



Mississippi Commission on Proprietary Schools and College Registration

3825 Ridgewood Road

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(601) 432-6185

May 9, 2023

The Honorable Thomas P. Keane
Associate Administrator, Office of Research and Registration
Federal Motor Carrier Safety Administration (FMCSA)
U.S. Department of Transportation
1200 New Jersey Ave, S.E.
West Building, Sixth Floor
Washington, D.C. 20590-0001

Re: Docket No. FMCSA-2023-0055: Agency Information Collection Activities; Renewal of an Approved Information Collection: Training Certification for Entry-Level Commercial Motor Vehicle Operators

Introduction:

The Commission on Proprietary School and College Registration (CPSCR) is responsible for the administration of the Mississippi Proprietary School and College Registration Law, Title 75, Chapter 60, Mississippi Code of 1972, as amended. CPSCR serves as the approval and state licensing authority for proprietary schools offering vocational/occupational/technical post-secondary education.

FMCSA should collect more information from TPR registrants to ensure that training providers meet state licensure requirements to validly train in the state. In Mississippi, CPSCR regulates CDL training, and FMCSA should collect information including, but not limited to, proof of state licensure with CPSCR through a copy of the licensure or collection of the license number.

This information is provided to every registered school with CPSCR, with renewals every two years.

Supportive Argument 1:

Any representative, employee, or staff member of FMCSA has never contacted my agency. We have never received any guidance on how or who to contact regarding any issues we have with training providers.

Supportive Argument 2:

Currently, 444 CDL trainers are registered for in-person training with FMCSA's TPR list. I have identified at least 23 approved by FMSCA that are not registered with CPSCR to offer vocational education in Mississippi.



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My agency has one full-time staff member to maintain all registration, rules, regulations, and policies for the current 67 schools in Mississippi. The time required for this staff member to regularly review, sort, and identify those training providers not following the law, is more than available.

CPSCR staff has attempted to contact most of these individuals but has not received any responses to the office on registering. There is no investigative section for CPSCR to engage with to review these schools for providing a proper and quality education in ELDT driving.

Supportive Argument 3:

By requiring additional proof of state licensing approval/authorization, the FMCSA and states would be able to add an additional layer of protection for the students enrolling and training with these schools.

Every state agency provides some type of approval letter or communication to all registered schools. This requirement is an easy fix of requiring a copy of the letter for approval. I am happy to provide FMCSA with the contact information for my agency to provide as part of the application process for approval.

The main reason and point to state authorization is to ensure that all schools provide a quality education to their students so they learn what skills they need to join the workforce. No workforce needs subpar workers, and this will eventually begin to happen in the CDL industry if FMCSA does not help states make sure all approved training providers are following all the proper state laws and federal ones.

Sincerely,

Kim Verneuille, Ed.D, Director
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Mississippi Community College Board
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