

## STATE OF WASHINGTON DEPARTMENT OF LICENSING PO Box 9020, Olympia, Washington 98507-9020

May 7, 2025

TO: Marcus Glasper, Agency Director
FROM: *Ellis Starrett, Rules and Policy Manager*SUBJECT: Amending WACs 308-108-020 (Definitions) & 308-108-155 (Required Curriculum)

Hearing date: May 6, 2025

City/Town: Olympia, WA

Program staff present: Bryan Jackson, Motorcycle Safety Program & Driver Training Schools Assistant Administrator; Cara Jockumsen, Management Analyst; Angela Berg, Management Analyst; Sarann Sinthavong, Program Specialist; Susan Campos, Professional Licensing Representative;

Number of persons present: 18\* \*Not including DOL staff Number speaking: 5

If one group dominated the hearing, which group? This public hearing centered around the driver training school industry, so all oral testimony was provided my driver training instructors.

Key comments: Key themes from the industry focused on overall concern that the Department was being overly prescriptive with the incorporation of the National standards and that the industry would prefer general guidance and flexibility on their curriculum. Testifiers also called to attention potential equity and accessibility concerns for students with educational challenges / differences who might further be disenfranchised by the new standards and that the new requirements could overload students too much. Implementation was also frequently cited as a challenge, primarily with potentially having to increase class time from 30 hours to 45 hours in order to satisfy all of the standards within the new curriculum.

Names/Affiliations: In order of oral testifiers: Dave Sedelmeier, APEX Driving School; JC Fawcett, Defensive Driving School; Nikki Bisconer, Driving 101; Jessica Carroll, Soaring Driving School; Deb Grenier, PDSA;

Comments/Concerns:

As referenced above, overall comments and concerns focused on the potential loss of flexibility in curriculum for the driver training school industry and a preference for general guidance versus overly prescripive details, concerns around equity and accessibility for students with different educational and learning challenges, concerns around potential student overload with the amount of new material to cover within the national standards, and overall concern around implementation – particularly, potentially increasing teaching hours from 30 hours to 45 hours (as the national standards outline). One member did note that they believed that the Department was engaging in malfeasance, misfeasance, and maladministration through this rulemaking process.