

WelcomeDriver Inc.
75 N. Middletown Road
Nanuet, NY 10954
WelcomeDriver.com 888.300.9263



March 7, 2023

To: Colorado General Assembly
Transportation, Housing & Local Government Committee

From: WelcomeDriver Inc.

Re: Questions and Comments for hearing for HB23-1147
Kipp--Driver's License Examination Reimbursement

We want to compliment Colorado on its commitment to increase driver safety through increased driver education requirements and the offsetting costs to families through SB 23-011. That bill encourages private driver education providers to expand to meet the increased need for more driver training while leaving them the choice as to how they offer the driver education component. For online alternatives, schools can make that choice based on quality of material, preparedness of students for driving lessons, and the customer support provided.

The cost analysis in the SB23-011 fiscal notes for a 30-hour online course is \$180. This figure is astonishing but helps me understand Legislator Kipp's motivation for including a free online course in HB23-1147. I applaud the motivation but I oppose the current proposal as it is without research, specification, or any costs analysis.

Our company specializes in providing state compliant high quality online driver education courses for fraction of that price point and none of the schools that we support mark up the cost of online course anywhere near that price point. There are a good variety of online courses available from competitors and many schools have written, or wish to write their own. Competition has kept prices low and if the state increases the requirements for driver education, those prices will go lower still.

Without details on how the program would be offered or run, we can only guess at what could potentially occur if the bill were passed and we envision a barebones lower quality course being created that would ultimately eradicate our Colorado business – which we have been servicing for over a decade, and the course component business of other high quality online competitors and driving schools. Our course is available on the internet platforms over computers/laptops/tablets/phones and is available 24 x 7 with at least 12 hours per day of phone support. Our business is primarily business to business and the

local driving schools we work with keep 50% to 80% of the revenue, which helps to keep these local brick and mortar businesses afloat.

In order to submit meaningful comments, I submitted questions to Legislator Kipp's office about this aspect of the bill and unfortunately my questions remain for the most part unanswered as the focus of the bill and the fiscal note do not address the online course component at all. Should the committee wish to pursue this bill, I ask that it be adjourned, amended and that an updated bill and fiscal note be prepared and a new hearing held.

The committee should recognize that the cost of developing and delivering an online course is not *de minimis* and includes: the cost of content development, the cost of acquiring/building/customizing a learning management system that meets Rule 8 legislative requirements, the cost of developing a website that integrates with the learning management system and provides the necessary auditing and logging requirements for course audits, the cost of technical support, the cost of customer support, the cost of operations including certification entry in DRIVES, the cost of dedicated servers, the cost of cyber liability insurance, etc.

For example, if you simply google "How much does it take to create an online course" you will see estimates of 80-280 hours per hour of course content – not including translation costs for other language. If you do similar searches for the cost of learning management systems you will see that costs per students range from \$3/month to \$30/year and these costs do not include customer support. Translation costs are also significant.

For those companies like ours that are dedicated to the development, technical support and customer support of online courses, the notion that the state might consider a bill without thinking through the provisioning aspects is worrisome. We do not know if our business will be eradicated or whether there will be provisions for bidding to become a state approved supplier. I.e., will a state sponsored solution eradicate all diversity and competition or continue to encourage competition and local business within new mandated standards?

The fiscal note for HB 23-1147 states only: "Because it is unknown what the requirements of this program will be at the time of this writing, a cost estimate cannot be determined at this time. The fiscal note assumes that any increase in expenditures will be paid from the ADEPT Enterprise Fund."

The entirety of 42-2-705(1)(b) specifies next to nothing and leaves the new ADEPT enterprise completely wide open as to the content, the operations, and any oversight of its implementation. The bill language itself seems to by-pass the Rule 8 provisions entirely that have governed driver education content for a very long time, and I ask if this is

intentional. The online course provision is in section 42-2-705 titled “re-imbusement of third-party providers” however there is no discussion of whether or not third-party providers – subject to Rule 8 – will even be used to provide the free course to the public.

→At this time the online course aspect of the bill is unspecified and unanalyzed; the portions of the bill related to this object can be easily removed for reconsideration as a separate bill; this is the course of action which is warranted in the absence of data, planning and a budget. Such a deferral of consideration would not harm the public and would protect driving school businesses which currently rely on the monies obtained to pay for their general operations.

If there remains a problem to be solved by the state provision of a free course it should be done with all implementation details worked out.

If you have any questions regarding this comment letter, please call me at 888-300-9263 x5 or on my cell phone at 917-519-1165.

Respectfully,

A handwritten signature in blue ink that reads "Deborah Munitz". The signature is written in a cursive, flowing style.

Deborah Munitz, President
WelcomeDriver Inc.

Thank you Mr. Chair and Members of the Committee and Representative Kipp for bringing forth this important piece of legislation. On behalf of the Colorado Immigrant Rights Coalition (CIRC) we would like to ask for your support with an AYE vote in favor of HB23-1147 Driver's License Examination Reimbursement.

The Colorado Immigrant Rights Coalition represents more than 80 member organizations from across the state of Colorado and advocates to make Colorado a more welcoming place for all, regardless of immigration status. We also coordinate the I Drive Coalition, which has worked for 8 years to implement and improve the SB13-251 Driver License program, which expanded access to driver licenses to all Coloradans regardless of immigration status.

The I Drive coalition works with community groups across the state of Colorado to support immigrants to obtain driver licenses and identifications from the state of Colorado. Immigrants face innumerable barriers that make accessing DMV services cumbersome and obtaining a license challenging. Unfortunately, during the pandemic the circumstances worsened as the DMV was forced to cut in-person services like the driving examination. Since driving exams were re-routed to private providers, Coloradans have had to pay between 50 to 80 dollars for a test, bringing the entire cost for a driver license to over 100 dollars. For many of our clients, these costs are prohibitive, which has rippling effects on their mobility and lives. In addition, the locations of private providers are limited, which has overburdened rural community members who in addition to two appointments at the DMV (one to obtain the permit and the second to obtain the license) now must travel upwards of 1 hour in one direction to complete the exam.

Finally, I would like to discuss the important provisions of this bill which address language access for non-English speakers. We have heard countless community leaders on the I-Drive coalition share that driving test centers are not providing interpretation or translation services. Under Title VI of the Civil Rights Act of 1964, which prohibits discrimination in public services, publicly funded agencies are required to provide adequate language services to ensure equal and equitable access. We ask that the DMV make their Pocketalk translation devices available to drive test providers. It is imperative that the state guarantee the same access is extended to and required of the private sector to make sure that Colorado continues to serve the needs of all its residents.

We are grateful to the state of Colorado for taking a strong stand in passing SB13-251 and affirming that it is in our best interest as a state to ensure that all residents of Colorado are verified and insured drivers. However, to do so, we must make sure that governmental services

are accessible linguistically and monetarily to customers. We ask for your AYE vote in favor of HB23-1147 Driver's License Examination Reimbursement.