and guardians have routinely requested that this training be available from end to end online. The prevalence of online training is only going to grow in the coming years and the driver education industry in Virginia should be ahead of the curve.
8. I presently do not offer the online course, but am considering it for future use.

9. I have not provided the online course and testing to date. This is the reason I was not able to report on the previous two questions. However, should the opportunity and facility become supportive to have end testing using some of the methods envisioned I will like to consider starting the online and testing services as well.
10. I don't have that capacity at this time.
11. Administration of the online course should be done by the schools to include end of course testing. Otherwise, get rid of the program completely.
12. We currently do not offer computer based programs
13. My answer for the majority of the questions was no. My reasoning for answering no is because I do not offer any online courses. My instructors and myself believe that Driver Education is a course that is most valuable to a teenager's driving development when they get to work with an instructor in a classroom environment. Thank you for the survey.
14. Online Driver Education is pointless. Students are not learning anything, just logging in to meet the time requirement. Parents, siblings and friends are signing in to help complete activities and quizzes. By the time they get to Behind the Wheel, they have learned absolutely nothing. Accepting "at home" tests is just confirmation that you really don't have to take this class seriously
15. It needs to remain the way it is, we to ensure the individual does not receive any assistance during the testing. We need to ensure the individual knows and understands the Drivers Manual of Virginia.
16. Support your local driver clinics and pass on these services to us. We have been serving the community for years and this would keep the financial growth in the local areas and promote jobs!
17. I believe there could be some changes to make it easier for the customer, but the test needs to be proctored.
18. Thanks for asking for input regarding this matter. I welcome your questions and hope to offer more valuable input.
19. The available curricula aren't very good and we have a wonderful product that we can't get approved because the procedure is almost impossible. Make it easier for us to get our program approved.

Appendix F: Stakeholder Comments on Draft Report and Study

July 30, 2018

Senator Thomas K. Norment, Jr.
P.O. Box 6205
Williamsburg, VA 23188

Dear Senator Norment, Jr,

Tommy, my purpose in contacting you is HB 1077 (Filler-Corn) and SB 889 (Marsden) concerning online end-of-course testing becoming virtual. As owners and operators of Patriot Driving School, Edna Lee and I are involved in a DMV working group to study this issue.

The DMV has a procedure in place that is working fine! Briefly, after completing an online DMV approved course, the student must schedule an appointment with the driver training school to complete the final exam in person. The student must provide a picture ID and a completed Parental Consent for Online Driver Education Examination (DTS 62), if under 18. This exam is monitored in person by a DMV certified instructor in the classroom. After the student completes the exam, the instructor and student must sign the Online Driver Education Examination Monitor Record (DTS 63), indicating the time-in and time-out of the test site. If the student passes this final exam, they will receive a certificate of completion that allows them to continue with behind-the-wheel instruction.

Tommy, I have tried to track these two Bills in the Legislature. House Bill 1077 appears dead in Subcommittee #3 and Senate Bill 889 appears with drawn by the chief patron. Having no knowledge of the process, Edna Lee and I did not want to take a chance and not contact you.

I remember very vividly Judge H. Lester Hooker, Sr. as Chairman of the State Corporation Commission for many years, stating that too often citizens of the State did not take an active role in legislation. I do not want to be that citizen!

Thank you in advance. Congratulations on your engagement! I trust your daughters are well.

Sincerely,

H. Lester Hooker, III
Owner/Operator
Patriot Driving School, Inc.